

- An inventory listing the systems / areas (with boundaries) where you have asbestos.
- The approximate degree to which any system has already been removed / abated or is planned to be removed.
- Programs in place to proactively replace asbestos insulation going forward.
- Any additional information you believe beneficial in order to develop an estimate.

Please provide quantities if known or readily defined. For this estimate, we would anticipate the predominance of asbestos is in the form / function of insulation. But other uses, such as in siding, should be identified as well. You do not need you to quantify all gasketing that contains asbestos.

I would appreciate feedback yet this week as to the level to which you think you have the requested information and will be able to respond. The data would be needed by October 27th.

Please let me know should you have questions or need clarification.

-- dale

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**From:** Wilson, Dale  
**Sent:** Friday, September 02, 2005 11:28 AM  
**To:** Hofmann, Mike  
**Cc:** Moreland, Bob; Thorp, Jim; Baker, Daniel E (Miami Fort); Stevens, George; Glenn, Erica; Sheppard, Amy  
**Subject:** RE: Asbestos Removal Costs

Mike -- Thanks for the offer. The first step is to recap by station what costs S&L has within their previous reports for asbestos abatement -- with all the assumptions and particulars. We'll try to pull that together next week and review with Accounting -- then likely touch base with S&L to see what sanity they might offer.

-- dale

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**From:** Hofmann, Mike  
**Sent:** Friday, September 02, 2005 7:40 AM  
**To:** Wilson, Dale  
**Subject:** RE: Asbestos Removal Costs

Let me know if you need our help Dale. Thanks.

---

**From:** Wilson, Dale  
**Sent:** Friday, September 02, 2005 8:27 AM  
**To:** Moreland, Bob  
**Cc:** Stevens, George; Thorp, Jim; Baker, Daniel E (Miami Fort); Roebel, John; Pulskamp, Barry; Hofmann, Mike  
**Subject:** RE: Asbestos Removal Costs

Bob -- Already on it. George and I have a meeting with Erica Glenn (who reports to Amy / Brett) in about 30 minutes. I asked George to attend this meeting based upon his prior coordination of our "decommissioning" studies performed by S&L.

-- dale

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**From:** Moreland, Bob  
**Sent:** Friday, September 02, 2005 7:17 AM  
**To:** Wilson, Dale  
**Subject:** FW: Asbestos Removal Costs

Would you have time to coordinate our efforts for pulling this together? Lets discuss.

---

**From:** Pulskamp, Barry  
**Sent:** Thursday, September 01, 2005 10:48 AM  
**To:** Moreland, Bôb  
**Cc:** Roebel, John; Hofmann, Mike; Ritchie, Brett; Sheppard, Amy  
**Subject:** Asbestos Removal Costs

I just spoke to Brett Ritchie and Amy Sheppard from accounting. There is a new accounting standard that requires us to estimate future asbestos removal costs. I think the best way to handle is thru the Investment Engineers. Could you please have Dale, Jim and Dan work on this. If you need assistance from the plants work thru Mike Hofmann.

Brett and Amy will be starting with Dale.

**Welles, Sarah**

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**From:** Melendez, Brenda  
**Sent:** Wednesday, January 04, 2006 4:28 PM  
**To:** Faris, Brett; Reynolds, Jaime  
**Cc:** Laub, Peggy  
**Subject:** RE: Asset Retirement Obligations - Interpretation No. 47

Brett,

There isn't a memo on the implementation of FIN47; but, we are currently working on the entries. Right now, it appears that on CG&E, we're going to have a cumulative effect of \$5-6M. On PSI, it appears as though the entire effect is going to reside in the 182303 regulatory asset account. We're still working through PSI's ultimate accounting with Accounting Research. Peggy has asked General Accounting to set up a couple of new accounts to record the tax effects on the cumulative effect. Jaime can provide you with additional details on the amounts and accounts and the numbers will be firmed up in the next day or two. The I/S account being charged on CG&E is 435300.

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**From:** Faris, Brett  
**Sent:** Wednesday, January 04, 2006 4:08 PM  
**To:** Melendez, Brenda  
**Subject:** RE: Asset Retirement Obligations - Interpretation No. 47

Brenda: Did you have a chance to consider this? I know you're busy but I wanted to see if we needed to book anything for the close. Thanks.

---

**From:** Faris, Brett  
**Sent:** Monday, December 19, 2005 5:26 PM  
**To:** Melendez, Brenda  
**Subject:** Asset Retirement Obligations - Interpretation No. 47

Brenda:

The 10Q states that Cinergy will adopt Interpretation 47 on 12/31/05. Sometimes in the past, write-ups have been prepared that describe the book accounting treatment in detail, and provide a detailed description of what accounts will be used. Does anything like this exist for the upcoming change in accounting principle? We have one existing tax adjustment that we recorded when FAS143 was implemented, but I need to determine if Interpretation 47 will follow, add to, or change our original adjustment. Do you have an estimate of the magnitude of this accounting change?

Let me know if you would like to discuss this. It might be easier to talk about it face to face. Thank you.

8/18/2006

**Welles, Sarah**

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**From:** Jett, Joseph  
**nt:** Tuesday, November 15, 2005 9:48 AM  
**o:** Reynolds, Jaime; Ryan, Timothy; Ruehlman, Steve  
**Cc:** Glenn, Erica  
**Subject:** RE: Cinergy-Facilities-Asbestos.xls

Jamie, I have reviewed the information and to the best of our knowledge it is accurate.

-----Original Message-----

**From:** Reynolds, Jaime  
**Sent:** Tuesday, November 15, 2005 9:36 AM  
**To:** Ryan, Timothy; Ruehlman, Steve; Jett, Joseph  
**Cc:** Glenn, Erica  
**Subject:** FW: Cinergy-Facilities-Asbestos.xls

Tim, Joe, Steve

I've gone through Tim's list and added a tab where I removed the substations, gen. stations, headquarter buildings and microwave sites. What is left is what I believe to be the district offices and miscellaneous buildings. In the "asbestos Y/N" column, Tim had yes's where he is aware of asbestos, I've added in green, yes's where I believe there to be asbestos based on the surveys Joe provided. Can you all do one last review to make sure we have a complete list and accurate asbestos information, to the best of your knowledge? Once this is final, we can move on with the materiality determination and close the book on the subject.

Thanks for your help.  
Jaime

-----Original Message-----

**From:** Ryan, Timothy  
**Sent:** Friday, November 11, 2005 1:54 PM  
**To:** Reynolds, Jaime  
**Subject:** Cinergy-Facilities-Asbestos.xls

Jamie, this is what we have to date and this report includes generating stations that we do not manage and the microwave sites that we do manage.

Cinergy-Facilities-Asbestos.xls

**Welles, Sarah**

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**From:** Stevens, George  
**Sent:** Friday, December 30, 2005 8:34 AM  
**To:** Reynolds, Jaime  
**Cc:** Glenn, Erica; Bloemer, John; Wilson, Dale  
**Subject:** RE: East Bend & Killen asbestos location  
**Attachments:** V1 FASB FIN 47 Accounting Data 122105.xls

Jaime:

Attached is also a copy of my latest data to Erica. East Bend is on line 29 and Killen is on line 46.

George

---

**From:** Reynolds, Jaime  
**Sent:** Thursday, December 29, 2005 2:38 PM  
**To:** Stevens, George; Glenn, Erica  
**Subject:** East Bend & Killen asbestos location  
**Importance:** High

George

I don't have an updated schedule of asbestos remediation costs that has the FERC codes (311, 312??) for East Bend and Killen. Can you provide that information?  
Thanks.

*Jaime Reynolds*  
*Fixed Asset Accounting*  
287-3490

Asbestos Remediation Cost Estimates for FASB FIN 47

Unit	Total from Sargent and Lundy Report	Total with Common facilities (ALL) Allocated to each Unit	Percent FERC Code 311 Structures	Percent FERC Code 312 Boilers	Percent FERC Code 314 Turbine	Percent FERC Code 316 Misc.	Total for FERC Code 311 Structures	Whole Unit	Whole Unit	Whole Unit	Whole Unit	Check Total	Ownership Percentage	Share Unit	Share Unit	Share Unit	Share Unit	Notes
								Total for FERC Code 312 Boilers	Total for FERC Code 314 Turbine	Total for FERC Code 316 Misc.	Total for FERC Code 311 Structures			Total for FERC Code 312 Boilers	Total for FERC Code 314 Turbine	Total for FERC Code 316 Misc.	Total for FERC Code 311 Structures	
Beckjord 1	\$ 503,936	\$ 503,936	0%	78.89%	21.11%	0%	\$ -	\$ 397,555	\$ 106,381	\$ -	\$ -	\$ -	100%	\$ -	\$ 397,555	\$ 106,381	\$ -	
Beckjord 2	\$ 544,876	\$ 544,876	0%	78.89%	21.11%	0%	\$ -	\$ 429,853	\$ 115,023	\$ -	\$ -	\$ -	100%	\$ -	\$ 429,853	\$ 115,023	\$ -	
Beckjord 3	\$ 480,213	\$ 480,213	0%	78.89%	21.11%	0%	\$ -	\$ 378,840	\$ 101,373	\$ -	\$ -	\$ -	100%	\$ -	\$ 378,840	\$ 101,373	\$ -	
Beckjord 4	\$ 1,238,322	\$ 1,238,322	0%	78.89%	21.11%	0%	\$ -	\$ 976,912	\$ 261,410	\$ -	\$ -	\$ -	100%	\$ -	\$ 976,912	\$ 261,410	\$ -	
Beckjord 5	\$ 477,465	\$ 477,465	0%	78.89%	21.11%	0%	\$ -	\$ 376,672	\$ 100,793	\$ -	\$ -	\$ -	100%	\$ -	\$ 376,672	\$ 100,793	\$ -	
Beckjord 6	\$ 672,877	\$ 672,877	0%	87.84%	12.16%	0%	\$ -	\$ 591,055	\$ 81,822	\$ -	\$ -	\$ -	37.5%	\$ -	\$ 221,646	\$ 30,683	\$ -	
Beckjord All Station Total	\$ 3,917,689	\$ 3,917,689																Note 1
Cayuga 1	\$ 759,449	\$ 759,449	0.00%	87.84%	12.16%	0.00%	\$ -	\$ 667,100	\$ 92,349	\$ -	\$ -	\$ -	100%	\$ -	\$ 667,100	\$ 92,349	\$ -	
Cayuga 2	\$ 759,449	\$ 759,449	0.00%	87.84%	12.16%	0.00%	\$ -	\$ 667,100	\$ 92,349	\$ -	\$ -	\$ -	100%	\$ -	\$ 667,100	\$ 92,349	\$ -	
Cayuga All Station Total	\$ 1,518,898	\$ 1,518,898																Note 2
Conesville 4	\$ 406,682	\$ 406,682	0.00%	87.84%	12.16%	0.00%	\$ -	\$ 357,229	\$ 49,453	\$ -	\$ -	\$ -	40%	\$ -	\$ 142,892	\$ 19,781	\$ -	Note 3
East Bend 2	\$ 853,875	\$ 853,875	0%	0%	100%	0%	\$ -	\$ -	\$ 853,875	\$ -	\$ -	\$ -	69.0%	\$ -	\$ -	\$ 589,174	\$ -	Note 4
Edwardsport 6	\$ 861,990	\$ 1,066,116	7.45%	62.57%	18.28%	11.70%	\$ 79,426	\$ 667,069	\$ 194,886	\$ 124,736	\$ -	\$ -	100%	\$ 79,426	\$ 667,069	\$ 194,886	\$ 124,736	
Edwardsport 7	\$ 424,296	\$ 524,773	7.45%	52.99%	27.86%	11.70%	\$ 39,096	\$ 278,077	\$ 146,202	\$ 61,398	\$ 0	\$ 0	100%	\$ 39,096	\$ 278,077	\$ 146,202	\$ 61,398	
Edwardsport 8	\$ 424,296	\$ 524,773	7.45%	52.99%	27.86%	11.70%	\$ 39,096	\$ 278,077	\$ 146,202	\$ 61,398	\$ 0	\$ 0	100%	\$ 39,096	\$ 278,077	\$ 146,202	\$ 61,398	
Edwardsport All Station Total	\$ 2,115,662	\$ 2,115,662																Note 5
Gallagher 1	\$ 1,922,131	\$ 2,012,531	0%	84.74%	10.77%	4.49%	\$ -	\$ 1,705,418	\$ 216,750	\$ 90,363	\$ -	\$ -	100%	\$ -	\$ 1,705,418	\$ 216,750	\$ 90,363	
Gallagher 2	\$ 1,922,131	\$ 2,012,531	0%	84.74%	10.77%	4.49%	\$ -	\$ 1,705,418	\$ 216,750	\$ 90,363	\$ -	\$ -	100%	\$ -	\$ 1,705,418	\$ 216,750	\$ 90,363	
Gallagher 3	\$ 1,922,131	\$ 2,012,531	0%	84.74%	10.77%	4.49%	\$ -	\$ 1,705,418	\$ 216,750	\$ 90,363	\$ -	\$ -	100%	\$ -	\$ 1,705,418	\$ 216,750	\$ 90,363	
Gallagher 4	\$ 1,922,131	\$ 2,012,531	0%	84.74%	10.77%	4.49%	\$ -	\$ 1,705,418	\$ 216,750	\$ 90,363	\$ -	\$ -	100%	\$ -	\$ 1,705,418	\$ 216,750	\$ 90,363	
Gallagher All Station Total	\$ 8,050,122	\$ 8,050,122																Note 6
Gibson 1	\$ 1,617,370	\$ 2,430,947	100%	0%	0%	0%	\$ 2,430,947	\$ -	\$ -	\$ -	\$ -	\$ -	100%	\$ 2,430,947	\$ -	\$ -	\$ -	
Gibson 2	\$ 1,617,370	\$ 2,430,947	100%	0%	0%	0%	\$ 2,430,947	\$ -	\$ -	\$ -	\$ -	\$ -	100%	\$ 2,430,947	\$ -	\$ -	\$ -	
Gibson 3	\$ 1,575,175	\$ 2,367,527	100%	0%	0%	0%	\$ 2,367,527	\$ -	\$ -	\$ -	\$ -	\$ -	100%	\$ 2,367,527	\$ -	\$ -	\$ -	
Gibson 4	\$ 1,575,175	\$ 2,367,527	100%	0%	0%	0%	\$ 2,367,527	\$ -	\$ -	\$ -	\$ -	\$ -	100%	\$ 2,367,527	\$ -	\$ -	\$ -	
Gibson 5	\$ 1,575,175	\$ 2,367,527	100%	0%	0%	0%	\$ 2,367,527	\$ -	\$ -	\$ -	\$ -	\$ -	100%	\$ 2,367,527	\$ -	\$ -	\$ -	
Gibson All Station Total	\$ 4,004,212	\$ -					\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	50.05%	\$ 1,184,947	\$ -	\$ -	\$ -	Note 7
Killen 2	\$ 853,875	\$ 853,875	0%	0%	100%	0%	\$ -	\$ -	\$ 853,875	\$ -	\$ -	\$ -	33.0%	\$ -	\$ -	\$ 281,779	\$ -	Note 8
Miami Fort 3	\$ 385,029	\$ 385,029	1.53%	43.56%	54.91%	0.00%	\$ 5,891	\$ 167,719	\$ 211,419	\$ -	\$ -	\$ -	100%	\$ 5,891	\$ 167,719	\$ 211,419	\$ -	
Miami Fort 4	\$ 385,029	\$ 385,029	1.53%	43.56%	54.91%	0.00%	\$ 5,891	\$ 167,719	\$ 211,419	\$ -	\$ -	\$ -	100%	\$ 5,891	\$ 167,719	\$ 211,419	\$ -	



Unit	Boiler Piping	Boiler Surface	Boiler Total - 312	Turbine Piping 314	Structures 311	Misc 316	Grand Total	Percent Boiler 312	Percent Turbine 314	Percent Structures 311	Percent Misc 316
Cayuga 1			\$ 485,152	\$ 67,174	-	-	552,326	88%	12%	0%	0%
Cayuga 2			\$ 485,152	\$ 67,174	-	-	552,326	88%	12%	0%	0%
<b>Add Directs and Indirects</b>											
Cayuga 1	-	-	\$ 667,084	\$ 92,364	-	-	759,448	87.84%	12.16%	0.00%	0.00%
Cayuga 2	-	-	\$ 667,084	\$ 92,364	-	-	759,448	87.84%	12.16%	0.00%	0.00%
<b>Total</b>			1,334,168	184,729	-	-	1,518,897				
											\$ 1,518,897
											\$ 1,104,652
											1.375



Unit	Boiler Piping	Boiler Surface	Boiler Total - 312	Turbine Piping 314	Structures 311	Misc 316	Grand Total	Percent Boiler 312	Percent Turbine 314	Percent Structures 311	Percent Misc 316
East Bend	-	-	\$ -	\$ 621,000	-	-	621,000	0%	100%	0%	0%
<b>Add Directs and Indirects</b>											
East Bend	485,152	-	\$ -	\$853,875.00	-	-	853,875	0.00%	100.00%	0.00%	0.00%
<b>Total</b>				853,875			853,875				
				Indirects Premium							10% 25% 1.375

Unit	Boiler Piping	Boiler Surface	Boiler Total - 312	Turbine Piping 314	Structures 311	Misc 316	Grand Total	Percent Boiler 312	Percent Turbine 314	Percent Structures 311	Percent Misc 316
Edwardsport 6	485,152	-	485,152	141,750	-	-	626,902				
Edwardsport 7-8	404,488	-	404,488	212,670			617,158				
Edwardsport ALL					\$ 114,604	\$ 180,000	294,604				
<b>Reallocate 311 and 316 to units</b>											
Edwardsport 6	485,152	-	485,152	141,750	57,751	90,705	775,358	63%	18%	7%	12%
Edwardsport 7-8	404,488	-	404,488	212,670	56,853	89,295	763,308	53%	28%	7%	12%
<b>Add Directs and Indirects</b>											
Edwardsport 6	485,152	-	667,084	194,906	79,407	124,719	1,068,117	62.57%	18.28%	7.45%	11.70%
Edwardsport 7-8	404,488	-	556,171	292,421	78,173	122,781	1,049,548	52.99%	27.86%	7.45%	11.70%
<b>Total</b>			1,223,255	487,328	157,581	247,500	2,115,663				
							\$ 2,115,661				
							\$ 1,538,663.00				
							1.375				

Unit	Boiler Piping	Boiler Surface	Boiler Total - 312	Turbine Piping 314	Structures 311	Misc 316	Grand Total	Percent Boiler 312	Percent Turbine 314	Percent Structure 311	Percent Misc 316
Galalgher 1	1,240,279	-	1,240,279	157,635	-	-	1,397,914				
Galalgher 2	1,240,279	-	1,240,279	157,635	-	-	1,397,914				
Galalgher 3	1,240,279	-	1,240,279	157,635	-	-	1,397,914				
Galalgher 4	1,240,279	-	1,240,279	157,635	-	-	1,397,914				
Galalgher All					\$ -	\$ 262,980	262,980				
							5,854,636				
<b>Reallocate 311 and 316 to units</b>											
Galalgher 1	1,240,279	-	1,240,279	157,635	-	65,745	1,463,659				
Galalgher 2	1,240,279	-	1,240,279	157,635	-	65,745	1,463,659				
Galalgher 3	1,240,279	-	1,240,279	157,635	-	65,745	1,463,659				
Galalgher 4	1,240,279	-	1,240,279	157,635	-	65,745	1,463,659				
							5,854,636				
<b>Add Directs and Indirects</b>											
Galalgher 1			\$ 1,705,384	\$ 216,748	\$ -	\$ 90,399	2,012,531	84.74%	10.77%	0.00%	4.49%
Galalgher 2			\$ 1,705,384	\$ 216,748	\$ -	\$ 90,399	2,012,531	84.74%	10.77%	0.00%	4.49%
Galalgher 3			\$ 1,705,384	\$ 216,748	\$ -	\$ 90,399	2,012,531	84.74%	10.77%	0.00%	4.49%
Galalgher 4			\$ 1,705,384	\$ 216,748	\$ -	\$ 90,399	2,012,531	84.74%	10.77%	0.00%	4.49%
<b>Total</b>			3,410,767	433,496	-	180,799	8,050,125				
				\$ 8,050,122							
				\$ 5,854,634							
				1.375							

Unit	Boiler Piping	Boiler Surface	Boiler Total - 312	Turbine Piping 314	Structures 311	Misc 316	Grand Total	Percent Boiler 312	Percent Turbine 314	Percent Structures 311	Percent Misc 316
Miami Fort 3	1,240,279	-	\$ 121,968	\$ 153,765	\$ 4,288	\$ -	280,021				
Miami Fort 4	1,240,279	-	\$ 121,968	\$ 153,765	\$ 4,288	\$ -	280,021				
Miami Fort 5	1,240,279	-	\$ 1,092,795	\$ 249,885	\$ 34,170	\$ -	1,376,850				
Miami Fort 6	1,240,279	-	\$ 653,400	\$ 621,000	\$ 308,200	\$ -	1,582,600				
							3,519,492				
<b>Add Directs and Indirects</b>											
Miami Fort 3			\$ 167,706	\$ 211,427	\$ 5,896	\$ -	385,029	43.56%	54.91%	1.53%	0.00%
Miami Fort 4			\$ 167,706	\$ 211,427	\$ 5,896	\$ -	385,029	43.56%	54.91%	1.53%	0.00%
Miami Fort 5			\$ 1,502,593	\$ 343,592	\$ 46,984	\$ -	1,893,169	79.37%	18.15%	2.48%	0.00%
Miami Fort 6			\$ 898,425	\$ 853,875	\$ 423,775	\$ -	2,176,075	41.29%	39.24%	19.47%	0.00%
<b>Total</b>			2,401,018	1,197,467	470,759	-	4,839,302				
				\$ 4,839,302							
				\$ 3,519,492							
				1,375							

Unit	Boiler Piping	Boiler Surface	Boiler Total - 312	Turbine Piping 314	Structures 311	Misc 316	Grand Total	Percent Boiler 312	Percent Turbine 314	Percent Structures 311	Percent Misc 316
Noblesville 1 and 2	485,152	-	214,698	255,690	43,590	-	513,978	42%	50%	8%	0%
<b>Add Directs and Indirects</b>											
Noblesville 1 and 2	485,152	-	295,210	351,574	59,936	-	706,720	41.77%	49.75%	8.48%	0.00%
							\$ 706,720				
							\$ 513,978				
							1.375				

Unit	Boiler Piping	Boiler Surface	Boiler Total - 312	Turbine Piping 314	Structures 311	Misc 316	Grand Total	Percent Boiler 312	Percent Turbine 314	Percent Structures 311	Percent Misc 316
Wabash River 1			\$ 331,267	\$ 63,117	\$ -	\$ -	394,384				
Wabash River 2			\$ 331,267	\$ 95,157	\$ -	\$ -	426,424				
Wabash River 3			\$ 414,084	\$ 95,157	\$ -	\$ -	509,241				
Wabash River 4			\$ 331,267	\$ 95,157	\$ -	\$ -	426,424				
Wabash River 5			\$ 257,664	\$ 91,582	\$ -	\$ -	349,246				
Wabash River 6			\$ 401,280	\$ 55,562	\$ -	\$ -	456,842				
							2,562,561				
<b>Add Directs and Indirects</b>											
Wabash River 1			\$ 455,492	\$ 86,786	\$ -	\$ -	542,278	84.00%	16.00%	0.00%	0.00%
Wabash River 2			\$ 455,492	\$ 130,841	\$ -	\$ -	586,333	77.68%	22.32%	0.00%	0.00%
Wabash River 3			\$ 569,365	\$ 130,841	\$ -	\$ -	700,206	81.31%	18.69%	0.00%	0.00%
Wabash River 4			\$ 455,492	\$ 130,841	\$ -	\$ -	586,333	77.68%	22.32%	0.00%	0.00%
Wabash River 5			\$ 354,288	\$ 125,925	\$ -	\$ -	480,213	73.78%	26.22%	0.00%	0.00%
Wabash River 6			\$ 551,760	\$ 76,398	\$ -	\$ -	628,158	87.84%	12.16%	0.00%	0.00%
<b>Total</b>			906,048	202,323	-	-	3,523,521	Average 1-2-3-4-5			
								78.89%	21.11%	0.00%	0.00%
				\$ 3,523,521							
				\$ 2,562,561							
				1.375							

**Welles, Sarah**

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**From:** Reynolds, Jaime  
**Sent:** Thursday, October 27, 2005 4:10 PM  
**To:** Jett, Joseph; Glenn, Erica  
**Cc:** Trammel, Fred; Shelton, Ray; Tyler, Darrell; Enderle, Fred; Bova, John; Ryan, Timothy  
**Subject:** RE: Facilities w/ asbestos

Tracking:	Recipient	Delivery	Read
	Jett, Joseph	Delivered: 10/27/2005 4:10 PM	
	Glenn, Erica		Read: 10/27/2005 6:07 PM
	Trammel, Fred	Delivered: 10/27/2005 4:10 PM	Read: 10/27/2005 4:18 PM
	Shelton, Ray	Delivered: 10/27/2005 4:10 PM	Read: 10/27/2005 4:30 PM
	Tyler, Darrell		Read: 10/27/2005 4:55 PM
	Enderle, Fred		Read: 10/28/2005 7:51 AM
	Bova, John	Delivered: 10/27/2005 4:10 PM	Read: 10/28/2005 10:04 AM
	Ryan, Timothy	Delivered: 10/27/2005 4:10 PM	Read: 10/27/2005 4:21 PM

Joe

By sending out this list I wanted to verify that we do indeed have the complete and up to date list of facilities in one place rather than depending on the individual survey files. I'm hoping that my list had all the facilities included and there are none to be added. As far as square footage, we are thinking of breaking down the facilities by size and if there needs to be any sampling done we can choose from each size group.  
 Erica - Anything to add?

---

**From:** Jett, Joseph  
**Sent:** Thursday, October 27, 2005 8:50 AM  
**To:** Reynolds, Jaime  
**Cc:** Trammel, Fred; Shelton, Ray; Tyler, Darrell; Enderle, Fred; Bova, John; Ryan, Timothy  
**Subject:** RE: Facilities w/ asbestos

Jamie, the survey that I provided you should be an accurate listing of locations that contain asbestos. Is there a problem with utilizing that information? I also am curious how square footage of locations will assist you with financial obligations of asbestos removal? Can you enlighten me?

---

**From:** Ryan, Timothy  
**Sent:** Thursday, October 27, 2005 8:45 AM  
**To:** Bova, John  
**Cc:** Reynolds, Jaime; Jett, Joseph; Trammel, Fred; Shelton, Ray; Tyler, Darrell; Enderle, Fred  
**Subject:** FW: Facilities w/ asbestos

John, Still waiting to hear from Jamie whether leased buildings should be included, so please generate a Archibus report that shows interior and external gross areas along with the appropriate supervisors name for each of our owned and leased properties in Ohio, Indiana and Kentucky. Also add two separate columns titled "asbestos Y/N" and one for "comments". Once completed issue the report to all our supervisors so they can verify their buildings and the asbestos content in them.

Jamie, What is the street address for the Florence Service building .... are we reporting both owned and leased facilities....and when do you need this back?

Thanks,  
Tim

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**From:** Reynolds, Jaime  
**Sent:** Wednesday, October 26, 2005 3:00 PM  
**To:** Ryan, Timothy  
**Subject:** Facilities w/ asbestos

Tim

You may be aware that the accounting research area and fixed asset accounting are looking into our financial obligations regarding asbestos removal at any of our facilities. This is due to a new accounting pronouncement we must have in place by year end. We've met with Joe Jett, Steve Ruehlman and Brian Vance regarding this. Currently, we are trying to get a handle on how district offices we own and how many of them contain asbestos. I was given your name by Tammy Jett for help with this list. I've attached a spreadsheet with a tab for east and west side facilities. (There are also tabs for subs, but I've got some other folks working on that for me.) Would you be able to look at these lists and a) let me know if I'm missing any buildings, b) give me the square footage of each facility, and c) identify the facilities containing any asbestos?

If there is someone else I should go to for help with this or if you've got any questions, please let me know. Thank you.

*Jaime Reynolds*  
*Fixed Asset Accounting*  
287-3490



**Welles, Sarah**

**From:** Melendez, Brenda  
**Sent:** Wednesday, January 04, 2006 9:36 AM  
**To:** Laub, Peggy; Henson, Kelly; Reynolds, Jaime  
**Subject:** RE: Fyi - Cum. Effect of Change . . .

The cumulative effect will hit Corp 010 and 100. Jaime is still working through the numbers; but, CG&E appears to be in the \$5-\$6M range and PSI is yet to be determined. For PSI, we're trying to determine how much will be charged to the reg asset 182303 ARO Other Regulatory Asset vs. how much will be charged to Cum. Effect. Right now, the max looks to be about \$8.2M; but, not sure how much will hit the I/S.

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**From:** Laub, Peggy  
**Sent:** Wednesday, January 04, 2006 9:24 AM  
**To:** Henson, Kelly  
**Cc:** Melendez, Brenda  
**Subject:** RE: Fyi - Cum. Effect of Change . . .

Kelly,

Instead of 409998 and 409999 please set up 410998 and 410999 for this cumulative effect.

Brenda - we need to know the amounts and corps as soon as possible so we can book deferrals on these amounts. Can you tell us which corps will possibly be affected and the approximate dollar amounts?

thanks

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**From:** Henson, Kelly  
**Sent:** Wednesday, January 04, 2006 8:32 AM  
**To:** Laub, Peggy  
**Subject:** FW: Fyi - Cum. Effect of Change . . .  
**Importance:** High

Peggy - will you need separate accounts for this?  
I did not see any tax accounts associated with Cum Effect ARO. These accounts would need to be mapped to a separate line. I need to set these accounts up today, so if you could let me know as soon as possible I would appreciate it. It looks like in the old system, the accounts were 409998 and 409999.  
Thanks.

Kelly

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**From:** Melendez, Brenda  
**Sent:** Wednesday, October 05, 2005 5:49 PM  
**To:** Henson, Kelly; Conley, Theresa  
**Cc:** Pate, Gwen; Lilly, Kathy  
**Subject:** Fyi - Cum. Effect of Change . . .

Kelly/Terri,

Just fyi. By year-end, we have to implement FIN47 Accounting for Conditional Asset Retirement Obligations. There will be a cumulative effect of change in accounting principle involved if it's determined that we have to book something. We're working with Accounting Research now.

This is not retroactive to the beginning of the year so no restatements! We would just book in December. But, I wanted to give you a heads up to check the statements and HFM to verify that we have that line included on the financial statements and that the accounts are established. I think things are probably ok; but, wanted to give you some lead time to check.

Let me know if any questions. Thanks.

*Brenda R. Melendez*  
*Fixed Asset and Cost Accounting*  
*Phone (513) 287-1554*  
*Fax (513) 287-4141*

**Welles, Sarah**

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**From:** Frushour, Doug  
**Sent:** Friday, October 28, 2005 2:26 PM  
**To:** Reynolds, Jaime  
**Subject:** RE: Substation List & Asbestos  
**Attachments:** Asbestos Survey.xls

Here is my spreadsheet with a list of the substations where we maintain equipment, extracted from our Maximo substation maintenance management system - it shows a total of 313 substations on the East and 592 on the West. Some of these stations are owned by other utilities, municipalities, customers, etc. and I've included a column noting any foreign ownership that Maximo shows (I would not put too much faith in the ownership information being absolutely correct).

As we discussed, I will send this list out to the substation maintenance supervisors and ask them to indicate which stations in their area include buildings (i.e. control buildings, etc.), and where they are aware of asbestos. That survey will probably take 1-2 weeks to get responses from everyone and back to you. In the meantime, please don't hesitate to call me with any questions.

*Doug Frushour*

Supervisor, Substation Services  
(513) 287-2704

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**From:** Reynolds, Jaime  
**Sent:** Wednesday, October 26, 2005 2:53 PM  
**To:** Frushour, Doug  
**Cc:** Isaack, Keith; Owens, David  
**Subject:**

Doug

I think you may be aware that the accounting research area and fixed asset accounting are looking into our financial obligations regarding asbestos removal at any of our facilities. This is due to a new accounting pronouncement we must have in place by year end. Currently, we are trying to get a handle on how many subs we own and how many of them contain asbestos. I was given your name by Tammy Jett for help with substation listings. I've attached a spreadsheet with a tab for east and west side subs, as well as facilities. I think I've got the east side subs complete with the help of Keith Isaack, but can you look at this list and let me know if all subs are listed and the ones marked containing asbestos are correct? I've also got a west side sub list, but I'm not sure it is exhaustive and I don't know which contain asbestos. Can you take a look and add any subs I've missed and label the ones with asbestos?

If you are not the right person for this, can you direct me to someone who may be able to help? Please let me know if you've got any questions. Thanks.

Don't worry about the facilities tabs, I'll go to someone else for that.

*Jaime Reynolds*  
*Fixed Asset Accounting*  
287-3490

Company	District Code	Maint District	Sub Code	Substation	Foreign Ownership?	Bldg ?	Asbestos ?
CG&E	BRECON	Brecon Area	AICHOLTZ	Aicholtz Sub ID# 362			
CG&E	BRECON	Brecon Area	AMELIA	Amelia Sub ID# 141			
CG&E	BRECON	Brecon Area	BANTAM	Bantam Sub ID# 193			
CG&E	BRECON	Brecon Area	BATAVIA	Batavia Sub ID# 139			
CG&E	BRECON	Brecon Area	BECKJORD	Beckjord Sub ID# 18			
CG&E	BRECON	Brecon Area	BERKSHRE	Berkshire Sub ID# 318			
CG&E	BRECON	Brecon Area	BETHEL	Bethel Sub ID# 116			
CG&E	BRECON	Brecon Area	BLAIR	Blairville Sub ID# 310			
CG&E	BRECON	Brecon Area	BLUEASH	Blue Ash Sub ID# 298			
CG&E	BRECON	Brecon Area	BRANCH	Branch Hill Sub ID# 105			
CG&E	BRECON	Brecon Area	BRECONCB	Brecon Storage Area Circuit Breakers			
CG&E	BRECON	Brecon Area	BRECONTB	Brecon Storage Area Transformers			
CG&E	BRECON	Brecon Area	BRECN	Brecon Sub ID# 154			
CG&E	BRECON	Brecon Area	BROWN	Brown Sub ID# 58			
CG&E	BRECON	Brecon Area	BUCKWHT	Buckwheat Sub ID# 172			
CG&E	BRECON	Brecon Area	BUFORD	Buford Sub ID# 326			
CG&E	BRECON	Brecon Area	BURNS	Burns Sub ID# 354			
CG&E	BRECON	Brecon Area	CEDARVLE	Cedarville Sub ID# 29			
CG&E	BRECON	Brecon Area	CINCIAFTON	Cincinnati Milacron Afton Sub ID# 538	Customer-owned		
CG&E	BRECON	Brecon Area	CINCINTORAB	Cincinnati Milacron Mt-Orab Sub ID# 722	Customer-owned		
CG&E	BRECON	Brecon Area	CLERMNT	Clermont Sub ID# 43			
CG&E	BRECON	Brecon Area	CLERTOMA	Clermont Sub ID# 178			
CG&E	BRECON	Brecon Area	CORNELL	Cornell Sub ID# 204			
CG&E	BRECON	Brecon Area	EASTWOOD	Eastwood Sub ID# 84			
CG&E	BRECON	Brecon Area	FAIRFAX	Fairfax Sub ID# 283			
CG&E	BRECON	Brecon Area	FELDMAN	Feldman Sub ID# 265			
CG&E	BRECON	Brecon Area	FELICITY	Felicity Sub ID# 359			
CG&E	BRECON	Brecon Area	FORDBATAV	Ford Batavia Sub ID# 588	Customer-owned		
CG&E	BRECON	Brecon Area	GEORGETN	Georgetown Sub ID# 249			
CG&E	BRECON	Brecon Area	GLENESTE	Glen Este Sub ID# 192			
CG&E	BRECON	Brecon Area	GSHEN	Goshen Sub ID# 149			
CG&E	BRECON	Brecon Area	GREENBSH	Greenbush Sub ID# 197			
CG&E	BRECON	Brecon Area	HAMERSVL	Hamersville Sub ID# 114			
CG&E	BRECON	Brecon Area	HAMLET	Hamlet Sub ID# 71			
CG&E	BRECON	Brecon Area	HOPEWELL	Hopewell Sub ID# 180			
CG&E	BRECON	Brecon Area	LOVELAND	Loveland Sub ID# 153			
CG&E	BRECON	Brecon Area	MADEIRA	Madeira Sub ID# 257			
CG&E	BRECON	Brecon Area	MARKLEY	Markley Sub ID# 51			Y
CG&E	BRECON	Brecon Area	MCMANN	McMann Sub ID# 209			
CG&E	BRECON	Brecon Area	MILFORD	Milford Sub ID# 100			
CG&E	BRECON	Brecon Area	MONTEREY	Monterey Sub ID# 113			
CG&E	BRECON	Brecon Area	MONTGMRY	Montgomery Sub ID# 137			
CG&E	BRECON	Brecon Area	MOSCOW	Moscow Sub ID# 301			
CG&E	BRECON	Brecon Area	MTORAB	Mount Orab Sub ID# 142			
CG&E	BRECON	Brecon Area	MTREPOSE	Mount Repose Sub ID# 195			
CG&E	BRECON	Brecon Area	MTWASH	Mount Washington Sub ID# 206			
CG&E	BRECON	Brecon Area	NEWHOPE	New Hope Sub ID# 129			
CG&E	BRECON	Brecon Area	NWRICHMD	New Richmond Sub ID# 143			
CG&E	BRECON	Brecon Area	NEWTOWN	Newtown Sub ID# 92			
CG&E	BRECON	Brecon Area	NICKOLVL	Nicholsville Sub ID# 341			
CG&E	BRECON	Brecon Area	NORTHPOL	North Pole Sub ID# 106			
CG&E	BRECON	Brecon Area	OWENSVLE	Owensville Sub ID# 163			
CG&E	BRECON	Brecon Area	PERINTWN	Perintown Sub ID# 343			
CG&E	BRECON	Brecon Area	PIERCE	Pierce Sub ID# 506 (Customer Owned)	Foreign Utility-owned		
CG&E	BRECON	Brecon Area	PLNVILLE	Plainville Sub ID# 107			
CG&E	BRECON	Brecon Area	REMGINTN	Remington Sub ID# 94			
CG&E	BRECON	Brecon Area	RICH	Rich Sub ID# 173			
CG&E	BRECON	Brecon Area	RIPLEY	Ripley Sub ID# 102			
CG&E	BRECON	Brecon Area	RUSLSVLE	Russellville Sub ID# 117			
CG&E	BRECON	Brecon Area	SBETHEL	South Bethel Sub ID# 81			
CG&E	BRECON	Brecon Area	SUMMERSD	Summerside Sub ID# 69			Y
CG&E	BRECON	Brecon Area	SUTTON	Sutton Sub ID# 126			
CG&E	BRECON	Brecon Area	TERRACE	Terrace Park Sub ID# 167			
CG&E	BRECON	Brecon Area	TOBASCO	Tobasco Sub ID# 63			Y
CG&E	BRECON	Brecon Area	20MILE	Twenty Mile Sub ID# 176			
CG&E	BRECON	Brecon Area	VERCRUZ	Vera Cruz Sub ID# 122			
CG&E	BRECON	Brecon Area	WBETHEL	West Bethel Sub ID# 234			
CG&E	BRECON	Brecon Area	WILLMBRG	Williamsburg Sub ID# 104			
CG&E	BRECON	Brecon Area	WITHAMS	Withamsville Sub ID# 145			
CG&E	BRECON	Brecon Area	ZIMMER	Zimmer Sub ID# 14			
CG&E	QUEENS	Queensgate Dist	ALEXANDRIA	Alexandria South Sub ID# 205			
CG&E	QUEENS	Queensgate Dist	ASHLAND	Ashland Sub ID# 11			
CG&E	QUEENS	Queensgate Dist	AUGTINE	Augustine Sub ID# 78			
CG&E	QUEENS	Queensgate Dist	AVONDLE	Avondale Sub ID# 136			
CG&E	QUEENS	Queensgate Dist	BARR	Barrier Dam Sub ID# 521	Customer-owned		
CG&E	QUEENS	Queensgate Dist	BEAVER	Beaver Sub ID# 86			
CG&E	QUEENS	Queensgate Dist	BEEKMAN	Beekman Sub ID# 270			
CG&E	QUEENS	Queensgate Dist	BELL	Bellevue Sub ID# 131			
CG&E	QUEENS	Queensgate Dist	BRACKEN	Bracken Sub ID# 297			
CG&E	QUEENS	Queensgate Dist	BRIDGE	Bridgetown Sub ID# 93			
CG&E	QUEENS	Queensgate Dist	BRIGHTON	Brighton Sub ID# 21			Y
CG&E	QUEENS	Queensgate Dist	BROWER	Brower Sub ID# 186			
CG&E	QUEENS	Queensgate Dist	BUFFTON	Buffington Sub ID# 67			
CG&E	QUEENS	Queensgate Dist	CAMPWASH	Camp Washington Sub CG3000 No Electrical Equipm	Customer-owned		
CG&E	QUEENS	Queensgate Dist	CHARLES	Charles Sub ID# 13			Y (Old)
CG&E	QUEENS	Queensgate Dist	CHASE	Chase Sub ID# 226			Y
CG&E	QUEENS	Queensgate Dist	CHEVORN	Chevron Gulf Refinery Sub ID# 554	Customer-owned		
CG&E	QUEENS	Queensgate Dist	CHEVIOT	Cheviot Sub ID# 229			Y

<u>Company</u>	<u>District Code</u>	<u>Maint District</u>	<u>Sub Code</u>	<u>Substation</u>	<u>Foreign Ownership?</u>	<u>Bldg ?</u>	<u>Asbestos ?</u>
CG&E	QUEENS	Queensgate Dist	CINCIGEAR	Cincinnati Gear Sub ID# 727	was customer-owned,		
CG&E	QUEENS	Queensgate Dist	CWW CAL	Cinti. Water Works California Sub ID# 532	Customer-owned		
CG&E	QUEENS	Queensgate Dist	CWW MAIN	Cinti. Water Works Main Sub ID# 530	Customer-owned		
CG&E	QUEENS	Queensgate Dist	CWW TENN	Cinti. Water Works Tennyson Sub ID# 531	Customer-owned		
CG&E	QUEENS	Queensgate Dist	CWW WEST	Cinti. Water Works Western Hills Sub ID# 600	Customer-owned		
CG&E	QUEENS	Queensgate Dist	CLARVILLE	Claryville Sub ID# 147			
CG&E	QUEENS	Queensgate Dist	CLDSPRNG	Cold Spring Sub ID# 132			
CG&E	QUEENS	Queensgate Dist	CONSTNCE	Constance Sub ID# 42			
CG&E	QUEENS	Queensgate Dist	COVEDALE	Covedale Sub ID# 266			
CG&E	QUEENS	Queensgate Dist	CRESCENT	Crescent Sub ID# 70			
CG&E	QUEENS	Queensgate Dist	CRIT	Crittenden Sub ID# 124			
CG&E	QUEENS	Queensgate Dist	CUMMINS	Cummins Sub ID# 64			
CG&E	QUEENS	Queensgate Dist	DAYTONKY	Dayton Sub CG3003 No Electrical Equipment			
CG&E	QUEENS	Queensgate Dist	DECORSEY	Decoursey Sub ID# 299			
CG&E	QUEENS	Queensgate Dist	DELHI	Delhi Sub ID# 267			
CG&E	QUEENS	Queensgate Dist	DIXIE	Dixie Sub ID# 89			
CG&E	QUEENS	Queensgate Dist	DONALD	Donaldson Sub ID# 55			
CG&E	QUEENS	Queensgate Dist	EASTBND	East Bend Sub ID# 20			
CG&E	QUEENS	Queensgate Dist	EASTBENDTRANS	East Bend Transmission Sub ID# 66			
CG&E	QUEENS	Queensgate Dist	EASTGP	Eastern Ave Gas Plant Sub ID# 541			
CG&E	QUEENS	Queensgate Dist	EBENZR	Ebenezer Sub ID# 68			Y
CG&E	QUEENS	Queensgate Dist	ELZBTH	Elizabethtown Sub ID# 121			
CG&E	QUEENS	Queensgate Dist	EMPIRE	Empire Sub ID# 289			
CG&E	QUEENS	Queensgate Dist	ERLANGER	Erlanger GP Sub ID# 585			
CG&E	QUEENS	Queensgate Dist	FERGSON	Ferguson Sub ID# 285			
CG&E	QUEENS	Queensgate Dist	FLORENCE	Florence Sub ID# 241			
CG&E	QUEENS	Queensgate Dist	FRDRDBNK	Ford Red Bank Sub ID# 547	Customer-owned		
CG&E	QUEENS	Queensgate Dist	FTMITCHL	Fort Mitchell Sub ID# 120			Y
CG&E	QUEENS	Queensgate Dist	GRANT	Grant Sub ID# 161			
CG&E	QUEENS	Queensgate Dist	GRNDALE	Greendale Sub ID# 502			
CG&E	QUEENS	Queensgate Dist	HANDS	Hands Sub ID# 128			
CG&E	QUEENS	Queensgate Dist	HEBRON	Hebron Sub ID# 152			
CG&E	QUEENS	Queensgate Dist	HILLSIDE	Hillside Sub ID# 146			
CG&E	QUEENS	Queensgate Dist	KENTON	Kenton Sub ID# 9			Y
CG&E	QUEENS	Queensgate Dist	KY UNIV	Kentucky University Sub ID# 287			
CG&E	QUEENS	Queensgate Dist	LAFARGE GYPSUM	LaFarge Gypsum Plant , Silver Grove Kentucky Sub II	Customer-owned		
CG&E	QUEENS	Queensgate Dist	LATONIA	Latonía Sub ID# 225			Y
CG&E	QUEENS	Queensgate Dist	LIMABURG	Limaburg Sub ID# 189			
CG&E	QUEENS	Queensgate Dist	LINNEMAN	Linneman Sub ID# 255			
CG&E	QUEENS	Queensgate Dist	LINWOOD	Linwood Sub ID# 27			Y
CG&E	QUEENS	Queensgate Dist	LONGBRANCH	Longbranch Sub ID# 98			
CG&E	QUEENS	Queensgate Dist	LUDLOW	Ludlow Sub CG3004 No Electrical Equipment	Customer-owned		
CG&E	QUEENS	Queensgate Dist	MACK	Mack Sub ID# 230			
CG&E	QUEENS	Queensgate Dist	MARSHALL	Marshall Sub ID# 358			
CG&E	QUEENS	Queensgate Dist	MFGT	Miami Fort Gas Turbine Sub ID# 28			
CG&E	QUEENS	Queensgate Dist	MIAMI FT	Miami Fort Sub ID# 16			
CG&E	QUEENS	Queensgate Dist	MDWAY	Midway Sub ID# 96			Y
CG&E	QUEENS	Queensgate Dist	MTAUBURN	MT Auburn Sub ID# 224			Y
CG&E	QUEENS	Queensgate Dist	MTLOOK	MT Lookout Sub ID# 247			
CG&E	QUEENS	Queensgate Dist	MTJOE	MT ST Joseph Sub ID# 718			
CG&E	QUEENS	Queensgate Dist	NEBRASKA	Nebraska Sub ID# 256			
CG&E	QUEENS	Queensgate Dist	NUEMAN	Neumann Sub ID# 181			
CG&E	QUEENS	Queensgate Dist	N KY SANITATION DIST	Northern Kentucky Sanitation District Pump Stations	Customer-owned		
CG&E	QUEENS	Queensgate Dist	OAKBROOK	Oakbrook Sub ID# 210			
CG&E	QUEENS	Queensgate Dist	PRICE	Price Hill Sub ID# 5			Y
CG&E	QUEENS	Queensgate Dist	PROSPECT	Prospect Sub ID# 127			
CG&E	QUEENS	Queensgate Dist	QGATE	Queensgate Sub ID# 293			
CG&E	QUEENS	Queensgate Dist	RICHWOOD	Richwood Sub ID# 199			
CG&E	QUEENS	Queensgate Dist	ROCHELLE	Rochelle Sub ID# 82			
CG&E	QUEENS	Queensgate Dist	RYAN	Ryan Sub ID# 7			
CG&E	QUEENS	Queensgate Dist	SAYLOR	Saylor Park Sub ID# 223			
CG&E	QUEENS	Queensgate Dist	SILVER	Silver Grove Sub ID# 62			
CG&E	QUEENS	Queensgate Dist	VERONA	Verona Sub ID# 125			
CG&E	QUEENS	Queensgate Dist	VILLA	Villa Sub ID# 243			
CG&E	QUEENS	Queensgate Dist	WALNUT	Walnut Hills Sub ID# 3			Y
CG&E	QUEENS	Queensgate Dist	WESTEND	West End Sub ID# 15			Y
CG&E	QUEENS	Queensgate Dist	WESTERN	Western Hills Plaza Sub ID# 248			
CG&E	QUEENS	Queensgate Dist	WESTWOD	Westwood Sub ID# 254			
CG&E	QUEENS	Queensgate Dist	WHITETRW	White Tower Sub ID# 304			
CG&E	QUEENS	Queensgate Dist	WILDER	Wilder Sub ID# 59			Y
CG&E	QUEENS	Queensgate Dist	YORK	York Sub ID# 77			
CG&E	TERMINAL	Hartwell Area	AMBERLY	Amberley Sub ID# 284			
CG&E	TERMINAL	Hartwell Area	ARGUS	Argus Sub ID# 240			
CG&E	TERMINAL	Hartwell Area	BANNING	Banning Sub ID# 272			
CG&E	TERMINAL	Hartwell Area	BARNSBRG	Barnesburg Sub ID# 156			
CG&E	TERMINAL	Hartwell Area	BRENTWOD	Brentwood Sub ID# 295			
CG&E	TERMINAL	Hartwell Area	CENTRAL	Central Sub ID# 39			Y
CG&E	TERMINAL	Hartwell Area	CHESTER	Chester Sub ID# 91			
CG&E	TERMINAL	Hartwell Area	COLLEGE	College Hill Sub ID# 246			Y
CG&E	TERMINAL	Hartwell Area	CONPLASCT	Continental Plastic Container Sub ID# 746			
CG&E	TERMINAL	Hartwell Area	COOPER	Cooper Sub ID# 44			
CG&E	TERMINAL	Hartwell Area	DEER PRK	Deer Park Sub ID# 26			
CG&E	TERMINAL	Hartwell Area	DILLION	Dillion Sub ID# 260			
CG&E	TERMINAL	Hartwell Area	ELMWOOD	Elmwood Sub ID# 6			Y
CG&E	TERMINAL	Hartwell Area	EVANSTON	Evanston Sub ID# 22			Y
CG&E	TERMINAL	Hartwell Area	EVNDALE	Evendale Sub ID# 46			Y
CG&E	TERMINAL	Hartwell Area	FERNALD	Fernald Sub ID# 157			
CG&E	TERMINAL	Hartwell Area	FINNEY	Finneytown Sub ID# 47			

<u>Company</u>	<u>District Code</u>	<u>Maint District</u>	<u>Sub Code</u>	<u>Substation</u>	<u>Foreign Ownership?</u>	<u>Bldg ?</u>	<u>Asbestos ?</u>
CG&E	TERMINAL	Hartwell Area	FUHRMAN	Fuhrman Sub ID# 323			
CG&E	TERMINAL	Hartwell Area	GALBRTH	Galbraith Sub ID# 278			
CG&E	TERMINAL	Hartwell Area	GLENDALE	Glendale Sub ID# 357			
CG&E	TERMINAL	Hartwell Area	GLENSHADE	Glenshade Sub ID# 45			
CG&E	TERMINAL	Hartwell Area	GLENVIEW	Glenview Sub ID# 72			
CG&E	TERMINAL	Hartwell Area	GOLF	Golf Manor Sub ID# 130			
CG&E	TERMINAL	Hartwell Area	HARISON	Harrison Sub ID# 151			
CG&E	TERMINAL	Hartwell Area	HENKEL	Henkel Substation Sub ID# 542 (Customer Owned)	Customer-owned		
CG&E	TERMINAL	Hartwell Area	HYDE PARK	Hyde Park Sub ID# 244			
CG&E	TERMINAL	Hartwell Area	INTERPAP	International Paper Springdale Sub ID# 747			
CG&E	TERMINAL	Hartwell Area	IVORY	Ivorydale Sub ID# 48			
CG&E	TERMINAL	Hartwell Area	KEMPER	Kemper Sub ID# 99			
CG&E	TERMINAL	Hartwell Area	KENWOOD	Kerwood Sub ID# 263			
CG&E	TERMINAL	Hartwell Area	KILBY	Kilby Sub ID# 184			
CG&E	TERMINAL	Hartwell Area	KLEEMAN	Kleeman Sub ID# 61			
CG&E	TERMINAL	Hartwell Area	LATERAL	Lateral Sub ID# 41			
CG&E	TERMINAL	Hartwell Area	LINCON	Lincoln Sub ID# 95			
CG&E	TERMINAL	Hartwell Area	MAPLKNOL	Mapleknoll Sub ID# 36			
CG&E	TERMINAL	Hartwell Area	DOW	Marion Merrell Dow Sub ID# 583			
CG&E	TERMINAL	Hartwell Area	MIAMI TWN	Miamitown Sub ID# 123			
CG&E	TERMINAL	Hartwell Area	MICA	Mica Sub ID# 140			
CG&E	TERMINAL	Hartwell Area	MTCHEL	Mitchell Ave Sub ID# 12			
CG&E	TERMINAL	Hartwell Area	MONFORT	Monfort Heights Sub ID# 292			
CG&E	TERMINAL	Hartwell Area	MORGAN	Morgan Sub ID# 49			
CG&E	TERMINAL	Hartwell Area	MTHEALTH	Mount Healthy Sub ID# 79			
CG&E	TERMINAL	Hartwell Area	MULHUS	Mulhauser Sub ID# 25			
CG&E	TERMINAL	Hartwell Area	NBALTIMR	New Baltimore Sub ID# 216			
CG&E	TERMINAL	Hartwell Area	NBURLNGT	New Burlington Sub ID# 119			
CG&E	TERMINAL	Hartwell Area	NGREEN	Northgreen Sub ID# 52			
CG&E	TERMINAL	Hartwell Area	NORWOOD	Norwood Sub ID# 73			Y
CG&E	TERMINAL	Hartwell Area	OAKLY	Oakley Sub ID# 8			Y
CG&E	TERMINAL	Hartwell Area	PADDOCK	Paddock Sub ID# 201			
CG&E	TERMINAL	Hartwell Area	PIPPIN	Pippin Sub ID# 190			
CG&E	TERMINAL	Hartwell Area	PLEASANT	Pleasant Ridge Sub ID# 259			
CG&E	TERMINAL	Hartwell Area	READING	Reading Sub ID# 346			
CG&E	TERMINAL	Hartwell Area	REDBANK	Red Bank Sub ID# 74			
CG&E	TERMINAL	Hartwell Area	ROSSMOYNE	Rossmoyne Sub ID# 264			
CG&E	TERMINAL	Hartwell Area	RYBOLT	Rybolt Sub ID# 185			
CG&E	TERMINAL	Hartwell Area	SAWBROOK	Sawbrook Steel Sub ID# 574			
CG&E	TERMINAL	Hartwell Area	SILVERTON	Silverton Sub ID# 290			
CG&E	TERMINAL	Hartwell Area	SPRNGDLE	Spingdale Sub ID# 165			
CG&E	TERMINAL	Hartwell Area	TERMNL1	Terminal Sub ID# 17-1			
CG&E	TERMINAL	Hartwell Area	TERMNL2	Terminal Sub ID# 17-2			
CG&E	TERMINAL	Hartwell Area	SHARONVILLE PO	US Postal Service (Sharonville) Sub ID# 587			
CG&E	TERMINAL	Hartwell Area	WHITEOAK	White Oak Sub ID# 277			
CG&E	TERMINAL	Hartwell Area	WILEY	Wiley Sub ID# 97			
CG&E	TERMINAL	Hartwell Area	WINTON	Winton Sub ID# 282			
CG&E	TERMINAL	Hartwell Area	WOODFORD	Woodford Sub ID# 202			
CG&E	TERMINAL	Hartwell Area	WOODLAWN	Woodlawn Sub ID# 288			
CG&E	TERMINAL	Hartwell Area	WYSCARVR	Wyscarver Sub ID# 268			
CG&E	TOD	Todhunter Area	3DINDUST	3-D Industries Sub ID# 745	Customer-owned		
CG&E	TOD	Todhunter Area	AKSTEEL	A K Steel (Maple) Sub ID# 518	Customer-owned		
CG&E	TOD	Todhunter Area	ALLEN	Allen Sub ID# 211			
CG&E	TOD	Todhunter Area	AMANDA	Amanda Sub ID# 250			
CG&E	TOD	Todhunter Area	ARMCO1C	Armco 1C Sub ID# 519	Customer-owned		
CG&E	TOD	Todhunter Area	ASTORIA	Astoria Sub ID# 351			
CG&E	TOD	Todhunter Area	GOODRICH	B. F. Goodrich/Ohio Valley Flooring Mason, OH Sub ID # 741			
CG&E	TOD	Todhunter Area	BETHANY	Bethany Sub ID# 40			
CG&E	TOD	Todhunter Area	BISHOP	Bishop Sub ID# 551			
CG&E	TOD	Todhunter Area	BLKHAWK	Blackhawk Sub ID# 118			
CG&E	TOD	Todhunter Area	BLNCHSTR	Blanchester Sub ID# 101			
CG&E	TOD	Todhunter Area	CARLSLE	Carlisle Sub ID# 37			
CG&E	TOD	Todhunter Area	CHAMPPAP	Champion Paper Sub ID# 526	Customer-owned		
CG&E	TOD	Todhunter Area	CHAMPWASTE	Champion Waste Sub ID# 742			
CG&E	TOD	Todhunter Area	CINCIMIL	Cincinnati Milacron Siemens Sub ID# 537			
CG&E	TOD	Todhunter Area	HAMILTON	City of Hamilton Sub ID# 60	Muni-owned		
CG&E	TOD	Todhunter Area	LEBNON	City of Lebanon/Glosser Rd. Sub ID# 414	Muni-owned		
CG&E	TOD	Todhunter Area	MONROE_RD	City of Lebanon Monroe Road Sub ID # 4003	Muni-owned		
CG&E	TOD	Todhunter Area	COLLINVL	Collinsville Sub ID# 90			
CG&E	TOD	Todhunter Area	CG0507.00	Contreras Metering Station ID # 507			
CG&E	TOD	Todhunter Area	CWWBOLT	CWW Bolton Sub ID# 719	Customer-owned		
CG&E	TOD	Todhunter Area	DAWSON	Dawson Sub ID# 174			
CG&E	TOD	Todhunter Area	DAYPLAST	Dayton Plastics Sub ID# 731			
CG&E	TOD	Todhunter Area	DICKS	Dicks Creek Gas Plant Sub ID# 269			
CG&E	TOD	Todhunter Area	DCGEN	Dicks Creek Generating Station Sub ID# 19			
CG&E	TOD	Todhunter Area	DIMMICK	Dimmick Sub ID# 133			
CG&E	TOD	Todhunter Area	FAIRFLD	Fairfield Sub ID# 57			
CG&E	TOD	Todhunter Area	FOSTER	Foster Sub ID# 54			
CG&E	TOD	Todhunter Area	FRNKLIN	Franklin Sub ID# 34			Y
CG&E	TOD	Todhunter Area	GASTON	Gaston Sub ID# 296			
CG&E	TOD	Todhunter Area	GILMORE	Gilmore Sub ID# 353			
CG&E	TOD	Todhunter Area	HALL	Hall Sub ID# 166			
CG&E	TOD	Todhunter Area	HENSLEY	Hensley Sub ID# 208			
CG&E	TOD	Todhunter Area	INTPAPMASON	International Paper (Mason) Sub ID# 748	Customer-owned		
CG&E	TOD	Todhunter Area	JACKSON	Jackson Sub ID# 65			
CG&E	TOD	Todhunter Area	KINGMIL	Kings Mills Sub ID# 85			
CG&E	TOD	Todhunter Area	LCI	Lebanon & Warren Correctional Institute Sub ID# 759	Customer-owned		
CG&E	TOD	Todhunter Area	LOCUST	Locust Sub ID# 232			

<u>Company</u>	<u>District Code</u>	<u>Maint District</u>	<u>Sub_Code</u>	<u>Substation</u>	<u>Foreign Ownership?</u>	<u>Bldg ?</u>	<u>Asbestos ?</u>
CG&E	TOD	Todhunter Area	MAD GEN	Madison Gen Station Sub ID# 50			Y
CG&E	TOD	Todhunter Area	MNCHSTR	Manchester Sub ID# 83			
CG&E	TOD	Todhunter Area	MASON	Mason Sub ID# 155			
CG&E	TOD	Todhunter Area	MAUD	Maud Sub ID# 187			
CG&E	TOD	Todhunter Area	MCGUFFY	McGuffey Sub ID# 233	Customer-owned		
CG&E	TOD	Todhunter Area	MIAMIU1	Miami U1 Sub ID# 584	Customer-owned		
CG&E	TOD	Todhunter Area	MIDDLEBORO	Middleboro Sub ID# 751	Muni-owned		
CG&E	TOD	Todhunter Area	MDLTWN	Middletown Sub ID# 33			
CG&E	TOD	Todhunter Area	MILLER	Miller Sub ID# 182	Customer-owned		
CG&E	TOD	Todhunter Area	MILLIKIN	Millikin Sub ID# 24			
CG&E	TOD	Todhunter Area	MILLVLE	Millville Sub ID# 103			
CG&E	TOD	Todhunter Area	MONROE	Monroe Sub ID# 158			
CG&E	TOD	Todhunter Area	MORROW	Morrow Sub ID# 138			
CG&E	TOD	Todhunter Area	NMIAMI	New Miami Sub CG3002 No Electrical Equipment			
CG&E	TOD	Todhunter Area	NILES	Nilles Sub ID# 363			
CG&E	TOD	Todhunter Area	HAMILTONOLD	Old Hamilton Sub CG3001 No Electrical Equipment			
CG&E	TOD	Todhunter Area	OTTER	Otterbein Sub ID# 322			
CG&E	TOD	Todhunter Area	OXFORD	Oxford Sub ID# 235			
CG&E	TOD	Todhunter Area	PARK	Park Sub ID# 320			
CG&E	TOD	Todhunter Area	PISGAH	Pisgah Sub ID# 164			
CG&E	TOD	Todhunter Area	PLSNTPLN	Pleasant Plain Sub ID# 198			
CG&E	TOD	Todhunter Area	PLSNTVALY	Pleasant Valley Sub ID# 215			
CG&E	TOD	Todhunter Area	POSTTWN	Poastown Sub ID# 352			
CG&E	TOD	Todhunter Area	PORTU	Port Union Sub ID# 38			
CG&E	TOD	Todhunter Area	PRINCTN	Princeton Sub ID# 355			
CG&E	TOD	Todhunter Area	RED	Red Lion Sub ID# 344			
CG&E	TOD	Todhunter Area	RVRCRCLE	River Circle Sub ID# 207			
CG&E	TOD	Todhunter Area	ROACHESTER	Roachester Sub ID# 316			
CG&E	TOD	Todhunter Area	7MILE	Seven Mile Sub ID# 115			
CG&E	TOD	Todhunter Area	SEWARD	Seward Sub ID# 330			
CG&E	TOD	Todhunter Area	SIMPSON	Simpson Sub ID# 191			
CG&E	TOD	Todhunter Area	SOCIAL	Socialville Sub ID# 175			
CG&E	TOD	Todhunter Area	SPRNGSRW	Springboro Sub ID# 179			
CG&E	TOD	Todhunter Area	ST_CLAIR	St Clair Sub ID# 135			
CG&E	TOD	Todhunter Area	STILLWEL	Stillwell Sub ID# 327			
CG&E	TOD	Todhunter Area	SYMMES	Symmes Sub ID# 183			
CG&E	TOD	Todhunter Area	TODHNTR	Todhunter Sub ID# 56			
CG&E	TOD	Todhunter Area	TRENTON	Trenton Sub ID# 32			
CG&E	TOD	Todhunter Area	TURTLE	Turtle Creek Sub ID# 361			
CG&E	TOD	Todhunter Area	TYLERVLE	Tylersville Sub ID# 150			
CG&E	TOD	Todhunter Area	TYTUS	Tytus Sub ID# 236			
CG&E	TOD	Todhunter Area	UNION	Union Sub ID# 162			
CG&E	TOD	Todhunter Area	VENICE	Venice Sub ID# 171			
CG&E	TOD	Todhunter Area	VOA	Voice of America Sub ID# 522	Customer-owned		
CG&E	TOD	Todhunter Area	WARREN	Warren Sub ID# 196			
CG&E	TOD	Todhunter Area	WESTBOR	Westboro Sub ID# 144			
CG&E	TOD	Todhunter Area	WOODSDLE	Woodsdale Sub ID# 30			
CG&E	TOD	Todhunter Area	WOODVILLE	Woodville Sub ID # 188			
CG&E	TOD	Todhunter Area	WORTHSTL	Worthington Steel Corp Sub ID# 739			
PSI ENER	ATTICA	Attica District	ATTICA 2	Attica 230 Sub ID# 160.00			
PSI ENER	ATTICA	Attica District	ATTICA69	Attica 69 Sub ID# 548.00			
PSI ENER	ATTICA	Attica District	FLEXEL	Covington Flexel Switching Station Sub ID# 153.00			
PSI ENER	ATTICA	Attica District	CVTNMUNI	Covington Municipal Sub ID# 663.00	Muni-owned		
PSI ENER	ATTICA	Attica District	CVNGTN W	Covington West Sub ID# 523.00	REMC-owned		
PSI ENER	ATTICA	Attica District	CRWFDSVL	Crawfordsville Sub ID# 173.00			
PSI ENER	ATTICA	Attica District	DARLNGTN	Darlington Sub ID# 431.00	Muni-owned		
PSI ENER	ATTICA	Attica District	HARRISON	Harrison Steel Sub ID# 635.00			
PSI ENER	ATTICA	Attica District	MARSHFLD	Marshfield Sub ID# 326.00	REMC-owned		
PSI ENER	ATTICA	Attica District	NEWTON	Newtown Sub ID# 719.00	REMC-owned		
PSI ENER	ATTICA	Attica District	ROBERTS	Roberts Sub ID# 504.00	REMC-owned		
PSI ENER	ATTICA	Attica District	THORNTWN	Thomtown Sub ID# 159.00			
PSI ENER	ATTICA	Attica District	8TH ST	Veedersburg 8th Street Sub ID# 403.00			
PSI ENER	ATTICA	Attica District	VDRSBRGE	Veedersburg East Sub ID# 792.00			
PSI ENER	ATTICA	Attica District	VDRSBRGW	Veedersburg West Sub ID# 183.00	REMC-owned		
PSI ENER	BEDFORD	Bedford District	ABYDEL	Abydel Sub ID# 502.00			
PSI ENER	BEDFORD	Bedford District	25TH ST	Bedford 25th St Sub ID# 499.00			
PSI ENER	BEDFORD	Bedford District	BDFRD345	Bedford 345 KV Sub ID# 166.00			
PSI ENER	BEDFORD	Bedford District	BOYDLN	Bedford Boyd Lane Sub ID# 274.00			
PSI ENER	BEDFORD	Bedford District	BDCTLFDY	Bedford Central Foundry Sub ID# 568.00			
PSI ENER	BEDFORD	Bedford District	CNTLFDY	Central Foundry Sub ID# 453.00			
PSI ENER	BEDFORD	Bedford District	FRENCHLK	French Lick 138 KV Sub ID# 186.00			
PSI ENER	BEDFORD	Bedford District	FNCHLK	French Lick 34.5 KV Sub ID# 691.00			
PSI ENER	BEDFORD	Bedford District	FRNCHLKS	French Lick South Sub ID# 412.00			
PSI ENER	BEDFORD	Bedford District	HARTLYVL	Hartleyville Sub ID# 753.00			
PSI ENER	BEDFORD	Bedford District	LEESVILL	Leesville Sub ID# 567.00			
PSI ENER	BEDFORD	Bedford District	MTCHLLEH	Mitchell Lehigh Portland Sub ID# 243.00			
PSI ENER	BEDFORD	Bedford District	MTCHLLR	Mitchell Lost River Sub ID# 298.00			
PSI ENER	BEDFORD	Bedford District	MITCHL	Mitchell Sub ID# 757.00			
PSI ENER	BEDFORD	Bedford District	OOLITIC	Oolitic Sub ID# 351.00			
PSI ENER	BEDFORD	Bedford District	ORLNSSESS	Orleans Essex Wire Sub ID# 429.00			
PSI ENER	BEDFORD	Bedford District	ORLNSROO	Orleans Roosevelt Rd Sub ID# 492.00	Foreign Utility-owned		
PSI ENER	BEDFORD	Bedford District	ORLNSSOU	Orleans South Sub ID# 637.00			
PSI ENER	BEDFORD	Bedford District	PAOLIMUN	Paoli Municipal Sub ID# 494.01	Muni-owned		
PSI ENER	BEDFORD	Bedford District	PAOLI	Paoli Sub ID# 494.00			
PSI ENER	BEDFORD	Bedford District	SHAWSWK	Shawswick Sub ID# 764.00			
PSI ENER	BEDFORD	Bedford District	SHOALS	Shoals Sub ID# 174.00			
PSI ENER	BEDFORD	Bedford District	SHUSGYP	Shoals U.S. Gypsum Sub ID# 345.00			
PSI ENER	BEDFORD	Bedford District	TXEA13	Texas Eastern Trans #13 Sub ID# 219.00	Customer-owned		

Company	District Code	Maint District	Sub Code	Substation	Foreign Ownership?	Bldg ?	Asbestos ?
PSI ENER	BEDFORD	Bedford District	WILLIAMS	Williams Sub ID# 684.00			
PSI ENER	BLMNGTN	Bloomington Dis	BLMN230	Bloomington 230 KV Sub ID# 158.00			
PSI ENER	BLMNGTN	Bloomington Dis	DILLMANR	Bloomington Dillman Rd Sub ID# 681.00			
PSI ENER	BLMNGTN	Bloomington Dis	DUNN ST	Bloomington Dunn St Sub ID# 441.00			
PSI ENER	BLMNGTN	Bloomington Dis	BLMGTNGE	Bloomington G.E. Sub ID# 472.00	Customer-owned		
PSI ENER	BLMNGTN	Bloomington Dis	BLMGNTNIU	Bloomington I.U. Sub ID# 800.00			
PSI ENER	BLMNGTN	Bloomington Dis	MEADWPK	Bloomington Meadow Park Sub ID# 440.00			
PSI ENER	BLMNGTN	Bloomington Dis	BLMGNW	Bloomington Northwest Sub ID# 770.00			
PSI ENER	BLMNGTN	Bloomington Dis	OTIS ELE	Bloomington Otis Elev Sub ID# 367.00			
PSI ENER	BLMNGTN	Bloomington Dis	ROGERSST	Bloomington Rogers St Sub ID# 205.00			
PSI ENER	BLMNGTN	Bloomington Dis	SMITHRD	Bloomington Smith Rd Sub ID# 685.00			
PSI ENER	BLMNGTN	Bloomington Dis	BLMG WST	Bloomington West Sub ID# 286.00			
PSI ENER	BLMNGTN	Bloomington Dis	WHTHALLP	Bloomington Whitehall Pike Sub ID# 601.00			
PSI ENER	BLMNGTN	Bloomington Dis	ELLETSVL	Ellettsville Sub ID# 439.00			
PSI ENER	BLMNGTN	Bloomington Dis	HRRDSBG	Harrodsburg Sub ID# 442.00			
PSI ENER	BRZL	Brazil District	AMAXCHIN	Amax Chinook Mine Sub ID# 741.00			
PSI ENER	BRZL	Brazil District	BRAZLE	Brazil East Sub ID# 555.00			
PSI ENER	BRZL	Brazil District	BRAZL	Brazil Sub ID# 485.00 BSC 652			
PSI ENER	BRZL	Brazil District	CARB34	Carbon 34 Sub ID# 179.02			
PSI ENER	BRZL	Brazil District	CARB69	Carbon 69 Sub ID# 179.01			
PSI ENER	BRZL	Brazil District	CARBONW	Carbon West Sub ID# 699.00			
PSI ENER	BRZL	Brazil District	CENTERPT	Center Point Sub ID# 782.00			
PSI ENER	BRZL	Brazil District	STAUMARA	Staunton Marathon Sub ID# 748.00			
PSI ENER	BRZL	Brazil District	STAUNTON	Staunton Sub ID# 265.00			
PSI ENER	CARML	Carmel District	146TH ST	Carmel 146th Street Sub ID# 281.00	REMC-owned		
PSI ENER	CARML	Carmel District	GUILFORDRD	Carmel Guilford Road Sub ID# 545.00			
PSI ENER	CARML	Carmel District	CSHLOIL	Carmel Shell Oil Sub ID# 479.00			
PSI ENER	CARML	Carmel District	CRMLSE	Carmel Southeast Sub ID# 444.00			
PSI ENER	CARML	Carmel District	SPRINGML	Carmel Spring Mill Rd Sub ID# 547.00			
PSI ENER	CARML	Carmel District	CRMEL	Carmel Sub ID# 425.00			
PSI ENER	CARML	Carmel District	CARMLTWN	Carmel Town Rd Sub ID# 560.00			
PSI ENER	CARML	Carmel District	EAGLEWORTH	Eagle Worth Sub ID# 198.02	REMC-owned		
PSI ENER	CARML	Carmel District	HOMEPLC	Homeplace Sub ID# 430.00			
PSI ENER	CARML	Carmel District	LEB ENT	Lebanon Enterprise Sub ID# 1349.00	Muni-owned		
PSI ENER	CARML	Carmel District	LEBANON	Lebanon Sub ID# 711.00			
PSI ENER	CARML	Carmel District	WSTFLDDITCH	Westfield Ditch Rd Sub ID# 401.00			
PSI ENER	CARML	Carmel District	WHTSTN	Whitestown 345 KV Sub ID# 198.00	REMC-owned		
PSI ENER	CARML	Carmel District	WHTSTN69	Whitestown 69 KV Sub ID# 647.00	REMC-owned		
PSI ENER	CARML	Carmel District	ZIONSVL	Zionsville 69 KV Sub ID# 553.00			
PSI ENER	CARML	Carmel District	ZIONSVL 96TH	Zionsville 96th St Sub ID# 329.00			
PSI ENER	CARML	Carmel District	TKYFTRD	Zionsville Turkeyfoot Rd Sub ID# 576.00			
PSI ENER	CLNTN	Clinton District	BRIDGTN	Bridgeton Sub ID# 347.00			
PSI ENER	CLNTN	Clinton District	CRBNSHLL	Carbon Shell Oil Sub ID# 621.00			
PSI ENER	CLNTN	Clinton District	CAYGA345	Cayuga 345 KV Sub ID# 240.00			
PSI ENER	CLNTN	Clinton District	CAY 69	Cayuga 69 KV Sub ID# 535.00			
PSI ENER	CLNTN	Clinton District	CAYUGA CT	Cayuga CT Switchyard Sub ID# 201.00			
PSI ENER	CLNTN	Clinton District	CAYUGA	Cayuga Gen Sta Sub ID# 212.00			
PSI ENER	CLNTN	Clinton District	INLNDCON	Cayuga Inland Container (Premier Box) Sub ID# 617.00			
PSI ENER	CLNTN	Clinton District	CLNTN230	Clinton 230 KV Sub ID# 251.00			
PSI ENER	CLNTN	Clinton District	CLINTN69	Clinton 69 KV Sub ID# 213.00			
PSI ENER	CLNTN	Clinton District	ELILILLN	Clinton Eli Lilly North Sub ID# 202.00			
PSI ENER	CLNTN	Clinton District	ELILILLY	Clinton Eli Lilly South Sub ID# 258.00			
PSI ENER	CLNTN	Clinton District	COXVILLE	Coxville Sub ID# 445.00	REMC-owned		
PSI ENER	CLNTN	Clinton District	DANAJCT	Dana Jct Sub ID# 785.00			
PSI ENER	CLNTN	Clinton District	KINGMAN	Kingman Sub ID# 379.00			
PSI ENER	CLNTN	Clinton District	MONTEZMA	Montezuma Sub ID# 760.00			
PSI ENER	CLNTN	Clinton District	NEW GOSH	New Goshen Sub ID# 718.00			
PSI ENER	CLNTN	Clinton District	NEWPTARM	Newport Army Ammunition Sub ID# 299.06	???		
PSI ENER	CLNTN	Clinton District	ROCKVILL	Rockville 138 Sub ID# 177.00			
PSI ENER	CLNTN	Clinton District	ROSEDL	Rosedale Marathon Sub ID# 631.00			
PSI ENER	CLNTN	Clinton District	ROSEDALE	Rosedale Sub ID# 583.00			
PSI ENER	CLNTN	Clinton District	VERMILLION	Vermillion Energy Facility Sub ID# 1364.00	Yes?		
PSI ENER	CLRKSVLE	Clarks ville Distric	CHARLSTN	Charlestown Jct Sub ID# 278.00			
PSI ENER	CLRKSVLE	Clarks ville Distric	CHRLSTN	Charlestown Sub ID# 771.00			
PSI ENER	CLRKSVLE	Clarks ville Distric	CLMTCNT	Clark Maritime Centre Sub ID# 709.00			
PSI ENER	CLRKSVLE	Clarks ville Distric	CLARKSVL	Clarksville Sub ID# 327.00			
PSI ENER	CLRKSVLE	Clarks ville Distric	GAL	Gallagher Gen Sta Sub ID# 151.00			
PSI ENER	CLRKSVLE	Clarks ville Distric	JFSVL138	Jeffersonville 138 KV Sub ID# 501.00			
PSI ENER	CLRKSVLE	Clarks ville Distric	KENTUCKY	Jeffersonville Kentucky Ave Sub ID# 517.00			
PSI ENER	CLRKSVLE	Clarks ville Distric	MONTGOM	Jeffersonville Montgomery Sub ID# 700.00			
PSI ENER	CLRKSVLE	Clarks ville Distric	POTTERRD	Jeffersonville Potter Rd Sub ID# 602.00			
PSI ENER	CLRKSVLE	Clarks ville Distric	NEWALBNY	New Albany 138 Sub ID# 269.00			
PSI ENER	CLRKSVLE	Clarks ville Distric	NACENTRL	New Albany Central Sub ID# 424.00			
PSI ENER	CLRKSVLE	Clarks ville Distric	GRANTLN	New Albany Grant Line Rd (H.E. Owned except 138k)	Foreign Utility-owned		
PSI ENER	CLRKSVLE	Clarks ville Distric	GRNVLYRD	New Albany Green Valley Rd Sub ID# 619.00			
PSI ENER	CLRKSVLE	Clarks ville Distric	SLATERUN	New Albany Slate Run Rd Sub ID# 755.00			
PSI ENER	CLRKSVLE	Clarks ville Distric	RIVERNOR	River Ridge North Sub ID # 299.05	Yes?		
PSI ENER	CLRKSVLE	Clarks ville Distric	INDARSNLS	River Ridge South Sub (Customer Owned)Sub ID# 2!	Yes?		
PSI ENER	CLRKSVLE	Clarks ville Distric	SELLRSBG	Sellersburg Sub ID# 304.00			
PSI ENER	CLRKSVLE	Clarks ville Distric	LOUSVLCM	Speed Louisville Cement Sub(Customer Owned) ID#	Customer-owned		
PSI ENER	CLRKSVLE	Clarks ville Distric	SPEED	Speed Sub ID# 167.00			
PSI ENER	CNRSVLE	Connersville Dis	BILNGSVL	Billingsville Sub ID# 416.00			
PSI ENER	CNRSVLE	Connersville Dis	LTLCEDR	Brookville Little Cedar Sub ID# 590.00			
PSI ENER	CNRSVLE	Connersville Dis	BROOKVL	Brookville Sub ID# 756.00			
PSI ENER	CNRSVLE	Connersville Dis	CMBDGCTY	Cambridge City Sub ID# 514.00			
PSI ENER	CNRSVLE	Connersville Dis	MCMNNRD	Centerville McMinn Rd Sub ID# 337.00	Muni-owned		
PSI ENER	CNRSVLE	Connersville Dis	CTRVLTN	Centerville Town Sub ID# 421.00			
PSI ENER	CNRSVLE	Connersville Dis	12TH ST	Connersville 12th St Sub ID# 407.00 BSC 842			



Company	District Code	Maint District	Sub Code	Substation	Foreign Ownership?	Bldg ?	Asbestos ?
PSI ENER	CNRSVLE	Connersville Dis	CNSVL138	Connersville 138 KV Sub ID# 155.00			
PSI ENER	CNRSVLE	Connersville Dis	30TH ST	Connersville 30th St. Sub ID# 470.00			
PSI ENER	CNRSVLE	Connersville Dis	CNVLFDR	Connersville Ford Sub ID# 341.00			
PSI ENER	CNRSVLE	Connersville Dis	ILLNOSAV	Connersville Illinois Ave Sub ID# 655.00			
PSI ENER	CNRSVLE	Connersville Dis	CONRVL	Connersville Peakers Sub ID# 155.			
PSI ENER	CNRSVLE	Connersville Dis	STHSEST	Connersville Southeast Sub ID# 428.00			
PSI ENER	CNRSVLE	Connersville Dis	LAUREL	Laurel Sub ID# 478.00			
PSI ENER	CNRSVLE	Connersville Dis	LIBERTY	Liberty Sub ID# 468.00			
PSI ENER	CNRSVLE	Connersville Dis	RSBGSW	Roseburg Switching Sta Sub ID# 287.00			
PSI ENER	COLUMBUS	Columbus Area	AZALIA	Azalia Sub ID# 750.00			
PSI ENER	COLUMBUS	Columbus Area	COL 345	Columbus 345 Sub ID# 268.00			
PSI ENER	COLUMBUS	Columbus Area	CLIFTYCR	Columbus Clifty Creek Sub ID# 375.00			
PSI ENER	COLUMBUS	Columbus Area	COMMERC	Columbus Commerce Park Sub ID# 443.00			
PSI ENER	COLUMBUS	Columbus Area	DENOISCR	Columbus Denois Creek Sub ID# 291.00			
PSI ENER	COLUMBUS	Columbus Area	COL EAST	Columbus East 25th St Sub ID# 307.00			
PSI ENER	COLUMBUS	Columbus Area	GLADSTN	Columbus Gladstone Ave Sub ID# 422.00			
PSI ENER	COLUMBUS	Columbus Area	MICHGNAV	Columbus Michigan Ave Sub ID# 720.00			
PSI ENER	COLUMBUS	Columbus Area	NCENTRAL	Columbus North Central Sub ID# 515.00			
PSI ENER	COLUMBUS	Columbus Area	NORTH	Columbus North Sub ID# 256.00			
PSI ENER	COLUMBUS	Columbus Area	COL SOUT	Columbus South Sub ID# 393.00			
PSI ENER	COLUMBUS	Columbus Area	COL WEST	Columbus West Sub ID# 640.00			
PSI ENER	COLUMBUS	Columbus Area	NASHVIL	Nashville Sub ID# 549.00			
PSI ENER	COLUMBUS	Columbus Area	WALESBOR	Walesboro Sub ID# 717.00			
PSI ENER	CORYDON	Corydon District	BCHWD	Beechwood Sub ID# 353.00			
PSI ENER	CORYDON	Corydon District	BORDEN	Borden Sub ID# 571.00			
PSI ENER	CORYDON	Corydon District	CRYDON	Corydon Sub ID# 334.00			
PSI ENER	CORYDON	Corydon District	GRGETWVN	Georgetown Sub ID# 467.00			
PSI ENER	CORYDON	Corydon District	GRENVL	Greenville Sub ID# 317.00			
PSI ENER	CORYDON	Corydon District	HRDNSBG	Hardinsburg Sub ID# 452.00			
PSI ENER	CORYDON	Corydon District	KOSSUTH	Kossuth Sub ID# 506.00			
PSI ENER	CORYDON	Corydon District	MARENGO	Marengo Sub ID# 324.00			
PSI ENER	CORYDON	Corydon District	MLTN138	Milltown 138 KV Sub ID# 195.00			
PSI ENER	CORYDON	Corydon District	MTTABOR	Mt Tabor Sub ID# 528.00			
PSI ENER	CORYDON	Corydon District	NWPEKIN	New Pekin Sub ID# 697.00			
PSI ENER	CORYDON	Corydon District	RAMSEY	Ramsey Sub ID# 649.00			
PSI ENER	CORYDON	Corydon District	SLINPK	Salem Industrial Park Sub ID# 460.00			
PSI ENER	CORYDON	Corydon District	SALEM	Salem Sub ID# 786.00			
PSI ENER	CORYDON	Corydon District	TEMPLE	Temple Sub ID# 781.00			
PSI ENER	CORYDON	Corydon District	TOWER	Tower Sub ID# 322.00			
PSI ENER	FRANKLIN	Franklin District	JOHARRD	Bargersville Joe Harrod Sub ID# 1120.00	Muni-owned		
PSI ENER	FRANKLIN	Franklin District	CPATTER	Camp Atterbury Sub ID# 497.00			
PSI ENER	FRANKLIN	Franklin District	EDNBG	Edinburgh Sub ID# 415.00			
PSI ENER	FRANKLIN	Franklin District	ESSEXGR	Essex Switch Gear Sub ID# 178.03			
PSI ENER	FRANKLIN	Franklin District	FLAT ROCK	Flat Rock Sub ID# 791.00			
PSI ENER	FRANKLIN	Franklin District	FRANCISCRK	Francis Creek Sub ID# 339.00			
PSI ENER	FRANKLIN	Franklin District	FRNKL230	Franklin 230 KV Sub ID# 178.00			
PSI ENER	FRANKLIN	Franklin District	EARLYWOOD	Franklin Earlywood Sub ID# 402.00			
PSI ENER	FRANKLIN	Franklin District	FRSYTHST	Franklin Forsythe St. Sub ID# 371.00			
PSI ENER	FRANKLIN	Franklin District	AVRTTROAD	Greenwood Averitt Rd Sub ID# 411.00			
PSI ENER	FRANKLIN	Franklin District	CLARKTWP	Greenwood Clark Township Sub ID# 279.00			
PSI ENER	FRANKLIN	Franklin District	GRNWDNORTH	Greenwood North Sub ID# 543.00			
PSI ENER	FRANKLIN	Franklin District	VALVISTA	Greenwood Valle Vista Sub ID# 758.00			
PSI ENER	FRANKLIN	Franklin District	GRNWDWEST	Greenwood West Sub ID# 446.00			
PSI ENER	FRANKLIN	Franklin District	HOPESUB	Hope Sub ID# 417.00			
PSI ENER	FRANKLIN	Franklin District	JNSNHOSP	Johnson Co. Hospital Sub ID# 178.02			
PSI ENER	FRANKLIN	Franklin District	WHITELND	Whiteland Sub ID# 767.00			
PSI ENER	GRNCSTLE	Greencastle Dist	AMAGG	American Aggregates Sub ID# 1369.00			
PSI ENER	GRNCSTLE	Greencastle Dist	BAINBRDG	Bainbridge Sub ID# 466.00			
PSI ENER	GRNCSTLE	Greencastle Dist	BARNARD	Barnard Sub ID# 610.00			
PSI ENER	GRNCSTLE	Greencastle Dist	CLVRDLE	Cloverdale 138 Sub ID# 168.00			
PSI ENER	GRNCSTLE	Greencastle Dist	CLVRNW	Cloverdale Northwest Sub ID# 677.00			
PSI ENER	GRNCSTLE	Greencastle Dist	FILLMORE	Fillmore Sub ID# 372.00			
PSI ENER	GRNCSTLE	Greencastle Dist	FRSTNPJT	France Stone Putnamville Sub ID# 657.00			
PSI ENER	GRNCSTLE	Greencastle Dist	GRNCS138	Greencastle 138 KV Sub ID# 152.00			
PSI ENER	GRNCSTLE	Greencastle Dist	CMTRYRD	Greencastle Cemetery Rd Sub ID# 323.00			
PSI ENER	GRNCSTLE	Greencastle Dist	GRNCSEA	Greencastle East Sub ID# 726.00			
PSI ENER	GRNCSTLE	Greencastle Dist	GINDPK	Greencastle Ind Park E JC Sub ID# 237.00			
PSI ENER	GRNCSTLE	Greencastle Dist	INDPK	Greencastle Industrial Park Sub ID# 581.00			
PSI ENER	GRNCSTLE	Greencastle Dist	MADNST	Greencastle Madison St Sub ID# 625.00			
PSI ENER	GRNCSTLE	Greencastle Dist	GRMFGCO	Greencastle Mfg Co Sub ID# 586.00			
PSI ENER	GRNCSTLE	Greencastle Dist	GRNCSTN	Greencastle North Sub ID# 346.00	Foreign Utility-owned		
PSI ENER	GRNCSTLE	Greencastle Dist	HERTGLK	Heritage Lake Sub ID# 587.00	Foreign Utility-owned		
PSI ENER	GRNCSTLE	Greencastle Dist	LADOGA	Ladoga Sub ID# 620.00			
PSI ENER	GRNCSTLE	Greencastle Dist	LEAR	Lear Corporation Sub ID# 1372.00			
PSI ENER	GRNCSTLE	Greencastle Dist	MIDWAY	Midway Sub ID# 373.00	Foreign Utility-owned		
PSI ENER	GRNCSTLE	Greencastle Dist	NUCORSTEL	Nucor Steel Inc. Sub ID# 1356.00 (Customer Owned)	Customer-owned		
PSI ENER	GRNCSTLE	Greencastle Dist	NUCORST	Nucor Steel Sub ID# 254.00			
PSI ENER	GRNCSTLE	Greencastle Dist	REELSVL	Reelsville Sub ID# 740.00	Foreign Utility-owned		
PSI ENER	GRNCSTLE	Greencastle Dist	RCHDLE	Roachdale Sub ID# 190.00			
PSI ENER	GRNCSTLE	Greencastle Dist	RUSVLE	Russellville Sub ID# 738.00	Foreign Utility-owned		
PSI ENER	GRNCSTLE	Greencastle Dist	STATEFRM	State Farm Sub ID# 1029.00			
PSI ENER	GRNCSTLE	Greencastle Dist	WHTSVLSO	Whitesville South Sub ID# 191.00	Foreign Utility-owned		
PSI ENER	GRNCSTLE	Greencastle Dist	WHTSVL	Whitesville Sub ID# 328.00			
PSI ENER	GRNSBRG	Greensburg Dist	AURORA	Aurora Sub ID# 387.00			
PSI ENER	GRNSBRG	Greensburg Dist	BATSVL345	Batesville 345 KV Sub ID# 170.00			
PSI ENER	GRNSBRG	Greensburg Dist	BATSVLHLB	Batesville Hillenbrand Sub ID# 609.00			
PSI ENER	GRNSBRG	Greensburg Dist	BATSVLNRTH	Batesville North Sub ID# 629.00			
PSI ENER	GRNSBRG	Greensburg Dist	GREENDALE	Greendale Sub ID# 171.00	Muni-owned		

<u>Company</u>	<u>District Code</u>	<u>Maint District</u>	<u>Sub Code</u>	<u>Substation</u>	<u>Foreign Ownership?</u>	<u>Bldg ?</u>	<u>Asbestos ?</u>
PSI ENER	GRNSBRG	Greensburg Dist	GRNSBR138	Greensburg 138KV Sub ID# 225.00			
PSI ENER	GRNSBRG	Greensburg Dist	WASHTN	Greensburg Washington Sub ID# 319.00			
PSI ENER	GRNSBRG	Greensburg Dist	MILANSUB	Milan Sub ID# 713.00			
PSI ENER	GRNSBRG	Greensburg Dist	OSGOOD	Osgood Sub ID# 690.00			
PSI ENER	GRNSBRG	Greensburg Dist	STPAUL	Saint Paul Sub ID# 338.00			
PSI ENER	GRNSBRG	Greensburg Dist	TXEATR15	Texas Eastern Trans #15 Sub ID# 215.00			
PSI ENER	GRNSBRG	Greensburg Dist	WILMINGTN	Wilmington Sub ID# 157.00			
PSI ENER	HUNTINGTON	Huntington Distri	ANDREWS	Andrews Sub ID# 551.00			
PSI ENER	HUNTINGTON	Huntington Distri	HUNT138	Huntington 138 KV Sub ID# 164.00			
PSI ENER	HUNTINGTON	Huntington Distri	HGOBJCT	Huntington Goblesville Jct Sub ID# 233.00	Decommissioned?		
PSI ENER	HUNTINGTON	Huntington Distri	HUNTNO	Huntington North Sub ID# 308.00			
PSI ENER	HUNTINGTON	Huntington Distri	HTRIVFK	Huntington Riverfork Sub ID# 423.00			
PSI ENER	HUNTINGTON	Huntington Distri	STATEST	Huntington State St Sub ID# 695.00			
PSI ENER	KOKOMO	Kokomo District	CONVERSE	Converse Sub ID# 638.00 BSC #422			
PSI ENER	KOKOMO	Kokomo District	DRCRK	Deer Creek Sub ID# 397.00	REMC-owned		
PSI ENER	KOKOMO	Kokomo District	GRNMAPLE	Greentown Maple St Sub ID# 727.00			
PSI ENER	KOKOMO	Kokomo District	GRNTN	Greentown Sub ID# 210.00			
PSI ENER	KOKOMO	Kokomo District	AEROPLEX4	Grissom Aeroplex 4 Sub ID# 683.00	Muni-owned		
PSI ENER	KOKOMO	Kokomo District	GRISSOM	Grissom Air Force Base Sub ID# 343.00	REMC-owned		
PSI ENER	KOKOMO	Kokomo District	KIRKLIN	Kirklin Sub ID# 572.00			
PSI ENER	KOKOMO	Kokomo District	CRYSLNO	Kokomo Chrysler North Sub ID# 382.00			
PSI ENER	KOKOMO	Kokomo District	KOCHRYS	Kokomo Chrysler South Sub ID# 376.00			
PSI ENER	KOKOMO	Kokomo District	DELCOEL	Kokomo Delco Electronics Sub ID# 512.00			
PSI ENER	KOKOMO	Kokomo District	KOEAAT	Kokomo East Sub ID# 297.00			
PSI ENER	KOKOMO	Kokomo District	KOKOHAY	Kokomo Haynes International Sub ID# 188.00			
PSI ENER	KOKOMO	Kokomo District	HIGHLAND	Kokomo Highland Park Sub ID# 234.00			
PSI ENER	KOKOMO	Kokomo District	JUDSONPK	Kokomo Judson Pike Sub ID# 503.00			
PSI ENER	KOKOMO	Kokomo District	SOMAIN	Kokomo South Main St Sub ID# 763.00			
PSI ENER	KOKOMO	Kokomo District	KOKOSE	Kokomo Southeast Sub ID# 557.00			
PSI ENER	KOKOMO	Kokomo District	TOBYPK	Kokomo Toby Pike Sub ID# 350.00			
PSI ENER	KOKOMO	Kokomo District	UNIVSTL	Kokomo Universal Steel Sub ID# 630.00			
PSI ENER	KOKOMO	Kokomo District	WEBSTER	Kokomo Webster St Sub ID# 272.00			
PSI ENER	KOKOMO	Kokomo District	LINCOLN	Lincoln Sub ID# 395.00	REMC-owned		
PSI ENER	KOKOMO	Kokomo District	COPLAYCE	Logansport Coplay Cement Sub ID# 607.00			
PSI ENER	KOKOMO	Kokomo District	LOGSPSO	Logansport South Sub ID# 299.02	Muni-owned		
PSI ENER	KOKOMO	Kokomo District	LGNSPSW	Logansport Switching Sta Sub ID# 236.00			
PSI ENER	KOKOMO	Kokomo District	MCHTWN	Michigantown Sub ID# 574.00			
PSI ENER	KOKOMO	Kokomo District	MDLFK	Middlefork Sub ID# 189.00			
PSI ENER	KOKOMO	Kokomo District	NWLDNSW	New London Switching Sta Sub ID# 194.00			
PSI ENER	KOKOMO	Kokomo District	POTTAW	Pottawatomie Sub ID# 538.00			
PSI ENER	KOKOMO	Kokomo District	RSHAVL	Russiaville Sub ID# 520.00			
PSI ENER	KOKOMO	Kokomo District	SHARPSVL	Sharpville Sub ID# 363.00			
PSI ENER	KOKOMO	Kokomo District	TIPTON	Tipton Sub ID# 742.00	Muni-owned		
PSI ENER	KOKOMO	Kokomo District	WALTON	Walton Sub ID# 185.00			
PSI ENER	KOKOMO	Kokomo District	WINDFALL	Windfall Sub ID# 584.00			
PSI ENER	LAF	Lafayette District	BRINGHRS	Bringhurst Sub ID# 427.00	REMC-owned		
PSI ENER	LAF	Lafayette District	BURROWS	Burrows Sub ID# 193.00			
PSI ENER	LAF	Lafayette District	CLARKSHILL	Clarks Hill Sub ID# 352.00			
PSI ENER	LAF	Lafayette District	COLBURN	Colburn Sub ID# 381.00			
PSI ENER	LAF	Lafayette District	DELWLS	Delphi Wells St Sub ID# 597.00			
PSI ENER	LAF	Lafayette District	FRANKFOR	Frankfort 230 Sub ID# 227.00	Muni-owned		
PSI ENER	LAF	Lafayette District	FRNKFT69	Frankfort 69 KV Sub ID# 565.00			
PSI ENER	LAF	Lafayette District	FRANKBUR	Frankfort Burlington Sub ID# 1302.00	Muni-owned		
PSI ENER	LAF	Lafayette District	FKWSWST	Frankfort Westside Switching Sta Sub ID# 1301.00	Muni-owned		
PSI ENER	LAF	Lafayette District	HAGGERT	Haggerty Lane Sub ID# 798.00			
PSI ENER	LAF	Lafayette District	ALTONBX	Jefferson Smurfit Sub ID# 1010.00			
PSI ENER	LAF	Lafayette District	JEFFERSON	Jefferson Sub ID# 566.00			
PSI ENER	LAF	Lafayette District	LAF230	Lafayette 230 KV Sub ID# 161.00			
PSI ENER	LAF	Lafayette District	AESTALEY	Lafayette A. E. Staley Sub ID# 789.00			
PSI ENER	LAF	Lafayette District	LAFALCOA	Lafayette Alcoa Sub ID# 224.00			
PSI ENER	LAF	Lafayette District	CATERPLR	Lafayette Caterpillar Sub ID# 154.00			
PSI ENER	LAF	Lafayette District	CINCINNA	Lafayette Cincinnati St Sub ID# 314.00			
PSI ENER	LAF	Lafayette District	CONCORDR	Lafayette Concord Rd Sub ID# 536.00			
PSI ENER	LAF	Lafayette District	LAFINDSO	Lafayette Industry South Sub ID# 331.00			
PSI ENER	LAF	Lafayette District	REAMAGNET	Lafayette Rea Magnet Sub ID# 149.01	Customer-owned		
PSI ENER	LAF	Lafayette District	LAFSO	Lafayette South Sub ID# 463.00			
PSI ENER	LAF	Lafayette District	SOUTHEST	Lafayette Southeast Sub ID# 285.00	REMC-owned		
PSI ENER	LAF	Lafayette District	SUB-ISU	Lafayette Subaru-Isuzu Sub ID# 284.00			
PSI ENER	LAF	Lafayette District	TIPPELAB	Lafayette Tippecanoe Labs Sub ID# 271.00			
PSI ENER	LAF	Lafayette District	LOCKPORT	Lockport Sub ID# 459.00	REMC-owned		
PSI ENER	LAF	Lafayette District	POTATOCR	Potato Creek Sub ID# 435.00			
PSI ENER	LAF	Lafayette District	ROCKFIEL	Rockfield Sub ID# 546.00	REMC-owned		
PSI ENER	LAF	Lafayette District	ROSSVL	Rossville Sub ID# 736.00			
PSI ENER	LAF	Lafayette District	SAGOP	Sagamore Operations-Staley Sub ID# 312.00			
PSI ENER	LAF	Lafayette District	SDELPHI	South Delphi Sub ID# 491.00	REMC-owned		
PSI ENER	LAF	Lafayette District	SPRINGBORO	Springboro Sub ID# 141.00 (Lafayette)			
PSI ENER	LAF	Lafayette District	CMBLNDAY	W. Lafayette Cumberland Ave Sub ID# 483.00			
PSI ENER	LAF	Lafayette District	WLPJRDU	West Lafayette Purdue Sub ID# 365.00			
PSI ENER	LAF	Lafayette District	WLAFAF	West Lafayette Sub ID# 594.00			
PSI ENER	LAF	Lafayette District	WSTWD	Westwood Sub ID# 220.00			
PSI ENER	MADISON	Madison District	AUSTINOR	Austin North Sub ID# 592.00			
PSI ENER	MADISON	Madison District	AUSTIN	Austin Sub ID# 639.00			
PSI ENER	MADISON	Madison District	BETHLEHM	Bethlehem Sub ID# 561.00			
PSI ENER	MADISON	Madison District	BLOCHER	Blocher Sub ID# 641.00			
PSI ENER	MADISON	Madison District	FAIRVIEW	Fairview Sub ID# 211.00			
PSI ENER	MADISON	Madison District	HANO138	Hanover 138 KV Sub ID# 689.00			
PSI ENER	MADISON	Madison District	HANO34.5	Hanover 34.5 KV Sub ID# 330.00			
PSI ENER	MADISON	Madison District	LTYORK	Little York Sub ID# 562.00			

Company	District Code	Maint District	Sub Code	Substation	Foreign Ownership?	Bldg ?	Asbestos ?
PSI ENER	MADISON	Madison District	MAD138	Madison 138 KV Sub ID# 226 00			
PSI ENER	MADISON	Madison District	MAD2ND	Madison 2nd St Sub ID# 653 00			
PSI ENER	MADISON	Madison District	MADMIRD	Madison Michigan Rd Sub ID# 300 00			
PSI ENER	MADISON	Madison District	ROBUSPRO	Madison Robus Products Sub ID# 524 00			
PSI ENER	MADISON	Madison District	MDNSTHOS	Madison State Hospital Sub ID# 406 00			
PSI ENER	MADISON	Madison District	MADISNW	Madison West Sub ID# 209 00			
PSI ENER	MADISON	Madison District	MARK	Markland Gen Sta. Sub ID# 200 00			
PSI ENER	MADISON	Madison District	NABB	Nabb Sub ID# 670 00			
PSI ENER	MADISON	Madison District	NWFRANK	New Frankfort Jct Sub ID# 613 00			
PSI ENER	MADISON	Madison District	NEWFRANK	New Frankfort Sub ID# 645 00			
PSI ENER	MADISON	Madison District	NWWASH	New Washington 34.5 KV Sub ID# 558 00			
PSI ENER	MADISON	Madison District	NMADISN	North Madison Sub ID# 332 00			
PSI ENER	MADISON	Madison District	PUMPKNCT	Pumpkin Center Sub ID# 199 00			
PSI ENER	MADISON	Madison District	SCOTTSBG	Scottsburg Sub ID# 249 00			
PSI ENER	MADISON	Madison District	VEVAYVN	Vevay Vineyard St Sub ID# 455 00			
PSI ENER	MRTNSVLE	Martinsville Distr	BEANBLO	Bean Blossom Sub ID# 404 00			
PSI ENER	MRTNSVLE	Martinsville Distr	BROOKLYN	Brooklyn Sub ID# 522 00			
PSI ENER	MRTNSVLE	Martinsville Distr	CENTERTO	Centerton Sub ID# 295 00			
PSI ENER	MRTNSVLE	Martinsville Distr	GOSPORT	Gosport Sub ID# 377 00			
PSI ENER	MRTNSVLE	Martinsville Distr	MRTNSVE	Martinsville East Sub ID# 419 00			
PSI ENER	MRTNSVLE	Martinsville Distr	MRTNSVL SE JCT	Martinsville Southeast Jct Sub ID# 235 00			
PSI ENER	MRTNSVLE	Martinsville Distr	SOUTHEAS	Martinsville Southeast Sub ID# 409 00			
PSI ENER	MRTNSVLE	Martinsville Distr	MRTNSVL	Martinsville Sub ID# 734 00			
PSI ENER	MRTNSVLE	Martinsville Distr	PARAGON	Paragon Sub ID# 772 00			
PSI ENER	MRTNSVLE	Martinsville Distr	SPENCER	Spencer 230 KV Sub ID# 250 00			
PSI ENER	MRTNSVLE	Martinsville Distr	SPENC69	Spencer 69 KV Sub ID# 384 00			
PSI ENER	NEWCASTLE	New Castle Distr	CADIZ138	Cadiz 138 KV Sub ID# 261 00			
PSI ENER	NEWCASTLE	New Castle Distr	CARTHAGE	Carthage Sub ID# 731 00			
PSI ENER	NEWCASTLE	New Castle Distr	CNTRVL	Centerville 138 KV Sub ID# 187 00			
PSI ENER	NEWCASTLE	New Castle Distr	FTNJCT	Fountain City Jct Sub ID# 264 00			
PSI ENER	NEWCASTLE	New Castle Distr	FTNCTY	Fountain City Sub ID# 303 00			
PSI ENER	NEWCASTLE	New Castle Distr	HASTINGS	Greenfield Hastings Park Sub ID# 678 00			
PSI ENER	NEWCASTLE	New Castle Distr	GRNFLDN	Greenfield North Sub ID# 513 00			Muni-owned
PSI ENER	NEWCASTLE	New Castle Distr	GRNFLD	Greenfield Sub ID# 790 00			Muni-owned
PSI ENER	NEWCASTLE	New Castle Distr	GRNSBORO	Greensboro Sub ID# 277 00			REMC-owned
PSI ENER	NEWCASTLE	New Castle Distr	GRNSFRK	Greensfork Sub ID# 516 00			
PSI ENER	NEWCASTLE	New Castle Distr	HAGRSTWN	Hagerstown Sub ID# 221 00			
PSI ENER	NEWCASTLE	New Castle Distr	HENRYCO	Henry Co Peaker Sta Sub ID# 238 00			
PSI ENER	NEWCASTLE	New Castle Distr	HENRYHOS	Henry Co. Hospital Sub ID# 801 00			
PSI ENER	NEWCASTLE	New Castle Distr	IMPA-RICHMOND	Impa-Richmond Sub ID# 1360 00			Muni-owned
PSI ENER	NEWCASTLE	New Castle Distr	KNGTSTN	Knightstown Sub ID# 710 00			
PSI ENER	NEWCASTLE	New Castle Distr	LWSVL	Lewisville Sub ID# 531 00			
PSI ENER	NEWCASTLE	New Castle Distr	MRKLEVL	Markleville Sub ID# 716 00			
PSI ENER	NEWCASTLE	New Castle Distr	MAXWJCT	Maxwell Junction Switching Sta Sub ID# 1359 00			
PSI ENER	NEWCASTLE	New Castle Distr	MIDTOWN	Middletown Sub ID# 495 00			
PSI ENER	NEWCASTLE	New Castle Distr	NWCHRY	New Castle Chrysler Sub ID# 1347 00			Customer-owned
PSI ENER	NEWCASTLE	New Castle Distr	GREDECO	New Castle Grede Corp Sub ID# 498 00			
PSI ENER	NEWCASTLE	New Castle Distr	NWCSTLE	New Castle I Ave Sub ID# 241 00			
PSI ENER	NEWCASTLE	New Castle Distr	INGER#1	New Castle Ingersoll #1 Sub ID# 706 00			
PSI ENER	NEWCASTLE	New Castle Distr	INGER#3	New Castle Ingersoll #3 Sub ID# 550 00			
PSI ENER	NEWCASTLE	New Castle Distr	MORTONST	New Castle Morton St Sub ID# 366 00			
PSI ENER	NEWCASTLE	New Castle Distr	SEWAGED	New Castle Sewage Dispo Sub ID# 1072 00			
PSI ENER	NEWCASTLE	New Castle Distr	NCSPRING	New Castle Spring St Sub ID# 344 00			
PSI ENER	NEWCASTLE	New Castle Distr	THRNBURG	New Castle Thornburg St Sub ID# 335 00			
PSI ENER	NEWCASTLE	New Castle Distr	NWRICH	Northwest Richmond Sub ID# 777 00			
PSI ENER	NEWCASTLE	New Castle Distr	SPICELAN	Spiceland Sub ID# 458 00			
PSI ENER	NEWCASTLE	New Castle Distr	WILBRCH	Willow Branch Sub ID# 519 00			
PSI ENER	NOBLE	Noblesville Distr	ARCADIANTH	Arcadia North Sub ID# 650 00			
PSI ENER	NOBLE	Noblesville Distr	ARCADIA	Arcadia Sub ID# 385 00			
PSI ENER	NOBLE	Noblesville Distr	CICERO	Cicero Sub ID# 489 00			
PSI ENER	NOBLE	Noblesville Distr	FISHERSNORTH	Fishers North Sub ID# 579 00			
PSI ENER	NOBLE	Noblesville Distr	OLIO RD	Fishers Olio Rd Sub ID# 360 00			
PSI ENER	NOBLE	Noblesville Distr	FISHERSO	Fishers South Sub ID# 541 00			
PSI ENER	NOBLE	Noblesville Distr	FISHERS	Fishers Sub ID# 666 00			
PSI ENER	NOBLE	Noblesville Distr	FORTVILL	Fortville Sub ID# 380 00			REMC-owned
PSI ENER	NOBLE	Noblesville Distr	GEIST	Geist Sub ID# 290 00			REMC-owned
PSI ENER	NOBLE	Noblesville Distr	HORTONVILLE	Hortonville Sub ID# 222 00			
PSI ENER	NOBLE	Noblesville Distr	ANDERSON	Impa-Anderson Sub ID# 1358 00			Muni-owned
PSI ENER	NOBLE	Noblesville Distr	BRCKWYGL	Lapel Brockway Glass Sub ID# 570 00			
PSI ENER	NOBLE	Noblesville Distr	LAPELJCT	Lapel Jct Sub ID# 192 00			
PSI ENER	NOBLE	Noblesville Distr	LAPEL	Lapel Sub ID# 775 00			
PSI ENER	NOBLE	Noblesville Distr	LEEHANNA	Lee Hanna 69 Sub ID# 355 00			
PSI ENER	NOBLE	Noblesville Distr	MAXWELL	Maxwell Sub ID# 654 00			
PSI ENER	NOBLE	Noblesville Distr	MOHAWK	Mohawk 138 KV Sub ID# 246 00			
PSI ENER	NOBLE	Noblesville Distr	MOHAWK34	Mohawk 34.5 KV Sub ID# 364 00			
PSI ENER	NOBLE	Noblesville Distr	MORSERES	Morse Reservoir Sub ID# 509 00			
PSI ENER	NOBLE	Noblesville Distr	MTCOMFOR	Mt Comfort Sub ID# 476 00			REMC-owned
PSI ENER	NOBLE	Noblesville Distr	NOB 8TH	Noblesville 8th St Sub ID# 622 00			
PSI ENER	NOBLE	Noblesville Distr	FIRESTN	Noblesville Firestone Sub ID# 673 00			
PSI ENER	NOBLE	Noblesville Distr	NOB	Noblesville Gen Sta. Sub ID# 223 00			
PSI ENER	NOBLE	Noblesville Distr	NOBNOEA	Noblesville Northeast Sub ID# 768 00			
PSI ENER	NOBLE	Noblesville Distr	NOB SW	Noblesville Southwest Sub ID# 450 00			
PSI ENER	NOBLE	Noblesville Distr	TRWINC	Noblesville TRW Inc Sub ID# 636 00			
PSI ENER	NOBLE	Noblesville Distr	WELLNGTN	Noblesville Wellington Sub ID# 623 00			
PSI ENER	NOBLE	Noblesville Distr	PENDLETN	Pendleton Sub ID# 754 00			Muni-owned
PSI ENER	NOBLE	Noblesville Distr	SHERIDAN	Sheridan Sub ID# 390 00			
PSI ENER	NOBLE	Noblesville Distr	WSTMARA	Westfield Marathon Sub ID# 749 00			
PSI ENER	NOBLE	Noblesville Distr	WESTFLD NE	Westfield Northeast Sub ID# 642 00			

<u>Company</u>	<u>District Code</u>	<u>Maint District</u>	<u>Sub Code</u>	<u>Substation</u>	<u>Foreign Ownership?</u>	<u>Bldg ?</u>	<u>Asbestos ?</u>
PSI ENER	NOBLE	Noblesville Distri	WESTFLD	Westfield Sub ID# 370.00			
PSI ENER	PLFD	Plainfield Danvill	ADVANCE	Advance Sub ID# 668.00			
PSI ENER	PLFD	Plainfield Danvill	AIRWEST	Airwest Sub ID# 475.00			
PSI ENER	PLFD	Plainfield Danvill	AMO	AMO 345 Sub ID# 306.00			
PSI ENER	PLFD	Plainfield Danvill	AMOCCLAY	Amo-Clayton Line Regs Sub ID# 1116.00			
PSI ENER	PLFD	Plainfield Danvill	AVONEAST	Avon East Sub ID# 766.00	Foreign Utility-owned		
PSI ENER	PLFD	Plainfield Danvill	AVON SOUTH	Avon South Sub ID# 603.00			
PSI ENER	PLFD	Plainfield Danvill	BELLVLE	Belleville Sub ID# 660.00			
PSI ENER	PLFD	Plainfield Danvill	BROWNSBG	Brownsburg North Sub ID# 418.00			
PSI ENER	PLFD	Plainfield Danvill	BRWNSBG	Brownsburg Sub ID# 471.00			
PSI ENER	PLFD	Plainfield Danvill	DANVILLE	Danville Sub ID# 362.00	Foreign Utility-owned		
PSI ENER	PLFD	Plainfield Danvill	JAMMARA	Jamestown Marathon Oil Sub ID# 600.00			
PSI ENER	PLFD	Plainfield Danvill	JMSTWNMU	Jamestown Municipal Sub ID# 1002.00			
PSI ENER	PLFD	Plainfield Danvill	PTSBORO	Pittsboro 69 Sub ID# 369.00			
PSI ENER	PLFD	Plainfield Danvill	PITTSBOR	Pittsboro Town Sub ID# 1003.00			
PSI ENER	PLFD	Plainfield Danvill	PLFD69	Plainfield 69 Sub ID# 539.00			
PSI ENER	PLFD	Plainfield Danvill	PLFDEST	Plainfield East Sub ID# 729.00			
PSI ENER	PLFD	Plainfield Danvill	PLFDSD	Plainfield South Sub ID# 163.00			
PSI ENER	PLFD	Plainfield Danvill	PRSTWCK	Prestwick Sub ID# 575.00	Foreign Utility-owned		
PSI ENER	PLFD	Plainfield Danvill	QUALSTML	Qualitech Steel Mill (Steel Dynamics) Sub ID# 176.00			
PSI ENER	PLFD	Plainfield Danvill	STLSVL	Stilesville Sub ID# 197.00			
PSI ENER	PRNCTN	Princeton Distric	ELBRFLDN	Elberfeld North Sub ID# 692.00			
PSI ENER	PRNCTN	Princeton Distric	ELBFLDSD	Elberfeld South Sub ID# 667.00			
PSI ENER	PRNCTN	Princeton Distric	GIBSON CLMN	Gibson County Coal Mine Sub ID# 299.20	Customer-owned		
PSI ENER	PRNCTN	Princeton Distric	GIBSN	Gibson Gen Sta Sub ID# 232.00			
PSI ENER	PRNCTN	Princeton Distric	IRELNDW	Ireland West Sub ID# 252.00			
PSI ENER	PRNCTN	Princeton Distric	MACKEY	Mackey Sub ID# 449.00			
PSI ENER	PRNCTN	Princeton Distric	MISC_PRNCTN	Miscellaneous - Princeton District			
PSI ENER	PRNCTN	Princeton Distric	OAKLND	Oakland City Sub ID# 242.00			
PSI ENER	PRNCTN	Princeton Distric	OWNSVLE	Owensville Sub ID# 493.00			
PSI ENER	PRNCTN	Princeton Distric	PTSBGIND	Petersburg Ind Park Sub ID# 588.00			
PSI ENER	PRNCTN	Princeton Distric	PTRSBG	Petersburg Sub ID# 725.00			
PSI ENER	PRNCTN	Princeton Distric	POSEYVL	Poseyville Sub ID# 374.00			
PSI ENER	PRNCTN	Princeton Distric	PRINCETN	Princeton Sub ID# 156.00			
PSI ENER	ROCHESTER	Rochester Distri	AKRON	Akron Sub ID# 578.00	REMC-owned		
PSI ENER	ROCHESTER	Rochester Distri	DEVL345	Deedsville 345 KV Sub ID# 245.00	Muni-owned		
PSI ENER	ROCHESTER	Rochester Distri	LUCERNE	Lucerne Sub ID# 658.00	REMC-owned		
PSI ENER	ROCHESTER	Rochester Distri	MACY	Macy Sub ID# 457.00			
PSI ENER	ROCHESTER	Rochester Distri	METEA	Metea Sub ID# 573.00	REMC-owned		
PSI ENER	ROCHESTER	Rochester Distri	METALPRO	Rochester Metal Products Sub ID# 368.00			
PSI ENER	ROCHESTER	Rochester Distri	ROCHSTR	Rochester Sub ID# 728.00			
PSI ENER	SEYMOUR	Seymour District	BROWNSTN	Brownstown Sub ID# 405.00			
PSI ENER	SEYMOUR	Seymour District	BRNSWST	Brownstown Switching Sta Sub ID# 181.00			
PSI ENER	SEYMOUR	Seymour District	CHESTNUT	Chestnut Ridge Sub ID# 309.00			
PSI ENER	SEYMOUR	Seymour District	CORTLAND	Cortland Sub ID# 464.00			
PSI ENER	SEYMOUR	Seymour District	CROTSVL	Crothersville Sub ID# 665.00			
PSI ENER	SEYMOUR	Seymour District	DUDLYTJC	Dudleytown Jct Sub ID# 507.00			
PSI ENER	SEYMOUR	Seymour District	DUDLYTWN	Dudleytown Sub ID# 354.00			
PSI ENER	SEYMOUR	Seymour District	HAYDEN	Hayden Sub ID# 611.00			
PSI ENER	SEYMOUR	Seymour District	HOUSTNMI	Houston Microwave Sub ID# 1201.00	Foreign Utility-owned		
PSI ENER	SEYMOUR	Seymour District	MEDORA	Medora Sub ID# 477.00			
PSI ENER	SEYMOUR	Seymour District	MUSCCOL	Muscatatuck Colony Sub ID# 530.00			
PSI ENER	SEYMOUR	Seymour District	NVERNON	North Vernon 138 KV Sub ID# 229.00			
PSI ENER	SEYMOUR	Seymour District	NVERNJCTN	North Vernon Jct Sub ID# 275.00			
PSI ENER	SEYMOUR	Seymour District	NVMAINST	North Vernon Main St Sub ID# 488.00			
PSI ENER	SEYMOUR	Seymour District	NV WEST	North Vernon West Sub ID# 359.00			
PSI ENER	SEYMOUR	Seymour District	PLEASNTG	Pleasant Grove Sub ID# 263.00			
PSI ENER	SEYMOUR	Seymour District	REDNGTN	Reddington Sub ID# 340.00			
PSI ENER	SEYMOUR	Seymour District	SEYMR138	Seymour 138 KV Sub ID# 267.00			
PSI ENER	SEYMOUR	Seymour District	AIRPORTR	Seymour Airport Rd Sub ID# 693.00			
PSI ENER	SEYMOUR	Seymour District	SEYJUMEN	Seymour Cummins Engine Sub ID# 788.00			
PSI ENER	SEYMOUR	Seymour District	ESTINDPK	Seymour Eastside Ind Park Sub ID# 664.00			
PSI ENER	SEYMOUR	Seymour District	OBRINST	Seymour O'Brien St Sub ID# 577.00			
PSI ENER	SEYMOUR	Seymour District	SPURGCNR	Spurgeon Corner Sub ID# 783.00			
PSI ENER	SEYMOUR	Seymour District	TXEATR14	Texas Eastern Trans #14 Sub ID# 208.00	Customer-owned		
PSI ENER	SHLBYVLE	Shelbyville Distri	ANDERSNV	Andersonville Sub ID# 672.00			
PSI ENER	SHLBYVLE	Shelbyville Distri	FIVEPTS	Five Points Sub ID# 165.00			
PSI ENER	SHLBYVLE	Shelbyville Distri	FOUNTTN	Fountaintown Sub ID# 383.00			
PSI ENER	SHLBYVLE	Shelbyville Distri	GLENWOOD	Glenwood Sub ID# 305.00			
PSI ENER	SHLBYVLE	Shelbyville Distri	GWNVLE	Gwynneville Sub ID# 273.00			
PSI ENER	SHLBYVLE	Shelbyville Distri	MORRISTN	Morristown Sub ID# 462.00			
PSI ENER	SHLBYVLE	Shelbyville Distri	NWPALES	New Palestine Sub ID# 349.00			
PSI ENER	SHLBYVLE	Shelbyville Distri	NRINTAT	NR Rushville Intat Sub ID# 473 CO			
PSI ENER	SHLBYVLE	Shelbyville Distri	PRESCOTT	Prescott Sub ID# 230.00	Muni-owned		
PSI ENER	SHLBYVLE	Shelbyville Distri	RUSHVLINT	Rushville Intat Sub ID# 473.00	Customer-owned		
PSI ENER	SHLBYVLE	Shelbyville Distri	RUSHVILLE	Rushville Sub ID# 454.00			
PSI ENER	SHLBYVLE	Shelbyville Distri	LIBOWFO	Shelbyville Libbey Owens Ford Sub ID# 484.00			
PSI ENER	SHLBYVLE	Shelbyville Distri	SHELNOB	Shelbyville Noble St Sub ID# 615.00			
PSI ENER	SHLBYVLE	Shelbyville Distri	SHELBYNE	Shelbyville Northeast Sub ID# 203.00			
PSI ENER	SHLBYVLE	Shelbyville Distri	SHLBYNRD	Shelbyville Northridge Sub ID# 437.00			
PSI ENER	SHLBYVLE	Shelbyville Distri	SHELSDOW	Shelbyville Southwest Sub ID# 180.00			
PSI ENER	SULLIVAN	Sullivan District	AMAX	Amax Minniehaha Mine Sub ID# 696.00			
PSI ENER	SULLIVAN	Sullivan District	BLOOMFLD	Bloomfield Sub ID# 204.00			
PSI ENER	SULLIVAN	Sullivan District	BUCKCRK	Buck Creek Coal Inc Sub ID# 388.00			
PSI ENER	SULLIVAN	Sullivan District	BUCKTWN	Bucktown Sub ID# 482.00			
PSI ENER	SULLIVAN	Sullivan District	CLAY CTY	Clay City Sub ID# 779.00			
PSI ENER	SULLIVAN	Sullivan District	COALMONT	Coalmont Sub ID# 559.00			
PSI ENER	SULLIVAN	Sullivan District	DUGGER	Dugger Sub ID# 694.00			

Company	District Code	Maint District	Sub Code	Substation	Foreign Ownership?	Bldg ?	Asbestos ?
PSI ENER	SULLIVAN	Sullivan District	ELNORA	Einora Sub ID# 582.00			
PSI ENER	SULLIVAN	Sullivan District	HYMERA	Hymera Sub ID# 705.00			
PSI ENER	SULLIVAN	Sullivan District	JSNVL138	Jasonville 138 KV Sub ID# 172.00			
PSI ENER	SULLIVAN	Sullivan District	JSNVL34	Jasonville 34.5 KV Sub ID# 707.00			
PSI ENER	SULLIVAN	Sullivan District	JASNEAST	Jasonville East Sub ID# 239.00		Decommissioned?	
PSI ENER	SULLIVAN	Sullivan District	JASNVLRE	Jasonville Line Regulator Sub ID# 1069.00		Decommissioned?	
PSI ENER	SULLIVAN	Sullivan District	LINTONGE	Linton GE Sub ID# 1343.00			
PSI ENER	SULLIVAN	Sullivan District	LINTON	Linton Sub ID# 182.00			
PSI ENER	SULLIVAN	Sullivan District	LINTONTN	Linton Town Metering Sub ID# 1064.00		Muni-owned	
PSI ENER	SULLIVAN	Sullivan District	LYONSREG	Lyons Regulator Sub ID# 142.00			
PSI ENER	SULLIVAN	Sullivan District	MEROM	Merom Sub ID# 521.00			
PSI ENER	SULLIVAN	Sullivan District	MIDLAND	Midland Sub ID# 769.00			
PSI ENER	SULLIVAN	Sullivan District	NWLEBAN	New Lebanon Sub ID# 486.00			
PSI ENER	SULLIVAN	Sullivan District	NEWBERRY	Newberry Sub ID# 496.00			
PSI ENER	SULLIVAN	Sullivan District	OAKTOWN	Oaktown Sub ID# 722.00			
PSI ENER	SULLIVAN	Sullivan District	ODON	Odon Sub ID# 480.00			
PSI ENER	SULLIVAN	Sullivan District	PEADUG	Peabody Coal Dugger Mine Sub ID# 589		Customer-owned	
PSI ENER	SULLIVAN	Sullivan District	PEABDY	Peabody Coal Hawthorne Sub ID# 540.00		Customer-owned	
PSI ENER	SULLIVAN	Sullivan District	PLAINVL	Plainville Sub ID# 500.00			
PSI ENER	SULLIVAN	Sullivan District	SANDBORN	Sandborn 138 KV Sub ID# 408.00			
PSI ENER	SULLIVAN	Sullivan District	SULLIVN NO	Sullivan North Sub ID# 723.00			
PSI ENER	SULLIVAN	Sullivan District	SULLIVN	Sullivan Sub ID# 255.00			
PSI ENER	SULLIVAN	Sullivan District	SWITZCTY	Switz City Sub ID# 510.00			
PSI ENER	SULLIVAN	Sullivan District	WORTHNTN	Worthington 34.5 KV Sub ID# 447.00			
PSI ENER	SULLIVAN	Sullivan District	WORTHGNTN	Worthington 69 KV Sub ID# 260.00			
PSI ENER	THAUTE	Terre Haute Dist	ALLENLNDL	Allendale Sub ID# 333.00			
PSI ENER	THAUTE	Terre Haute Dist	CF IND	C F Industries Sub ID# 196.00			
PSI ENER	THAUTE	Terre Haute Dist	DRESSER	Dresser Sub ID# 216.00			
PSI ENER	THAUTE	Terre Haute Dist	E GLENN	East Glenn Sub ID# 661.00			
PSI ENER	THAUTE	Terre Haute Dist	N THAUTE	North Terre Haute Sub ID# 714.00			
PSI ENER	THAUTE	Terre Haute Dist	REG HOSP	Regional Hospital Sub ID# 1071.00			
PSI ENER	THAUTE	Terre Haute Dist	RILEY	Riley Sub ID# 386.00			
PSI ENER	THAUTE	Terre Haute Dist	SANFORD	Sandford Road Sub ID# 596.00			
PSI ENER	THAUTE	Terre Haute Dist	SPLTVL M	Spelterville Metering Sta Sub ID# 175.00			
PSI ENER	THAUTE	Terre Haute Dist	SUGAR CREEK	Sugar Creek Gen Sta Sub ID# 1363.00			
PSI ENER	THAUTE	Terre Haute Dist	TH 13TH	Terre Haute 13th St Sub ID# 737.00			
PSI ENER	THAUTE	Terre Haute Dist	TH 25TH	Terre Haute 25th St Sub ID# 762.00			
PSI ENER	THAUTE	Terre Haute Dist	TH 29TH	Terre Haute 29th St Sub ID# 456.00			
PSI ENER	THAUTE	Terre Haute Dist	TH 6TH	Terre Haute 6th St Sub ID# 432.00			
PSI ENER	THAUTE	Terre Haute Dist	TH AET	Terre Haute A.E.T. Sub ID# 739.00			
PSI ENER	THAUTE	Terre Haute Dist	AMPACET	Terre Haute Ampacet Sub ID# 389.00			
PSI ENER	THAUTE	Terre Haute Dist	CSN	Terre Haute CSN Sub ID# 1370.00			
PSI ENER	THAUTE	Terre Haute Dist	DEMINGST	Terre Haute Deming St Sub ID# 656.00			
PSI ENER	THAUTE	Terre Haute Dist	TH EAST	Terre Haute East Sub ID# 162.00			
PSI ENER	THAUTE	Terre Haute Dist	FRUITRDG	Terre Haute Fruitridge Ave Sub ID# 413.00			
PSI ENER	THAUTE	Terre Haute Dist	GARTLND	Terre Haute Garland Fdy Sub ID# 1054.00			
PSI ENER	THAUTE	Terre Haute Dist	HONEYCRK	Terre Haute Honey Creek Sub ID# 451.00			
PSI ENER	THAUTE	Terre Haute Dist	K-MART	Terre Haute K-Mart Xtr Sub ID# 1045.00			
PSI ENER	THAUTE	Terre Haute Dist	MAPLE AV	Terre Haute Maple Ave Sub ID# 715.00			
PSI ENER	THAUTE	Terre Haute Dist	MARGRTA	Terre Haute Margaret Ave Sub ID# 795.00			
PSI ENER	THAUTE	Terre Haute Dist	PFIZER	Terre Haute Pfizer Corp Sub ID# 465.00			
PSI ENER	THAUTE	Terre Haute Dist	PFIZERJC	Terre Haute Pfizer Jct Sub ID# 282.00			
PSI ENER	THAUTE	Terre Haute Dist	THPILBCO	Terre Haute Pillsbury Co Sub ID# 320.00			
PSI ENER	THAUTE	Terre Haute Dist	QUAKERM	Terre Haute Quakermaid (Jadcore) Sub ID# 675.00			
PSI ENER	THAUTE	Terre Haute Dist	SANDCUT	Terre Haute Sandcut Sub ID# 378.00			
PSI ENER	THAUTE	Terre Haute Dist	TH S 1ST	Terre Haute South 1st St Sub ID# 605.00			
PSI ENER	THAUTE	Terre Haute Dist	SO VIGO	Terre Haute South Vigo Sub ID# 688.00			
PSI ENER	THAUTE	Terre Haute Dist	TH SPRUC	Terre Haute Spruce Sub ID# 511.00			
PSI ENER	THAUTE	Terre Haute Dist	TREDEGAR	Terre Haute Tredegar Sub ID# 796.00			
PSI ENER	THAUTE	Terre Haute Dist	USPRISON	Terre Haute U.S. Prison Sub ID# 743.00			
PSI ENER	THAUTE	Terre Haute Dist	TH UN NO	Terre Haute Ungnd North Alley Sub ID# 1062.01			
PSI ENER	THAUTE	Terre Haute Dist	TH UNGND	Terre Haute Ungnd South Alley Sub ID# 1062.00			
PSI ENER	THAUTE	Terre Haute Dist	VIGOCOIND	Terre Haute Vigo County Industrial Sub ID# 651.00			
PSI ENER	THAUTE	Terre Haute Dist	WATER ST	Terre Haute Water St 138 KV Sub ID# 448.00			
PSI ENER	THAUTE	Terre Haute Dist	WESTON	Terre Haute Weston Paper #1 (International Paper) Sub ID# 525.00			
PSI ENER	THAUTE	Terre Haute Dist	WESTONPA	Terre Haute Weston Paper #2 (International Paper) Sub ID# 746.00			
PSI ENER	THAUTE	Terre Haute Dist	TOAD HOP	Toad Hop Sub ID# 752.00			
PSI ENER	THAUTE	Terre Haute Dist	WBRGS	Wabash River Gen Sta. Sub ID# 266.00			
PSI ENER	THAUTE	Terre Haute Dist	W VIGO	West Vigo Sub ID# 527.00			
PSI ENER	VNCEN	Vincennes Distri	ALLEGHNEY	Allegheny Switch Yard Sub ID# 336.00		Foreign Utility-owned	
PSI ENER	VNCEN	Vincennes Distri	BICKNELL	Bicknell Sub ID# 518.00			
PSI ENER	VNCEN	Vincennes Distri	BLBEAIR	Black Beauty Air Quality Sub ID# 659.00			
PSI ENER	VNCEN	Vincennes Distri	BRUCEVL	Bruceville Sub ID# 532.00			
PSI ENER	VNCEN	Vincennes Distri	CRANE	Crane Metering Sta Sub ID# 244.00			
PSI ENER	VNCEN	Vincennes Distri	CRANEW	Crane West Metering Sta Sub ID# 214.00			
PSI ENER	VNCEN	Vincennes Distri	DECKEREA	Decker East Sub ID# 674.00			
PSI ENER	VNCEN	Vincennes Distri	DOVERHL	Dover Hill Microwave Sub ID# 3520.00		Customer-owned	
PSI ENER	VNCEN	Vincennes Distri	EPORT	Edwardsport Gen Sta. Sub ID# 218.00			
PSI ENER	VNCEN	Vincennes Distri	EDWSPTN	Edwardsport Town Sub ID# 436.00			
PSI ENER	VNCEN	Vincennes Distri	FRELANDVL	Freelandville Sub ID# 698.00			
PSI ENER	VNCEN	Vincennes Distri	LOOGOOTE	Loogootee Sub ID# 169.00			
PSI ENER	VNCEN	Vincennes Distri	ROYALOK	Royal Oak Jct Sw Sta Sub ID# 248.00			
PSI ENER	VNCEN	Vincennes Distri	SHENDOAH	Shenandoah Sub ID# 662.00			
PSI ENER	VNCEN	Vincennes Distri	VNCEN138	Vincennes 138 Sub ID# 257.00			
PSI ENER	VNCEN	Vincennes Distri	BAYOU	Vincennes Bayou St. Sub ID# 474.00			
PSI ENER	VNCEN	Vincennes Distri	HAMLNGNL	Vincennes Hamilton Glass Sub ID# 316.00			
PSI ENER	VNCEN	Vincennes Distri	JOHNSN	Vincennes Johnson Control Sub ID# 311.00			
PSI ENER	VNCEN	Vincennes Distri	LEVEEBLV	Vincennes Levee Blvd Sub ID# 342.00			

<u>Company</u>	<u>District Code</u>	<u>Maint District</u>	<u>Sub Code</u>	<u>Substation</u>	<u>Foreign Ownership?</u>	<u>Bldg ?</u>	<u>Asbestos ?</u>
PSI ENER	VNCEN	Vincennes Distri	MAIN ST	Vincennes Main St Sub ID# 302.00			
PSI ENER	VNCEN	Vincennes Distri	V SO 6TH	Vincennes South 6th St Sub ID# 313.00			
PSI ENER	VNCEN	Vincennes Distri	VINCUNI	Vincennes University Sub ID# 325.00			
PSI ENER	VNCEN	Vincennes Distri	VIGO ST	Vincennes Vigo St Sub ID# 745.00			
PSI ENER	VNCEN	Vincennes Distri	WSHMUN	Washington Municipal 10th Sub ID# 394.00	Muni-owned		
PSI ENER	VNCEN	Vincennes Distri	WHTLNDE	Wheatland East Sub ID# 434.00			
PSI ENER	VNCEN	Vincennes Distri	WHEATLND	Wheatland Sub ID# 773.00			
PSI ENER	VNCEN	Vincennes Distri	WHITFIEL	Whitfield Sub ID# 628.00			
PSI ENER	WABASH	Wabash District	COLLAMER	Collamer Sub ID# 438.00			
PSI ENER	WABASH	Wabash District	DEEDSVL	Deedsville 69 KV Sub ID# 391.00	REMC-owned		
PSI ENER	WABASH	Wabash District	W HOPEWELL	Hopewell Sub ID# 1365.00	REMC-owned		
PSI ENER	WABASH	Wabash District	LAGRO	Lagro Sub ID# 552.00			
PSI ENER	WABASH	Wabash District	NM9THSTR	North Manchester 9th St Sub ID# 759.00			
PSI ENER	WABASH	Wabash District	NMANFDRY	North Manchester Foundry Sub ID# 626.00			
PSI ENER	WABASH	Wabash District	NMANCHST	North Manchester Sub ID# 721.00			
PSI ENER	WABASH	Wabash District	NMANSWST	North Manchester Sw Sta Sub ID# 294.00	Muni-owned		
PSI ENER	WABASH	Wabash District	PERUMUN	Peru Municipal Jct Sw Sta Sub ID# 259.00			
PSI ENER	WABASH	Wabash District	PERUSOEA	Peru Southeast Sub ID# 231.00	Muni-owned		
PSI ENER	WABASH	Wabash District	ROANN	Roann Sub ID# 580.00			
PSI ENER	WABASH	Wabash District	SOWHIT	South Whitley Sub ID# 399.00			
PSI ENER	WABASH	Wabash District	TREATY	Treaty Sub ID# 793.00			
PSI ENER	WABASH	Wabash District	URBANA	Urbana Sub ID# 398.00	REMC-owned		
PSI ENER	WABASH	Wabash District	WABASH138	Wabash 138 Sub ID# 270.00			
PSI ENER	WABASH	Wabash District	CHIPPEWA	Wabash Chippewa Sub ID# 481.00			
PSI ENER	WABASH	Wabash District	GENERLTR	Wabash General Tire Sub ID# 612.00			

**Welles, Sarah**

**From:** Stevens, George  
**Sent:** Friday, December 30, 2005 11:40 AM  
**To:** Glenn, Erica  
**Cc:** Reynolds, Jaime; Bloemer, John; Wilson, Dale  
**Subject:** RE: V1 FASB FIN 47 Accounting Data 122105.xls

**Attachments:** V2 FASB FIN 47 Accounting Data 123005.xls



V2 FASB FIN 47  
Accounting Data...

Erica:

Here is the updated spreadsheet. Last week I wrote the note about Conesville correctly and then failed to update the values.

Thanks, George

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**From:** Glenn, Erica  
**Sent:** Wednesday, December 28, 2005 10:28 AM  
**To:** Stevens, George  
**Cc:** Reynolds, Jaime  
**Subject:** RE: V1 FASB FIN 47 Accounting Data 122105.xls

George,

I think this spreadsheet needs to be updated for AEP's adjustment to their Conesville estimate to 324,480 (see attached email).

Thanks,  
Erica

<< Message: RE: Conesville Unit 4 Asbestos Estimate >>

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**From:** Stevens, George  
**Sent:** Wednesday, December 21, 2005 9:10 AM  
**To:** Glenn, Erica; Sheppard, Amy  
**Cc:** Bloemer, John; Wilson, Dale  
**Subject:** V1 FASB FIN 47 Accounting Data 122105.xls

<< File: V1 FASB FIN 47 Accounting Data 122105.xls >>

Erica and Amy:

This is the updated file showing the cooling tower fill at East Bend (and likewise assumed to be at Killen).

George

Asbestos Remediation Cost Estimates for FASB FIN 47

Unit	Total from Sargent and Lundy Report	Total with Common facilities (ALL) Allocated to each Unit	Percent FERC Code 311 Structures	Percent FERC Code 312 Boilers	Percent FERC Code 314 Turbine	Percent FERC Code 316 Misc.	Total for FERC Code 311 Structures	Whole Unit	Whole Unit	Whole Unit	Whole Unit	Check Total	Ownership Percentage	Share Unit	Share Unit	Share Unit	Share Unit	Notes
														Total for FERC Code 311 Structures	Total for FERC Code 312 Boilers	Total for FERC Code 314 Turbine	Total for FERC Code 316 Misc.	
Beckjord 1	\$ 503,936	\$ 503,936	0%	78.89%	21.11%	0%	\$ -	\$ 397,555	\$ 106,381	\$ -	\$ -	\$ -	100%	\$ -	\$ 397,555	\$ 106,381	\$ -	
Beckjord 2	\$ 544,876	\$ 544,876	0%	78.89%	21.11%	0%	\$ -	\$ 429,853	\$ 115,023	\$ -	\$ -	\$ -	100%	\$ -	\$ 429,853	\$ 115,023	\$ -	
Beckjord 3	\$ 480,213	\$ 480,213	0%	78.89%	21.11%	0%	\$ -	\$ 378,840	\$ 101,373	\$ -	\$ -	\$ -	100%	\$ -	\$ 378,840	\$ 101,373	\$ -	
Beckjord 4	\$ 1,238,322	\$ 1,238,322	0%	78.89%	21.11%	0%	\$ -	\$ 976,912	\$ 261,410	\$ -	\$ -	\$ -	100%	\$ -	\$ 976,912	\$ 261,410	\$ -	
Beckjord 5	\$ 477,465	\$ 477,465	0%	78.89%	21.11%	0%	\$ -	\$ 376,672	\$ 100,793	\$ -	\$ -	\$ -	100%	\$ -	\$ 376,672	\$ 100,793	\$ -	
Beckjord 6	\$ 672,877	\$ 672,877	0%	87.84%	12.16%	0%	\$ -	\$ 591,055	\$ 81,822	\$ -	\$ -	\$ -	37.5%	\$ -	\$ 221,646	\$ 30,683	\$ -	
Beckjord All Station Total	\$ 3,917,689	\$ 3,917,689																Note 1
Cayuga 1	\$ 759,449	\$ 759,449	0.00%	87.84%	12.16%	0.00%	\$ -	\$ 667,100	\$ 92,349	\$ -	\$ -	\$ -	100%	\$ -	\$ 667,100	\$ 92,349	\$ -	
Cayuga 2	\$ 759,449	\$ 759,449	0.00%	87.84%	12.16%	0.00%	\$ -	\$ 667,100	\$ 92,349	\$ -	\$ -	\$ -	100%	\$ -	\$ 667,100	\$ 92,349	\$ -	
Cayuga All Station Total	\$ 1,518,898	\$ 1,518,898																Note 2
Conesville 4	\$ 324,480	\$ 324,480	0.00%	87.84%	12.16%	0.00%	\$ -	\$ 285,023	\$ 39,457	\$ -	\$ (0)	40%	\$ -	\$ 114,009	\$ 15,783	\$ -		Note 3
East Bend 2	\$ 853,875	\$ 853,875	0%	0%	100%	0%	\$ -	\$ -	\$ 853,875	\$ -	\$ -	69.0%	\$ -	\$ -	\$ 589,174	\$ -		Note 4
Edwardsport 6	\$ 861,990	\$ 1,066,116	7.45%	62.57%	18.28%	11.70%	\$ 79,426	\$ 667,069	\$ 194,886	\$ 124,736	\$ -	100%	\$ 79,426	\$ 667,069	\$ 194,886	\$ 124,736		
Edwardsport 7	\$ 424,296	\$ 524,773	7.45%	52.99%	27.86%	11.70%	\$ 39,096	\$ 278,077	\$ 146,202	\$ 61,398	\$ 0	100%	\$ 39,096	\$ 278,077	\$ 146,202	\$ 61,398		
Edwardsport 8	\$ 424,296	\$ 524,773	7.45%	52.99%	27.86%	11.70%	\$ 39,096	\$ 278,077	\$ 146,202	\$ 61,398	\$ 0	100%	\$ 39,096	\$ 278,077	\$ 146,202	\$ 61,398		
Edwardsport All Station Total	\$ 405,080	\$ -																Note 5
Edwardsport Station Total	\$ 2,115,662	\$ 2,115,662																
Gallagher 1	\$ 1,922,131	\$ 2,012,531	0%	84.74%	10.77%	4.49%	\$ -	\$ 1,705,418	\$ 216,750	\$ 90,363	\$ -	100%	\$ -	\$ 1,705,418	\$ 216,750	\$ 90,363		
Gallagher 2	\$ 1,922,131	\$ 2,012,531	0%	84.74%	10.77%	4.49%	\$ -	\$ 1,705,418	\$ 216,750	\$ 90,363	\$ -	100%	\$ -	\$ 1,705,418	\$ 216,750	\$ 90,363		
Gallagher 3	\$ 1,922,131	\$ 2,012,531	0%	84.74%	10.77%	4.49%	\$ -	\$ 1,705,418	\$ 216,750	\$ 90,363	\$ -	100%	\$ -	\$ 1,705,418	\$ 216,750	\$ 90,363		
Gallagher 4	\$ 1,922,131	\$ 2,012,531	0%	84.74%	10.77%	4.49%	\$ -	\$ 1,705,418	\$ 216,750	\$ 90,363	\$ -	100%	\$ -	\$ 1,705,418	\$ 216,750	\$ 90,363		
Gallagher All Station Total	\$ 361,598	\$ -																Note 6
Gallagher Station Total	\$ 8,050,122	\$ 8,050,122																
Gibson 1	\$ 1,617,370	\$ 2,430,947	100%	0%	0%	0%	\$ 2,430,947	\$ -	\$ -	\$ -	\$ -	100%	\$ 2,430,947	\$ -	\$ -	\$ -		
Gibson 2	\$ 1,617,370	\$ 2,430,947	100%	0%	0%	0%	\$ 2,430,947	\$ -	\$ -	\$ -	\$ -	100%	\$ 2,430,947	\$ -	\$ -	\$ -		
Gibson 3	\$ 1,575,175	\$ 2,367,527	100%	0%	0%	0%	\$ 2,367,527	\$ -	\$ -	\$ -	\$ -	100%	\$ 2,367,527	\$ -	\$ -	\$ -		
Gibson 4	\$ 1,575,175	\$ 2,367,527	100%	0%	0%	0%	\$ 2,367,527	\$ -	\$ -	\$ -	\$ -	100%	\$ 2,367,527	\$ -	\$ -	\$ -		
Gibson 5	\$ 1,575,175	\$ 2,367,527	100%	0%	0%	0%	\$ 2,367,527	\$ -	\$ -	\$ -	\$ -	50.05%	\$ 1,184,947	\$ -	\$ -	\$ -		
Gibson All Station Total	\$ 4,004,212	\$ -																Note 7
Gibson Station Total	\$ 11,964,477	\$ 11,964,477																
Killen 2	\$ 853,875	\$ 853,875	0%	0%	100%	0%	\$ -	\$ -	\$ 853,875	\$ -	\$ -	33.0%	\$ -	\$ -	\$ 281,779	\$ -		Note 8
Miami Fort 3	\$ 385,029	\$ 385,029	1.53%	43.56%	54.91%	0.00%	\$ 5,891	\$ 167,719	\$ 211,419	\$ -	\$ -	100%	\$ 5,891	\$ 167,719	\$ 211,419	\$ -		
Miami Fort 4	\$ 385,029	\$ 385,029	1.53%	43.56%	54.91%	0.00%	\$ 5,891	\$ 167,719	\$ 211,419	\$ -	\$ -	100%	\$ 5,891	\$ 167,719	\$ 211,419	\$ -		



Asbestos Remediation Cost Estimates for FASB FIN 47

Miami Fort 5	\$ 1,893,169	\$ 1,893,169	2.48%	79.37%	18.15%	0.00%	\$ 46,951	\$ 1,502,608	\$ 343,610	\$ -	\$ (0)	100%	\$ 46,951	\$ 1,502,608	\$ 343,610	\$ -
Miami Fort 6	\$ 2,176,075	\$ 2,176,075	19.47%	41.29%	39.24%	0.00%	\$ 423,682	\$ 898,501	\$ 853,892	\$ -	\$ -	100%	\$ 423,682	\$ 898,501	\$ 853,892	\$ -
Miami Fort 7	\$ -	\$ -	0%	0%	0%	0%	\$ -	\$ -	\$ -	\$ -	\$ -	64%	\$ -	\$ -	\$ -	\$ -
Miami Fort 8	\$ -	\$ -	0%	0%	0%	0%	\$ -	\$ -	\$ -	\$ -	\$ -	64%	\$ -	\$ -	\$ -	\$ -
Miami Fort All	\$ -	\$ -					\$ -	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	\$ -	\$ -
Station Total	\$ 4,839,302	\$ 4,839,302														
Noblesville 1	\$ -	\$ 235,573	8.48%	41.77%	49.75%	0.00%	\$ 19,977	\$ 98,399	\$ 117,198	\$ -	\$ -	100%	\$ 19,977	\$ 98,399	\$ 117,198	\$ -
Noblesville 2	\$ -	\$ 235,573	8.48%	41.77%	49.75%	0.00%	\$ 19,977	\$ 98,399	\$ 117,198	\$ -	\$ -	100%	\$ 19,977	\$ 98,399	\$ 117,198	\$ -
Noblesville 3	\$ -	\$ 235,573	8.48%	41.77%	49.75%	0.00%	\$ 19,977	\$ 98,399	\$ 117,198	\$ -	\$ -	100%	\$ 19,977	\$ 98,399	\$ 117,198	\$ -
Noblesville All	\$ 706,720	\$ -														
Station Total	\$ 706,720	\$ 706,720														
Stuart 1	\$ 1,575,175	\$ 2,376,017	100%	0%	0%	0%	\$ 2,376,017	\$ -	\$ -	\$ -	\$ -	39%	\$ 926,647	\$ -	\$ -	\$ -
Stuart 2	\$ 1,575,175	\$ 2,376,017	100%	0%	0%	0%	\$ 2,376,017	\$ -	\$ -	\$ -	\$ -	39%	\$ 926,647	\$ -	\$ -	\$ -
Stuart 3	\$ 1,575,175	\$ 2,376,017	100%	0%	0%	0%	\$ 2,376,017	\$ -	\$ -	\$ -	\$ -	39%	\$ 926,647	\$ -	\$ -	\$ -
Stuart 4	\$ 1,575,175	\$ 2,376,017	100%	0%	0%	0%	\$ 2,376,017	\$ -	\$ -	\$ -	\$ -	39%	\$ 926,647	\$ -	\$ -	\$ -
Stuart All	\$ 3,203,370	\$ -														
Station Total	\$ 9,504,070	\$ 9,504,070														
Wabash River 1	\$ 542,278	\$ 542,278	0%	84%	16%	0%	\$ -	\$ 455,514	\$ 86,764	\$ -	\$ -	100%	\$ -	\$ 455,514	\$ 86,764	\$ -
Wabash River 2	\$ 586,333	\$ 586,333	0%	88%	12%	0%	\$ -	\$ 515,973	\$ 70,360	\$ -	\$ -	100%	\$ -	\$ 515,973	\$ 70,360	\$ -
Wabash River 3	\$ 700,206	\$ 700,206	0%	90%	10%	0%	\$ -	\$ 630,185	\$ 70,021	\$ -	\$ -	100%	\$ -	\$ 630,185	\$ 70,021	\$ -
Wabash River 4	\$ 586,333	\$ 586,333	0%	88%	12%	0%	\$ -	\$ 515,973	\$ 70,360	\$ -	\$ -	100%	\$ -	\$ 515,973	\$ 70,360	\$ -
Wabash River 5	\$ 480,213	\$ 480,213	0%	90%	10%	0%	\$ -	\$ 432,192	\$ 48,021	\$ -	\$ -	100%	\$ -	\$ 432,192	\$ 48,021	\$ -
Wabash River 6	\$ 628,157	\$ 628,157	0%	78%	22%	0%	\$ -	\$ 489,962	\$ 138,195	\$ -	\$ -	100%	\$ -	\$ 489,962	\$ 138,195	\$ -
Wabash River All	\$ -	\$ -														
Station Total	\$ 3,523,520	\$ 3,523,520														
Zimmer	\$ 5,039,793	\$ 5,039,793	0%	0%	100%	0%	\$ -	\$ -	\$ 5,039,793	\$ -	\$ -	46.5%	\$ -	\$ -	\$ 2,343,504	\$ -
PSI CT Units																
CGE CT Units																
UHL&P CT Units																

Notes:

- 1 Beckjord data is from the Sargent and Lundy report dated Dec. 19, 2005; assume FERC code percentages are similar to a comparable Wabash River unit
- 2 Cayuga data is from the Sargent and Lundy report dated Dec. 19, 2005
- 3 Conesville data is from AEP email dated Dec. 19, 2005; assume FERC code percentages are similar to the Cayuga units which have same vintage
- 4 East Bend data is from the Sargent and Lundy Decommissioning Cost Estimate report dated October 31, 2005
- 5 Edwardsport data is from the Sargent and Lundy report dated Dec. 19, 2005
- 6 Gallagher data is from the Sargent and Lundy report dated Dec. 19, 2005
- 7 Gibson data is from the Sargent and Lundy report dated Dec. 19, 2005
- 8 Killen is assumed to be similar to East Bend since no data was received from DP&L
- 9 Miami Fort 3-4-5-6- data is from the Sargent and Lundy report dated Dec. 19, 2005; Miami Fort 7 and 8 are assumed to be asbestos free for this estimate.
- 10 Noblesville data is from the Sargent and Lundy report dated Dec. 19, 2005
- 11 The Stuart units are assumed to be similar to the Gibson units since no data was received from DP&L
- 12 Wabash River data is from the Sargent and Lundy report dated Dec. 19, 2005
- 13 Zimmer data is from the Sargent and Lundy report dated Dec. 19, 2005; assume cooling tower fill is in FERC account 316
- 14 All CT and CT/CC units were found to be asbestos free for this estimate

Unit	Boller Piping	Boller Surface	Boller Total - 312	Turbine Piping 314	Structures 311	Misc 316	Grand Total	Percent Boiler 312	Percent Turbine 314	Percent Structures 311	Percent Misc 316
Cayuga 1			\$ 485,152	\$ 67,174	-	-	552,326	88%	12%	0%	0%
Cayuga 2			\$ 485,152	\$ 67,174	-	-	552,326	88%	12%	0%	0%
<b>Add Directs and Indirects</b>											
Cayuga 1	-	-	\$ 667,084	\$ 92,364	-	-	759,448	87.84%	12.16%	0.00%	0.00%
Cayuga 2	-	-	\$ 667,084	\$ 92,364	-	-	759,448	87.84%	12.16%	0.00%	0.00%
<b>Total</b>			1,334,168	184,729	-	-	1,518,897				
											\$ 1,518,897
											\$ 1,104,652
											1.375

Unit	Boiler Piping	Boiler Surface	Boiler Total - 312	Turbine Piping 314	Structures 311	Misc 316	Grand Total	Percent Boiler 312	Percent Turbine 314	Percent Structures 311	Percent Misc 316
East Bend	-	-	\$ -	\$ 621,000	-	-	621,000	0%	100%	0%	0%
<b>Add Directs and Indirects</b>											
East Bend	485,152	-	\$ -	\$853,875.00	-	-	853,875	0.00%	100.00%	0.00%	0.00%
<b>Total</b>				853,875	-	-	853,875				
				Indirects Premium							10% 25% 1.375

Unit	Boiler Piping	Boiler Surface	Boiler Total - 312	Turbine Piping 314	Structures 311	Misc 316	Grand Total	Percent Boiler 312	Percent Turbine 314	Percent Structures 311	Percent Misc 316
Edwardsport 6	485,152	-	485,152	141,750	-	-	626,902				
Edwardsport 7-8	404,488	-	404,488	212,670			617,158				
Edwardsport ALL					\$ 114,604	\$ 180,000	294,604				
<b>Reallocate 311 and 316 to units</b>											
Edwardsport 6	485,152	-	485,152	141,750	57,751	90,705	775,358	63%	18%	7%	12%
Edwardsport 7-8	404,488	-	404,488	212,670	56,853	89,295	783,308	53%	28%	7%	12%
<b>Add Directs and Indirects</b>											
Edwardsport 6	485,152	-	667,084	194,906	79,407	124,719	1,086,117	62.57%	18.28%	7.45%	11.70%
Edwardsport 7-8	404,488	-	556,171	292,421	78,173	122,781	1,049,546	52.99%	27.86%	7.45%	11.70%
<b>Total</b>			1,223,255	487,328	157,581	247,500	2,115,663				
					\$ 2,115,661						
					\$ 1,538,663.00						
					1.375						

Unit	Boiler Piping	Boiler Surface	Boiler Total - 312	Turbine Piping 314	Structures 311	Misc 316	Grand Total	Percent Boiler 312	Percent Turbine 314	Percent Structures 311	Percent Misc 316
Galalgher 1	1,240,279	-	1,240,279	157,635	-	-	1,397,914				
Galalgher 2	1,240,279	-	1,240,279	157,635	-	-	1,397,914				
Galalgher 3	1,240,279	-	1,240,279	157,635	-	-	1,397,914				
Galalgher 4	1,240,279	-	1,240,279	157,635	-	-	1,397,914				
Galalgher All					\$ -	\$ 262,980	262,980				
							5,854,636				
<b>Reallocate 311 and 316 to units</b>											
Galalgher 1	1,240,279	-	1,240,279	157,635	-	65,745	1,463,659				
Galalgher 2	1,240,279	-	1,240,279	157,635	-	65,745	1,463,659				
Galalgher 3	1,240,279	-	1,240,279	157,635	-	65,745	1,463,659				
Galalgher 4	1,240,279	-	1,240,279	157,635	-	65,745	1,463,659				
							5,854,636				
<b>Add Directs and Indirects</b>											
Galalgher 1			\$ 1,705,384	\$216,748	\$ -	\$ 90,399	2,012,531	84.74%	10.77%	0.00%	4.49%
Galalgher 2			\$ 1,705,384	\$216,748	\$ -	\$ 90,399	2,012,531	84.74%	10.77%	0.00%	4.49%
Galalgher 3			\$ 1,705,384	\$216,748	\$ -	\$ 90,399	2,012,531	84.74%	10.77%	0.00%	4.49%
Galalgher 4			\$ 1,705,384	\$216,748	\$ -	\$ 90,399	2,012,531	84.74%	10.77%	0.00%	4.49%
<b>Total</b>			3,410,767	433,496	-	180,799	8,050,125				
				\$	8,050,122						
				\$	5,854,634						
					1.375						

Unit	Boiler Piping	Boiler Surface	Boiler Total - 312	Turbine Piping 314	Structures 311	Misc 316	Grand Total	Percent Boiler 312	Percent Turbine 314	Percent Structures 311	Percent Misc 316
Miami Fort 3	1,240,279	-	\$ 121,968	\$ 153,765	\$ 4,288	\$ -	280,021				
Miami Fort 4	1,240,279	-	\$ 121,968	\$ 153,765	\$ 4,288	\$ -	280,021				
Miami Fort 5	1,240,279	-	\$ 1,092,795	\$ 249,885	\$ 34,170	\$ -	1,376,850				
Miami Fort 6	1,240,279	-	\$ 653,400	\$ 621,000	\$ 308,200	\$ -	1,582,600				
							3,519,492				
<b>Add Directs and Indirects</b>											
Miami Fort 3			\$ 167,706	\$ 211,427	\$ 5,896	\$ -	385,029	43.56%	54.91%	1.53%	0.00%
Miami Fort 4			\$ 167,706	\$ 211,427	\$ 5,896	\$ -	385,029	43.56%	54.91%	1.53%	0.00%
Miami Fort 5			\$ 1,502,593	\$ 343,592	\$ 46,984	\$ -	1,893,169	79.37%	18.15%	2.48%	0.00%
Miami Fort 6			\$ 898,425	\$ 853,875	\$ 423,775	\$ -	2,176,075	41.29%	39.24%	19.47%	0.00%
<b>Total</b>			2,401,018	1,197,467	470,759	-	4,839,302				
				\$ 4,839,302							
				\$ 3,519,492							
				1.375							

Unit	Boiler Piping	Boiler Surface	Boiler Total - 312	Turbine Piping 314	Structures 311	Misc 316	Grand Total	Percent Boiler 312	Percent Turbine 314	Percent Structures 311	Percent Misc 316
Noblesville 1 and 2	485,152	-	214,698	255,690	43,590	-	513,978	42%	50%	8%	0%
<b>Add Directs and Indirects</b>											
Noblesville 1 and 2	485,152	-	295,210	351,574	59,936	-	706,720	41.77%	49.75%	8.48%	0.00%
					\$	706,720					
					\$	513,978					
						1.375					

Unit	Boiler Piping	Boiler Surface	Boiler Total - 312	Turbine Piping 314	Structures 311	Misc 316	Grand Total	Percent Boiler 312	Percent Turbine 314	Percent Structures 311	Percent Misc 316
Wabash River 1			\$ 331,267	\$ 63,117	\$ -	\$ -	394,384				
Wabash River 2			\$ 331,267	\$ 95,157	\$ -	\$ -	426,424				
Wabash River 3			\$ 414,084	\$ 95,157	\$ -	\$ -	509,241				
Wabash River 4			\$ 331,267	\$ 95,157	\$ -	\$ -	426,424				
Wabash River 5			\$ 257,664	\$ 91,582	\$ -	\$ -	349,246				
Wabash River 6			\$ 401,280	\$ 55,562	\$ -	\$ -	456,842				
<b>Add Directs and Indirects</b>							2,562,561				
Wabash River 1			\$ 455,492	\$ 86,786	\$ -	\$ -	542,278	84.00%	16.00%	0.00%	0.00%
Wabash River 2			\$ 455,492	\$ 130,841	\$ -	\$ -	586,333	77.68%	22.32%	0.00%	0.00%
Wabash River 3			\$ 569,365	\$ 130,841	\$ -	\$ -	700,206	81.31%	18.69%	0.00%	0.00%
Wabash River 4			\$ 455,492	\$ 130,841	\$ -	\$ -	586,333	77.68%	22.32%	0.00%	0.00%
Wabash River 5			\$ 354,288	\$ 125,925	\$ -	\$ -	480,213	73.78%	26.22%	0.00%	0.00%
Wabash River 6			\$ 551,760	\$ 76,398	\$ -	\$ -	628,158	87.84%	12.16%	0.00%	0.00%
<b>Total</b>			906,048	202,323	-	-	3,523,521	Average 1-2-3-4-5			
								78.89%	21.11%	0.00%	0.00%
				\$ 3,523,521							
				\$ 2,562,561							
				1.375							



**Welles, Sarah**

**From:** Glenn, Erica  
**Sent:** Friday, December 09, 2005 10:03 AM  
**To:** Reynolds, Jaime

**Attachments:** River Structures AROs.xls



River Structures  
AROs.xls

**Erica Glenn**

Cinergy Corp.  
Accounting Research  
(317) 838-2280

Old 143 Infl Fcts and Disc Rts

Assumed rate of inflation: 3.00%

Inflation Factors			Discount Rates			
	# Periods Into Future	Factor	PSI			
			Risk-free Rate	Credit Spread	Discount Rate	
2003	0.5	1.0149	2003	1.206%	1.35%	2.556%
2004	1.5	1.0453	2004	1.391%	1.35%	2.741%
2005	2.5	1.0767	2005	1.766%	1.35%	3.116%
2006	3.5	1.1090	2006	2.240%	1.35%	3.590%
2007	4.5	1.1423	2007	2.631%	1.38%	4.006%
2008	5.5	1.1765	2008	3.031%	1.40%	4.431%
2009	6.5	1.2118	2009	3.451%	1.45%	4.901%
2010	7.5	1.2482	2010	3.800%	1.50%	5.300%
2011	8.5	1.2856	2011	3.988%	1.52%	5.505%
2012	9.5	1.3242	2012	4.079%	1.53%	5.612%
2013	10.5	1.3639	2013	4.417%	1.55%	5.967%
2014	11.5	1.4048	2014	4.550%	1.56%	6.110%
2015	12.5	1.4470	2015	4.697%	1.57%	6.267%
2016	13.5	1.4904	2016	4.821%	1.58%	6.401%
2017	14.5	1.5351	2017	4.958%	1.59%	6.548%
2018	15.5	1.5812	2018	5.060%	1.60%	6.660%
2019	16.5	1.6286	2019	5.166%	1.61%	6.776%
2020	17.5	1.6775	2020	5.220%	1.62%	6.840%
2021	18.5	1.7278	2021	5.274%	1.63%	6.904%
2022	19.5	1.7796	2022	5.308%	1.64%	6.948%
2023	20.5	1.8330	2023	5.329%	1.65%	6.979%
2024	21.5	1.8880	2024	5.344%	1.66%	7.004%
2025	22.5	1.9446	2025	5.353%	1.67%	7.023%
2026	23.5	2.0030	2026	5.336%	1.68%	7.016%
2027	24.5	2.0631	2027	5.343%	1.69%	7.033%
2028	25.5	2.1250	2028	5.281%	1.70%	6.981%
2029	26.5	2.1887	2029	5.257%	1.71%	6.967%
2030	27.5	2.2544	2030	5.228%	1.72%	6.948%
2031	28.5	2.3220	2031	5.228%	1.73%	6.958%
2032	29.5	2.3917	2032	5.228%	1.74%	6.968%
2033	30.5	2.4634	2033	5.228%	1.75%	6.978%
2034	31.5	2.5373	2034	5.228%	1.75%	6.978%
2035	32.5	2.6134	2035	5.228%	1.75%	6.978%
2036	33.5	2.6918	2036	5.228%	1.75%	6.978%
2037	34.5	2.7726	2037	5.228%	1.75%	6.978%
2038	35.5	2.8558	2038	5.228%	1.75%	6.978%
2039	36.5	2.9414	2039	5.228%	1.75%	6.978%
2040	37.5	3.0297	2040	5.228%	1.75%	6.978%
2041	38.5	3.1206	2041	5.228%	1.75%	6.978%
2042	39.5	3.2142	2042	5.228%	1.75%	6.978%
2043	40.5	3.3106	2043	5.228%	1.75%	6.978%

CGandE River Structures Obligation

Inflation factor: 2.25%

Plant	In-Service Dt	Anticipated Settlement Dt	Probability Assigned to Settlement Dt	Abatement Cost (2003 \$)	Inflated \$	5% Discount Rate	\$ Discounted to 12/31/2005	\$ Discounted to 5-Apr-84	Accretion Cumulative Effect	ARC Depreciation Period (mos)	ARC Accum Deprec 12/31/2005	Total Cumulative Effect	Cin % Owned	CSP % Owned	DP&L % Owned
Beckjord (Units 1-5)	1952	2029	100%	6,944,167	12,247,141					537	0	0			
Beckjord (Unit 6)	1952	2029	100%	1,388,833	2,449,428	0.05							38%	13%	50%
East Bend	1981	2041	100%	2,465,000	5,677,947					681	0	0	69%		31%
Miami Fort (Units 5)	1949	2038	100%	678,750	1,462,495										
Miami Fort (Units 7 & 8)	1975	2038	100%	1,357,500	2,924,989								64%		36%
Miami Fort (Unit 6)	1949	2038	100%	678,750	1,462,495					645	0	0			
Zimmer	1991	2051	100%	3,696,000	10,635,049					801	0	0	47%	25%	28%
Stuart - 100%	1969	2030	50%	3,887,109	7,009,784	0.05				549	0	0	39%		
Stuart	1969	2040	50%	3,887,109	8,756,846					669	0	0	39%		
Killen	1982	2040	50%	2,951,861	6,649,774					669	0	0	33%		
Killen	1982	2050	50%	2,951,861	8,306,921					789	0	0	33%		
				including non-owned portions											
<b>Total CG&amp;E</b>				<b>30,886,939</b>											



**Welles, Sarah**

**From:** Glenn, Erica  
**Sent:** Wednesday, December 28, 2005 10:54 AM  
**To:** Reynolds, Jaime  
**Subject:** Updated Fin 47 files

**Attachments:** PowerPlant Input - Summary file.xls; Test file - Excel Calcs to PowerPlant.xls

Jaime,

Attached is a cleaned up Input file. I have moved the test items to a separate file and included a line to drop in the PowerPlant results for comparison. Please let me know if you see any significant differences. Please note the asbestos amount for Conesville. I am not sure which versions of the input file had the most updated amount from AEP.

I am out after this morning but feel free to call me at home. I can get on the network from there to look at scenarios or answer questions. My home number is 317-538-1812 and my cell phone number is 317-509-4109. I won't necessarily be sitting by the phone but will be in and out.

Thanks,

**Erica Glenn**

Cinergy Corp.  
Accounting Research  
(317) 838-2280



PowerPlant Input -  
Summary fil...



Test file - Excel  
Calcs to Pow...

Infl Factors and Disc Rates

Assumed rate of inflation: 2.50% a

<b>Inflation Factors</b>			<b>Discount Rates</b>			
			<b>CGE, PSI, and ULHP</b>			
			<b>b</b>	<b>c</b>		
	<b># Periods Into Future</b>	<b>Factor</b>	<b>Risk-free Rate</b>	<b>Credit Spread</b>	<b>Discount Rate</b>	
2006	0.5	1.0124	2006	4.47%	0.68%	5.20%
2007	1.5	1.0377	2007	4.46%	0.68%	5.20%
2008	2.5	1.0637	2008	4.44%	0.68%	5.20%
2009	3.5	1.0903	2009	4.45%	0.73%	5.20%
2010	4.5	1.1175	2010	4.42%	0.80%	5.30%
2011	5.5	1.1455	2011	4.43%	0.88%	5.40%
2012	6.5	1.1741	2012	4.44%	0.93%	5.40%
2013	7.5	1.2035	2013	4.46%	0.98%	5.50%
2014	8.5	1.2335	2014	4.49%	1.02%	5.60%
2015	9.5	1.2644	2015	4.58%	1.06%	5.70%
2016	10.5	1.2960	2016	4.63%	1.10%	5.80%
2017	11.5	1.3284	2017	4.69%	1.23%	6.00%
2018	12.5	1.3616	2018	4.73%	1.35%	6.10%
2019	13.5	1.3956	2019	4.76%	1.40%	6.20%
2020	14.5	1.4305	2020	4.80%	1.45%	6.30%
2021	15.5	1.4663	2021	4.83%	1.50%	6.40%
2022	16.5	1.5029	2022	4.83%	1.50%	6.40%
2023	17.5	1.5405	2023	4.83%	1.51%	6.40%
2024	18.5	1.5790	2024	4.83%	1.51%	6.40%
2025	19.5	1.6185	2025	4.83%	1.51%	6.40%
2026	20.5	1.6590	2026	4.81%	1.52%	6.40%
2027	21.5	1.7004	2027	4.80%	1.52%	6.40%
2028	22.5	1.7430	2028	4.78%	1.52%	6.40%
2029	23.5	1.7865	2029	4.76%	1.53%	6.30%
2030	24.5	1.8312	2030	4.74%	1.53%	6.30%
2031	25.5	1.8770	2031	4.74%	1.53%	6.30%
2032	26.5	1.9239	2032	4.74%	1.54%	6.30%
2033	27.5	1.9720	2033	4.74%	1.54%	6.30%
2034	28.5	2.0213	2034	4.74%	1.54%	6.30%
2035	29.5	2.0718	2035	4.74%	1.55%	6.30%
2036	30.5	2.1236	2036	4.74%	1.55%	6.30%
2037	31.5	2.1767	2037	4.74%	1.55%	6.30%
2038	32.5	2.2311	2038	4.74%	1.55%	6.30%
2039	33.5	2.2869	2039	4.74%	1.55%	6.30%
2040	34.5	2.3441	2040	4.74%	1.55%	6.30%
2041	35.5	2.4027	2041	4.74%	1.55%	6.30%
2042	36.5	2.4628	2042	4.74%	1.55%	6.30%
2043	37.5	2.5243	2043	4.74%	1.55%	6.30%
2044	38.5	2.5874	2044	4.74%	1.55%	6.30%
2045	39.5	2.6521	2045	4.74%	1.55%	6.30%
2046	40.5	2.7184	2046	4.74%	1.55%	6.30%
2047	41.5	2.7864	2047	4.74%	1.55%	6.30%
2048	42.5	2.8560	2048	4.74%	1.55%	6.30%
2049	43.5	2.9274	2049	4.74%	1.55%	6.30%
2050	44.5	3.0006	2050	4.74%	1.55%	6.30%

Infl Factors and Disc Rates

Assumed rate of inflation: 2.50% a

Inflation Factors			Discount Rates CGE, PSI, and ULHP			
	# Periods Into Future	Factor		b	c	Discount Rate
				Risk-free Rate	Credit Spread	
2051	45.5	3.0756	2051	4.74%	1.55%	6.30%
2052	46.5	3.1525	2052	4.74%	1.55%	6.30%
2053	47.5	3.2313	2053	4.74%	1.55%	6.30%
2054	48.5	3.3121	2054	4.74%	1.55%	6.30%
2055	49.5	3.3949	2055	4.74%	1.55%	6.30%
2056	50.5	3.4798	2056	4.74%	1.55%	6.30%
2057	51.5	3.5668	2057	4.74%	1.55%	6.30%
2058	52.5	3.6560	2058	4.74%	1.55%	6.30%
2059	53.5	3.7474	2059	4.74%	1.55%	6.30%
2060	54.5	3.8411	2060	4.74%	1.55%	6.30%
2061	55.5	3.9371	2061	4.74%	1.55%	6.30%
2062	56.5	4.0355	2062	4.74%	1.55%	6.30%
2063	57.5	4.1364	2063	4.74%	1.55%	6.30%
2064	58.5	4.2398	2064	4.74%	1.55%	6.30%
2065	59.5	4.3458	2065	4.74%	1.55%	6.30%
2066	60.5	4.4544	2066	4.74%	1.55%	6.30%
2067	61.5	4.5658	2067	4.74%	1.55%	6.30%
2068	62.5	4.6800	2068	4.74%	1.55%	6.30%
2069	63.5	4.7970	2069	4.74%	1.55%	6.30%
2070	64.5	4.9169	2070	4.74%	1.55%	6.30%
2071	65.5	5.0398	2071	4.74%	1.55%	6.30%
2072	66.5	5.1658	2072	4.74%	1.55%	6.30%
2073	67.5	5.2949	2073	4.74%	1.55%	6.30%
2074	68.5	5.4273	2074	4.74%	1.55%	6.30%
2075	69.5	5.5630	2075	4.74%	1.55%	6.30%
2076	70.5	5.7021	2076	4.74%	1.55%	6.30%
2077	71.5	5.8446	2077	4.74%	1.55%	6.30%
2078	72.5	5.9907	2078	4.74%	1.55%	6.30%
2079	73.5	6.1405	2079	4.74%	1.55%	6.30%
2080	74.5	6.2940	2080	4.74%	1.55%	6.30%
2081	75.5	6.4514	2081	4.74%	1.55%	6.30%

a Rate of inflation obtained from Jon Gomez, Manager - Power Operations Financial Analysis. Rate based on historical CPI.

b Rate obtained from Bloomberg report run by Ed Bowen, Treasury. Average of bid and ask price used, where different, from an approximate midpoint of

c Credit spread obtained from Barclays Capital report provided by Larry Riffe, Treasury. Interpolated where necessary. Midpoint used when reoffer spread was a range.

### Asbestos Remediation Cost Estimates for FASB FIN 47

Unit	a			b		c		CG&E	PSI
	Total with Common facilities (ALL) Allocated to each Unit	Ownership Percentage	Notes	Share Unit Common facilities (ALL) Allocated to each Unit	Vintage date	50% prob Settlement Date - Depr Dt	50% prob Settlement Date - Depr Dt * 20 years		
Beckjord 1	\$ 503,936	100%		\$ 503,936	11/20/1990	6/30/2029	6/30/2049	CG&E	
Beckjord 2	\$ 544,876	100%		\$ 544,876	11/20/1990	6/30/2029	6/30/2049	CG&E	
Beckjord 3	\$ 480,213	100%		\$ 480,213	11/20/1990	6/30/2029	6/30/2049	CG&E	
Beckjord 4	\$ 1,238,322	100%		\$ 1,238,322	11/20/1990	6/30/2029	6/30/2049	CG&E	
Beckjord 5	\$ 477,465	100%		\$ 477,465	11/20/1990	6/30/2029	6/30/2049	CG&E	
Beckjord 6	\$ 672,877	37.5%		\$ 252,329	11/20/1990	6/30/2029	6/30/2049	CG&E	
Beckjord All	\$ -								
Station Total	\$ 3,917,689		<b>Note 1</b>	<u>\$ 3,497,141</u>					\$ 3,497,141
Cayuga 1	\$ 759,449	100%		\$ 759,449	11/20/1990	6/30/2032	6/30/2052	PSI	
Cayuga 2	\$ 759,449	100%		\$ 759,449	11/20/1990	6/30/2032	6/30/2052	PSI	
Cayuga All	\$ -			\$ -					
Station Total	\$ 1,518,898		<b>Note 2</b>	<u>\$ 1,518,898</u>					\$ 1,518,898
Conesville 4	\$ 324,480	40%	<b>Note 3</b>	\$ 129,792	11/20/1990	6/30/2033	6/30/2053	CG&E	\$ 129,792
East Bend 2	\$ 853,875	69.0%	<b>Note 4</b>	\$ 589,174	11/20/1990	6/30/2041	6/30/2061	CG&E	\$ 589,174
Edwardsport 6	\$ 1,066,116	100%		\$ 1,066,116	11/20/1990	6/30/2006	6/30/2026	PSI	
Edwardsport 7	\$ 524,773	100%		\$ 524,773	11/20/1990	6/30/2006	6/30/2026	PSI	
Edwardsport 8	\$ 524,773	100%		\$ 524,773	11/20/1990	6/30/2006	6/30/2026	PSI	
Edwardsport All	\$ -			\$ -					
Station Total	\$ 2,115,662		<b>Note 5</b>	<u>\$ 2,115,662</u>					\$ 2,115,662
Gallagher 1	\$ 2,012,531	100%		\$ 2,012,531	11/20/1990	6/30/2021	6/30/2041	PSI	
Gallagher 2	\$ 2,012,531	100%		\$ 2,012,531	11/20/1990	6/30/2021	6/30/2041	PSI	
Gallagher 3	\$ 2,012,531	100%		\$ 2,012,531	11/20/1990	6/30/2021	6/30/2041	PSI	
Gallagher 4	\$ 2,012,531	100%		\$ 2,012,531	11/20/1990	6/30/2021	6/30/2041	PSI	
Gallagher All	\$ -			\$ -					



Asbestos Remediation Cost Estimates for FASB FIN 47

Station Total	\$ 8,050,122		<b>Note 6</b>	<u>\$ 8,050,122</u>					\$ 8,050,122
Gibson 1	\$ 2,430,947	100%		\$ 2,430,947	11/20/1990	6/30/2042	6/30/2062	PSI	
Gibson 2	\$ 2,430,947	100%		\$ 2,430,947	11/20/1990	6/30/2042	6/30/2062	PSI	
Gibson 3	\$ 2,367,527	100%		\$ 2,367,527	11/20/1990	6/30/2042	6/30/2062	PSI	
Gibson 4	\$ 2,367,527	100%		\$ 2,367,527	11/20/1990	6/30/2042	6/30/2062	PSI	
Gibson 5	\$ 2,367,527	50.05%		\$ 1,184,947	11/20/1990	6/30/2042	6/30/2062	PSI	
Gibson All	\$ -			\$ -					
Station Total	\$ 11,964,477		<b>Note 7</b>	<u>\$ 10,781,897</u>					\$ 10,781,897
Killen 2	\$ 853,875	33.0%	<b>Note 8</b>	\$ 281,779	11/20/1990	6/30/2042	6/30/2062	CG&E	\$ 281,779
Miami Fort 3	\$ 385,029	100%		\$ 385,029	11/20/1990	6/30/2038	6/30/2058	CG&E	
Miami Fort 4	\$ 385,029	100%		\$ 385,029	11/20/1990	6/30/2038	6/30/2058	CG&E	
Miami Fort 5	\$ 1,893,169	100%		\$ 1,893,169	11/20/1990	6/30/2038	6/30/2058	CG&E	
Miami Fort 6	\$ 2,176,075	100%		\$ 2,176,075	11/20/1990	6/30/2038	6/30/2058	CG&E	
Miami Fort 7	\$ -	64%		\$ -	11/20/1990	6/30/2038	6/30/2058	CG&E	
Miami Fort 8	\$ -	64%		\$ -	11/20/1990	6/30/2038	6/30/2058	CG&E	
Miami Fort All	\$ -			\$ -					
Station Total	\$ 4,839,302		<b>Note 9</b>	<u>\$ 4,839,302</u>					\$ 4,839,302
Noblesville 1	\$ 235,573	100%		\$ 235,573	11/20/1990	6/30/2038	6/30/2058	PSI	
Noblesville 2	\$ 235,573	100%		\$ 235,573	11/20/1990	6/30/2038	6/30/2058	PSI	
Noblesville 3	\$ 235,573	100%		\$ 235,573	11/20/1990	6/30/2038	6/30/2058	PSI	
Noblesville All	\$ -			\$ -					
Station Total	\$ 706,720		<b>Note 10</b>	<u>\$ 706,720</u>					\$ 706,720
Stuart 1	\$ 2,376,017	39%		\$ 926,647	11/20/1990	6/30/2034	6/30/2054	CG&E	
Stuart 2	\$ 2,376,017	39%		\$ 926,647	11/20/1990	6/30/2034	6/30/2054	CG&E	
Stuart 3	\$ 2,376,017	39%		\$ 926,647	11/20/1990	6/30/2034	6/30/2054	CG&E	
Stuart 4	\$ 2,376,017	39%		\$ 926,647	11/20/1990	6/30/2034	6/30/2054	CG&E	
Stuart All	\$ -			\$ -					
Station Total	\$ 9,504,070		<b>Note 11</b>	<u>\$ 3,706,587</u>					\$ 3,706,587
Wabash River 1	\$ 542,278	100%		\$ 542,278	11/20/1990	6/30/2028	6/30/2048	PSI	
Wabash River 2	\$ 586,333	100%		\$ 586,333	11/20/1990	6/30/2028	6/30/2048	PSI	
Wabash River 3	\$ 700,206	100%		\$ 700,206	11/20/1990	6/30/2028	6/30/2048	PSI	
Wabash River 4	\$ 586,333	100%		\$ 586,333	11/20/1990	6/30/2028	6/30/2048	PSI	
Wabash River 5	\$ 480,213	100%		\$ 480,213	11/20/1990	6/30/2028	6/30/2048	PSI	

**Asbestos Remediation Cost Estimates for FASB FIN 47**

Wabash River 6	\$ 628,157	100%	\$ 628,157	11/20/1990	6/30/2028	6/30/2048	PSI	
Wabash River All	\$ -							
Station Total	\$ 3,523,520		<u>\$ 3,523,520</u>					\$ 3,523,520
		<b>Note 12</b>						
Zimmer	\$ 5,039,793	46.5%	\$ 2,343,504	12/31/1991	6/30/2051	6/30/2071	CG&E	\$ 2,343,504
		<b>Note 13</b>						
	<u>\$ 53,212,483</u>		<u>\$42,084,097</u>					<u>\$15,387,278</u> <u>\$26,696,819</u>
PSI CT Units								
		<b>Note 14</b>						
CGE CT Uniits								
		<b>Note 14</b>						
UHL&P CT Uniits								
		<b>Note 14</b>						

**Notes:**

- 1 Beckjord data is from the Sargent and Lundy report dated Dec. 19, 2005; assume FERC code percentages are similar to a comparable Wabash River unit
- 2 Cayuga data is from the Sargent and Lundy report dated Dec. 19, 2005
- 3 Conesville data is from AEP email dated Dec. 19, 2005; assume FERC code percentages are similar to the Cayuga units which have same vintage
- 4 East Bend data is from the Sargent and Lundy Decommissioning Cost Estimate report dated October 31,2005
- 5 Edwardsport data is from the Sargent and Lundy report dated Dec. 19, 2005
- 6 Gallagher data is from the Sargent and Lundy report dated Dec. 19, 2005
- 7 Gibson data is from the Sargent and Lundy report dated Dec. 19, 2005
- 8 Killen is assumed to be similar to East Bend since no data was received from DP&L
- 9 Miami Fort 3-4-5-6- data is from the Sargent and Lundy report dated Dec. 19, 2005; Miami Fort 7 and 8 are assumed to be asbestos free for this estimate.
- 10 Noblesville data is from the Sargent and Lundy report dated Dec. 19, 2005
- 11 The Stuart units are assumed to be similar to the Gibson units since no data was received from DP&L
- 12 Wabash River data is from the Sargent and Lundy report dated Dec. 19, 2005
- 13 Zimmer data is from the Sargent and Lundy report dated Dec. 19, 2005; assume cooling tower fill is in FERCaccount 316
- 14 All CT and CT/CC units were found to be asbestos free for this estimate

a Provided by George Stevens.

b Based on later of 1990 regulations revisions (per Randy Born) or in service date.

c Based on discussion with Engineering and most recent depreciation study information.

	e			a	b		d		
	Vintage / In-service Date:	50% prob Settlement Date - Depr Dt	50% prob Settlement Date - Depr Dt + 30 yrs	Removal Cost 2003 \$\$	Removal Cost 12/31/05 \$\$	Ownership %	Cin Owned Removal Cost 12/31/05 \$\$	Likelihood Removal Enforced	At 25% probability of enforcement
<b>CG&amp;E</b>									
Beckjord Unit 1	1952	2029	2059	1,388,833	1,496,885	100%	1,496,885	25%	374,221
Beckjord Unit 2	1952	2029	2059	1,388,833	1,496,885	100%	1,496,885	25%	374,221
Beckjord Unit 3	1952	2029	2059	1,388,833	1,496,885	100%	1,496,885	25%	374,221
Beckjord Unit 4	1952	2029	2059	1,388,833	1,496,885	100%	1,496,885	25%	374,221
Beckjord Unit 5	1952	2029	2059	1,388,833	1,496,885	100%	1,496,885	25%	374,221
Beckjord Unit 6	1952	2029	2059	1,388,833	1,496,885	37.5%	561,332	25%	140,333
East Bend	1981	2041	2071	2,465,000	2,656,777	69%	1,833,176	25%	458,294
Miami Fort Unit 5	1949	2038	2068	678,750	731,557	100%	731,557	25%	182,889
Miami Fort Unit 6	1949	2038	2068	678,750	731,557	100%	731,557	25%	182,889
Miami Fort Unit 7	1975	2038	2068	678,750	731,557	64%	468,196	25%	117,049
Miami Fort Unit 8	1975	2038	2068	678,750	731,557	64%	468,196	25%	117,049
Zimmer	1991	2051	2081	3,696,000	3,983,549	46.5%	1,852,350	25%	463,088
Stuart	1969	2034	2064	7,774,218	8,379,053	39%	3,267,831	25%	816,958
Killen	1982	2042	2072	5,903,721	6,363,031	33%	2,099,800	25%	524,950
							<u>19,498,419</u>		<u>4,874,605</u>
<b>PSI</b>									
Cayuga	1970	2032	2062	1,509,000	1,626,400	100%	1,626,400	25%	406,600
Gallagher	1958	2021	2051	1,373,000	1,479,819	100%	1,479,819	25%	369,955
Gibson	1975	2042	2072	368,800	397,493	100%	397,493	25%	99,373
Gibson (Unit 5)	1975	2042	2072	92,200	99,373	50%	49,736	25%	12,434
Wabash River	1953	2028	2058	2,401,000	2,587,798	100%	2,587,798	25%	646,949
Dresser	c						<u>6,141,247</u>		<u>1,535,312</u>

a Removal costs obtained from 2003 S&L study.

b 2003 costs inflated (using monthly compounding) to 2005 for input into PowerPlant.

c Dresser not being recorded based on expectation never have to remove based on river structure location per conversation with Dale Wilson, Investment Engineer. Also, estimated cost to remove in 2003 dollars was \$391,000.

d Estimate of enforcement provided by Tim Hayes.

e In-service dates obtained from Dale Wilson, Engineering, and confirmed with Jaime Reynolds, Fixed Assets.

Estimated removal cost per (m<sup>3</sup>): \$ 750 b

	a	b	b	100% Est.	Owned Portion	b
	Vintage	Size (m <sup>3</sup> )	Removal Cost (2005 \$)	Ownership %	st Removal Cost (2005 \$)	Estimated Settlement Dt
<b>CGE</b>						
East Bend						
Catalyst A	7/1/2002	194.6	\$	145,950	69.00%	\$ 100,706 4/1/2011
Catalyst B	7/1/2002	194.6	\$	145,950	69.00%	\$ 100,706 4/1/2013
Miami Fort 7						
Catalyst A	7/1/2003	323.4	\$	242,550	64.00%	\$ 155,232 4/1/2008
Catalyst B	7/1/2003	323.4	\$	242,550	64.00%	\$ 155,232 4/1/2010
Miami Fort 8						
Catalyst A	7/1/2002	323.4	\$	242,550	64.00%	\$ 155,232 4/1/2009
Catalyst B	7/1/2002	323.4	\$	242,550	64.00%	\$ 155,232 4/1/2011
Zimmer						
Catalyst A	5/31/2004	529.1	\$	396,825	46.50%	\$ 184,524 4/1/2010
Catalyst B	5/31/2004	529.1	\$	396,825	46.50%	\$ 184,524 4/1/2012
Catalyst C	5/31/2004	529.1	\$	396,825	46.50%	\$ 184,524 4/1/2014
Stuart 1						
Catalyst A	5/1/2004	500	\$	375,000	39.00%	\$ 146,250 4/1/2012
Catalyst B	5/1/2004	500	\$	375,000	39.00%	\$ 146,250 4/1/2014
Stuart 2						
Catalyst A	5/1/2004	500	\$	375,000	39.00%	\$ 146,250 4/1/2012
Catalyst B	5/1/2004	500	\$	375,000	39.00%	\$ 146,250 4/1/2014
Stuart 3						
Catalyst A	5/1/2004	500	\$	375,000	39.00%	\$ 146,250 4/1/2013
Catalyst B	5/1/2004	500	\$	375,000	39.00%	\$ 146,250 4/1/2015
Stuart 4						
Catalyst A	5/1/2004	500	\$	375,000	39.00%	\$ 146,250 4/1/2009
Catalyst B	5/1/2004	500	\$	375,000	39.00%	\$ 146,250 4/1/2013
Catalyst C	3/1/2005	500	\$	375,000	39.00%	\$ 146,250 4/1/2015
Killen						
Catalyst A	5/1/2004	203	\$	152,250	33.00%	\$ 50,243 4/1/2008
Catalyst B	5/1/2004	203	\$	152,250	33.00%	\$ 50,243 4/1/2010
			\$	<u>6,132,075</u>		\$ <u>2,792,645</u>

**PSI**

Gibson 1

Estimated removal cost per (m<sup>3</sup>): \$ 750 b

	a	b	b			b
			100% Est.	Owned Portion	Estimated	
	Vintage	Size (m <sup>3</sup> )	Removal Cost (2005 \$)	Ownership %	st Removal Cost (2005 \$)	Settlement Dt
Catalyst A	5/1/2005	403.2	\$ 302,400	100.00%	\$ 302,400	4/1/2011
Catalyst B	5/1/2005	403.2	\$ 302,400	100.00%	\$ 302,400	4/1/2013
Gibson 2						
Catalyst A	7/1/2002	403.2	\$ 302,400	100.00%	\$ 302,400	4/1/2009
Catalyst B	7/1/2002	403.2	\$ 302,400	100.00%	\$ 302,400	4/1/2011
Catalyst C	6/1/2004	403.2	\$ 302,400	100.00%	\$ 302,400	4/1/2013
Gibson 3						
Catalyst A	7/1/2002	403.2	\$ 302,400	100.00%	\$ 302,400	4/1/2008
Catalyst B	7/1/2002	403.2	\$ 302,400	100.00%	\$ 302,400	4/1/2010
Catalyst C	6/1/2004	403.2	\$ 302,400	100.00%	\$ 302,400	4/1/2012
Gibson 4						
Catalyst A	7/1/2003	403.2	\$ 302,400	100.00%	\$ 302,400	4/1/2007
Catalyst B	7/1/2003	403.2	\$ 302,400	100.00%	\$ 302,400	4/1/2009
Catalyst C	6/1/2004	201.6	\$ 151,200	100.00%	\$ 151,200	4/1/2013
Gibson 5						
Catalyst A	5/1/2005	403.2	\$ 302,400	50.05%	\$ 151,351	4/1/2010
Catalyst B	5/1/2005	403.2	\$ 302,400	50.05%	\$ 151,351	4/1/2012
			<u>\$ 3,780,000</u>		<u>\$ 3,477,902</u>	

a Vintage (in-service) dates provided by Mike O'Connor and verified with Jaime Reynolds, Fixed Assets.

b Data obtained from Mike O'Connor.

Discounts Rates for Different Settlements Dates

Asbestos								River Structures						
Station	Settlement A	Settlement B	Discount Rate	Discount Rate	Difference:	Average:		Settlement A	Settlement B	Discount Rate	Discount Rate	Difference:	Average:	
<b>CGE</b>														
Beckjord	6/30/2029	6/30/2049	6.30%	6.30%	0.00%	6.30%		6/30/2029	6/30/2059	6.30%	6.30%	0.00%	6.30%	
Conesville	6/30/2033	6/30/2053	6.30%	6.30%	0.00%	6.30%								
East Bend	6/30/2041	6/30/2061	6.30%	6.30%	0.00%	6.30%		6/30/2041	6/30/2071	6.30%	6.30%	0.00%	6.30%	
Killen	6/30/2042	6/30/2062	6.30%	6.30%	0.00%	6.30%		6/30/2042	6/30/2072	6.30%	6.30%	0.00%	6.30%	
Miami Fort	6/30/2038	6/30/2058	6.30%	6.30%	0.00%	6.30%		6/30/2038	6/30/2068	6.30%	6.30%	0.00%	6.30%	
Stuart	6/30/2034	6/30/2054	6.30%	6.30%	0.00%	6.30%		6/30/2034	6/30/2064	6.30%	6.30%	0.00%	6.30%	
Zimmer	6/30/2051	6/30/2071	6.30%	6.30%	0.00%	6.30%		6/30/2051	6/30/2081	6.30%	6.30%	0.00%	6.30%	
<b>PSI</b>														
Cayuga	6/30/2032	6/30/2052	6.30%	6.30%	0.00%	6.30%		6/30/2032	6/30/2062	6.30%	6.30%	0.00%	6.30%	
Edwardsport	6/30/2006	6/30/2026	5.20%	6.40%	-1.20%	5.80%								
Gallagher	6/30/2021	6/30/2041	6.40%	6.30%	0.10%	6.35%		6/30/2021	6/30/2051	6.40%	6.30%	0.10%	6.35%	
Gibson	6/30/2042	6/30/2062	6.30%	6.30%	0.00%	6.30%		6/30/2042	6/30/2072	6.30%	6.30%	0.00%	6.30%	
Noblesville	6/30/2038	6/30/2058	6.30%	6.30%	0.00%	6.30%								
Wabash River	6/30/2028	6/30/2048	6.40%	6.30%	0.10%	6.35%		6/30/2028	6/30/2058	6.40%	6.30%	0.10%	6.35%	

PowerPlant only allows a single credit-adjusted risk-free rate to be entered. Therefore, where probabilities are used regarding settlements the average rate of the two estimated settlements will be used (based on the minimal differences). The difference in Edwardsport (asbestos) was deminimus between the 2 methods. Edwardsport (asbestos) had the most significant rate difference.

Assumed rate of inflation: 2.50% a

Inflation Factors			Discount Rates CGE, PSI, and ULHP				
# Periods Into Future	Factor		b		Discount Rate		
			Risk-free Rate	Credit Spread			
2006	0.5	1.0124	2006	4.469%	0.675%	5.144%	5.20%
2007	1.5	1.0377	2007	4.463%	0.675%	5.138%	5.20%
2008	2.5	1.0637	2008	4.444%	0.675%	5.119%	5.20%
2009	3.5	1.0903	2009	4.451%	0.725%	5.176%	5.20%
2010	4.5	1.1175	2010	4.421%	0.800%	5.221%	5.30%
2011	5.5	1.1455	2011	4.426%	0.875%	5.301%	5.40%
2012	6.5	1.1741	2012	4.438%	0.925%	5.363%	5.40%
2013	7.5	1.2035	2013	4.455%	0.975%	5.430%	5.50%
2014	8.5	1.2335	2014	4.490%	1.017%	5.507%	5.60%
2015	9.5	1.2644	2015	4.575%	1.058%	5.633%	5.70%
2016	10.5	1.2960	2016	4.626%	1.100%	5.726%	5.80%
2017	11.5	1.3284	2017	4.667%	1.225%	5.912%	6.00%
2018	12.5	1.3616	2018	4.726%	1.350%	6.078%	6.10%
2019	13.5	1.3956	2019	4.761%	1.400%	6.161%	6.20%
2020	14.5	1.4305	2020	4.801%	1.450%	6.251%	6.30%
2021	15.5	1.4663	2021	4.825%	1.500%	6.325%	6.40%
2022	16.5	1.5029	2022	4.832%	1.503%	6.335%	6.40%
2023	17.5	1.5405	2023	4.828%	1.507%	6.334%	6.40%
2024	18.5	1.5790	2024	4.828%	1.510%	6.338%	6.40%
2025	19.5	1.6185	2025	4.828%	1.513%	6.341%	6.40%
2026	20.5	1.6590	2026	4.811%	1.517%	6.328%	6.40%
2027	21.5	1.7004	2027	4.800%	1.520%	6.320%	6.40%
2028	22.5	1.7430	2028	4.781%	1.523%	6.305%	6.40%
2029	23.5	1.7865	2029	4.761%	1.527%	6.288%	6.30%
2030	24.5	1.8312	2030	4.737%	1.530%	6.267%	6.30%
2031	25.5	1.8770	2031	4.737%	1.533%	6.270%	6.30%
2032	26.5	1.9239	2032	4.737%	1.537%	6.274%	6.30%
2033	27.5	1.9720	2033	4.737%	1.540%	6.277%	6.30%
2034	28.5	2.0213	2034	4.737%	1.543%	6.280%	6.30%
2035	29.5	2.0718	2035	4.737%	1.547%	6.284%	6.30%
2036	30.5	2.1236	2036	4.737%	1.550%	6.287%	6.30%
2037	31.5	2.1767	2037	4.737%	1.550%	6.287%	6.30%
2038	32.5	2.2311	2038	4.737%	1.550%	6.287%	6.30%
2039	33.5	2.2869	2039	4.737%	1.550%	6.287%	6.30%
2040	34.5	2.3441	2040	4.737%	1.550%	6.287%	6.30%
2041	35.5	2.4027	2041	4.737%	1.550%	6.287%	6.30%
2042	36.5	2.4628	2042	4.737%	1.550%	6.287%	6.30%
2043	37.5	2.5243	2043	4.737%	1.550%	6.287%	6.30%
2044	38.5	2.5874	2044	4.737%	1.550%	6.287%	6.30%
2045	39.5	2.6521	2045	4.737%	1.550%	6.287%	6.30%
2046	40.5	2.7184	2046	4.737%	1.550%	6.287%	6.30%
2047	41.5	2.7864	2047	4.737%	1.550%	6.287%	6.30%
2048	42.5	2.8560	2048	4.737%	1.550%	6.287%	6.30%
2049	43.5	2.9274	2049	4.737%	1.550%	6.287%	6.30%
2050	44.5	3.0006	2050	4.737%	1.550%	6.287%	6.30%
2051	45.5	3.0756	2051	4.737%	1.550%	6.287%	6.30%
2052	46.5	3.1525	2052	4.737%	1.550%	6.287%	6.30%
2053	47.5	3.2313	2053	4.737%	1.550%	6.287%	6.30%
2054	48.5	3.3121	2054	4.737%	1.550%	6.287%	6.30%
2055	49.5	3.3949	2055	4.737%	1.550%	6.287%	6.30%
2056	50.5	3.4798	2056	4.737%	1.550%	6.287%	6.30%
2057	51.5	3.5668	2057	4.737%	1.550%	6.287%	6.30%
2058	52.5	3.6560	2058	4.737%	1.550%	6.287%	6.30%
2059	53.5	3.7474	2059	4.737%	1.550%	6.287%	6.30%
2060	54.5	3.8411	2060	4.737%	1.550%	6.287%	6.30%
2061	55.5	3.9371	2061	4.737%	1.550%	6.287%	6.30%
2062	56.5	4.0355	2062	4.737%	1.550%	6.287%	6.30%
2063	57.5	4.1364	2063	4.737%	1.550%	6.287%	6.30%
2064	58.5	4.2398	2064	4.737%	1.550%	6.287%	6.30%
2065	59.5	4.3458	2065	4.737%	1.550%	6.287%	6.30%
2066	60.5	4.4544	2066	4.737%	1.550%	6.287%	6.30%
2067	61.5	4.5658	2067	4.737%	1.550%	6.287%	6.30%
2068	62.5	4.6800	2068	4.737%	1.550%	6.287%	6.30%
2069	63.5	4.7970	2069	4.737%	1.550%	6.287%	6.30%
2070	64.5	4.9169	2070	4.737%	1.550%	6.287%	6.30%
2071	65.5	5.0398	2071	4.737%	1.550%	6.287%	6.30%
2072	66.5	5.1658	2072	4.737%	1.550%	6.287%	6.30%
2073	67.5	5.2949	2073	4.737%	1.550%	6.287%	6.30%
2074	68.5	5.4273	2074	4.737%	1.550%	6.287%	6.30%
2075	69.5	5.5630	2075	4.737%	1.550%	6.287%	6.30%
2076	70.5	5.7021	2076	4.737%	1.550%	6.287%	6.30%
2077	71.5	5.8446	2077	4.737%	1.550%	6.287%	6.30%
2078	72.5	5.9907	2078	4.737%	1.550%	6.287%	6.30%
2079	73.5	6.1405	2079	4.737%	1.550%	6.287%	6.30%
2080	74.5	6.2940	2080	4.737%	1.550%	6.287%	6.30%
2081	75.5	6.4514	2081	4.737%	1.550%	6.287%	6.30%

a Rate of inflation obtained from Jon Gomez, Manager - Power Operations Financial Analysis. Rate based on historical CPI.

b Rate obtained from Bloomberg report run by Ed Bowen, Treasury. Average of bid and ask price used, where different, from an approximate midpoint of each year.

c Credit spread obtained from Barclays Capital report provided by Larry Riffe, Treasury. Interpolated where necessary. Midpoint used when reoffer spread was a range.

Edwardsport - Asbestos - Different Rates for Different Settlements

In-service date 6/30/1952  
 Estimated settlement 6/30/2029

	Closure Cost (2005 \$)	Inflation factor	Inflated \$	Discount Rate	\$ Discounted to 12/31/2005	\$ Discounted to 11/20/1990	Accretion Cum Catch	Depreciation Cum Catch
6/30/2006	2,115,662	1.0124	2,141,945	0.052	2,088,771	970,377	1,118,394	
6/30/2026	2,115,662	1.6590	3,509,826	0.064	983,386	384,838	598,548	
	<u>4,231,324</u>		<u>5,651,770</u>		<u>3,072,156</u>	<u>1,355,215</u>	<u>1,716,942</u>	
50%	2,115,662		2,825,885		1,536,078	677,607	858,471	655,982
Per PowerPlant:								
Difference:					<u>1,536,078</u>	<u>677,607</u>	<u>858,471</u>	<u>655,982</u>

Monthly accretion schedule:

	6/30/2006 Settlement			6/30/2026 Settlement			Monthly depreciation
	Beginning ARO	Monthly Accretion	Ending ARO	Beginning ARO	Monthly Accretion	Ending ARO	
Nov-90	970,377	4,052	974,428	384,838	1,967	386,805	3,604
Dec-90	974,428	4,204	978,633	386,805	2,043	388,848	3,604
Jan-91	978,633	4,223	982,855	388,848	2,054	390,903	3,604
Feb-91	982,855	3,830	986,685	390,903	1,865	392,767	3,604
Mar-91	986,685	4,257	990,942	392,767	2,075	394,842	3,604
Apr-91	990,942	4,137	995,080	394,842	2,018	396,861	3,604
May-91	995,080	4,293	999,373	396,861	2,096	398,957	3,604
Jun-91	999,373	4,173	1,003,546	398,957	2,039	400,996	3,604
Jul-91	1,003,546	4,330	1,007,876	400,996	2,118	403,115	3,604
Aug-91	1,007,876	4,349	1,012,225	403,115	2,130	405,244	3,604
Sep-91	1,012,225	4,226	1,016,451	405,244	2,072	407,316	3,604
Oct-91	1,016,451	4,386	1,020,837	407,316	2,152	409,468	3,604
Nov-91	1,020,837	4,262	1,025,099	409,468	2,093	411,561	3,604
Dec-91	1,025,099	4,423	1,029,522	411,561	2,174	413,735	3,604
Jan-92	1,029,522	4,442	1,033,964	413,735	2,186	415,920	3,604
Feb-92	1,033,964	4,173	1,038,137	415,920	2,055	417,975	3,604
Mar-92	1,038,137	4,479	1,042,616	417,975	2,208	420,183	3,604
Apr-92	1,042,616	4,353	1,046,969	420,183	2,148	422,331	3,604
May-92	1,046,969	4,517	1,051,487	422,331	2,231	424,562	3,604
Jun-92	1,051,487	4,390	1,055,877	424,562	2,170	426,733	3,604
Jul-92	1,055,877	4,556	1,060,433	426,733	2,254	428,987	3,604
Aug-92	1,060,433	4,575	1,065,008	428,987	2,266	431,253	3,604
Sep-92	1,065,008	4,447	1,069,455	431,253	2,204	433,458	3,604
Oct-92	1,069,455	4,614	1,074,069	433,458	2,290	435,747	3,604
Nov-92	1,074,069	4,485	1,078,554	435,747	2,227	437,975	3,604
Dec-92	1,078,554	4,654	1,083,207	437,975	2,314	440,289	3,604



Edwardsport - Asbestos - Different Rates for Different Settlements

Jan-93	1,083,207	4,674	1,087,881	440,289	2,326	442,615	3,604
Feb-93	1,087,881	4,239	1,092,120	442,615	2,111	444,726	3,604
Mar-93	1,092,120	4,712	1,096,832	444,726	2,349	447,075	3,604
Apr-93	1,096,832	4,580	1,101,412	447,075	2,285	449,361	3,604
May-93	1,101,412	4,752	1,106,164	449,361	2,374	451,734	3,604
Jun-93	1,106,164	4,619	1,110,782	451,734	2,309	454,044	3,604
Jul-93	1,110,782	4,793	1,115,575	454,044	2,399	456,442	3,604
Aug-93	1,115,575	4,813	1,120,389	456,442	2,411	458,853	3,604
Sep-93	1,120,389	4,678	1,125,066	458,853	2,346	461,199	3,604
Oct-93	1,125,066	4,854	1,129,921	461,199	2,436	463,635	3,604
Nov-93	1,129,921	4,718	1,134,638	463,635	2,370	466,005	3,604
Dec-93	1,134,638	4,896	1,139,534	466,005	2,462	468,467	3,604
Jan-94	1,139,534	4,917	1,144,451	468,467	2,475	470,942	3,604
Feb-94	1,144,451	4,459	1,148,910	470,942	2,246	473,188	3,604
Mar-94	1,148,910	4,957	1,153,867	473,188	2,500	475,688	3,604
Apr-94	1,153,867	4,818	1,158,685	475,688	2,432	478,120	3,604
May-94	1,158,685	4,999	1,163,684	478,120	2,526	480,645	3,604
Jun-94	1,163,684	4,859	1,168,543	480,645	2,457	483,102	3,604
Jul-94	1,168,543	5,042	1,173,585	483,102	2,552	485,654	3,604
Aug-94	1,173,585	5,064	1,178,649	485,654	2,566	488,220	3,604
Sep-94	1,178,649	4,921	1,183,570	488,220	2,496	490,716	3,604
Oct-94	1,183,570	5,107	1,188,677	490,716	2,592	493,308	3,604
Nov-94	1,188,677	4,963	1,193,640	493,308	2,522	495,830	3,604
Dec-94	1,193,640	5,150	1,198,790	495,830	2,619	498,449	3,604
Jan-95	1,198,790	5,172	1,203,962	498,449	2,633	501,082	3,604
Feb-95	1,203,962	4,691	1,208,653	501,082	2,390	503,472	3,604
Mar-95	1,208,653	5,215	1,213,868	503,472	2,660	506,132	3,604
Apr-95	1,213,868	5,068	1,218,937	506,132	2,587	508,719	3,604
May-95	1,218,937	5,259	1,224,196	508,719	2,687	511,407	3,604
Jun-95	1,224,196	5,111	1,229,307	511,407	2,614	514,021	3,604
Jul-95	1,229,307	5,304	1,234,611	514,021	2,715	516,736	3,604
Aug-95	1,234,611	5,327	1,239,938	516,736	2,730	519,466	3,604
Sep-95	1,239,938	5,177	1,245,116	519,466	2,655	522,122	3,604
Oct-95	1,245,116	5,372	1,250,488	522,122	2,758	524,880	3,604
Nov-95	1,250,488	5,221	1,255,709	524,880	2,683	527,563	3,604
Dec-95	1,255,709	5,418	1,261,127	527,563	2,787	530,350	3,604
Jan-96	1,261,127	5,441	1,266,568	530,350	2,802	533,151	3,604
Feb-96	1,266,568	5,112	1,271,680	533,151	2,634	535,786	3,604
Mar-96	1,271,680	5,487	1,277,167	535,786	2,830	538,616	3,604
Apr-96	1,277,167	5,332	1,282,499	538,616	2,753	541,369	3,604
May-96	1,282,499	5,534	1,288,033	541,369	2,860	544,229	3,604
Jun-96	1,288,033	5,378	1,293,411	544,229	2,782	547,011	3,604
Jul-96	1,293,411	5,581	1,298,992	547,011	2,890	549,901	3,604
Aug-96	1,298,992	5,605	1,304,596	549,901	2,905	552,806	3,604
Sep-96	1,304,596	5,447	1,310,043	552,806	2,826	555,632	3,604

Edwardsport - Asbestos - Different Rates for Different Settlements

Oct-96	1,310,043	5,652	1,315,696	555,632	2,935	558,567	3,604
Nov-96	1,315,696	5,493	1,321,189	558,567	2,855	561,422	3,604
Dec-96	1,321,189	5,701	1,326,890	561,422	2,966	564,388	3,604
Jan-97	1,326,890	5,725	1,332,615	564,388	2,981	567,369	3,604
Feb-97	1,332,615	5,192	1,337,807	567,369	2,706	570,076	3,604
Mar-97	1,337,807	5,772	1,343,580	570,076	3,012	573,087	3,604
Apr-97	1,343,580	5,610	1,349,189	573,087	2,930	576,017	3,604
May-97	1,349,189	5,821	1,355,011	576,017	3,043	579,060	3,604
Jun-97	1,355,011	5,658	1,360,668	579,060	2,960	582,020	3,604
Jul-97	1,360,668	5,871	1,366,539	582,020	3,075	585,095	3,604
Aug-97	1,366,539	5,896	1,372,435	585,095	3,091	588,185	3,604
Sep-97	1,372,435	5,730	1,378,166	588,185	3,007	591,192	3,604
Oct-97	1,378,166	5,946	1,384,112	591,192	3,123	594,315	3,604
Nov-97	1,384,112	5,779	1,389,891	594,315	3,038	597,353	3,604
Dec-97	1,389,891	5,997	1,395,888	597,353	3,156	600,509	3,604
Jan-98	1,395,888	6,023	1,401,911	600,509	3,172	603,681	3,604
Feb-98	1,401,911	5,462	1,407,373	603,681	2,880	606,561	3,604
Mar-98	1,407,373	6,072	1,413,446	606,561	3,204	609,765	3,604
Apr-98	1,413,446	5,901	1,419,347	609,765	3,117	612,882	3,604
May-98	1,419,347	6,124	1,425,471	612,882	3,238	616,120	3,604
Jun-98	1,425,471	5,952	1,431,423	616,120	3,149	619,269	3,604
Jul-98	1,431,423	6,176	1,437,599	619,269	3,271	622,541	3,604
Aug-98	1,437,599	6,203	1,443,802	622,541	3,289	625,829	3,604
Sep-98	1,443,802	6,028	1,449,830	625,829	3,199	629,028	3,604
Oct-98	1,449,830	6,256	1,456,086	629,028	3,323	632,351	3,604
Nov-98	1,456,086	6,080	1,462,165	632,351	3,232	635,584	3,604
Dec-98	1,462,165	6,309	1,468,474	635,584	3,358	638,941	3,604
Jan-99	1,468,474	6,336	1,474,810	638,941	3,375	642,317	3,604
Feb-99	1,474,810	5,746	1,480,557	642,317	3,064	645,381	3,604
Mar-99	1,480,557	6,388	1,486,945	645,381	3,409	648,790	3,604
Apr-99	1,486,945	6,208	1,493,153	648,790	3,316	652,107	3,604
May-99	1,493,153	6,443	1,499,596	652,107	3,445	655,551	3,604
Jun-99	1,499,596	6,261	1,505,857	655,551	3,351	658,902	3,604
Jul-99	1,505,857	6,497	1,512,354	658,902	3,481	662,383	3,604
Aug-99	1,512,354	6,525	1,518,880	662,383	3,499	665,882	3,604
Sep-99	1,518,880	6,342	1,525,222	665,882	3,404	669,286	3,604
Oct-99	1,525,222	6,581	1,531,802	669,286	3,536	672,822	3,604
Nov-99	1,531,802	6,396	1,538,198	672,822	3,439	676,261	3,604
Dec-99	1,538,198	6,637	1,544,835	676,261	3,572	679,834	3,604
Jan-00	1,544,835	6,666	1,551,501	679,834	3,591	683,425	3,604
Feb-00	1,551,501	6,262	1,557,762	683,425	3,377	686,802	3,604
Mar-00	1,557,762	6,721	1,564,483	686,802	3,628	690,430	3,604
Apr-00	1,564,483	6,532	1,571,015	690,430	3,529	693,959	3,604
May-00	1,571,015	6,778	1,577,794	693,959	3,666	697,625	3,604
Jun-00	1,577,794	6,588	1,584,382	697,625	3,566	701,191	3,604

Edwardsport - Asbestos - Different Rates for Different Settlements

Jul-00	1,584,382	6,836	1,591,218	701,191	3,704	704,896	3,604
Aug-00	1,591,218	6,866	1,598,083	704,896	3,724	708,619	3,604
Sep-00	1,598,083	6,672	1,604,756	708,619	3,622	712,242	3,604
Oct-00	1,604,756	6,924	1,611,680	712,242	3,763	716,004	3,604
Nov-00	1,611,680	6,729	1,618,409	716,004	3,660	719,664	3,604
Dec-00	1,618,409	6,983	1,625,392	719,664	3,802	723,466	3,604
Jan-01	1,625,392	7,013	1,632,405	723,466	3,822	727,288	3,604
Feb-01	1,632,405	6,360	1,638,766	727,288	3,469	730,757	3,604
Mar-01	1,638,766	7,071	1,645,836	730,757	3,860	734,617	3,604
Apr-01	1,645,836	6,872	1,652,708	734,617	3,755	738,373	3,604
May-01	1,652,708	7,131	1,659,839	738,373	3,901	742,273	3,604
Jun-01	1,659,839	6,930	1,666,769	742,273	3,794	746,068	3,604
Jul-01	1,666,769	7,192	1,673,961	746,068	3,941	750,009	3,604
Aug-01	1,673,961	7,223	1,681,184	750,009	3,962	753,971	3,604
Sep-01	1,681,184	7,019	1,688,203	753,971	3,854	757,825	3,604
Oct-01	1,688,203	7,284	1,695,487	757,825	4,003	761,828	3,604
Nov-01	1,695,487	7,079	1,702,566	761,828	3,894	765,723	3,604
Dec-01	1,702,566	7,346	1,709,913	765,723	4,045	769,768	3,604
Jan-02	1,709,913	7,378	1,717,290	769,768	4,066	773,834	3,604
Feb-02	1,717,290	6,691	1,723,981	773,834	3,691	777,526	3,604
Mar-02	1,723,981	7,439	1,731,420	777,526	4,107	781,633	3,604
Apr-02	1,731,420	7,229	1,738,649	781,633	3,996	785,629	3,604
May-02	1,738,649	7,502	1,746,151	785,629	4,150	789,779	3,604
Jun-02	1,746,151	7,291	1,753,442	789,779	4,037	793,816	3,604
Jul-02	1,753,442	7,566	1,761,007	793,816	4,193	798,009	3,604
Aug-02	1,761,007	7,598	1,768,605	798,009	4,216	802,225	3,604
Sep-02	1,768,605	7,384	1,775,990	802,225	4,101	806,326	3,604
Oct-02	1,775,990	7,663	1,783,653	806,326	4,260	810,585	3,604
Nov-02	1,783,653	7,447	1,791,100	810,585	4,144	814,729	3,604
Dec-02	1,791,100	7,728	1,798,828	814,729	4,304	819,033	3,604
Jan-03	1,798,828	7,761	1,806,589	819,033	4,327	823,360	3,604
Feb-03	1,806,589	7,039	1,813,629	823,360	3,928	827,287	3,604
Mar-03	1,813,629	7,825	1,821,454	827,287	4,370	831,657	3,604
Apr-03	1,821,454	7,605	1,829,059	831,657	4,251	835,909	3,604
May-03	1,829,059	7,892	1,836,951	835,909	4,416	840,325	3,604
Jun-03	1,836,951	7,670	1,844,620	840,325	4,296	844,620	3,604
Jul-03	1,844,620	7,959	1,852,579	844,620	4,462	849,082	3,604
Aug-03	1,852,579	7,993	1,860,573	849,082	4,485	853,567	3,604
Sep-03	1,860,573	7,768	1,868,341	853,567	4,363	857,931	3,604
Oct-03	1,868,341	8,061	1,876,403	857,931	4,532	862,463	3,604
Nov-03	1,876,403	7,834	1,884,237	862,463	4,409	866,872	3,604
Dec-03	1,884,237	8,130	1,892,367	866,872	4,579	871,451	3,604
Jan-04	1,892,367	8,165	1,900,532	871,451	4,604	876,055	3,604
Feb-04	1,900,532	7,670	1,908,202	876,055	4,329	880,383	3,604
Mar-04	1,908,202	8,233	1,916,436	880,383	4,651	885,034	3,604

Edwardsport - Asbestos - Different Rates for Different Settlements

Apr-04	1,916,436	8,002	1,924,437	885,034	4,524	889,558	3,604
May-04	1,924,437	8,303	1,932,741	889,558	4,699	894,257	3,604
Jun-04	1,932,741	8,070	1,940,810	894,257	4,571	898,829	3,604
Jul-04	1,940,810	8,374	1,949,184	898,829	4,748	903,577	3,604
Aug-04	1,949,184	8,410	1,957,595	903,577	4,773	908,350	3,604
Sep-04	1,957,595	8,173	1,965,768	908,350	4,643	912,993	3,604
Oct-04	1,965,768	8,482	1,974,250	912,993	4,823	917,816	3,604
Nov-04	1,974,250	8,243	1,982,493	917,816	4,692	922,508	3,604
Dec-04	1,982,493	8,554	1,991,047	922,508	4,873	927,382	3,604
Jan-05	1,991,047	8,591	1,999,637	927,382	4,899	932,281	3,604
Feb-05	1,999,637	7,791	2,007,429	932,281	4,447	936,728	3,604
Mar-05	2,007,429	8,662	2,016,090	936,728	4,948	941,676	3,604
Apr-05	2,016,090	8,418	2,024,508	941,676	4,814	946,490	3,604
May-05	2,024,508	8,735	2,033,243	946,490	5,000	951,490	3,604
Jun-05	2,033,243	8,489	2,041,732	951,490	4,864	956,354	3,604
Jul-05	2,041,732	8,810	2,050,542	956,354	5,052	961,406	3,604
Aug-05	2,050,542	8,848	2,059,389	961,406	5,079	966,485	3,604
Sep-05	2,059,389	8,598	2,067,988	966,485	4,940	971,425	3,604
Oct-05	2,067,988	8,923	2,076,911	971,425	5,132	976,557	3,604
Nov-05	2,076,911	8,672	2,085,582	976,557	4,992	981,549	3,604
Dec-05	2,085,582	8,999	2,094,581	981,549	5,185	986,734	3,604
Jan-06	2,094,581	9,038	2,103,619	986,734	5,213	991,947	3,604
Feb-06	2,103,619	8,196	2,111,815	991,947	4,732	996,678	3,604
Mar-06	2,111,815	9,112	2,120,927	996,678	5,265	1,001,943	3,604
Apr-06	2,120,927	8,855	2,129,782	1,001,943	5,122	1,007,065	3,604
May-06	2,129,782	9,189	2,138,972	1,007,065	5,320	1,012,385	3,604
Jun-06	2,138,972	8,931	2,147,902	1,012,385	5,175	1,017,560	3,604
Jul-06	June 30, 2006:	2,985	2,141,957	1,017,560	5,375	1,022,936	
Aug-06	Jun-06			1,022,936	5,404	1,028,340	
Sep-06				1,028,340	5,257	1,033,596	
Oct-06				1,033,596	5,460	1,039,056	
Nov-06				1,039,056	5,311	1,044,368	
Dec-06				1,044,368	5,517	1,049,885	
Jan-07				1,049,885	5,546	1,055,431	
Feb-07				1,055,431	5,035	1,060,466	
Mar-07				1,060,466	5,602	1,066,068	
Apr-07				1,066,068	5,450	1,071,517	
May-07				1,071,517	5,660	1,077,178	
Jun-07				1,077,178	5,506	1,082,684	
Jul-07				1,082,684	5,719	1,088,404	
Aug-07				1,088,404	5,750	1,094,153	
Sep-07				1,094,153	5,593	1,099,746	
Oct-07				1,099,746	5,810	1,105,556	
Nov-07				1,105,556	5,651	1,111,207	
Dec-07				1,111,207	5,870	1,117,078	

655,982

Edwardsport - Asbestos - Different Rates for Different Settlements

Jan-08	1,117,078	5,901	1,122,979
Feb-08	1,122,979	5,549	1,128,527
Mar-08	1,128,527	5,962	1,134,489
Apr-08	1,134,489	5,799	1,140,288
May-08	1,140,288	6,024	1,146,312
Jun-08	1,146,312	5,860	1,152,172
Jul-08	1,152,172	6,087	1,158,258
Aug-08	1,158,258	6,119	1,164,377
Sep-08	1,164,377	5,952	1,170,329
Oct-08	1,170,329	6,182	1,176,512
Nov-08	1,176,512	6,014	1,182,526
Dec-08	1,182,526	6,247	1,188,773
Jan-09	1,188,773	6,280	1,195,052
Feb-09	1,195,052	5,701	1,200,753
Mar-09	1,200,753	6,343	1,207,096
Apr-09	1,207,096	6,170	1,213,267
May-09	1,213,267	6,409	1,219,676
Jun-09	1,219,676	6,235	1,225,911
Jul-09	1,225,911	6,476	1,232,387
Aug-09	1,232,387	6,510	1,238,897
Sep-09	1,238,897	6,333	1,245,230
Oct-09	1,245,230	6,578	1,251,808
Nov-09	1,251,808	6,399	1,258,207
Dec-09	1,258,207	6,647	1,264,854
Jan-10	1,264,854	6,682	1,271,536
Feb-10	1,271,536	6,066	1,277,601
Mar-10	1,277,601	6,749	1,284,350
Apr-10	1,284,350	6,565	1,290,916
May-10	1,290,916	6,819	1,297,735
Jun-10	1,297,735	6,634	1,304,369
Jul-10	1,304,369	6,891	1,311,260
Aug-10	1,311,260	6,927	1,318,187
Sep-10	1,318,187	6,738	1,324,925
Oct-10	1,324,925	6,999	1,331,924
Nov-10	1,331,924	6,809	1,338,733
Dec-10	1,338,733	7,072	1,345,805
Jan-11	1,345,805	7,109	1,352,914
Feb-11	1,352,914	6,454	1,359,368
Mar-11	1,359,368	7,181	1,366,549
Apr-11	1,366,549	6,986	1,373,534
May-11	1,373,534	7,256	1,380,790
Jun-11	1,380,790	7,058	1,387,849
Jul-11	1,387,849	7,332	1,395,180
Aug-11	1,395,180	7,370	1,402,550
Sep-11	1,402,550	7,170	1,409,720

Edwardsport - Asbestos - Different Rates for Different Settlements

Oct-11	1,409,720	7,447	1,417,167
Nov-11	1,417,167	7,244	1,424,411
Dec-11	1,424,411	7,525	1,431,936
Jan-12	1,431,936	7,564	1,439,501
Feb-12	1,439,501	7,113	1,446,613
Mar-12	1,446,613	7,642	1,454,255
Apr-12	1,454,255	7,434	1,461,689
May-12	1,461,689	7,722	1,469,411
Jun-12	1,469,411	7,511	1,476,922
Jul-12	1,476,922	7,802	1,484,724
Aug-12	1,484,724	7,843	1,492,567
Sep-12	1,492,567	7,630	1,500,197
Oct-12	1,500,197	7,925	1,508,122
Nov-12	1,508,122	7,709	1,515,831
Dec-12	1,515,831	8,008	1,523,839
Jan-13	1,523,839	8,050	1,531,889
Feb-13	1,531,889	7,307	1,539,196
Mar-13	1,539,196	8,131	1,547,327
Apr-13	1,547,327	7,910	1,555,237
May-13	1,555,237	8,216	1,563,453
Jun-13	1,563,453	7,992	1,571,445
Jul-13	1,571,445	8,301	1,579,746
Aug-13	1,579,746	8,345	1,588,092
Sep-13	1,588,092	8,118	1,596,210
Oct-13	1,596,210	8,432	1,604,642
Nov-13	1,604,642	8,203	1,612,845
Dec-13	1,612,845	8,520	1,621,365
Jan-14	1,621,365	8,565	1,629,930
Feb-14	1,629,930	7,775	1,637,705
Mar-14	1,637,705	8,651	1,646,356
Apr-14	1,646,356	8,416	1,654,772
May-14	1,654,772	8,742	1,663,514
Jun-14	1,663,514	8,504	1,672,017
Jul-14	1,672,017	8,833	1,680,850
Aug-14	1,680,850	8,879	1,689,730
Sep-14	1,689,730	8,638	1,698,367
Oct-14	1,698,367	8,972	1,707,339
Nov-14	1,707,339	8,728	1,716,067
Dec-14	1,716,067	9,065	1,725,132
Jan-15	1,725,132	9,113	1,734,245
Feb-15	1,734,245	8,273	1,742,518
Mar-15	1,742,518	9,205	1,751,723
Apr-15	1,751,723	8,954	1,760,678
May-15	1,760,678	9,301	1,769,979
Jun-15	1,769,979	9,048	1,779,027

Edwardsport - Asbestos - Different Rates for Different Settlements

Jul-15	1,779,027	9,398	1,788,425
Aug-15	1,788,425	9,448	1,797,872
Sep-15	1,797,872	9,190	1,807,063
Oct-15	1,807,063	9,546	1,816,609
Nov-15	1,816,609	9,286	1,825,895
Dec-15	1,825,895	9,646	1,835,540
Jan-16	1,835,540	9,697	1,845,237
Feb-16	1,845,237	9,117	1,854,354
Mar-16	1,854,354	9,796	1,864,150
Apr-16	1,864,150	9,529	1,873,679
May-16	1,873,679	9,898	1,883,578
Jun-16	1,883,578	9,629	1,893,206
Jul-16	1,893,206	10,001	1,903,207
Aug-16	1,903,207	10,054	1,913,261
Sep-16	1,913,261	9,780	1,923,041
Oct-16	1,923,041	10,159	1,933,200
Nov-16	1,933,200	9,882	1,943,082
Dec-16	1,943,082	10,265	1,953,347
Jan-17	1,953,347	10,319	1,963,666
Feb-17	1,963,666	9,367	1,973,033
Mar-17	1,973,033	10,423	1,983,456
Apr-17	1,983,456	10,139	1,993,595
May-17	1,993,595	10,531	2,004,126
Jun-17	2,004,126	10,245	2,014,371
Jul-17	2,014,371	10,641	2,025,012
Aug-17	2,025,012	10,697	2,035,710
Sep-17	2,035,710	10,406	2,046,116
Oct-17	2,046,116	10,809	2,056,925
Nov-17	2,056,925	10,515	2,067,440
Dec-17	2,067,440	10,922	2,078,361
Jan-18	2,078,361	10,979	2,089,341
Feb-18	2,089,341	9,967	2,099,307
Mar-18	2,099,307	11,090	2,110,397
Apr-18	2,110,397	10,788	2,121,185
May-18	2,121,185	11,206	2,132,391
Jun-18	2,132,391	10,900	2,143,291
Jul-18	2,143,291	11,322	2,154,613
Aug-18	2,154,613	11,382	2,165,995
Sep-18	2,165,995	11,072	2,177,068
Oct-18	2,177,068	11,501	2,188,568
Nov-18	2,188,568	11,188	2,199,756
Dec-18	2,199,756	11,621	2,211,376
Jan-19	2,211,376	11,682	2,223,058
Feb-19	2,223,058	10,604	2,233,663
Mar-19	2,233,663	11,800	2,245,462

Edwardsport - Asbestos - Different Rates for Different Settlements

Apr-19	2,245,462	11,478	2,256,941
May-19	2,256,941	11,923	2,268,864
Jun-19	2,268,864	11,598	2,280,462
Jul-19	2,280,462	12,047	2,292,508
Aug-19	2,292,508	12,111	2,304,619
Sep-19	2,304,619	11,781	2,316,400
Oct-19	2,316,400	12,237	2,328,637
Nov-19	2,328,637	11,904	2,340,540
Dec-19	2,340,540	12,364	2,352,904
Jan-20	2,352,904	12,430	2,365,334
Feb-20	2,365,334	11,687	2,377,021
Mar-20	2,377,021	12,557	2,389,578
Apr-20	2,389,578	12,215	2,401,793
May-20	2,401,793	12,688	2,414,481
Jun-20	2,414,481	12,342	2,426,824
Jul-20	2,426,824	12,820	2,439,644
Aug-20	2,439,644	12,888	2,452,531
Sep-20	2,452,531	12,537	2,465,068
Oct-20	2,465,068	13,022	2,478,090
Nov-20	2,478,090	12,668	2,490,758
Dec-20	2,490,758	13,158	2,503,916
Jan-21	2,503,916	13,227	2,517,143
Feb-21	2,517,143	12,007	2,529,151
Mar-21	2,529,151	13,361	2,542,511
Apr-21	2,542,511	12,997	2,555,508
May-21	2,555,508	13,500	2,569,008
Jun-21	2,569,008	13,132	2,582,140
Jul-21	2,582,140	13,641	2,595,781
Aug-21	2,595,781	13,713	2,609,493
Sep-21	2,609,493	13,339	2,622,833
Oct-21	2,622,833	13,856	2,636,688
Nov-21	2,636,688	13,478	2,650,167
Dec-21	2,650,167	14,000	2,664,166
Jan-22	2,664,166	14,074	2,678,240
Feb-22	2,678,240	12,776	2,691,016
Mar-22	2,691,016	14,216	2,705,232
Apr-22	2,705,232	13,829	2,719,061
May-22	2,719,061	14,364	2,733,424
Jun-22	2,733,424	13,973	2,747,397
Jul-22	2,747,397	14,514	2,761,911
Aug-22	2,761,911	14,590	2,776,501
Sep-22	2,776,501	14,193	2,790,694
Oct-22	2,790,694	14,742	2,805,436
Nov-22	2,805,436	14,341	2,819,777
Dec-22	2,819,777	14,896	2,834,673



Edwardsport - Asbestos - Different Rates for Different Settlements

Jan-23	2,834,673	14,975	2,849,648
Feb-23	2,849,648	13,593	2,863,241
Mar-23	2,863,241	15,126	2,878,367
Apr-23	2,878,367	14,714	2,893,080
May-23	2,893,080	15,283	2,908,364
Jun-23	2,908,364	14,867	2,923,231
Jul-23	2,923,231	15,442	2,938,673
Aug-23	2,938,673	15,524	2,954,197
Sep-23	2,954,197	15,101	2,969,298
Oct-23	2,969,298	15,686	2,984,984
Nov-23	2,984,984	15,259	3,000,243
Dec-23	3,000,243	15,849	3,016,092
Jan-24	3,016,092	15,933	3,032,025
Feb-24	3,032,025	14,981	3,047,006
Mar-24	3,047,006	16,096	3,063,103
Apr-24	3,063,103	15,658	3,078,761
May-24	3,078,761	16,264	3,095,025
Jun-24	3,095,025	15,821	3,110,846
Jul-24	3,110,846	16,434	3,127,280
Aug-24	3,127,280	16,520	3,143,800
Sep-24	3,143,800	16,071	3,159,871
Oct-24	3,159,871	16,693	3,176,563
Nov-24	3,176,563	16,238	3,192,801
Dec-24	3,192,801	16,866	3,209,668
Jan-25	3,209,668	16,956	3,226,623
Feb-25	3,226,623	15,392	3,242,015
Mar-25	3,242,015	17,126	3,259,141
Apr-25	3,259,141	16,660	3,275,802
May-25	3,275,802	17,305	3,293,106
Jun-25	3,293,106	16,834	3,309,940
Jul-25	3,309,940	17,485	3,327,426
Aug-25	3,327,426	17,578	3,345,003
Sep-25	3,345,003	17,099	3,362,102
Oct-25	3,362,102	17,761	3,379,863
Nov-25	3,379,863	17,277	3,397,140
Dec-25	3,397,140	17,946	3,415,086
Jan-26	3,415,086	18,041	3,433,127
Feb-26	3,433,127	16,377	3,449,504
Mar-26	3,449,504	18,223	3,467,726
Apr-26	3,467,726	17,726	3,485,453
May-26	3,485,453	18,412	3,503,865
Jun-26	3,503,865	17,911	3,521,776
Jul-26	5,384		3,509,250
June 30, 2026:		5,384	3,509,250
Jul-26			

Edwardsport - Asbestos - Average rate for Different Settlements

In-service date 6/30/1952  
 Estimated settlement date 6/30/2029

	Closure Cost (2005 \$)	Inflation factor	Inflated \$	(avg b/n settler Discount Rate)	\$ Discounted to 12/31/2005	\$ Discounted to 11/20/1990	Accretion Cum Catch	Depreciation Cum Catch
6/30/2006	2,115,662	1.0124	2,141,945	0.058	2,082,888	887,896	1,194,992	
6/30/2026	2,115,662	1.6590	3,509,826	0.058	1,104,319	470,750	633,569	
	<u>4,231,324</u>		<u>5,651,770</u>		<u>3,187,207</u>	<u>1,358,647</u>	<u>1,828,561</u>	
50%	2,115,662		2,825,885		1,593,604	679,323	914,280	657,643
Diff from specific rts scenario	-		-		57,525	1,716	55,810	1,661
Per PowerPlant: Difference:					<u>1,593,604</u>	<u>679,323</u>	<u>914,280</u>	<u>657,643</u>

Monthly accretion schedule:

	6/30/2006 Settlement			6/30/2026 Settlement			Monthly depreciation
	Beginning ARO	Monthly Accretion	Ending ARO	Beginning ARO	Monthly Accretion	Ending ARO	
Nov-90	887,896	4,124	892,020	470,750	2,187	472,937	3,613
Dec-90	892,020	4,282	896,302	472,937	2,270	475,207	3,613
Jan-91	896,302	4,302	900,604	475,207	2,281	477,488	3,613
Feb-91	900,604	3,904	904,508	477,488	2,070	479,558	3,613
Mar-91	904,508	4,342	908,849	479,558	2,302	481,860	3,613
Apr-91	908,849	4,221	913,071	481,860	2,238	484,098	3,613
May-91	913,071	4,383	917,453	484,098	2,324	486,421	3,613
Jun-91	917,453	4,261	921,715	486,421	2,259	488,681	3,613
Jul-91	921,715	4,424	926,139	488,681	2,346	491,026	3,613
Aug-91	926,139	4,445	930,584	491,026	2,357	493,383	3,613
Sep-91	930,584	4,322	934,907	493,383	2,292	495,675	3,613
Oct-91	934,907	4,488	939,394	495,675	2,379	498,054	3,613
Nov-91	939,394	4,363	943,757	498,054	2,313	500,367	3,613
Dec-91	943,757	4,530	948,287	500,367	2,402	502,769	3,613
Jan-92	948,287	4,552	952,839	502,769	2,413	505,182	3,613
Feb-92	952,839	4,278	957,117	505,182	2,268	507,450	3,613
Mar-92	957,117	4,594	961,711	507,450	2,436	509,886	3,613
Apr-92	961,711	4,467	966,178	509,886	2,368	512,254	3,613
May-92	966,178	4,638	970,816	512,254	2,459	514,713	3,613
Jun-92	970,816	4,509	975,325	514,713	2,391	517,104	3,613
Jul-92	975,325	4,682	980,006	517,104	2,482	519,586	3,613
Aug-92	980,006	4,704	984,710	519,586	2,494	522,080	3,613
Sep-92	984,710	4,574	989,284	522,080	2,425	524,505	3,613
Oct-92	989,284	4,749	994,033	524,505	2,518	527,023	3,613
Nov-92	994,033	4,617	998,650	527,023	2,448	529,470	3,613

Edwardsport - Asbestos - Average rate for Different Settlements

Dec-92	998,650	4,793	1,003,443	529,470	2,541	532,012	3,613
Jan-93	1,003,443	4,816	1,008,260	532,012	2,554	534,565	3,613
Feb-93	1,008,260	4,370	1,012,630	534,565	2,317	536,883	3,613
Mar-93	1,012,630	4,861	1,017,490	536,883	2,577	539,460	3,613
Apr-93	1,017,490	4,726	1,022,216	539,460	2,506	541,965	3,613
May-93	1,022,216	4,907	1,027,123	541,965	2,601	544,567	3,613
Jun-93	1,027,123	4,771	1,031,894	544,567	2,529	547,096	3,613
Jul-93	1,031,894	4,953	1,036,847	547,096	2,626	549,722	3,613
Aug-93	1,036,847	4,977	1,041,824	549,722	2,639	552,361	3,613
Sep-93	1,041,824	4,839	1,046,663	552,361	2,566	554,926	3,613
Oct-93	1,046,663	5,024	1,051,687	554,926	2,664	557,590	3,613
Nov-93	1,051,687	4,885	1,056,571	557,590	2,590	560,180	3,613
Dec-93	1,056,571	5,071	1,061,643	560,180	2,689	562,869	3,613
Jan-94	1,061,643	5,096	1,066,739	562,869	2,702	565,570	3,613
Feb-94	1,066,739	4,624	1,071,362	565,570	2,451	568,022	3,613
Mar-94	1,071,362	5,142	1,076,505	568,022	2,726	570,748	3,613
Apr-94	1,076,505	5,000	1,081,505	570,748	2,651	573,399	3,613
May-94	1,081,505	5,191	1,086,696	573,399	2,752	576,151	3,613
Jun-94	1,086,696	5,047	1,091,744	576,151	2,676	578,828	3,613
Jul-94	1,091,744	5,240	1,096,984	578,828	2,778	581,606	3,613
Aug-94	1,096,984	5,265	1,102,249	581,606	2,792	584,398	3,613
Sep-94	1,102,249	5,120	1,107,369	584,398	2,714	587,112	3,613
Oct-94	1,107,369	5,315	1,112,684	587,112	2,818	589,930	3,613
Nov-94	1,112,684	5,168	1,117,852	589,930	2,740	592,670	3,613
Dec-94	1,117,852	5,366	1,123,218	592,670	2,845	595,515	3,613
Jan-95	1,123,218	5,391	1,128,609	595,515	2,858	598,373	3,613
Feb-95	1,128,609	4,892	1,133,501	598,373	2,594	600,967	3,613
Mar-95	1,133,501	5,441	1,138,942	600,967	2,885	603,852	3,613
Apr-95	1,138,942	5,290	1,144,232	603,852	2,805	606,656	3,613
May-95	1,144,232	5,492	1,149,724	606,656	2,912	609,568	3,613
Jun-95	1,149,724	5,340	1,155,065	609,568	2,831	612,400	3,613
Jul-95	1,155,065	5,544	1,160,609	612,400	2,939	615,339	3,613
Aug-95	1,160,609	5,571	1,166,180	615,339	2,954	618,293	3,613
Sep-95	1,166,180	5,417	1,171,596	618,293	2,872	621,164	3,613
Oct-95	1,171,596	5,624	1,177,220	621,164	2,982	624,146	3,613
Nov-95	1,177,220	5,468	1,182,688	624,146	2,899	627,045	3,613
Dec-95	1,182,688	5,677	1,188,365	627,045	3,010	630,055	3,613
Jan-96	1,188,365	5,704	1,194,069	630,055	3,024	633,079	3,613
Feb-96	1,194,069	5,361	1,199,430	633,079	2,842	635,921	3,613
Mar-96	1,199,430	5,757	1,205,187	635,921	3,052	638,974	3,613
Apr-96	1,205,187	5,598	1,210,785	638,974	2,968	641,942	3,613
May-96	1,210,785	5,812	1,216,596	641,942	3,081	645,023	3,613
Jun-96	1,216,596	5,651	1,222,247	645,023	2,996	648,019	3,613
Jul-96	1,222,247	5,867	1,228,114	648,019	3,110	651,129	3,613
Aug-96	1,228,114	5,895	1,234,009	651,129	3,125	654,255	3,613
Sep-96	1,234,009	5,732	1,239,740	654,255	3,039	657,293	3,613

Edwardsport - Asbestos - Average rate for Different Settlements

Oct-96	1,239,740	5,951	1,245,691	657,293	3,155	660,448	3,613
Nov-96	1,245,691	5,786	1,251,477	660,448	3,068	663,516	3,613
Dec-96	1,251,477	6,007	1,257,484	663,516	3,185	666,701	3,613
Jan-97	1,257,484	6,036	1,263,520	666,701	3,200	669,901	3,613
Feb-97	1,263,520	5,477	1,268,997	669,901	2,904	672,805	3,613
Mar-97	1,268,997	6,091	1,275,088	672,805	3,229	676,034	3,613
Apr-97	1,275,088	5,922	1,281,010	676,034	3,140	679,174	3,613
May-97	1,281,010	6,149	1,287,159	679,174	3,260	682,434	3,613
Jun-97	1,287,159	5,979	1,293,138	682,434	3,170	685,604	3,613
Jul-97	1,293,138	6,207	1,299,345	685,604	3,291	688,895	3,613
Aug-97	1,299,345	6,237	1,305,581	688,895	3,307	692,201	3,613
Sep-97	1,305,581	6,064	1,311,645	692,201	3,215	695,416	3,613
Oct-97	1,311,645	6,296	1,317,941	695,416	3,338	698,754	3,613
Nov-97	1,317,941	6,122	1,324,063	698,754	3,246	702,000	3,613
Dec-97	1,324,063	6,355	1,330,418	702,000	3,370	705,370	3,613
Jan-98	1,330,418	6,386	1,336,804	705,370	3,386	708,755	3,613
Feb-98	1,336,804	5,794	1,342,598	708,755	3,072	711,827	3,613
Mar-98	1,342,598	6,444	1,349,043	711,827	3,417	715,244	3,613
Apr-98	1,349,043	6,266	1,355,309	715,244	3,322	718,566	3,613
May-98	1,355,309	6,505	1,361,814	718,566	3,449	722,015	3,613
Jun-98	1,361,814	6,325	1,368,140	722,015	3,354	725,369	3,613
Jul-98	1,368,140	6,567	1,374,707	725,369	3,482	728,851	3,613
Aug-98	1,374,707	6,599	1,381,305	728,851	3,498	732,349	3,613
Sep-98	1,381,305	6,416	1,387,721	732,349	3,402	735,751	3,613
Oct-98	1,387,721	6,661	1,394,382	735,751	3,532	739,282	3,613
Nov-98	1,394,382	6,477	1,400,858	739,282	3,434	742,716	3,613
Dec-98	1,400,858	6,724	1,407,582	742,716	3,565	746,281	3,613
Jan-99	1,407,582	6,756	1,414,339	746,281	3,582	749,863	3,613
Feb-99	1,414,339	6,130	1,420,469	749,863	3,250	753,113	3,613
Mar-99	1,420,469	6,818	1,427,287	753,113	3,615	756,728	3,613
Apr-99	1,427,287	6,629	1,433,917	756,728	3,515	760,243	3,613
May-99	1,433,917	6,883	1,440,799	760,243	3,649	763,892	3,613
Jun-99	1,440,799	6,692	1,447,492	763,892	3,548	767,440	3,613
Jul-99	1,447,492	6,948	1,454,440	767,440	3,684	771,124	3,613
Aug-99	1,454,440	6,981	1,461,421	771,124	3,701	774,825	3,613
Sep-99	1,461,421	6,788	1,468,209	774,825	3,599	778,424	3,613
Oct-99	1,468,209	7,047	1,475,256	778,424	3,736	782,161	3,613
Nov-99	1,475,256	6,852	1,482,108	782,161	3,633	785,794	3,613
Dec-99	1,482,108	7,114	1,489,222	785,794	3,772	789,565	3,613
Jan-00	1,489,222	7,148	1,496,370	789,565	3,790	793,355	3,613
Feb-00	1,496,370	6,718	1,503,089	793,355	3,562	796,917	3,613
Mar-00	1,503,089	7,215	1,510,303	796,917	3,825	800,742	3,613
Apr-00	1,510,303	7,015	1,517,318	800,742	3,719	804,461	3,613
May-00	1,517,318	7,283	1,524,601	804,461	3,861	808,323	3,613
Jun-00	1,524,601	7,081	1,531,683	808,323	3,754	812,077	3,613
Jul-00	1,531,683	7,352	1,539,035	812,077	3,898	815,975	3,613

Edwardsport - Asbestos - Average rate for Different Settlements

Aug-00	1,539,035	7,387	1,546,422	815,975	3,917	819,892	3,613
Sep-00	1,546,422	7,183	1,553,605	819,892	3,808	823,700	3,613
Oct-00	1,553,605	7,457	1,561,062	823,700	3,954	827,654	3,613
Nov-00	1,561,062	7,251	1,568,313	827,654	3,844	831,498	3,613
Dec-00	1,568,313	7,528	1,575,841	831,498	3,991	835,489	3,613
Jan-01	1,575,841	7,564	1,583,404	835,489	4,010	839,499	3,613
Feb-01	1,583,404	6,863	1,590,268	839,499	3,639	843,138	3,613
Mar-01	1,590,268	7,633	1,597,901	843,138	4,047	847,185	3,613
Apr-01	1,597,901	7,422	1,605,323	847,185	3,935	851,120	3,613
May-01	1,605,323	7,705	1,613,028	851,120	4,085	855,206	3,613
Jun-01	1,613,028	7,492	1,620,520	855,206	3,972	859,178	3,613
Jul-01	1,620,520	7,778	1,628,299	859,178	4,124	863,302	3,613
Aug-01	1,628,299	7,816	1,636,114	863,302	4,144	867,446	3,613
Sep-01	1,636,114	7,599	1,643,714	867,446	4,029	871,475	3,613
Oct-01	1,643,714	7,890	1,651,604	871,475	4,183	875,658	3,613
Nov-01	1,651,604	7,671	1,659,275	875,658	4,067	879,725	3,613
Dec-01	1,659,275	7,964	1,667,239	879,725	4,223	883,947	3,613
Jan-02	1,667,239	8,003	1,675,242	883,947	4,243	888,190	3,613
Feb-02	1,675,242	7,261	1,682,503	888,190	3,850	892,040	3,613
Mar-02	1,682,503	8,076	1,690,579	892,040	4,282	896,322	3,613
Apr-02	1,690,579	7,852	1,698,431	896,322	4,163	900,485	3,613
May-02	1,698,431	8,152	1,706,584	900,485	4,322	904,807	3,613
Jun-02	1,706,584	7,927	1,714,510	904,807	4,203	909,010	3,613
Jul-02	1,714,510	8,230	1,722,740	909,010	4,363	913,373	3,613
Aug-02	1,722,740	8,269	1,731,009	913,373	4,384	917,757	3,613
Sep-02	1,731,009	8,040	1,739,049	917,757	4,263	922,020	3,613
Oct-02	1,739,049	8,347	1,747,397	922,020	4,426	926,446	3,613
Nov-02	1,747,397	8,116	1,755,513	926,446	4,303	930,749	3,613
Dec-02	1,755,513	8,426	1,763,939	930,749	4,468	935,216	3,613
Jan-03	1,763,939	8,467	1,772,406	935,216	4,489	939,705	3,613
Feb-03	1,772,406	7,682	1,780,088	939,705	4,073	943,779	3,613
Mar-03	1,780,088	8,544	1,788,633	943,779	4,530	948,309	3,613
Apr-03	1,788,633	8,308	1,796,940	948,309	4,405	952,713	3,613
May-03	1,796,940	8,625	1,805,566	952,713	4,573	957,286	3,613
Jun-03	1,805,566	8,386	1,813,952	957,286	4,446	961,733	3,613
Jul-03	1,813,952	8,707	1,822,659	961,733	4,616	966,349	3,613
Aug-03	1,822,659	8,749	1,831,408	966,349	4,638	970,987	3,613
Sep-03	1,831,408	8,506	1,839,914	970,987	4,510	975,497	3,613
Oct-03	1,839,914	8,831	1,848,746	975,497	4,682	980,180	3,613
Nov-03	1,848,746	8,587	1,857,333	980,180	4,553	984,732	3,613
Dec-03	1,857,333	8,915	1,866,248	984,732	4,727	989,459	3,613
Jan-04	1,866,248	8,958	1,875,206	989,459	4,749	994,208	3,613
Feb-04	1,875,206	8,419	1,883,624	994,208	4,464	998,672	3,613
Mar-04	1,883,624	9,041	1,892,666	998,672	4,794	1,003,466	3,613
Apr-04	1,892,666	8,791	1,901,457	1,003,466	4,661	1,008,126	3,613
May-04	1,901,457	9,127	1,910,584	1,008,126	4,839	1,012,965	3,613

Edwardsport - Asbestos - Average rate for Different Settlements

Jun-04	1,910,584	8,874	1,919,458	1,012,965	4,705	1,017,670	3,613
Jul-04	1,919,458	9,213	1,928,671	1,017,670	4,885	1,022,555	3,613
Aug-04	1,928,671	9,258	1,937,929	1,022,555	4,908	1,027,463	3,613
Sep-04	1,937,929	9,001	1,946,930	1,027,463	4,772	1,032,236	3,613
Oct-04	1,946,930	9,345	1,956,275	1,032,236	4,955	1,037,190	3,613
Nov-04	1,956,275	9,086	1,965,361	1,037,190	4,817	1,042,008	3,613
Dec-04	1,965,361	9,434	1,974,795	1,042,008	5,002	1,047,009	3,613
Jan-05	1,974,795	8,601	1,984,274	1,047,009	5,026	1,052,035	3,613
Feb-05	1,984,274	8,601	1,992,875	1,052,035	4,560	1,056,595	3,613
Mar-05	1,992,875	9,566	2,002,440	1,056,595	5,072	1,061,667	3,613
Apr-05	2,002,440	9,301	2,011,741	1,061,667	4,931	1,066,598	3,613
May-05	2,011,741	9,656	2,021,397	1,066,598	5,120	1,071,717	3,613
Jun-05	2,021,397	9,389	2,030,786	1,071,717	4,978	1,076,695	3,613
Jul-05	2,030,786	9,748	2,040,534	1,076,695	5,168	1,081,863	3,613
Aug-05	2,040,534	9,794	2,050,328	1,081,863	5,193	1,087,056	3,613
Sep-05	2,050,328	9,523	2,059,852	1,087,056	5,049	1,092,105	3,613
Oct-05	2,059,852	9,887	2,069,739	1,092,105	5,242	1,097,347	3,613
Nov-05	2,069,739	9,613	2,079,352	1,097,347	5,097	1,102,444	3,613
Dec-05	2,079,352	9,981	2,089,333	1,102,444	5,292	1,107,736	3,613
Jan-06	2,089,333	10,029	2,099,362	1,107,736	5,317	1,113,053	3,613
Feb-06	2,099,362	9,100	2,108,461	1,113,053	4,824	1,117,877	3,613
Mar-06	2,108,461	10,121	2,118,582	1,117,877	5,366	1,123,243	3,613
Apr-06	2,118,582	9,840	2,128,422	1,123,243	5,217	1,128,460	3,613
May-06	2,128,422	10,216	2,138,638	1,128,460	5,417	1,133,877	3,613
Jun-06	2,138,638	9,933	2,148,572	1,133,877	5,267	1,139,143	3,613
Jul-06	2,148,572	3,321	2,141,960	1,139,143	5,468	1,144,611	3,613
Aug-06	2,141,960			1,144,611	5,494	1,150,105	3,613
Sep-06				1,150,105	5,342	1,155,447	3,613
Oct-06				1,155,447	5,546	1,160,993	3,613
Nov-06				1,160,993	5,393	1,166,386	3,613
Dec-06				1,166,386	5,599	1,171,985	3,613
Jan-07				1,171,985	5,625	1,177,610	3,613
Feb-07				1,177,610	5,104	1,182,714	3,613
Mar-07				1,182,714	5,677	1,188,391	3,613
Apr-07				1,188,391	5,520	1,193,911	3,613
May-07				1,193,911	5,731	1,199,642	3,613
Jun-07				1,199,642	5,572	1,205,214	3,613
Jul-07				1,205,214	5,785	1,210,999	3,613
Aug-07				1,210,999	5,813	1,216,812	3,613
Sep-07				1,216,812	5,652	1,222,463	3,613
Oct-07				1,222,463	5,868	1,228,331	3,613
Nov-07				1,228,331	5,705	1,234,036	3,613
Dec-07				1,234,036	5,923	1,239,960	3,613
Jan-08				1,239,960	5,952	1,245,911	3,613
Feb-08				1,245,911	5,594	1,251,505	3,613
Mar-08				1,251,505	6,007	1,257,512	3,613

Edwardsport - Asbestos - Average rate for Different Settlements

Apr-08	1,257,512	5,841	1,263,353
May-08	1,263,353	6,064	1,269,417
Jun-08	1,269,417	5,896	1,275,313
Jul-08	1,275,313	6,121	1,281,435
Aug-08	1,281,435	6,151	1,287,585
Sep-08	1,287,585	5,981	1,293,566
Oct-08	1,293,566	6,209	1,299,775
Nov-08	1,299,775	6,037	1,305,812
Dec-08	1,305,812	6,268	1,312,080
Jan-09	1,312,080	6,298	1,318,378
Feb-09	1,318,378	5,714	1,324,092
Mar-09	1,324,092	6,356	1,330,448
Apr-09	1,330,448	6,180	1,336,628
May-09	1,336,628	6,416	1,343,043
Jun-09	1,343,043	6,238	1,349,281
Jul-09	1,349,281	6,476	1,355,758
Aug-09	1,355,758	6,508	1,362,265
Sep-09	1,362,265	6,327	1,368,593
Oct-09	1,368,593	6,569	1,375,162
Nov-09	1,375,162	6,387	1,381,549
Dec-09	1,381,549	6,631	1,388,181
Jan-10	1,388,181	6,663	1,394,844
Feb-10	1,394,844	6,046	1,400,890
Mar-10	1,400,890	6,724	1,407,614
Apr-10	1,407,614	6,538	1,414,152
May-10	1,414,152	6,788	1,420,940
Jun-10	1,420,940	6,600	1,427,540
Jul-10	1,427,540	6,852	1,434,392
Aug-10	1,434,392	6,885	1,441,277
Sep-10	1,441,277	6,694	1,447,971
Oct-10	1,447,971	6,950	1,454,921
Nov-10	1,454,921	6,758	1,461,679
Dec-10	1,461,679	7,016	1,468,695
Jan-11	1,468,695	7,050	1,475,745
Feb-11	1,475,745	6,397	1,482,141
Mar-11	1,482,141	7,114	1,489,255
Apr-11	1,489,255	6,917	1,496,173
May-11	1,496,173	7,182	1,503,354
Jun-11	1,503,354	6,983	1,510,337
Jul-11	1,510,337	7,250	1,517,587
Aug-11	1,517,587	7,284	1,524,871
Sep-11	1,524,871	7,083	1,531,954
Oct-11	1,531,954	7,353	1,539,307
Nov-11	1,539,307	7,150	1,546,457
Dec-11	1,546,457	7,423	1,553,879
Jan-12	1,553,879	7,459	1,561,338

Edwardsport - Asbestos - Average rate for Different Settlements

Feb-12	1,561,338	7,010	1,568,348
Mar-12	1,568,348	7,528	1,575,876
Apr-12	1,575,876	7,320	1,583,195
May-12	1,583,195	7,599	1,590,795
Jun-12	1,590,795	7,389	1,598,183
Jul-12	1,598,183	7,671	1,605,855
Aug-12	1,605,855	7,708	1,613,563
Sep-12	1,613,563	7,495	1,621,057
Oct-12	1,621,057	7,781	1,628,838
Nov-12	1,628,838	7,566	1,636,404
Dec-12	1,636,404	7,855	1,644,258
Jan-13	1,644,258	7,892	1,652,151
Feb-13	1,652,151	7,161	1,659,312
Mar-13	1,659,312	7,965	1,667,276
Apr-13	1,667,276	7,744	1,675,021
May-13	1,675,021	8,040	1,683,061
Jun-13	1,683,061	7,817	1,690,878
Jul-13	1,690,878	8,116	1,698,994
Aug-13	1,698,994	8,155	1,707,149
Sep-13	1,707,149	7,929	1,715,079
Oct-13	1,715,079	8,232	1,723,311
Nov-13	1,723,311	8,004	1,731,315
Dec-13	1,731,315	8,310	1,739,625
Jan-14	1,739,625	8,350	1,747,975
Feb-14	1,747,975	7,576	1,755,552
Mar-14	1,755,552	8,427	1,763,979
Apr-14	1,763,979	8,193	1,772,172
May-14	1,772,172	8,506	1,780,678
Jun-14	1,780,678	8,271	1,788,949
Jul-14	1,788,949	8,587	1,797,536
Aug-14	1,797,536	8,628	1,806,164
Sep-14	1,806,164	8,389	1,814,553
Oct-14	1,814,553	8,710	1,823,263
Nov-14	1,823,263	8,469	1,831,731
Dec-14	1,831,731	8,792	1,840,524
Jan-15	1,840,524	8,834	1,849,358
Feb-15	1,849,358	8,016	1,857,374
Mar-15	1,857,374	8,915	1,866,289
Apr-15	1,866,289	8,668	1,874,958
May-15	1,874,958	9,000	1,883,957
Jun-15	1,883,957	8,751	1,892,708
Jul-15	1,892,708	9,085	1,901,793
Aug-15	1,901,793	9,129	1,910,921
Sep-15	1,910,921	8,876	1,919,797
Oct-15	1,919,797	9,215	1,929,012
Nov-15	1,929,012	8,960	1,937,972



Edwardsport - Asbestos - Average rate for Different Settlements

Dec-15	1,937,972	9,302	1,947,274
Jan-16	1,947,274	9,347	1,956,621
Feb-16	1,956,621	8,784	1,965,405
Mar-16	1,965,405	9,434	1,974,839
Apr-16	1,974,839	9,173	1,984,012
May-16	1,984,012	9,523	1,993,535
Jun-16	1,993,535	9,259	2,002,794
Jul-16	2,002,794	9,613	2,012,408
Aug-16	2,012,408	9,659	2,022,067
Sep-16	2,022,067	9,392	2,031,459
Oct-16	2,031,459	9,751	2,041,210
Nov-16	2,041,210	9,481	2,050,691
Dec-16	2,050,691	9,843	2,060,534
Jan-17	2,060,534	9,890	2,070,425
Feb-17	2,070,425	8,974	2,079,399
Mar-17	2,079,399	9,981	2,089,380
Apr-17	2,089,380	9,705	2,099,084
May-17	2,099,084	10,075	2,109,160
Jun-17	2,109,160	9,797	2,118,956
Jul-17	2,118,956	10,171	2,129,127
Aug-17	2,129,127	10,220	2,139,347
Sep-17	2,139,347	9,937	2,149,284
Oct-17	2,149,284	10,316	2,159,600
Nov-17	2,159,600	10,031	2,169,631
Dec-17	2,169,631	10,414	2,180,045
Jan-18	2,180,045	10,464	2,190,509
Feb-18	2,190,509	9,495	2,200,004
Mar-18	2,200,004	10,560	2,210,564
Apr-18	2,210,564	10,268	2,220,831
May-18	2,220,831	10,660	2,231,491
Jun-18	2,231,491	10,365	2,241,856
Jul-18	2,241,856	10,761	2,252,617
Aug-18	2,252,617	10,812	2,263,429
Sep-18	2,263,429	10,513	2,273,942
Oct-18	2,273,942	10,915	2,284,857
Nov-18	2,284,857	10,613	2,295,470
Dec-18	2,295,470	11,018	2,306,488
Jan-19	2,306,488	11,071	2,317,559
Feb-19	2,317,559	10,045	2,327,604
Mar-19	2,327,604	11,172	2,338,776
Apr-19	2,338,776	10,863	2,349,640
May-19	2,349,640	11,278	2,360,918
Jun-19	2,360,918	10,966	2,371,884
Jul-19	2,371,884	11,385	2,383,268
Aug-19	2,383,268	11,440	2,394,708
Sep-19	2,394,708	11,123	2,405,831

Edwardsport - Asbestos - Average rate for Different Settlements

Oct-19	2,405,831	11,548	2,417,379
Nov-19	2,417,379	11,228	2,428,607
Dec-19	2,428,607	11,657	2,440,264
Jan-20	2,440,264	11,713	2,451,977
Feb-20	2,451,977	11,008	2,462,986
Mar-20	2,462,986	11,822	2,474,808
Apr-20	2,474,808	11,495	2,486,303
May-20	2,486,303	11,934	2,498,237
Jun-20	2,498,237	11,604	2,509,840
Jul-20	2,509,840	12,047	2,521,888
Aug-20	2,521,888	12,105	2,533,993
Sep-20	2,533,993	11,770	2,545,762
Oct-20	2,545,762	12,220	2,557,982
Nov-20	2,557,982	11,881	2,569,863
Dec-20	2,569,863	12,335	2,582,198
Jan-21	2,582,198	12,394	2,594,593
Feb-21	2,594,593	11,246	2,605,839
Mar-21	2,605,839	12,508	2,618,347
Apr-21	2,618,347	12,162	2,630,508
May-21	2,630,508	12,626	2,643,135
Jun-21	2,643,135	12,277	2,655,411
Jul-21	2,655,411	12,746	2,668,157
Aug-21	2,668,157	12,807	2,680,964
Sep-21	2,680,964	12,452	2,693,416
Oct-21	2,693,416	12,928	2,706,345
Nov-21	2,706,345	12,570	2,718,915
Dec-21	2,718,915	13,051	2,731,966
Jan-22	2,731,966	13,113	2,745,079
Feb-22	2,745,079	11,898	2,756,977
Mar-22	2,756,977	13,233	2,770,211
Apr-22	2,770,211	12,867	2,783,078
May-22	2,783,078	13,359	2,796,436
Jun-22	2,796,436	12,989	2,809,425
Jul-22	2,809,425	13,485	2,822,910
Aug-22	2,822,910	13,550	2,836,460
Sep-22	2,836,460	13,175	2,849,635
Oct-22	2,849,635	13,678	2,863,313
Nov-22	2,863,313	13,299	2,876,612
Dec-22	2,876,612	13,808	2,890,420
Jan-23	2,890,420	13,874	2,904,294
Feb-23	2,904,294	12,588	2,916,882
Mar-23	2,916,882	14,001	2,930,883
Apr-23	2,930,883	13,613	2,944,496
May-23	2,944,496	14,133	2,958,630
Jun-23	2,958,630	13,742	2,972,372
Jul-23	2,972,372	14,267	2,986,639

Edwardsport - Asbestos - Average rate for Different Settlements

Aug-23	2,986,639	14,336	3,000,975
Sep-23	3,000,975	13,939	3,014,913
Oct-23	3,014,913	14,471	3,029,385
Nov-23	3,029,385	14,071	3,043,456
Dec-23	3,043,456	14,608	3,058,064
Jan-24	3,058,064	14,679	3,072,743
Feb-24	3,072,743	13,795	3,086,538
Mar-24	3,086,538	14,815	3,101,353
Apr-24	3,101,353	14,405	3,115,758
May-24	3,115,758	14,955	3,130,714
Jun-24	3,130,714	14,541	3,145,255
Jul-24	3,145,255	15,097	3,160,352
Aug-24	3,160,352	15,170	3,175,522
Sep-24	3,175,522	14,750	3,190,271
Oct-24	3,190,271	15,313	3,205,584
Nov-24	3,205,584	14,889	3,220,473
Dec-24	3,220,473	15,458	3,235,932
Jan-25	3,235,932	15,532	3,251,464
Feb-25	3,251,464	14,093	3,265,557
Mar-25	3,265,557	15,675	3,281,232
Apr-25	3,281,232	15,241	3,296,472
May-25	3,296,472	15,823	3,312,295
Jun-25	3,312,295	15,385	3,327,680
Jul-25	3,327,680	15,973	3,343,653
Aug-25	3,343,653	16,049	3,359,702
Sep-25	3,359,702	15,605	3,375,307
Oct-25	3,375,307	16,201	3,391,508
Nov-25	3,391,508	15,753	3,407,261
Dec-25	3,407,261	16,355	3,423,616
Jan-26	3,423,616	16,433	3,440,049
Feb-26	3,440,049	14,911	3,454,959
Mar-26	3,454,959	16,584	3,471,543
Apr-26	3,471,543	16,124	3,487,668
May-26	3,487,668	16,741	3,504,408
Jun-26	3,504,408	16,277	3,520,685
Jul-26			
	June 30, 2026:	5,442	<b>3,509,851</b>
	Jun-26		

Beckjord 1-5 - River Structure - Specific Rates for Different Settlement Dates

	In-service date Estimated settlen	Closure Cost		Discount Rate	\$ Discounted to		Accretion Cum Catch	Depreciation Cum Catch
		(2005 \$)	Inflation factor		Inflated \$	12/31/2005		
6/30/2029	6/30/1952	3,244,812	1.7865	5,798,961	0.063	1,378,293	547,106	831,187
6/30/2049	6/30/2029	3,244,812	2.9274	9,489,896	0.063	664,852	263,949	401,003
		6,489,624		15,295,957		2,043,245	811,055	1,232,190
50%		3,244,812		7,647,978		1,021,622	405,527	616,095
Per PowerPlant:								
Difference:								
						1,021,622	405,527	616,095
								159,065

Monthly accretion schedule:

	6/30/2029 Settlement			6/30/2059 Settlement			Monthly depreciation
	Beginning ARO	Monthly Accretion	Ending ARO	Beginning ARO	Monthly Accretion	Ending ARO	
Nov-90	547,106	2,754	549,860	263,949	1,329	265,278	874
Dec-90	549,860	2,861	552,721	265,278	1,380	266,658	874
Jan-91	552,721	2,875	555,596	266,658	1,387	268,045	874
Feb-91	555,596	2,810	558,206	268,045	1,259	269,304	874
Mar-91	558,206	2,904	561,110	269,304	1,401	270,705	874
Apr-91	561,110	2,825	563,935	270,705	1,383	272,068	874
May-91	563,935	2,934	566,869	272,068	1,415	273,483	874
Jun-91	566,869	2,854	569,722	273,483	1,377	274,860	874
Jul-91	569,722	2,964	572,686	274,860	1,430	276,290	874
Aug-91	572,686	2,979	575,666	276,290	1,437	277,727	874
Sep-91	575,666	2,898	578,564	277,727	1,398	279,126	874
Oct-91	578,564	3,010	581,574	279,126	1,452	280,578	874
Nov-91	581,574	2,928	584,501	280,578	1,412	281,990	874
Dec-91	584,501	3,041	587,542	281,990	1,467	283,457	874
Jan-92	587,542	3,057	590,599	283,457	1,475	284,932	874
Feb-92	590,599	2,874	593,472	284,932	1,386	286,318	874
Mar-92	593,472	3,087	596,560	286,318	1,490	287,808	874
Apr-92	596,560	3,003	599,563	287,808	1,449	289,257	874
May-92	599,563	3,119	602,682	289,257	1,505	290,762	874
Jun-92	602,682	3,034	605,716	290,762	1,464	292,225	874
Jul-92	605,716	3,151	608,867	292,225	1,520	293,746	874
Aug-92	608,867	3,168	612,035	293,746	1,528	295,274	874
Sep-92	612,035	3,081	615,116	295,274	1,488	296,760	874
Oct-92	615,116	3,200	618,316	296,760	1,544	298,304	874
Nov-92	618,316	3,113	621,429	298,304	1,502	299,806	874
Dec-92	621,429	3,233	624,662	299,806	1,560	301,365	874
Jan-93	624,662	3,250	627,911	301,365	1,568	302,933	874
Feb-93	627,911	2,950	630,861	302,933	1,423	304,356	874
Mar-93	630,861	3,282	634,143	304,356	1,583	305,940	874
Apr-93	634,143	3,192	637,338	305,940	1,540	307,480	874
May-93	637,338	3,318	640,651	307,480	1,600	309,080	874
Jun-93	640,651	3,225	643,876	309,080	1,556	310,635	874
Jul-93	643,876	3,350	647,226	310,635	1,616	312,252	874
Aug-93	647,226	3,367	650,593	312,252	1,624	313,876	874
Sep-93	650,593	3,275	653,868	313,876	1,580	315,458	874
Oct-93	653,868	3,402	657,270	315,458	1,641	317,097	874
Nov-93	657,270	3,309	660,579	317,097	1,596	318,693	874
Dec-93	660,579	3,437	664,015	318,693	1,658	320,351	874
Jan-94	664,015	3,454	667,470	320,351	1,667	322,018	874
Feb-94	667,470	3,136	670,605	322,018	1,513	323,531	874
Mar-94	670,605	3,489	674,094	323,531	1,683	325,214	874
Apr-94	674,094	3,393	677,488	325,214	1,637	326,851	874
May-94	677,488	3,525	681,012	326,851	1,700	328,552	874
Jun-94	681,012	3,428	684,441	328,552	1,654	330,205	874
Jul-94	684,441	3,561	688,001	330,205	1,718	331,923	874
Aug-94	688,001	3,579	691,591	331,923	1,727	333,650	874
Sep-94	691,591	3,482	695,062	333,650	1,680	335,330	874
Oct-94	695,062	3,616	698,678	335,330	1,745	337,074	874
Nov-94	698,678	3,517	702,195	337,074	1,697	338,771	874
Dec-94	702,195	3,653	705,848	338,771	1,762	340,534	874
Jan-95	705,848	3,672	709,520	340,534	1,772	342,305	874
Feb-95	709,520	3,333	712,854	342,305	1,608	343,913	874
Mar-95	712,854	3,709	716,562	343,913	1,789	345,702	874
Apr-95	716,562	3,607	720,169	345,702	1,740	347,443	874











Beckjord 1-5 - River Structure - Specific Rates for Different Settlement Dates

Sep-19	3,188,677	16,052	3,204,729	1,538,364	7,744	1,546,108	874
Oct-19	3,204,729	16,672	3,221,402	1,546,108	8,043	1,554,152	874
Nov-19	3,221,402	16,217	3,237,619	1,554,152	7,824	1,561,976	874
Dec-19	3,237,619	16,843	3,254,462	1,561,976	8,126	1,570,102	874
Jan-20	3,254,462	16,931	3,271,393	1,570,102	8,168	1,578,270	874
Feb-20	3,271,393	15,918	3,287,311	1,578,270	7,680	1,585,950	874
Mar-20	3,287,311	17,102	3,304,413	1,585,950	8,251	1,594,200	874
Apr-20	3,304,413	16,635	3,321,048	1,594,200	8,025	1,602,228	874
May-20	3,321,048	17,277	3,338,325	1,602,228	8,335	1,610,561	874
Jun-20	3,338,325	16,806	3,355,131	1,610,561	8,108	1,618,669	874
Jul-20	3,355,131	17,455	3,372,586	1,618,669	8,421	1,627,090	874
Aug-20	3,372,586	17,545	3,390,131	1,627,090	8,465	1,635,555	874
Sep-20	3,390,131	17,066	3,407,198	1,635,555	8,234	1,643,788	874
Oct-20	3,407,198	17,726	3,424,923	1,643,788	8,552	1,652,340	874
Nov-20	3,424,923	17,242	3,442,165	1,652,340	8,318	1,660,658	874
Dec-20	3,442,165	17,907	3,460,072	1,660,658	8,839	1,669,297	874
Jan-21	3,460,072	18,001	3,478,073	1,669,297	8,684	1,677,982	874
Feb-21	3,478,073	16,339	3,494,412	1,677,982	7,883	1,685,864	874
Mar-21	3,494,412	18,179	3,512,591	1,685,864	8,771	1,694,635	874
Apr-21	3,512,591	17,683	3,530,274	1,694,635	8,531	1,703,168	874
May-21	3,530,274	18,366	3,548,640	1,703,168	8,861	1,712,026	874
Jun-21	3,548,640	17,864	3,566,504	1,712,026	8,619	1,720,645	874
Jul-21	3,566,504	18,554	3,585,059	1,720,645	8,951	1,729,597	874
Aug-21	3,585,059	18,651	3,603,709	1,729,597	8,998	1,738,595	874
Sep-21	3,603,709	18,142	3,621,851	1,738,595	8,752	1,747,347	874
Oct-21	3,621,851	18,842	3,640,693	1,747,347	9,090	1,756,437	874
Nov-21	3,640,693	18,328	3,659,021	1,756,437	8,842	1,765,279	874
Dec-21	3,659,021	19,036	3,678,057	1,765,279	9,184	1,774,463	874
Jan-22	3,678,057	19,135	3,697,191	1,774,463	9,231	1,783,895	874
Feb-22	3,697,191	17,368	3,714,560	1,783,895	8,379	1,792,074	874
Mar-22	3,714,560	19,325	3,733,884	1,792,074	9,323	1,801,397	874
Apr-22	3,733,884	18,797	3,752,881	1,801,397	9,068	1,810,465	874
May-22	3,752,881	19,523	3,772,204	1,810,465	9,419	1,819,884	874
Jun-22	3,772,204	18,990	3,791,194	1,819,884	9,162	1,829,046	874
Jul-22	3,791,194	19,723	3,810,917	1,829,046	9,515	1,838,561	874
Aug-22	3,810,917	19,826	3,830,743	1,838,561	9,565	1,848,126	874
Sep-22	3,830,743	19,285	3,850,028	1,848,126	9,304	1,857,430	874
Oct-22	3,850,028	20,029	3,870,057	1,857,430	9,663	1,867,093	874
Nov-22	3,870,057	19,482	3,889,539	1,867,093	9,399	1,876,492	874
Dec-22	3,889,539	20,235	3,909,774	1,876,492	9,762	1,886,254	874
Jan-23	3,909,774	20,340	3,930,114	1,886,254	9,813	1,896,067	874
Feb-23	3,930,114	18,463	3,948,577	1,896,067	8,907	1,904,975	874
Mar-23	3,948,577	20,542	3,969,119	1,904,975	9,910	1,914,885	874
Apr-23	3,969,119	19,981	3,989,100	1,914,885	9,640	1,924,525	874
May-23	3,989,100	20,753	4,009,853	1,924,525	10,012	1,934,537	874
Jun-23	4,009,853	20,186	4,030,039	1,934,537	9,739	1,944,276	874
Jul-23	4,030,039	20,966	4,051,005	1,944,276	10,115	1,954,390	874
Aug-23	4,051,005	21,075	4,072,080	1,954,390	10,167	1,964,558	874
Sep-23	4,072,080	20,499	4,092,579	1,964,558	9,880	1,974,448	874
Oct-23	4,092,579	21,291	4,113,871	1,974,448	10,272	1,984,720	874
Nov-23	4,113,871	20,710	4,134,580	1,984,720	9,991	1,994,711	874
Dec-23	4,134,580	21,510	4,156,090	1,994,711	10,377	2,005,088	874
Jan-24	4,156,090	21,622	4,177,712	2,005,088	10,431	2,015,520	874
Feb-24	4,177,712	20,328	4,198,040	2,015,520	9,807	2,025,327	874
Mar-24	4,198,040	21,840	4,219,880	2,025,327	10,537	2,035,863	874
Apr-24	4,219,880	21,243	4,241,123	2,035,863	10,249	2,046,112	874
May-24	4,241,123	22,064	4,263,187	2,046,112	10,645	2,056,757	874
Jun-24	4,263,187	21,461	4,284,649	2,056,757	10,354	2,067,111	874
Jul-24	4,284,649	22,280	4,306,939	2,067,111	10,754	2,077,865	874
Aug-24	4,306,939	22,406	4,329,346	2,077,865	10,810	2,088,675	874
Sep-24	4,329,346	21,795	4,351,140	2,088,675	10,515	2,099,189	874
Oct-24	4,351,140	22,636	4,373,776	2,099,189	10,921	2,110,110	874
Nov-24	4,373,776	22,018	4,395,795	2,110,110	10,623	2,120,733	874
Dec-24	4,395,795	22,869	4,418,663	2,120,733	11,033	2,131,766	874
Jan-25	4,418,663	22,988	4,441,651	2,131,766	11,090	2,142,856	874
Feb-25	4,441,651	20,866	4,462,517	2,142,856	10,067	2,152,923	874
Mar-25	4,462,517	23,218	4,485,732	2,152,923	11,200	2,164,123	874
Apr-25	4,485,732	22,582	4,508,314	2,164,123	10,895	2,175,017	874
May-25	4,508,314	23,454	4,531,768	2,175,017	11,315	2,186,333	874
Jun-25	4,531,768	22,814	4,554,582	2,186,333	11,008	2,197,339	874
Jul-25	4,554,582	23,695	4,578,276	2,197,339	11,431	2,208,770	874
Aug-25	4,578,276	23,818	4,602,084	2,208,770	11,491	2,220,261	874
Sep-25	4,602,084	23,168	4,625,262	2,220,261	11,177	2,231,438	874

Beckjord 1-5 - River Structure - Specific Rates for Different Settlement Dates

Oct-25	4,625,262	24,062	4,649,324	2,231,438	11,609	2,243,047	874
Nov-25	4,649,324	23,405	4,672,730	2,243,047	11,292	2,254,339	874
Dec-25	4,672,730	24,309	4,697,039	2,254,339	11,728	2,266,067	874
Jan-26	4,697,039	24,436	4,721,475	2,266,067	11,789	2,277,858	874
Feb-26	4,721,475	22,180	4,743,655	2,277,858	10,701	2,288,557	874
Mar-26	4,743,655	24,678	4,768,334	2,288,557	11,906	2,300,463	874
Apr-26	4,768,334	24,004	4,782,338	2,300,463	11,581	2,312,043	874
May-26	4,792,338	24,932	4,817,270	2,312,043	12,028	2,324,072	874
Jun-26	4,817,270	24,251	4,841,520	2,324,072	11,700	2,335,771	874
Jul-26	4,841,520	25,187	4,866,708	2,335,771	12,152	2,347,923	874
Aug-26	4,866,708	25,318	4,892,028	2,347,923	12,215	2,360,138	874
Sep-26	4,892,028	24,627	4,916,654	2,360,138	11,881	2,372,019	874
Oct-26	4,916,654	25,578	4,942,232	2,372,019	12,340	2,384,359	874
Nov-26	4,942,232	24,880	4,967,112	2,384,359	12,003	2,396,362	874
Dec-26	4,967,112	25,841	4,992,953	2,396,362	12,467	2,408,829	874
Jan-27	4,992,953	25,975	5,018,928	2,408,829	12,532	2,421,361	874
Feb-27	5,018,928	23,578	5,042,505	2,421,361	11,375	2,432,736	874
Mar-27	5,042,505	26,233	5,068,739	2,432,736	12,656	2,445,392	874
Apr-27	5,068,739	25,517	5,094,255	2,445,392	12,310	2,457,702	874
May-27	5,094,255	26,502	5,120,758	2,457,702	12,788	2,470,488	874
Jun-27	5,120,758	25,779	5,146,538	2,470,488	12,437	2,482,925	874
Jul-27	5,146,538	26,774	5,173,310	2,482,925	12,917	2,495,842	874
Aug-27	5,173,310	26,914	5,200,224	2,495,842	12,984	2,508,826	874
Sep-27	5,200,224	26,179	5,226,403	2,508,826	12,630	2,521,456	874
Oct-27	5,226,403	27,180	5,253,592	2,521,456	13,118	2,534,574	874
Nov-27	5,253,592	26,447	5,280,040	2,534,574	12,759	2,547,333	874
Dec-27	5,280,040	27,469	5,307,509	2,547,333	13,252	2,560,585	874
Jan-28	5,307,509	27,612	5,335,120	2,560,585	13,321	2,573,906	874
Feb-28	5,335,120	25,960	5,361,081	2,573,906	12,524	2,586,431	874
Mar-28	5,361,081	27,890	5,388,971	2,586,431	13,456	2,599,887	874
Apr-28	5,388,971	27,129	5,416,100	2,599,887	13,088	2,612,975	874
May-28	5,416,100	28,177	5,444,276	2,612,975	13,594	2,626,568	874
Jun-28	5,444,276	27,407	5,471,684	2,626,568	13,223	2,639,791	874
Jul-28	5,471,684	28,468	5,500,150	2,639,791	13,733	2,653,524	874
Aug-28	5,500,150	28,614	5,528,763	2,653,524	13,805	2,667,329	874
Sep-28	5,528,763	27,833	5,556,596	2,667,329	13,428	2,680,757	874
Oct-28	5,556,596	28,908	5,585,504	2,680,757	13,946	2,694,703	874
Nov-28	5,585,504	28,118	5,613,622	2,694,703	13,566	2,708,268	874
Dec-28	5,613,622	29,204	5,642,826	2,708,268	14,089	2,722,358	874
Jan-29	5,642,826	29,356	5,672,182	2,722,358	14,163	2,736,521	874
Feb-29	5,672,182	26,646	5,698,829	2,736,521	12,855	2,749,378	874
Mar-29	5,698,829	29,647	5,728,476	2,749,378	14,303	2,763,679	874
Apr-29	5,728,476	28,838	5,757,314	2,763,679	13,913	2,777,592	874
May-29	5,757,314	29,952	5,787,266	2,777,592	14,450	2,792,042	874
Jun-29	5,787,266	29,134	5,816,400	2,792,042	14,056	2,806,098	874
Jul-29	June 30, 2028:	9,744	5,797,010	2,806,098	14,598	2,820,696	
Aug-29	Jun-29			2,820,696	14,674	2,835,371	
Sep-29				2,835,371	14,274	2,849,644	
Oct-29				2,849,644	14,825	2,864,469	
Nov-29				2,864,469	14,420	2,878,889	
Dec-29				2,878,889	14,977	2,893,866	
Jan-30				2,893,866	15,055	2,908,921	
Feb-30				2,908,921	13,665	2,922,587	
Mar-30				2,922,587	15,204	2,937,791	
Apr-30				2,937,791	14,789	2,952,580	
May-30				2,952,580	15,360	2,967,941	
Jun-30				2,967,941	14,941	2,982,882	
Jul-30				2,982,882	15,518	2,998,400	
Aug-30				2,998,400	15,599	3,013,999	
Sep-30				3,013,999	15,173	3,029,172	
Oct-30				3,029,172	15,759	3,044,931	
Nov-30				3,044,931	15,329	3,060,259	
Dec-30				3,060,259	15,921	3,076,180	
Jan-31				3,076,180	16,003	3,092,183	
Feb-31				3,092,183	14,526	3,108,710	
Mar-31				3,108,710	16,162	3,122,872	
Apr-31				3,122,872	15,721	3,138,593	
May-31				3,138,593	16,328	3,154,921	
Jun-31				3,154,921	15,882	3,170,804	
Jul-31				3,170,804	16,496	3,187,289	
Aug-31				3,187,289	16,582	3,203,881	
Sep-31				3,203,881	16,129	3,220,010	
Oct-31				3,220,010	16,752	3,238,761	

of years and make this number much more accurate.

Let me know if I can do anything else or if you would like to discuss in greater detail.

**Welles, Sarah**

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**From:** Hebbeler, Gary  
**Sent:** Thursday, January 26, 2006 2:05 PM  
**To:** Glenn, Erica  
**Cc:** Ritchie, Brett  
**Subject:** RE: Gas mains ARO

Yes  
Gary

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**From:** Glenn, Erica  
**Sent:** Thursday, January 26, 2006 1:59 PM  
**To:** Hebbeler, Gary  
**Cc:** Ritchie, Brett  
**Subject:** Gas mains ARO

Gary,

When you say "cost of removal" and "abandon the facility", you mean the purge, cap, and seal process in accordance with the Department of Transportation regulations, correct?

Thanks again,  
Erica

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**From:** Hebbeler, Gary  
**Sent:** Thursday, January 26, 2006 1:53 PM  
**To:** Glenn, Erica; Ritchie, Brett  
**Cc:** Dlugokecki, Amy; Walker, Patty; Kemper, Nancy  
**Subject:** RE:

The projected footage should be 711,580 wich equates to \$2.33/ft. Sorry about the mistake.  
Gary

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**From:** Hebbeler, Gary  
**Sent:** Thursday, January 26, 2006 1:46 PM  
**To:** Glenn, Erica; Ritchie, Brett  
**Cc:** Dlugokecki, Amy; Walker, Patty; Kemper, Nancy  
**Subject:**

Erica

Per your request, I'm submitting to you our projected cost of removal for replacement projects that is in the 2006 budget. The methodology used to develop these numbers is as follows: The 2004 actuals are used and split out by resource and converted to a percentage. One of the resource categories is the cost of removal. We use historical data along with known specific projects to determine footages and number of services to be replaced during the budget year. A three year average cost is applied to the projected footages and number of services. This is calculated for each project in the budget. This will provide a total dollar amount. Percentages are used based off 2004 actuals, as mentioned above, to obtain the resource breakdown. The total cost of removal for the categories as indicated for both Kentucky and Ohio is \$1,658,949 and projected footage is 719,001. Therefore, an average cost per foot for the cost of removal is \$2.31 per foot.

8/17/2006

Your original question on Thursday January 19 was in regard to the cast iron and bare steel replacement program. The annual cost provided were preliminary estimates based of the replacement program in Ohio using 2005 preliminaries and were not cost for other replacement projects. These cost will vary from year to year.

The KO Transmission estimate of \$20,000 per year were derived at by using the following methodology for the river crossing AM4. It is my assumption that we will abandon one of the four lines each year starting in 2007. It will cost about \$20,000 dollars to dig a hole on each end and abandon the facility. 100% of these cost would go to the cost of removal. Therefore we would spend about \$20,000 to purge and cap the facility each of the four years.

If you need any additional information, please call.

Gary

**Welles, Sarah**

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**From:** Hayes, Tim  
**Sent:** Monday, December 19, 2005 10:08 AM  
**To:** Glenn, Erica  
**Cc:** Born, Randall; Nispel, Debbie  
**Subject:** RE: SOS - Asbestos - Date of Legal Obligation

Erica, per our phone conversation today, my guess would be about a 25% chance the Corps or Engineers or Coast Guard would require the removal of structures in the river. If mooring cells or other structures become unsightly or unsafe they may make us remove or demolish them. I know of a couple retired stations (Cane Run on the Ohio river and the Breed Plant on the Wabash river) owned by other power companies where all the structures are still place.

At the abandoned Marble Hill plant on the Ohio river, we did remove the intake structure there but I think we did this on our own to keep from having to maintain a lighted marker buoy. Also, the Marble Hill intake structure extended way out in the middle of the Ohio river channel.

Keep in mind that the 25% guess is just a guess on my part. I hope this helps. If you have any questions or need additional information, please let me know.

Tim

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**From:** Glenn, Erica  
**Sent:** Monday, December 19, 2005 9:17 AM  
**To:** Hayes, Tim  
**Subject:** FW: SOS - Asbestos - Date of Legal Obligation

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**From:** Born, Randall  
**Sent:** Friday, December 16, 2005 11:07 AM  
**To:** Glenn, Erica; Sheppard, Amy  
**Cc:** Hayes, Tim  
**Subject:** RE: SOS - Asbestos - Date of Legal Obligation

The 1990 revisions to the asbestos regulations (40 CFR Part 61.140-157 (Subpart M)) were published in the Federal Register on November 20, 1990.

TITLE 40--PROTECTION OF ENVIRONMENT CHAPTER I--ENVIRONMENTAL PROTECTION AGENCY (CONTINUED)

As to the likelihood that we will ever be required to remove structures from the river: I can only say it seems logical that if we decided to abandon a riverfront property the COE might require the removal of structures that could impact navigation. However, I am *not* the department expert on COE regulation. Tim Hayes *is* our department authority in that arena, and I will defer to him to provide you with a more conclusive answer.

**Randall Born**  
**Generation Resources**  
**Water Quality & Waste Management Group**  
**513-287-3234**

8/17/2006

-----Original Message-----

From: Glenn, Erica  
Sent: Thursday, December 15, 2005 4:55 PM  
To: Born, Randall  
Cc: Sheppard, Amy  
Subject: RE: SOS - Asbestos - Date of Legal Obligation  
Importance: High

Randy,

Per my voicemail, could you let me know the date in 1990 the more stringent regulations went into effect?

Also, we would like to discuss the likelihood that we would ever be asked to remove our river structures by the U.S. Army Corp of Engineers. Who should we contact in Environmental on this topic?

Thank you,  
Erica

-----Original Message-----

From: Born, Randall  
Sent: Wednesday, November 30, 2005 11:36 AM  
To: Glenn, Erica  
Cc: Pearl, Steve  
Subject: RE: SOS - Asbestos - Date of Legal Obligation

Vanderwerff's summary is very good.

The asbestos rules first became effective in 1973, and at that time there was a legal obligation to follow those rules. However, until 1990 the rules were narrow in scope and following them was not costly. In 1990, the rules were modified to cover a broader spectrum of activities and they were made much more stringent with respect to work practices. This imposed a new legal obligation on the regulated entity and the associated costs became dramatically higher.

The legal obligation started in 1973, the big expenses started in 1990.

RPB

**Welles, Sarah**

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**From:** Born, Randall  
**Sent:** Friday, December 16, 2005 11:07 AM  
**To:** Glenn, Erica; Sheppard, Amy  
**Cc:** Hayes, Tim  
**Subject:** RE: SOS - Asbestos - Date of Legal Obligation

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TITLE 40--PROTECTION OF ENVIRONMENT CHAPTER I--ENVIRONMENTAL PROTECTION AGENCY (CONTINU

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**Randall Born**  
**Generation Resources**  
**Water Quality & Waste Management Group**  
**513-287-3234**

-----Original Message-----

**From:** Glenn, Erica  
**Sent:** Thursday, December 15, 2005 4:55 PM  
**To:** Born, Randall  
**Cc:** Sheppard, Amy  
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**From:** Born, Randall  
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**Cc:** Pearl, Steve  
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8/17/2006



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The legal obligation started in 1973, the big expenses started in 1990.

RPB

**KyPSC Case No. 2006-00172**  
**Attachment AG-DR-02-028**  
**Page 574 of 608**

**Welles, Sarah**

**From:** Glenn, Erica  
**Sent:** Wednesday, January 04, 2006 6:30 PM  
**To:** Glenn, Erica  
**Subject:** Ongoing asbestos remediation immateriality

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**From:** Stevens, George  
**Sent:** Monday, December 19, 2005 2:18 PM  
**To:** Glenn, Erica; Sheppard, Amy  
**Cc:** Bloemer, John; Wilson, Dale  
**Subject:** FASB FIN 47 Accounting Data 121605.xls

Amy and Erica:

Attached is the file with the asbestos remediation costs estimates for total remediation at the time the station (unit) is demolished.

We also discussed the amount of ongoing remediation from now to when a station (unit) is demolished. We think an annual decrease of 1% of the ARO is a reasonable assumption for the following reasons:

- 1 - Most of the asbestos containing areas that would be remediated during routine maintenance (piping inspections and replacements, boiler casing repairs, etc.) have already been remediated;
- 2 - Normally our capital budgeting process does not provide for an ongoing remediation program due to limited capital funds; and
- 3 - We would expect to do the majority of the remediation work on the remaining asbestos at the time of demolition; and

Please forward any questions to me. I should be around most of the time during the holidays.

George

**Welles, Sarah**

**From:** Meiers, Jim  
**Sent:** Wednesday, November 02, 2005 10:58 AM  
**To:** Glenn, Erica  
**Cc:** Nispel, Debbie  
**Subject:** RE: Follow up question related to ash ponds and asset retirement obligations

Hi Erica,

If ash is removed from one of our ponds for a structural fill or a similar applications, this work is usually done to gain an economic advantage for the station, a net positive. The economic benefit comes from off-setting the cost of final disposal of the ash that is reused and / or from off-setting the cost of the purchase and delivery of natural fill materials which. It is very hard to clearly identify what is the dollar amount associated with the economic advantage and it is not often documented. The advantage can be minimal because most projects are subsidized by the plant up to the estimated cost for final disposal of the coal ash. The cost to complete these projects with natural materials would be higher. I have identified two other examples of ponded ash reuse, but there are others I have not identified.

- One example is the use of coal ash from the ash pond at the Wabash River Station. The beneficial application here was to use coal ash in the construction of the berms for expanding ash storage capacity at the site. If coal ash was not used in the construction, clay type soils would have been used. Approximately 600,000 tons of coal ash was beneficially reused in the construction of these berms.
- Another example is the use of bottom ash for road base at the Gibson Station. The bottom ash from the ash ponds has been beneficially reused as road base in the construction of a haul roads at the station. The use of these materials off set the need to use rock or other aggregate in the road construction.

I hope this answers your questions, please don't hesitate to let me know if you need more detail or have additional questions.

Jim

---

**From:** Glenn, Erica  
**Sent:** Monday, October 24, 2005 4:39 PM  
**To:** Meiers, Jim  
**Subject:** Follow up question related to ash ponds and asset retirement obligations

Jim,

You wrote the attached memo on ash ponds some time ago to assist Christa Barnhart with the implementation of SFAS 143, Accounting for Asset Retirement Obligations. An interpretation of the original SFAS 143 was issued this year. We have a follow up question on ash ponds for our work around this new interpretation.

Your memo mentions the ash can be used beneficially elsewhere (e.g. structural fill). The question is as follows: When we use the ash elsewhere, are we at a net positive or net negative? That is, if we had to get structural fill from another source, would it be more or less expensive than doing the work to use our own ash? Are there examples where we used the ash other than for structural fill (what was the net dollar impact if so)?

Please feel free to call me if this question is unclear.

Thank you for your assistance,

**Erica Glenn**

Cinergy Corp.

Accounting Research

(317) 838-2280

<< File: FAS 143 ash Ponds.doc >>

The purpose of this spreadsheet is to demonstrate at a very high level that items not recorded due to materiality considerations with the adoption of Fin 47 are immaterial individually, and in the aggregate. Note that calculation of the true costs of these AROs was not attempted. The amounts below are based on high level conversations with subject matter experts. These amounts do not take into account any inflation to expected settlement dates and corresponding discounting to the current date which would lower the balances. Note also that the percentage information below was developed by applying 100% of the high level amount to each registrant. The percentages would be smaller for CG&E, PSI, and ULH&P had the amount been split among the registrants.

Real Estate - Main Buildings and District offices	455,000	<b>a</b>
Real Estate - substations	296,640	<b>b</b>
PCB contaminated equipment	860,000	<b>c</b>
Mercury - residential regulators	945,000	<b>d</b>
Retired real estate sites	N/A	<b>e</b>
	<b>2,556,640</b>	<b>A</b>

**As of 9/30/05**

	Total assets	Total assets / A	Total liabilities	Total liabilities / A
Cinergy	17,466,207,000	0.01%	12,993,504,000	0.02%
CG&E	7,619,094,000	0.03%	5,726,354,000	0.04%
PSI	5,995,293,000	0.04%	4,075,030,000	0.06%
ULH&P	470,159,000	0.54%	268,322,000	0.95%

- a** 91 total buildings (main buildings and district offices) that either are known to contain asbestos, or there is uncertainty, times \$10,000 divided by two (as \$10,000 was given as the ceiling) based on memo from Joe Jett.
- b** The average of costs of two known abatements \* 64 substations that either are known to contain asbestos, or there is uncertainty, times 90% (as not necessarily all 64 substations will have asbestos) based on information from Tammy Jett and Doug Frushour.
- c** \$86,000 per year historical average times 10 remaining years (based on midpoint of lives of equipment, 30-50 years, and that the company would have stopped using PCB contaminated equipment around 1/1/76). Information primarily from Pat McKee, Environmental, and Jim Dean, Fixed Assets.
- d** \$90,000 approximate per year times 10.5 remaining years (midpoint between 8-13 years) based on information from Kerri Buhrlage.
- e** High level estimate not deemed necessary based on historical pattern of insignificant costs.

**Finnigan, John**

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-028  
Page 579 of 608

**From:** Henson, Kelly  
**Sent:** Friday, August 18, 2006 10:51 AM  
**To:** Finnigan, John  
**Subject:** FW: Fin 47 Supporting documentation - ATTN: Carolyn

**Attachments:** RE: Fin 47 - question and request; rates.pdf; CIN Spreads 12-14-05.pdf; Discount rates.xls;  
RE: Catalyst Disposal Cost - Documentation question; SCR Catalysts ARO Data.xls

Here is one more e-mail (in addition to the ones saved on the R drive as mentioned in a earlier e-mail) for AG-DR-02-28, 29.

Kelly

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**From:** Reynolds, Jaime  
**Sent:** Friday, August 18, 2006 10:49 AM  
**To:** Henson, Kelly  
**Subject:** FW: Fin 47 Supporting documentation - ATTN: Carolyn

*Jaime*

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**From:** Glenn, Erica  
**Sent:** Wednesday, January 25, 2006 5:57 PM  
**To:** Deloitte Auditors; Karageorges, Carolyn - smtp  
**Cc:** Reynolds, Jaime  
**Subject:** Fin 47 Supporting documentation - ATTN: Carolyn

Carolyn,

Attached is requested Fin 47 supporting documentation as discussed. The items are as follows:

1. email from AEP for Conesville
2. risk free rate data from Treasury
3. credit spread information from Treasury (go to last page and use the reoffer spread row)
4. spreadsheet combining 2 and 3 for use
5. email from Mike O'Connor regarding SCR catalysts estimates
6. spreadsheet compiling information from Mike

I will have to follow up regarding S&L qualifications.

Please let me know if you have additional questions/requests.

Thanks,

**Erica Glenn**  
Cinergy Corp.  
Accounting Research  
(317) 838-2280



RE: Fin 47 -  
question and requ...



rates.pdf (491 KB)



CIN Spreads  
.2-14-05.pdf (88 K..



Discount rates.xls  
(37 KB)



RE: Catalyst  
Disposal Cost - D...



SCR Catalysts ARO  
Data.xls (31...

**KyPSC Case No. 2006-00172**  
**Attachment AG-DR-02-028**  
**Page 580 of 608**

**Finnigan, John**

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**From:** smhannis@aep.com  
**Sent:** Friday, January 13, 2006 1:42 PM  
**To:** Glenn, Erica  
**Cc:** temitchell@aep.com  
**Subject:** RE: Fin 47 - question and request

Erica,

Our asbestos estimate was an internal calculation. The cubic yards of asbestos remaining per unit was estimated by plant personnel based on plant records and gross MW output. Then an estimated market price per cubic yard was applied for asbestos removal and disposal. The \$324,480 is the estimated cubic yards (270.4) times the estimated price per cubic yard (\$1,200).

- Susannah  
(614) 716-1172

"Glenn, Erica" <Erica.Glenn@Cinergy.COM>

01/11/2006 08:44 AM

To <smhannis@aep.com>

cc

Subject RE: Fin 47 - question and request

Susannah,

Thanks for the data. Could you send me some additional language regarding the calculation below for our files. I believe this is an internal estimate but could you confirm? Also, how do I get to the \$324,480 using the data given below?

Please feel free to call me at 317-838-2280 if you prefer to discuss.

Thanks again,  
Erica

---

**From:** smhannis@aep.com [mailto:smhannis@aep.com]  
**Sent:** Tuesday, January 10, 2006 5:48 PM  
**To:** Glenn, Erica  
**Cc:** temitchell@aep.com  
**Subject:** Re: Fin 47 - question and request

Erica,

Sorry we didn't get back to you sooner. We have also tentatively concluded that the FIN 47 entries don't need to be filed with the FERC, but we are still discussing with our Legal department.

8/19/2006



Below is our calculation of the Conesville unit 4 estimate. Let me know if you need anything else.

Plant	Unit	Size	Fuel	In Service Date	O/S Date	Percent Asbestos	Cubic yards	Dollars for Removal & Disposal
Conesville	CV-4	800	C	1973	2045	5	270.4	\$324,480

Thanks,  
Susannah  
(614) 716-1172

"Glenn, Erica" <Erica.Glenn@Cinergy.COM>

01/03/2006 02:07 PM

To <temitchell@aep.com>, <smhannis@aep.com>  
cc  
Subject Fin 47 - question and request

Tom and Susannah,

We spoke previously regarding whether the Fin 47 entries would need to be filed with the FERC under Order 631. We have tentatively concluded that the Fin 47 entries do not need to be filed. Is this AEP's conclusion also?

Secondly, could you provide me support for the Conesville asbestos ARO estimate for our files?

Thank you,

**Erica Glenn**  
Cinergy Corp.  
Accounting Research  
(317) 838-2280

8/19/2006

<HELP> for explanation.  
 ENTER # <GOVT> <GO> TO SELECT SECURITY

N247 Govt **GOVT**

GOVERNMENT		SECURITIES			Page 6 of 11		
SECURITY		BID	ASK	ASKPRC	DUR	RISK	PSRC
1) STRIP PRINC	11/30/05						
2) STRIP PRINC	12/31/05	8.728	8.728	99.79	0.03	0.02	BFV
3) STRIP PRINC	1/31/06	4.440	4.440	99.52	0.11	0.11	BFV
4) STRIP PRINC	2/15/06	3.753	3.733	99.45	0.15	0.15	BGN
5) STRIP PRINC	2/28/06	3.890	3.870	99.28	0.19	0.19	BGN
6) STRIP PRINC	3/31/06	4.145	4.145	98.89	0.27	0.27	BFV
7) STRIP PRINC	4/30/06	4.252	4.252	98.51	0.36	0.35	BFV
8) STRIP PRINC	5/15/06	4.279	4.259	98.33	0.40	0.38	BGN
9) STRIP PRINC	5/31/06	4.374	4.374	98.11	0.44	0.42	BFV
10) STRIP PRINC	6/30/06	4.469	4.469	97.71	0.52	0.50	BFV
11) STRIP PRINC	7/15/06	4.468	4.468	97.53	0.57	0.54	BFV
12) STRIP PRINC	7/31/06	8.372	8.372	95.18	0.60	0.55	BFV
13) STRIP PRINC	8/15/06	4.424	4.404	97.21	0.65	0.62	BGN
14) STRIP PRINC	8/31/06	4.474	4.474	97.00	0.69	0.65	BFV
15) STRIP PRINC	9/30/06	4.480	4.480	96.64	0.77	0.73	BFV
16) STRIP PRINC	10/15/06	4.484	4.484	96.46	0.81	0.77	BFV
17) STRIP PRINC	10/31/06	4.489	4.489	96.27	0.86	0.81	BFV
18) STRIP PRINC	11/15/06	4.472	4.452	96.12	0.90	0.84	BGN
19) STRIP PRINC	11/30/06	4.498	4.498	95.91	0.94	0.88	BFV
20) STRIP PRINC	12/31/06	4.502	4.502	95.54	1.02	0.96	BFV
21) STRIP PRINC	1/31/07	4.495	4.495	95.19	1.11	1.03	BFV

<HELP> for explanation.  
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N247 Govt GOVT

**GOVERNMENT SECURITIES**

Page 7 of 11

SECURITY		BID	ASK	ASKPRC	DUR	RISK	PSRC
1) STRIP PRINC	2/15/07	4.437	4.417	95.10	1.15	1.07	BGN
2) STRIP PRINC	2/28/07	4.489	4.489	94.86	1.19	1.10	BFV
3) STRIP PRINC	3/31/07	4.482	4.482	94.52	1.27	1.18	BFV
4) STRIP PRINC	4/30/07	4.475	4.475	94.17	1.36	1.25	BFV
5) STRIP PRINC	5/15/07	4.414	4.394	94.11	1.40	1.29	BGN
6) STRIP PRINC	5/31/07	4.469	4.469	93.84	1.44	1.32	BFV
7) STRIP PRINC	6/30/07	4.463	4.463	93.49	1.52	1.39	BFV
8) STRIP PRINC	7/31/07	4.458	4.458	93.15	1.61	1.47	BFV
9) STRIP PRINC	8/15/07	4.430	4.410	93.06	1.65	1.50	BGN
10) STRIP PRINC	8/31/07	4.453	4.453	92.84	1.69	1.53	BFV
11) STRIP PRINC	9/30/07	4.448	4.448	92.50	1.77	1.60	BFV
12) STRIP PRINC	10/31/07	4.444	4.444	92.17	1.86	1.67	BFV
13) STRIP PRINC	11/15/07	4.440	4.420	92.04	1.90	1.71	BGN
14) STRIP PRINC	11/30/07	4.439	4.439	91.84	1.94	1.74	BFV
15) STRIP PRINC	2/15/08	4.402	4.382	91.10	2.15	1.92	BGN
16) STRIP PRINC	5/15/08	4.454	4.434	90.02	2.40	2.11	BGN
17) STRIP PRINC	8/15/08	4.445	4.425	89.05	2.65	2.31	BGN
18) STRIP PRINC	9/15/08	4.445	4.445	88.69	2.73	2.37	BFV
19) STRIP PRINC	10/15/08	4.446	4.446	88.36	2.81	2.43	BFV
20) STRIP PRINC	11/15/08	4.448	4.428	88.08	2.90	2.50	BGN
21) STRIP PRINC	12/15/08	4.449	4.449	87.71	2.98	2.56	BFV

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N247 Govt GOVT

GOVERNMENT		SECURITIES				Page 8 of 11	
SECURITY		BID	ASK	ASKPRC	DUR	RISK	PSRC
1) STRIP PRINC	1/15/09	4.449	4.449	87.38	3.07	2.62	BFV
2) STRIP PRINC	2/15/09	4.412	4.392	87.21	3.15	2.69	BGN
3) STRIP PRINC	3/15/09	4.450	4.450	86.75	3.23	2.74	BFV
4) STRIP PRINC	4/15/09	4.450	4.450	86.43	3.31	2.80	BFV
5) STRIP PRINC	5/15/09	4.446	4.426	86.18	3.40	2.86	BGN
6) STRIP PRINC	6/15/09	4.451	4.451	85.79	3.48	2.92	BFV
7) STRIP PRINC	7/15/09	4.451	4.451	85.48	3.57	2.98	BFV
8) STRIP PRINC	8/15/09	4.438	4.418	85.26	3.65	3.04	BGN
9) STRIP PRINC	9/15/09	4.452	4.452	84.86	3.73	3.10	BFV
10) STRIP PRINC	10/15/09	4.452	4.452	84.54	3.81	3.15	BFV
11) STRIP PRINC	11/15/09	4.493	4.473	84.16	3.90	3.21	BGN
12) STRIP PRINC	12/15/09	4.453	4.453	83.92	3.98	3.27	BFV
13) STRIP PRINC	1/15/10	4.448	4.448	83.62	4.07	3.33	BFV
14) STRIP PRINC	2/15/10	4.445	4.425	83.39	4.15	3.39	BGN
15) STRIP PRINC	3/15/10	4.438	4.438	83.06	4.23	3.44	BFV
16) STRIP PRINC	4/15/10	4.432	4.432	82.77	4.31	3.49	BFV
17) STRIP PRINC	5/15/10	4.440	4.420	82.51	4.40	3.55	BGN
18) STRIP PRINC	6/15/10	4.421	4.421	82.21	4.48	3.60	BFV
19) STRIP PRINC	7/15/10	4.416	4.416	81.92	4.57	3.66	BFV
20) STRIP PRINC	8/15/10	4.420	4.400	81.68	4.65	3.72	BGN
21) STRIP PRINC	9/15/10	4.405	4.405	81.38	4.73	3.77	BFV

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N247 Govt **GOVT**

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**GOVERNMENT SECURITIES**

Page 9 of 11

SECURITY		BID	ASK	ASKPRC	DUR	RISK	PSRC
1) STRIP PRINC	10/15/10	4.400	4.400	81.10	4.81	3.82	BFV
2) STRIP PRINC	11/15/10	4.420	4.400	80.80	4.90	3.87	BGN
3) STRIP PRINC	12/15/10	4.389	4.389	80.55	4.98	3.93	BFV
4) STRIP PRINC	2/15/11	4.430	4.410	79.88	5.15	4.02	BGN
5) STRIP PRINC	8/15/11	4.442	4.422	78.11	5.65	4.32	BGN
6) STRIP PRINC	2/15/12	4.430	4.410	76.47	6.15	4.60	BGN
7) STRIP PRINC	8/15/12	4.465	4.445	74.65	6.65	4.86	BGN
8) STRIP PRINC	11/15/12	4.460	4.440	73.87	6.90	4.98	BGN
9) STRIP PRINC	2/15/13	4.477	4.457	72.97	7.15	5.10	BGN
10) STRIP PRINC	5/15/13	4.465	4.445	72.24	7.40	5.23	BGN
11) STRIP PRINC	8/15/13	4.425	4.405	71.66	7.65	5.36	BGN
12) STRIP PRINC	11/15/13	4.550	4.530	70.20	7.90	5.42	BGN
13) STRIP PRINC	2/15/14	4.447	4.427	69.99	8.15	5.58	BGN
14) STRIP PRINC	5/15/14	4.500	4.480	68.93	8.40	5.66	BGN
15) STRIP PRINC	8/15/14	4.515	4.495	68.08	8.65	5.76	BGN
16) STRIP PRINC	11/15/14	4.470	4.450	67.60	8.90	5.88	BGN
17) STRIP PRINC	2/15/15	4.590	4.570	66.14	9.15	5.92	BGN
18) STRIP PRINC	5/15/15	4.585	4.565	65.43	9.40	6.01	BGN
19) STRIP PRINC	8/15/15	4.582	4.562	64.71	9.65	6.11	BGN
20) STRIP PRINC	11/15/15	4.612	4.592	63.80	9.90	6.17	BGN
21) STRIP PRINC	2/15/16	4.626	4.596	63.05	10.15	6.26	BGN

Australia 61 2 9777 8600  
Hong Kong 852 2977 6000

Brazil 5511 3048 4500  
Japan 81 3 3201 8900

Europe 44 20 7330 7500  
Singapore 65-6212 1000 U.S. 1 212 318 2000

Germany 49 69 920410  
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N247 Govt **GOVT**

Page 10 of 11

GOVERNMENT		SECURITIES				RISK	PSRC
SECURITY		BID	ASK	ASKPRC	DUR		
1) STRIP PRINC	5/15/16	4.641	4.611	62.25	10.40	6.33	BGN
2) STRIP PRINC	11/15/16	4.669	4.639	60.67	10.90	6.46	BGN
3) STRIP PRINC	5/15/17	4.702	4.672	59.07	11.40	6.58	BGN
4) STRIP PRINC	8/15/17	4.709	4.679	58.34	11.65	6.64	BGN
5) STRIP PRINC	5/15/18	4.743	4.713	56.13	12.40	6.80	BGN
6) STRIP PRINC	11/15/18	4.757	4.727	54.74	12.90	6.90	BGN
7) STRIP PRINC	2/15/19	4.770	4.740	54.01	13.15	6.94	BGN
8) STRIP PRINC	8/15/19	4.782	4.752	52.67	13.65	7.02	BGN
9) STRIP PRINC	2/15/20	4.806	4.776	51.28	14.15	7.09	BGN
10) STRIP PRINC	5/15/20	4.816	4.786	50.61	14.40	7.12	BGN
11) STRIP PRINC	8/15/20	4.822	4.792	49.97	14.65	7.15	BGN
12) STRIP PRINC	2/15/21	4.830	4.800	48.74	15.15	7.21	BGN
13) STRIP PRINC	5/15/21	4.840	4.810	48.10	15.40	7.23	BGN
14) STRIP PRINC	8/15/21	4.843	4.813	47.51	15.65	7.26	BGN
15) STRIP PRINC	11/15/21	4.846	4.816	46.93	15.90	7.28	BGN
16) STRIP PRINC	8/15/22	4.847	4.817	45.27	16.65	7.36	BGN
17) STRIP PRINC	11/15/22	4.850	4.820	44.72	16.90	7.38	BGN
18) STRIP PRINC	2/15/23	4.844	4.814	44.23	17.15	7.41	BGN
19) STRIP PRINC	8/15/23	4.841	4.811	43.21	17.65	7.45	BGN
20) STRIP PRINC	11/15/24	4.844	4.814	40.70	18.90	7.51	BGN
21) STRIP PRINC	2/15/25	4.845	4.815	40.21	19.15	7.52	BGN

<HELP> for explanation.

N247 Govt GOVT

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**GOVERNMENT SECURITIES**

Page 11 of 11

	SECURITY		BID	ASK	ASKPRC	DUR	RISK	PSRC
1)	STRIP PRINC	8/15/25	4.840	4.810	39.30	19.65	7.54	BGN
2)	STRIP PRINC	2/15/26	4.827	4.787	38.55	20.15	7.59	BGN
3)	STRIP PRINC	8/15/26	4.835	4.795	37.59	20.65	7.58	BGN
4)	STRIP PRINC	11/15/26	4.831	4.791	37.18	20.90	7.59	BGN
5)	STRIP PRINC	2/15/27	4.823	4.783	36.80	21.15	7.60	BGN
6)	STRIP PRINC	8/15/27	4.817	4.777	35.99	21.65	7.61	BGN
7)	STRIP PRINC	11/15/27	4.814	4.774	35.59	21.90	7.61	BGN
8)	STRIP PRINC	8/15/28	4.795	4.755	34.49	22.65	7.63	BGN
9)	STRIP PRINC	11/15/28	4.786	4.746	34.16	22.90	7.64	BGN
10)	STRIP PRINC	2/15/29	4.786	4.746	33.76	23.15	7.63	BGN
11)	STRIP PRINC	8/15/29	4.776	4.736	33.06	23.65	7.64	BGN
12)	STRIP PRINC	5/15/30	4.757	4.717	32.06	24.40	7.64	BGN
13)	STRIP PRINC	2/15/31	4.645	4.605	31.82	25.15	7.82	BGN

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N247 Govt GOVT

GOVERNMENT		SECURITIES			Page 9 of 16		
SECURITY		BID	ASK	ASKPRC	DUR	RISK	PSRC
1) STRIPS	12/31/05	8.730	8.730	99.79	0.03	0.02	BFV
2) STRIPS	1/15/06	3.810	3.790	99.75	0.07	0.06	BGN
3) STRIPS	1/31/06	4.442	4.442	99.52	0.11	0.11	BFV
4) STRIPS	2/15/06	3.768	3.748	99.44	0.15	0.15	BGN
5) STRIPS	2/28/06	3.830	3.810	99.29	0.19	0.19	BGN
6) STRIPS	3/15/06	4.145	4.145	99.06	0.23	0.23	BFV
7) STRIPS	3/31/06	4.146	4.146	98.89	0.27	0.27	BFV
8) STRIPS	4/15/06	4.194	4.194	98.70	0.32	0.31	BFV
9) STRIPS	4/30/06	4.252	4.252	98.51	0.36	0.35	BFV
10) STRIPS	5/15/06	4.206	4.186	98.36	0.40	0.38	BGN
11) STRIPS	5/31/06	4.374	4.374	98.11	0.44	0.42	BFV
12) STRIPS	6/15/06	4.439	4.439	97.91	0.48	0.46	BFV
13) STRIPS	6/30/06	4.469	4.469	97.71	0.52	0.50	BFV
14) STRIPS	7/15/06	4.125	4.105	97.73	0.57	0.54	BGN
15) STRIPS	7/31/06	4.462	4.462	97.35	0.61	0.58	BFV
16) STRIPS	8/15/06	4.295	4.275	97.29	0.65	0.62	BGN
17) STRIPS	8/31/06	4.474	4.474	97.00	0.69	0.65	BFV
18) STRIPS	9/15/06	4.477	4.477	96.82	0.73	0.69	BFV
19) STRIPS	9/30/06	4.480	4.480	96.64	0.77	0.73	BFV
20) STRIPS	10/15/06	4.484	4.484	96.46	0.81	0.77	BFV
21) STRIPS	10/31/06	4.489	4.489	96.27	0.86	0.81	BFV

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N247 Govt GOVT

GOVERNMENT SECURITIES

Page 10 of 16

SECURITY		BID	ASK	ASKPRC	DUR	RISK	PSRC
1) STRIPS	11/15/06	4.342	4.322	96.23	0.90	0.85	BGN
2) STRIPS	11/30/06	4.498	4.498	95.91	0.94	0.88	BFV
3) STRIPS	12/15/06	4.503	4.503	95.73	0.98	0.92	BFV
4) STRIPS	12/31/06	4.502	4.502	95.54	1.02	0.96	BFV
5) STRIPS	1/15/07	4.499	4.499	95.37	1.07	0.99	BFV
6) STRIPS	1/31/07	4.495	4.495	95.19	1.11	1.03	BFV
7) STRIPS	2/15/07	4.350	4.330	95.20	1.15	1.07	BGN
8) STRIPS	2/28/07	4.489	4.489	94.86	1.19	1.10	BFV
9) STRIPS	3/15/07	4.360	4.340	94.86	1.23	1.14	BGN
10) STRIPS	3/31/07	4.482	4.482	94.52	1.27	1.18	BFV
11) STRIPS	4/15/07	4.478	4.478	94.35	1.31	1.21	BFV
12) STRIPS	4/30/07	4.475	4.475	94.17	1.36	1.25	BFV
13) STRIPS	5/15/07	4.387	4.367	94.14	1.40	1.29	BGN
14) STRIPS	5/31/07	4.469	4.469	93.84	1.44	1.32	BFV
15) STRIPS	6/15/07	4.466	4.466	93.67	1.48	1.36	BFV
16) STRIPS	6/30/07	4.463	4.463	93.49	1.52	1.39	BFV
17) STRIPS	7/15/07	4.460	4.460	93.33	1.57	1.43	BFV
18) STRIPS	7/31/07	4.458	4.458	93.15	1.61	1.47	BFV
19) STRIPS	8/15/07	4.400	4.380	93.10	1.65	1.50	BGN
20) STRIPS	8/31/07	4.453	4.453	92.84	1.69	1.53	BFV
21) STRIPS	9/15/07	4.451	4.451	92.67	1.73	1.57	BFV

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N247 Govt **GOVT**

Page 11 of 16

GOVERNMENT		SECURITIES			DUR	RISK	PSRC
SECURITY		BID	ASK	ASKPRC			
1) STRIPS	9/30/07	4.448	4.448	92.50	1.77	1.60	BFV
2) STRIPS	10/15/07	4.446	4.446	92.34	1.81	1.64	BFV
3) STRIPS	10/31/07	4.444	4.444	92.17	1.86	1.67	BFV
4) STRIPS	11/15/07	4.419	4.399	92.07	1.90	1.71	BGN
5) STRIPS	11/30/07	4.439	4.439	91.84	1.94	1.74	BFV
6) STRIPS	12/15/07	4.436	4.436	91.68	1.98	1.78	BFV
7) STRIPS	1/15/08	4.436	4.436	91.34	2.07	1.85	BFV
8) STRIPS	2/15/08	4.432	4.412	91.05	2.15	1.91	BGN
9) STRIPS	3/15/08	4.438	4.438	90.68	2.23	1.98	BFV
10) STRIPS	4/15/08	4.439	4.439	90.34	2.31	2.04	BFV
11) STRIPS	5/15/08	4.438	4.418	90.05	2.40	2.11	BGN
12) STRIPS	6/15/08	4.441	4.441	89.68	2.48	2.18	BFV
13) STRIPS	7/15/08	4.442	4.442	89.34	2.57	2.24	BFV
14) STRIPS	8/15/08	4.411	4.391	89.13	2.65	2.31	BGN
15) STRIPS	9/15/08	4.445	4.445	88.69	2.73	2.37	BFV
16) STRIPS	10/15/08	4.446	4.446	88.36	2.81	2.43	BFV
17) STRIPS	11/15/08	4.452	4.432	88.07	2.90	2.50	BGN
18) STRIPS	12/15/08	4.449	4.449	87.71	2.98	2.56	BFV
19) STRIPS	1/15/09	4.449	4.449	87.38	3.07	2.62	BFV
20) STRIPS	2/15/09	4.445	4.425	87.12	3.15	2.68	BGN
21) STRIPS	3/15/09	4.450	4.450	86.75	3.23	2.74	BFV

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N247 Govt GOVT

Page 12 of 16

GOVERNMENT		SECURITIES			DUR	RISK	PSRC
SECURITY		BID	ASK	ASKPRC			
1) STRIPS	4/15/09	4.450	4.450	86.43	3.31	2.80	BFV
2) STRIPS	5/15/09	4.455	4.435	86.15	3.40	2.86	BGN
3) STRIPS	6/15/09	4.451	4.451	85.79	3.48	2.92	BFV
4) STRIPS	7/15/09	4.451	4.451	85.48	3.57	2.98	BFV
5) STRIPS	8/15/09	4.444	4.424	85.24	3.65	3.04	BGN
6) STRIPS	9/15/09	4.452	4.452	84.86	3.73	3.10	BFV
7) STRIPS	10/15/09	4.452	4.452	84.54	3.81	3.15	BFV
8) STRIPS	11/15/09	4.449	4.429	84.30	3.90	3.21	BGN
9) STRIPS	12/15/09	4.453	4.453	83.92	3.98	3.27	BFV
10) STRIPS	1/15/10	4.448	4.448	83.62	4.07	3.33	BFV
11) STRIPS	2/15/10	4.424	4.404	83.46	4.15	3.39	BGN
12) STRIPS	3/15/10	4.438	4.438	83.06	4.23	3.44	BFV
13) STRIPS	4/15/10	4.432	4.432	82.77	4.31	3.49	BFV
14) STRIPS	5/15/10	4.362	4.342	82.79	4.40	3.56	BGN
15) STRIPS	6/15/10	4.421	4.421	82.21	4.48	3.60	BFV
16) STRIPS	7/15/10	4.416	4.416	81.92	4.57	3.66	BFV
17) STRIPS	8/15/10	4.325	4.305	82.03	4.65	3.73	BGN
18) STRIPS	9/15/10	4.405	4.405	81.38	4.73	3.77	BFV
19) STRIPS	10/15/10	4.400	4.400	81.10	4.81	3.82	BFV
20) STRIPS	11/15/10	4.299	4.279	81.27	4.90	3.90	BGN
21) STRIPS	12/15/10	4.389	4.389	80.55	4.98	3.93	BFV

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N247 Govt **GOVT**

GOVERNMENT		SECURITIES				Page 13 of 16	
SECURITY		BID	ASK	ASKPRC	DUR	RISK	PSRC
1) STRIPS	2/15/11	4.440	4.420	79.84	5.15	4.02	BGN
2) STRIPS	5/15/11	4.336	4.316	79.41	5.40	4.20	BGN
3) STRIPS	8/15/11	4.443	4.423	78.10	5.65	4.32	BGN
4) STRIPS	11/15/11	4.348	4.328	77.68	5.90	4.48	BGN
5) STRIPS	2/15/12	4.479	4.459	76.25	6.15	4.59	BGN
6) STRIPS	5/15/12	4.459	4.439	75.51	6.40	4.73	BGN
7) STRIPS	8/15/12	4.487	4.467	74.55	6.65	4.85	BGN
8) STRIPS	11/15/12	4.506	4.486	73.64	6.90	4.97	BGN
9) STRIPS	2/15/13	4.535	4.515	72.67	7.15	5.08	BGN
10) STRIPS	5/15/13	4.560	4.540	71.74	7.40	5.19	BGN
11) STRIPS	8/15/13	4.568	4.548	70.89	7.65	5.30	BGN
12) STRIPS	11/15/13	4.578	4.558	70.05	7.90	5.41	BGN
13) STRIPS	2/15/14	4.595	4.575	69.17	8.15	5.51	BGN
14) STRIPS	5/15/14	4.613	4.593	68.29	8.40	5.61	BGN
15) STRIPS	8/15/14	4.623	4.603	67.46	8.65	5.70	BGN
16) STRIPS	11/15/14	4.637	4.617	66.62	8.90	5.79	BGN
17) STRIPS	2/15/15	4.633	4.613	65.88	9.15	5.89	BGN
18) STRIPS	5/15/15	4.602	4.582	65.33	9.40	6.00	BGN
19) STRIPS	8/15/15	4.632	4.612	64.40	9.65	6.07	BGN
20) STRIPS	11/15/15	4.653	4.633	63.55	9.90	6.15	BGN
21) STRIPS	2/15/16	4.676	4.646	62.74	10.15	6.22	BGN

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N247 Govt **GOVT**

**GOVERNMENT SECURITIES**

Page 14 of 16

SECURITY		BID	ASK	ASKPRC	DUR	RISK	PSRC
1) STRIPS	5/15/16	4.686	4.656	61.97	10.40	6.30	BGN
2) STRIPS	8/15/16	4.696	4.666	61.19	10.65	6.37	BGN
3) STRIPS	11/15/16	4.708	4.678	60.42	10.90	6.43	BGN
4) STRIPS	2/15/17	4.718	4.688	59.65	11.15	6.50	BGN
5) STRIPS	5/15/17	4.741	4.711	58.82	11.40	6.55	BGN
6) STRIPS	8/15/17	4.746	4.716	58.10	11.65	6.61	BGN
7) STRIPS	11/15/17	4.761	4.731	57.33	11.90	6.66	BGN
8) STRIPS	2/15/18	4.770	4.740	56.60	12.15	6.72	BGN
9) STRIPS	5/15/18	4.773	4.743	55.92	12.40	6.77	BGN
10) STRIPS	8/15/18	4.786	4.756	55.18	12.65	6.82	BGN
11) STRIPS	11/15/18	4.791	4.761	54.51	12.90	6.87	BGN
12) STRIPS	2/15/19	4.803	4.773	53.78	13.15	6.91	BGN
13) STRIPS	5/15/19	4.810	4.780	53.11	13.40	6.95	BGN
14) STRIPS	8/15/19	4.801	4.771	52.54	13.65	7.01	BGN
15) STRIPS	11/15/19	4.814	4.784	51.84	13.90	7.04	BGN
16) STRIPS	2/15/20	4.825	4.795	51.15	14.15	7.07	BGN
17) STRIPS	5/15/20	4.837	4.807	50.46	14.40	7.10	BGN
18) STRIPS	8/15/20	4.845	4.815	49.81	14.65	7.12	BGN
19) STRIPS	11/15/20	4.849	4.819	49.19	14.90	7.16	BGN
20) STRIPS	2/15/21	4.848	4.818	48.61	15.15	7.19	BGN
21) STRIPS	5/15/21	4.857	4.827	47.98	15.40	7.21	BGN

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N247 Govt **GOVT**

GOVERNMENT		SECURITIES				Page 15 of 16	
SECURITY		BID	ASK	ASKPRC	DUR	RISK	PSRC
1) STRIPS	8/15/21	4.863	4.833	47.36	15.65	7.24	BGN
2) STRIPS	11/15/21	4.869	4.839	46.76	15.90	7.26	BGN
3) STRIPS	2/15/22	4.856	4.826	46.30	16.15	7.30	BGN
4) STRIPS	5/15/22	4.855	4.825	45.76	16.40	7.33	BGN
5) STRIPS	8/15/22	4.840	4.810	45.32	16.65	7.37	BGN
6) STRIPS	11/15/22	4.868	4.838	44.58	16.90	7.36	BGN
7) STRIPS	2/15/23	4.851	4.821	44.18	17.15	7.40	BGN
8) STRIPS	5/15/23	4.859	4.829	43.60	17.40	7.41	BGN
9) STRIPS	8/15/23	4.859	4.829	43.08	17.65	7.42	BGN
10) STRIPS	11/15/23	4.864	4.834	42.53	17.90	7.43	BGN
11) STRIPS	2/15/24	4.863	4.833	42.03	18.15	7.45	BGN
12) STRIPS	5/15/24	4.867	4.837	41.51	18.40	7.46	BGN
13) STRIPS	8/15/24	4.862	4.832	41.05	18.65	7.48	BGN
14) STRIPS	11/15/24	4.867	4.837	40.53	18.90	7.48	BGN
15) STRIPS	2/15/25	4.862	4.832	40.08	19.15	7.49	BGN
16) STRIPS	5/15/25	4.865	4.835	39.58	19.40	7.50	BGN
17) STRIPS	8/15/25	4.859	4.829	39.16	19.65	7.51	BGN
18) STRIPS	11/15/25	4.856	4.826	38.72	19.90	7.52	BGN
19) STRIPS	2/15/26	4.851	4.811	38.37	20.15	7.55	BGN
20) STRIPS	5/15/26	4.857	4.817	37.87	20.40	7.54	BGN
21) STRIPS	8/15/26	4.859	4.819	37.41	20.65	7.54	BGN

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GOVERNMENT SECURITIES

Page 15 of 16

SECURITY		BID	ASK	ASKPRC	DUR	RISK	PSRC
1) STRIPS	8/15/21	4.863	4.833	47.36	15.65	7.24	BGN
2) STRIPS	11/15/21	4.869	4.839	46.76	15.90	7.26	BGN
3) STRIPS	2/15/22	4.856	4.826	46.30	16.15	7.30	BGN
4) STRIPS	5/15/22	4.855	4.825	45.76	16.40	7.33	BGN
5) STRIPS	8/15/22	4.840	4.810	45.32	16.65	7.37	BGN
6) STRIPS	11/15/22	4.868	4.838	44.58	16.90	7.36	BGN
7) STRIPS	2/15/23	4.851	4.821	44.18	17.15	7.40	BGN
8) STRIPS	5/15/23	4.859	4.829	43.60	17.40	7.41	BGN
9) STRIPS	8/15/23	4.859	4.829	43.08	17.65	7.42	BGN
10) STRIPS	11/15/23	4.864	4.834	42.53	17.90	7.43	BGN
11) STRIPS	2/15/24	4.863	4.833	42.03	18.15	7.45	BGN
12) STRIPS	5/15/24	4.867	4.837	41.51	18.40	7.46	BGN
13) STRIPS	8/15/24	4.862	4.832	41.05	18.65	7.48	BGN
14) STRIPS	11/15/24	4.867	4.837	40.53	18.90	7.48	BGN
15) STRIPS	2/15/25	4.862	4.832	40.08	19.15	7.49	BGN
16) STRIPS	5/15/25	4.865	4.835	39.58	19.40	7.50	BGN
17) STRIPS	8/15/25	4.859	4.829	39.16	19.65	7.51	BGN
18) STRIPS	11/15/25	4.856	4.826	38.72	19.90	7.52	BGN
19) STRIPS	2/15/26	4.851	4.811	38.37	20.15	7.55	BGN
20) STRIPS	5/15/26	4.857	4.817	37.87	20.40	7.54	BGN
21) STRIPS	8/15/26	4.859	4.819	37.41	20.65	7.54	BGN

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GOVERNMENT SECURITIES

Page 15 of 16

SECURITY		BID	ASK	ASKPRC	DUR	RISK	PSRC
1) STRIPS	8/15/21	4.863	4.833	47.36	15.65	7.24	BGN
2) STRIPS	11/15/21	4.869	4.839	46.76	15.90	7.26	BGN
3) STRIPS	2/15/22	4.856	4.826	46.30	16.15	7.30	BGN
4) STRIPS	5/15/22	4.855	4.825	45.76	16.40	7.33	BGN
5) STRIPS	8/15/22	4.840	4.810	45.32	16.65	7.37	BGN
6) STRIPS	11/15/22	4.868	4.838	44.58	16.90	7.36	BGN
7) STRIPS	2/15/23	4.851	4.821	44.18	17.15	7.40	BGN
8) STRIPS	5/15/23	4.859	4.829	43.60	17.40	7.41	BGN
9) STRIPS	8/15/23	4.859	4.829	43.08	17.65	7.42	BGN
10) STRIPS	11/15/23	4.864	4.834	42.53	17.90	7.43	BGN
11) STRIPS	2/15/24	4.863	4.833	42.03	18.15	7.45	BGN
12) STRIPS	5/15/24	4.867	4.837	41.51	18.40	7.46	BGN
13) STRIPS	8/15/24	4.862	4.832	41.05	18.65	7.48	BGN
14) STRIPS	11/15/24	4.867	4.837	40.53	18.90	7.48	BGN
15) STRIPS	2/15/25	4.862	4.832	40.08	19.15	7.49	BGN
16) STRIPS	5/15/25	4.865	4.835	39.58	19.40	7.50	BGN
17) STRIPS	8/15/25	4.859	4.829	39.16	19.65	7.51	BGN
18) STRIPS	11/15/25	4.856	4.826	38.72	19.90	7.52	BGN
19) STRIPS	2/15/26	4.851	4.811	38.37	20.15	7.55	BGN
20) STRIPS	5/15/26	4.857	4.817	37.87	20.40	7.54	BGN
21) STRIPS	8/15/26	4.859	4.819	37.41	20.65	7.54	BGN



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N247 Govt **GOVT**

Page 16 of 16

SECURITY		BID	ASK	ASKPRC	DUR	RISK	PSRC
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2) STRIPS	2/15/27	4.836	4.796	36.70	21.15	7.58	BGN
3) STRIPS	5/15/27	4.846	4.806	36.20	21.40	7.56	BGN
4) STRIPS	8/15/27	4.832	4.792	35.87	21.65	7.59	BGN
5) STRIPS	11/15/27	4.832	4.792	35.45	21.90	7.58	BGN
6) STRIPS	2/15/28	4.820	4.780	35.12	22.15	7.60	BGN
7) STRIPS	5/15/28	4.815	4.775	34.75	22.39	7.60	BGN
8) STRIPS	8/15/28	4.812	4.772	34.36	22.65	7.60	BGN
9) STRIPS	11/15/28	4.804	4.764	34.03	22.90	7.61	BGN
10) STRIPS	2/15/29	4.820	4.780	33.50	23.15	7.58	BGN
11) STRIPS	5/15/29	4.810	4.770	33.19	23.39	7.58	BGN
12) STRIPS	8/15/29	4.777	4.737	33.05	23.65	7.64	BGN
13) STRIPS	11/15/29	4.790	4.750	32.57	23.90	7.60	BGN
14) STRIPS	2/15/30	4.761	4.721	32.41	24.15	7.64	BGN
15) STRIPS	5/15/30	4.768	4.728	31.98	24.39	7.62	BGN
16) STRIPS	8/15/30	4.714	4.674	32.02	24.65	7.71	BGN
17) STRIPS	2/15/31	4.757	4.717	30.96	25.15	7.61	BGN



## Secondary Trading Levels

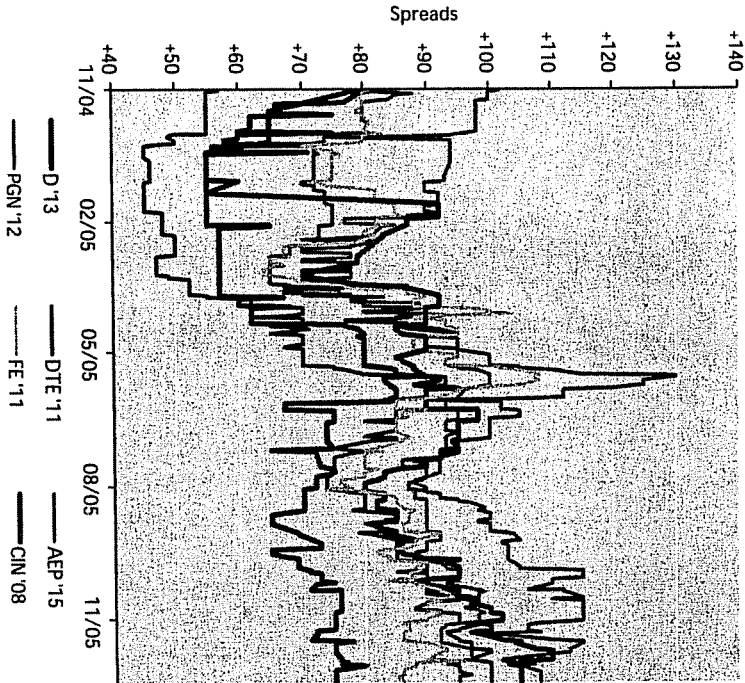
Issuer	Moody's	S&P	Amt	Cpn	Mty	Spread	Libor
12/14/05							
Barclays Capital Corp	Baa3	BBB-	200	5.50%	03/09	+122	+68
Barclays Capital Corp	Baa3	BBB-	200	5.50%	03/09	+170	+117
Barclays Capital Corp	Baa3	BBB-	200	5.50%	03/09	+118	+64
Barclays Capital Corp	Baa3	BBB-	200	5.50%	03/09	+160	+106
Barclays Capital Corp	Baa3	BBB-	200	5.50%	03/09	+95	+41
Barclays Capital Corp	Baa3	BBB-	200	5.50%	03/09	+117	+63
Barclays Capital Corp	Baa3	BBB-	200	5.50%	03/09	+155	+101
Barclays Capital Corp	Baa3	BBB-	200	5.50%	03/09	+100	+48
Barclays Capital Corp	Baa3	BBB-	200	5.50%	03/09	+168	+114
Constellation Energy Grp	Baa1	BBB	550	4.550%	06/15	+122	+68
Constellation Energy Grp	Baa1	BBB	700	7.500%	04/32	+170	+117
Constellation Energy Grp	Baa1	BBB-	500	5.150%	07/15	+118	+64
Constellation Energy Grp	Baa1	BBB-	500	5.950%	06/35	+160	+106
Constellation Energy Grp	Baa1	BBB-	400	4.450%	05/10	+95	+41
Constellation Energy Grp	Baa2	BBB	800	4.900%	06/15	+117	+63
Constellation Energy Grp	Baa2	BBB	500	5.625%	06/35	+155	+101
Constellation Energy Grp	Baa2	BBB-	600	7.050%	06/11	+100	+48
Constellation Energy Grp	Baa2	BBB-	400	6.375%	04/33	+168	+114
Constellation Energy Grp	Baa2	BBB-	450	6.850%	04/12	+108	+61
Constellation Energy Grp	Baa2	BBB-	650	7.750%	03/31	+82	+32
Constellation Energy Grp	Baa2	BBB-	500	5.375%	03/10	+82	+32
Constellation Energy Grp	Baa2	BBB	300	5.250%	06/15	+95	+41
Constellation Energy Grp	Baa3	BBB-	1500	6.450%	11/11	+86	+34
Constellation Energy Grp	Baa3	BBB-	1500	7.375%	11/31	+152	+99
↓ negative outlook ↓ negative watch ↔ outlook forming ↑ positive outlook ↑ positive watch *secured							
Baltimore Gas & Electric	A2	BBB+	200	5.200%	06/33	+118	+64
Virginia Electric & Power	A3	BBB+	400	4.750%	03/13	+85	+35
Consolidated Natural Gas	A3	BBB+	200	5.000%	12/14	+100	+47
Commonwealth Edison*	A3	A-	600	6.150%	03/12	+98	+51
Commonwealth Edison*	A3	A-	350	5.875%	02/33	+138	+84
Detroit Edison Company*	A3	BBB+	200	4.800%	02/15	+95	+42
Detroit Edison Company*	A3	BBB+	200	5.450%	02/35	+130	+76
Michigan Consolidated Gas*	A3	BBB	200	5.700%	03/33	+130	+76
Carolina Power & Light*	A3	BBB	300	5.150%	04/15	+90	+36
Carolina Power & Light*	A3	BBB	200	5.700%	04/35	+115	+61
Ohio Power Company	A3	BBB	250	5.500%	02/13	+90	+41
AEP Texas Central	Baa2	BBB	275	5.500%	02/13	+95	+46
Columbus Southern Power	A3	BBB	250	6.600%	03/33	+136	+82
Ohio Edison	Baa2	BBB-	175	4.000%	05/08	+73	+26
Ohio Edison	Baa2	BBB-	150	5.450%	05/15	+103	+49



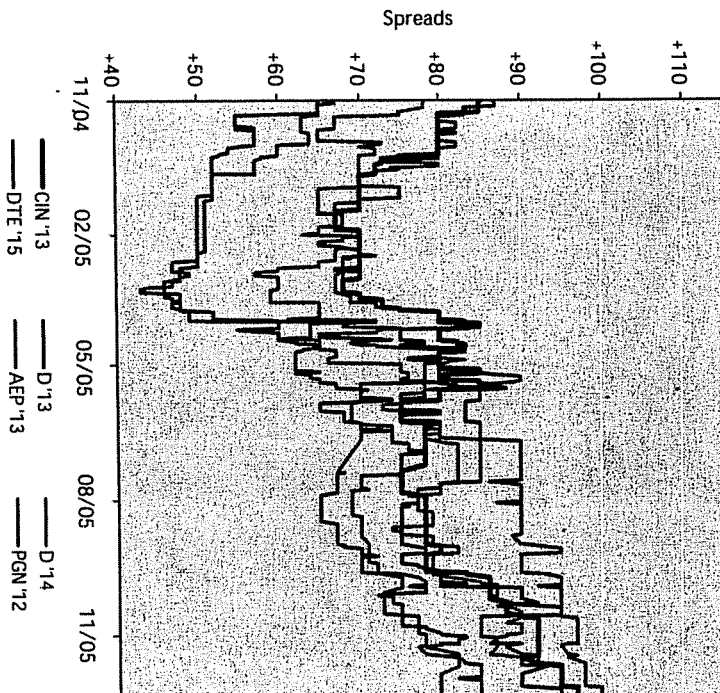


## Recent Trading Activity

Holding Company Trading History



Operating Company Trading History





## Indicative New Issue Pricing – Cinergy Notes (Baa2/BBB↓)

	2 Years	3 Years	5 Years	7 Years	10 Years	12 Years	15 Years	20 Years	30 Years
<b>Fixed Rate Issuance</b>									
Benchmark	4.25% 11/07	4.375% 11/08	4.375% 12/10	4% 11/12	4.5% 11/15	4.5% 11/15	4.5% 11/15	5.375% 2/31	5.375% 2/31
Benchmark Yield	4.410%	4.420%	4.440%	4.500%	4.530%	4.530%	4.530%	4.730%	4.730%
Reoffer Spread	+75 area	+80 area	+85 area	+105 area	+115 - 120	+140 area	+155 area	+155 area	+165 area
Reoffer Yield	5.16% area	5.22% area	5.39% area	5.55% area	5.68% - 5.73%	5.93% area	6.08% area	6.28% area	6.38% area
Underwriting Commission	0.250%	0.350%	0.600%	0.625%	0.650%	0.675%	0.750%	0.875%	0.875%
All-in Yield	5.29% area	5.35% area	5.53% area	5.66% area	5.77% - 5.82%	6.01% area	6.16% area	6.36% area	6.45% area
<b>Swapped to LIBOR Levels</b>									
Swap Spread	+45	+48	+52	+52	+55	+60	+65	+50	+53
Reoffer versus LIBOR	\$1+30 area	\$1+32 area	\$1+43 area	\$1+53 area	\$1+60 - 65	\$1+80 area	\$1+90 area	\$1+105 area	\$1+112 area
All-in versus LIBOR	\$1+43 area	\$1+45 area	\$1+57 area	\$1+64 area	\$1+69 - 74	\$1+88 area	\$1+98 area	\$1+113 area	\$1+119 area
<b>Floating Rate Issuance</b>									
Reoffer vs LIBOR	2Yr NCL \$1+30 area	2Yr NCL 6m \$1+33 area	3Yr NCL \$1+35 area	3Yr NCL 6m \$1+40 area					
Underwriting Commission	0.250%	0.250%	0.350%	0.350%					
All-in vs LIBOR	\$1+43 area	\$1+46 area	\$1+48 area	\$1+53 area					

Benchmark and reoffer spreads as of 12/14/2005.





## Indicative New Issue Pricing: CG&E/PSI/ULH&P Notes (Baa1/BBB↓)

Fixed Rate Issuance	2 Years	3 Years	5 Years	7 Years	10 Years	12 Years	15 Years	30 Years
Benchmark	4.25% 11/07	4.375% 11/08	4.375% 12/10	4% 11/12	4.5% 11/15	4.5% 11/15	4.5% 11/15	5.375% 2/31
Benchmark Yield	4.410%	4.420%	4.440%	4.500%	4.530%	4.530%	4.530%	4.730%
Reoffer Spread	+65 - 70	+70 - 75	+85 - 90	+95 - 100	+110 area	+135 area	+150 area	+155 area
Reoffer Yield	5.06% - 5.11%	5.12% - 5.17%	5.29% - 5.34%	5.45% - 5.50%	5.63% area	5.88% area	6.03% area	6.28% area
Underwriting Commission	0.250%	0.350%	0.600%	0.625%	0.650%	0.675%	0.750%	0.875%
All-in Yield	5.19% - 5.24%	5.25% - 5.30%	5.43% - 5.48%	5.56% - 5.61%	5.72% area	5.96% area	6.11% area	6.35% area
<b>Swapped to LIBOR Levels</b>								
Swap Spread	+45	+48	+52	+52	+55	+60	+65	+53
Reoffer versus LIBOR	\$L+20 - 25	\$L+22 - 27	\$L+33 - 38	\$L+43 - 48	\$L+55 area	\$L+75 area	\$L+85 area	\$L+102 area
All-in versus LIBOR	\$L+33 - 38	\$L+35 - 40	\$L+47 - 52	\$L+54 - 59	\$L+64 area	\$L+83 area	\$L+93 area	\$L+109 area

Floating Rate Issuance	2yr NCL	2yr NC 6m	3yr NCL	3yr NC 6m
Reoffer vs LIBOR	\$L + 25 area	\$L + 28 - 30	\$L + 30 area	\$L + 35 area
Underwriting Commission	0.250%	0.250%	0.350%	0.350%
All-in vs LIBOR	\$L + 38 area	\$L + 41 - 43	\$L + 43 area	\$L + 48 area

Benchmark and reoffer spreads as of 12/14/2005.



**Discount Rates**  
**CGE, PSI, and ULHP**

	a		Discount Rate
	Risk-free Rate	Credit Spread	
2006	4.47%	0.68%	5.20%
2007	4.46%	0.68%	5.20%
2008	4.44%	0.68%	5.20%
2009	4.45%	0.73%	5.20%
2010	4.42%	0.80%	5.30%
2011	4.43%	0.88%	5.40%
2012	4.44%	0.93%	5.40%
2013	4.46%	0.98%	5.50%
2014	4.49%	1.02%	5.60%
2015	4.58%	1.06%	5.70%
2016	4.63%	1.10%	5.80%
2017	4.69%	1.23%	6.00%
2018	4.73%	1.35%	6.10%
2019	4.76%	1.40%	6.20%
2020	4.80%	1.45%	6.30%
2021	4.83%	1.50%	6.40%
2022	4.83%	1.50%	6.40%
2023	4.83%	1.51%	6.40%
2024	4.83%	1.51%	6.40%
2025	4.83%	1.51%	6.40%
2026	4.81%	1.52%	6.40%
2027	4.80%	1.52%	6.40%
2028	4.78%	1.52%	6.40%
2029	4.76%	1.53%	6.30%
2030	4.74%	1.53%	6.30%
2031	4.74%	1.53%	6.30%
2032	4.74%	1.54%	6.30%
2033	4.74%	1.54%	6.30%
2034	4.74%	1.54%	6.30%
2035	4.74%	1.55%	6.30%
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2038	4.74%	1.55%	6.30%
2039	4.74%	1.55%	6.30%
2040	4.74%	1.55%	6.30%
2041	4.74%	1.55%	6.30%
2042	4.74%	1.55%	6.30%
2043	4.74%	1.55%	6.30%
2044	4.74%	1.55%	6.30%
2045	4.74%	1.55%	6.30%
2046	4.74%	1.55%	6.30%
2047	4.74%	1.55%	6.30%
2048	4.74%	1.55%	6.30%
2049	4.74%	1.55%	6.30%
2050	4.74%	1.55%	6.30%
2051	4.74%	1.55%	6.30%

**Discount Rates**  
**CGE, PSI, and ULHP**

	a	b	Discount Rate
	Risk-free Rate	Credit Spread	
2052	4.74%	1.55%	6.30%
2053	4.74%	1.55%	6.30%
2054	4.74%	1.55%	6.30%
2055	4.74%	1.55%	6.30%
2056	4.74%	1.55%	6.30%
2057	4.74%	1.55%	6.30%
2058	4.74%	1.55%	6.30%
2059	4.74%	1.55%	6.30%
2060	4.74%	1.55%	6.30%
2061	4.74%	1.55%	6.30%
2062	4.74%	1.55%	6.30%
2063	4.74%	1.55%	6.30%
2064	4.74%	1.55%	6.30%
2065	4.74%	1.55%	6.30%
2066	4.74%	1.55%	6.30%
2067	4.74%	1.55%	6.30%
2068	4.74%	1.55%	6.30%
2069	4.74%	1.55%	6.30%
2070	4.74%	1.55%	6.30%
2071	4.74%	1.55%	6.30%
2072	4.74%	1.55%	6.30%
2073	4.74%	1.55%	6.30%
2074	4.74%	1.55%	6.30%
2075	4.74%	1.55%	6.30%
2076	4.74%	1.55%	6.30%
2077	4.74%	1.55%	6.30%
2078	4.74%	1.55%	6.30%
2079	4.74%	1.55%	6.30%
2080	4.74%	1.55%	6.30%
2081	4.74%	1.55%	6.30%

**a** Rate obtained from Bloomberg report run by Ed Bowen, Treasury. Average of bid and ask price used, where different, from an approximate midpoint of each year. Interpolated where necessary.

**b** Credit spread obtained from Barclays Capital report provided by Larry Riffe, Treasury. Interpolated where necessary. Midpoint used when reoffer spread was a range.

**From:** O'Connor, Mike  
**Sent:** Thursday, January 05, 2006 9:46 AM  
**To:** Glenn, Erica  
**Subject:** RE: Catalyst Disposal Cost - Documentation question

Erica,

I'm in conference calls this morning, and will answer in greater detail if needed later today. In summary, you are correct that I assumed that around 50% of the disposals would be as normal waste and the rest as hazardous waste (with higher cost). At this point, it is all a best information assumption due to limited Cinergy specific or industry data. We will be sending some samples out for analysis over the next 12-18 months to develop a better estimate.

Mike O

-----Original Message-----

**From:** Glenn, Erica  
**Sent:** Thursday, January 05, 2006 8:21 AM  
**To:** O'Connor, Mike  
**Subject:** RE: Catalyst Disposal Cost - Documentation question  
**Importance:** High

Mike,

I am working on our final documentation for the adoption of FIN 47, the interpretation on asset retirement obligations. We wanted to add a more specific comment regarding the \$750 estimate and that it takes into account that a percentage of the total catalysts will be deemed hazardous waste (and the rest will fall under normal disposal).

Based on the information below, it looks like your estimate assumes somewhere between 50% and 75% of the catalysts will be deemed hazardous waste. Is this an accurate statement to include in our documentation? Did you have a more precise percentage or range in mind when you developed your estimate?

Thank you,  
Erica

-----Original Message-----

**From:** O'Connor, Mike  
**Sent:** Wednesday, August 17, 2005 12:49 PM  
**To:** Glenn, Erica  
**Subject:** RE: Catalyst Disposal Cost estimate - follow up questions

\$750 per cubic meter should cover all costs, including transportation. To be conservative, you could count it as today's dollars and escalate it.

Per your question on the debate that effects the disposal of catalyst. The disposal is dictated by Hazardous Waste (RCRA) regulations. We will test the catalyst (with flyash inside it) prior to disposal to categorize whether it will be a hazardous waste or not. Catalyst itself is not a Hazardous Waste, however, the flyash inside the catalyst could turn it into such a waste. At that point, I may have the catalyst cleaned rather than dispose of as a hazardous waste. I based my dollar estimate on the assumption that some of our catalyst will be need to be cleaned or disposed of as a Hazardous Waste and the rest will fall under normal disposal. This assumption is as valid as possible, note that with 7 scrubbers being built and coal changes expected on these units, there is good deal of unknown at this time. Some other utilities are opting to dispose of all catalyst as hazardous waste and this could run expected costs up to \$1000- \$1500/ cubic meter. Other utilities are not even testing and disposing of all as normal waste on the premise they have already characterized their flyash to be non-hazardous. I am responsible for recommending SCR budgets to the Stations and very familiar with Haz Waste regulations and have also discussed with Randy Born of Environmental Services. I am comfortable with costs as listed knowing as we change coals we will do some analysis over the next couple



of years and make this number much more accurate.

Let me know if I can do anything else or if you would like to discuss in greater detail.

		Estimated removal cost per (m <sup>3</sup> ):		\$	750 b		
		a	b		b		b
		100% Est.			Owned Portion		Estimated
Vintage	Size (m <sup>3</sup> )	Removal Cost (2005 \$)	Ownership %	st	Removal Cost (2005 \$)	Settlement Dt	
<b>CGE</b>							
East Bend							
Catalyst A	7/1/2002	194.6 \$	145,950	69.00%	\$ 100,706	4/1/2011	
Catalyst B	7/1/2002	194.6 \$	145,950	69.00%	\$ 100,706	4/1/2013	
Miami Fort 7							
Catalyst A	7/1/2003	323.4 \$	242,550	64.00%	\$ 155,232	4/1/2008	
Catalyst B	7/1/2003	323.4 \$	242,550	64.00%	\$ 155,232	4/1/2010	
Miami Fort 8							
Catalyst A	7/1/2002	323.4 \$	242,550	64.00%	\$ 155,232	4/1/2009	
Catalyst B	7/1/2002	323.4 \$	242,550	64.00%	\$ 155,232	4/1/2011	
Zimmer							
Catalyst A	5/31/2004	529.1 \$	396,825	46.50%	\$ 184,524	4/1/2010	
Catalyst B	5/31/2004	529.1 \$	396,825	46.50%	\$ 184,524	4/1/2012	
Catalyst C	5/31/2004	529.1 \$	396,825	46.50%	\$ 184,524	4/1/2014	
Stuart 1							
Catalyst A	5/1/2004	500 \$	375,000	39.00%	\$ 146,250	4/1/2012	
Catalyst B	5/1/2004	500 \$	375,000	39.00%	\$ 146,250	4/1/2014	
Stuart 2							
Catalyst A	5/1/2004	500 \$	375,000	39.00%	\$ 146,250	4/1/2012	
Catalyst B	5/1/2004	500 \$	375,000	39.00%	\$ 146,250	4/1/2014	
Stuart 3							
Catalyst A	5/1/2004	500 \$	375,000	39.00%	\$ 146,250	4/1/2013	
Catalyst B	5/1/2004	500 \$	375,000	39.00%	\$ 146,250	4/1/2015	
Stuart 4							
Catalyst A	5/1/2004	500 \$	375,000	39.00%	\$ 146,250	4/1/2009	
Catalyst B	5/1/2004	500 \$	375,000	39.00%	\$ 146,250	4/1/2013	
Catalyst C	3/1/2005	500 \$	375,000	39.00%	\$ 146,250	4/1/2015	
Killen							
Catalyst A	5/1/2004	203 \$	152,250	33.00%	\$ 50,243	4/1/2008	
Catalyst B	5/1/2004	203 \$	152,250	33.00%	\$ 50,243	4/1/2010	
			<u>\$ 6,132,075</u>		<u>\$ 2,792,645</u>		

**PSI**  
 Gibson 1

Estimated removal cost per (m<sup>3</sup>): \$ 750 b

	a	b	b				b
			100% Est.		Owned Portion		Estimated
	Vintage	Size (m <sup>3</sup> )	Removal Cost (2005 \$)	Ownership %	st Removal Cost (2005 \$)		Settlement Dt
Catalyst A	5/1/2005	403.2	\$ 302,400	100.00%	\$ 302,400		4/1/2011
Catalyst B	5/1/2005	403.2	\$ 302,400	100.00%	\$ 302,400		4/1/2013
Gibson 2							
Catalyst A	7/1/2002	403.2	\$ 302,400	100.00%	\$ 302,400		4/1/2009
Catalyst B	7/1/2002	403.2	\$ 302,400	100.00%	\$ 302,400		4/1/2011
Catalyst C	6/1/2004	403.2	\$ 302,400	100.00%	\$ 302,400		4/1/2013
Gibson 3							
Catalyst A	7/1/2002	403.2	\$ 302,400	100.00%	\$ 302,400		4/1/2008
Catalyst B	7/1/2002	403.2	\$ 302,400	100.00%	\$ 302,400		4/1/2010
Catalyst C	6/1/2004	403.2	\$ 302,400	100.00%	\$ 302,400		4/1/2012
Gibson 4							
Catalyst A	7/1/2003	403.2	\$ 302,400	100.00%	\$ 302,400		4/1/2007
Catalyst B	7/1/2003	403.2	\$ 302,400	100.00%	\$ 302,400		4/1/2009
Catalyst C	6/1/2004	201.6	\$ 151,200	100.00%	\$ 151,200		4/1/2013
Gibson 5							
Catalyst A	5/1/2005	403.2	\$ 302,400	50.05%	\$ 151,351		4/1/2010
Catalyst B	5/1/2005	403.2	\$ 302,400	50.05%	\$ 151,351		4/1/2012
			<u>\$ 3,780,000</u>		<u>\$ 3,477,902</u>		

a Vintage (in-service) dates provided by Mike O'Connor and verified with Jaime Reynolds, Fixed Assets.

b Data obtained from Mike O'Connor.



**Attorney General Second Set Data Requests**  
**Duke Energy Kentucky Case No. 2006-00172**  
**Date Received: August 09, 2006**  
**Response Due Date: August 23, 2006**

**AG-DR-02-029**

**REQUEST:**

29. Provide complete copies of all correspondence with the following parties regarding the Company's implementation of FASB Statement No. 143, FIN 47 and the FERC NOPR and Order 631 in RM02-7-000:
- a. External auditors and other public accounting firms.
  - b. Consultants
  - c. External counsel
  - d. Federal and State regulatory agencies
  - e. Internal Revenue Service

**RESPONSE:**

See Attachment AG-DR-02-029 and Attachment AG-DR-02-029 Supplemental. This response consists, in part, of documents produced by Duke Energy Kentucky in response to a similar data request in Case No. 2005-00042.

**WITNESS RESPONSIBLE:** Carl J. Council, Jr.

**Finnigan, John**

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**From:** Ritchie, Brett  
**Sent:** Friday, February 20, 2004 1:08 PM  
**To:** Barnhart, Christa; Laub, Peggy; Dean, James; Pate, Gwen; Howe, Lee  
**Subject:** FW: Non-Legal Cost of Removal - SEC Update

fyi

-----Original Message-----

**From:** Umbaugh, Jan (US - Raleigh)  
**Sent:** Friday, February 20, 2004 12:16 PM  
**Subject:**

We just heard back from the SEC and they are standing firm in their requirement that non-legal cost of removal amounts in accumulated depreciation that have been retained as regulatory liabilities must be reclassified out of accumulated depreciation to a separate regulatory liability account. They indicated that if amounts are not reclassified in 2003 financial statements they will require restatement. We understand they have called PWC and a representative of EEI today, but are not sure at this point what additional communications they plan to make, if any.

Jan A. Umbaugh  
Deloitte & Touche LLP  
+1-919-546-8030  
Fax - 704-409-5125  
jumbaugh@deloitte.com  
[www.deloitte.com](http://www.deloitte.com)

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**Attorney General First Set Data Requests**  
**ULH&P Case No. 2005-00042**  
**Date Received: April 6, 2005**  
**Response Due Date: April 19, 2005**

**AG-DR-01-070**

**REQUEST:**

70. Please provide complete copies of all correspondence with the following parties regarding the Company's implementation of FASB Statement No. 143 the FERC NOPR and Order 631 in RM02-7-000:
- a. External auditors and other public accounting firms,
  - b. Consultants,
  - c. External counsel,
  - d. Federal and State regulatory agencies, and
  - e. Internal Revenue Service.

**RESPONSE:**

See Attachment KyAG-DR-01-070. ULH&P had no correspondence with the Internal Revenue Service regarding the items referenced above.

**WITNESS RESPONSIBLE:**

a through d -- Peggy J. Laub  
e -- Alexander J. Torok

**Laub, Peggy**

**From:** Ritchie, Brett  
**Sent:** Monday, April 12, 2004 7:28 PM  
**To:** Barnhart, Christa  
**Cc:** Sheppard, Amy  
**Subject:** FW: FASB Educational Session on SOP on PP&E and Decision on Interpretation of FAS 143

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 2 of 286

**Tracking:** Recipient      Read  
Barnhart, Christa Read: 4/13/2004 8:59 AM  
Sheppard, Amy Read: 4/13/2004 7:25 AM

Note the second part below re: the FSP on FAS 143: Bad news.

-----Original Message-----

**From:** Bitter, Robert (US - Cincinnati) [mailto:rbitter@deloitte.com]  
**Sent:** Monday, April 12, 2004 5:03 PM  
**To:** Ritchie, Brett; Chong, Amy  
**Cc:** Good, Lynn  
**Subject:** FW: FASB Educational Session on SOP on PP&E and Decision on Interpretation of FAS 143

-----Original Message-----

**From:** Umbaugh, Jan (US - Raleigh)  
**Sent:** Monday, April 12, 2004 9:46 AM  
**To:** US National Energy Managers and Seniors; Zaegel, Robert (US - McLean); Adams, Craig (US - Orlando); Adams, James (US - San Francisco); Aliff, Gregory (US - McLean); Aughton, Jeffery (US - Detroit); Baldwin, Larry (US - Houston); Barton, Trevor (US - Omaha); Battey, William H. (US - Charlotte); Bell, Dave (US - Atlanta); Benesh, Kay (US - Detroit); Bitter, Robert (US - Cincinnati); Bitton, Val (US - Chicago); Black, John (US - Atlanta); Boroch, Kevin (US - Pittsburgh); Bub, Scott (US - Houston); Carmazzi, Christine (US - Columbus); Carpenter, Jim C (US - Louisville); Caspersen, Robyn (US - Seattle); Condon, Patrick J (US - Chicago); Curran, John E (US - Hartford); D'Andrea, Chip (US - Houston); Dolan, Kevin P (US - Atlanta); Dowds, Joseph (US - Dallas); Durand, Daniel T. (US - Houston); Edmunds, Mark (US - San Francisco); Eichelberger, Tom (US - Atlanta); England, John (US - Houston); Enoch, Jason (US - Charlotte); Erken, William (US - Detroit); Fike, Andrew (US - Houston); Foote, William G (US - New York); Fredericks, William (US - Parsippany); Giannuzzi, John L (US - Charlotte); Gibbs, Brian (US - Atlanta); Gillam, Tim (US - Raleigh); Golden, Tracey (US - Wilton); Gordon III, Bob P. (US - Chicago); Gorin, David (US - New York); Graf, William P. (US - Chicago); Hahn, Charles (US - Phoenix); Hahne, Robert (US - McLean); Hall, Robert S (US - McLean); Harrington, Dennis (US - New York); Harrison, Jay Q (HK - Hong Kong); Harwood, Steve (US - Los Angeles); Henderson, Marjorie (US - Hartford); Heys, Ed (US - Atlanta); Higgins, Karen (CA - Toronto); Hoffman, Cliff (US - Minneapolis); Hoover, Tom (US - Seattle); Horak, Paul (US - Houston); Horner, Dennis (US - Dallas); Hudgens, Dan (US - Houston); Hutchinson, Michael (US - Denver); Ihlan, Thomas (US - Portland); Johnston, Randy (US - McLean); Jones, Daniel (US - Houston); Jones, Jeff (US - San Francisco); Jones, Larry (US - Houston); Keefe, Tom (US - New Orleans); Kilkenny, Thomas (US - Milwaukee); Kirkland, Jeff (US - Charlotte); Kurek, Gerard (US - McLean); Larkworthy, Richard (US - McLean); Layton, Mark (US - Dallas); Lonbom, Alan (US - Atlanta); Louw, Adrian (US - Stamford); Malloy, Michael (US - New York); Mathews, Dwight (US - Atlanta); Maxant, Robert (US - New York); Maynard, Paul A. (US - Minneapolis); McCormack, Debbie (US - McLean); McKnight, Benjamin A (US - Chicago); Milbury, Tom (US - Boston); Monroe, Kevin (US - McLean); Montag, Jeffrey (US - Houston); Montag, Kim (US - Houston); Moseley, Fred (US - Chicago); Muha, Charles (US - San Diego); Newton, Todd (US - Minneapolis); Nicholson, Chris (US - McLean); Odum, Dan (US - Dallas); Olsen, Clifford (US - Columbus); Orberg, Thomas (US - Parsippany); Parkin, James (US - Seattle); Phillips, Henry (US - Wilton); Pimentel, Armando (US - West Palm Beach); Poche', Tim (US - Houston); Polacek, Steven L. (US - Minneapolis); Poroch, David (US - Atlanta); Prunty, Patrick (US - Minneapolis); Radlick, Patricia (US - Indianapolis); Ray, Gail (US - West Palm Beach); Rayson, Rick W. (US - Phoenix); Reisner, Troy (US - Denver); Rich, Tom (US - Salt Lake City); Riggs, Don (US - Portland); Robinson, Jack (US - Charlotte); Roff, Don (US - Dallas); Roger, Nick (US - Parsippany); Rosenberg, Lawrence (US - New York); Rosenbloom, Richard (US - San Francisco); Rouch, James (US - Omaha); Roush, Gary (US - San Antonio); Seelagy, Greg (US - San Francisco); Shehorn, John (US - Indianapolis); Shepherd, Donald (US - New Orleans); Slyh, John (US - Boston); Smith, Scott (US - San Francisco); Stenvick, Tim (US - Sacramento); Stephens, Sondria (US - Los Angeles); Stevens, Mark (US - Salt Lake City); Stokx, Randy (US - Dallas); Storer, Glen (US - Boise); Strange, William (US - Houston); Suddeth, Nate (US - St. Louis); Sullivan, Gary (US - Columbus); Sullivan, John B. (US - Houston); Tanguay, Tom (US - Atlanta); Terhark, Chris (US - Des Moines); Theuer, Stephen (US - Richmond); Thompson, Stephen (US - Los Angeles); Tish, Laurie (US - Seattle); Travers, George (US - New York); Uffelman, Bernard (US - Austin); Umbaugh, Jan (US - Raleigh); Vichot, Julie (US - Omaha); Viehman, J. David (US - Philadelphia); Wilson, Todd (US - Chicago); Wiltsie, Karen (US - Detroit); Wisniewski, Carisa (US - San Diego); Wolfson, John (US - Wilton); Yankee, David J. (US - Chicago)

**Subject:** FW: FASB Educational Session on SOP on PP&E and Decision on Interpretation of FAS 143



Jan A. Umbaugh  
 Deloitte & Touche LLP  
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[www.deloitte.com](http://www.deloitte.com)

KyPSC Case No. 2006-00172  
 Attachment AG-DR-02-029  
 Page 3 of 286

Below is a brief summary of the FASB's Educational Session on the AcSEC project on PP&E. Here are the highlights of the meeting that elicited the most amount of discussion. In addition to the brief summary AcSEC also provided a powerpoint handout that if any of you are interested in could be forwarded onto you.

- **Planned Major Maintenance** - A significant discussion was held regarding the potential for divergence between this SOP and IAS 16. IAS 16 would suggest that the Planned Major Maintenance activities could be treated as a separate asset and therefore capitalized. This SOP would not allow for Planned Major Maintenance being treated as a separate asset and therefore expense as incurred.
- **Component Accounting** - The Board expressed objections to the amount of management discretion allowed in determining the level of component accounting. In addition, the Board was extremely uneasy concerning the concept of a "Functional Unit". In the example presented to the Board an airplane would be considered the functional unit so at the very least assets would need to be capitalized at that level. The Board questioned why the airplane's engines could not be considered a functional unit.
  - A significant discussion ensued regarding practical examples and what in AcSEC's mind constituted a functional unit and an appropriate level of component accounting.
  - AcSEC believes that the anti-abuse provision inherent in the SOP is that if companies set their level of component accounting too high that their future operating results could be significantly impacted by large one-time costs being charged to future period earnings. A high threshold for component accounting would likely cause large swings in companies' future operating results that will cause them to exercise a greater amount of diligence in setting their level of component accounting at a reasonably low level.
  - One Board member specifically did not like that ability for a company, because of a management's ability in setting their level of component accounting, to expense something in the future that would clearly be considered an asset under existing GAAP. For example, if management set their level of component accounting at a building level, if in 10 years time the company needed to replace the elevator within the building, the elevator would presumably be expensed. In the Board Members view the elevator is clearly an asset as it provides benefit to the company that is greater than one year.
- **Mass Asset** - There was a bit of a discussion surrounding what was considered a homogenous asset in order to qualify for the mass asset method. For instance, could an airplane company group all of their airplane seats together, among all of their planes, and account for them as one asset.
- At the conclusion of the educational session one Board member made an overriding comment with regard to the SOP. If the FASB Board is later expected to take on a PP&E project to converge US GAAP and IAS does it make sense for the FASB Board to approve this SOP? The question was left open with discussion expected at this coming week's Board meeting.
- Other topics discussed that did not elicit significant discussion included: 1.) Overview of the project, 2.) Project Stage Framework, 3.) Accounting for cost incurred in the stages, 4.) G&A costs, 5.) Removal Costs, 6.) Presentation and disclosure, 7.) Transition, and 8.) Effective Date

\*\*\*\*\*

The Board agreed to the following with respect to the FAS 143 project in lieu of the FSP related to asbestos:

- 1) FAS 143 does require an entity to recognize a liability for a legal obligation to perform asset retirement activities when the retirement of the asset is conditional upon a future event.

2) The effective date of the interpretation of FAS 143 will be for fiscal years ending after December 15, 2005 (December 31, 2005 for Calendar Companies).

3) The transition and measurement provisions will be consistent with FAS 143.

The Board expects to issue the interpretation in May with a 45 day comment period in anticipation that the final interpretation will be issued by September.

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 4 of 286

If you have any questions or comments please feel free to contact me.

John

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**Laub, Peggy**

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**From:** Ritchie, Brett  
**Sent:** Thursday, April 01, 2004 8:38 AM  
**To:** Pate, Gwen; Howe, Lee  
**Cc:** Lawler, Sarah  
**Subject:** FW: FERC Form 1 classification of non-143 cost of removal costs

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 5 of 286

**Attachments:** Form 1 Classification of non- FAS 143 accumulated cost of removal.doc; RE: Form 1 Classification of non- FAS 143 accumulated cost of removal



Form 1  
Classification of non- Classification of n...

RE: Form 1

See attached, I also included the Cinergy response.

-----Original Message-----

**From:** David Stringfellow [mailto:DStringfellow@eei.org]  
**Sent:** Wednesday, March 31, 2004 5:14 PM  
**To:** Accounting Standards Committee  
**Subject:** FERC Form 1 classification of non-143 cost of removal costs

**TO:** EEI Accounting Standards Committee Members

Attached is the summary of the Committee survey on the FERC Form 1 classification of non-Statement 143 cost of removal costs. I sent this summary to Jim Guest at the FERC.

David Stringfellow  
Edison Electric Institute

**Tracking:**

**Recipient**  
Pate, Gwen  
Howe, Lee  
Lawler, Sarah

**Read**  
Read: 4/1/2004 2:50 PM  
  
Read: 4/1/2004 8:40 AM

3/24/04

TO: EEI Accounting Standards Committee Members

As everyone is likely very aware, the SEC staff has definitively said that for its filings (Form 10K and 10Q) the non-Statement 143 accumulated cost of removal for operations that continue to be subject to the provisions of Statement 71 should be broken out from accumulated depreciation and reclassified as a regulatory liability on the balance sheet.

What is still uncertain is whether this same format should be used for the FERC Form 1 for 2003. The FERC staff has not issued any definitive guidance on whether the SEC preference should be followed for the FERC Form 1 balance sheet.

I have informally spoken with Jim Guest at the FERC. He asked if I could receive some feedback on how companies would prefer to report this non-143 accumulated cost of removal - leave it in Account 108 or reclassify it as a regulatory liability for the FERC Form 1 balance sheet.

I can pass on your comments on a summary basis (no company names used) back to Jim Guest at the FERC. This would help the FERC in issuing some guidance on this issue.

Thank you.

David Stringfellow  
Edison Electric Institute

Twenty-one responses (some respondents are at the holding company level representing several operating companies) support leaving the accumulated cost of removal in Account 108.

Among the comments received –

The Commission in Order 631 specifically chose not to require reclassification.

I believe that non-ARO accumulated cost of removal should continue to be classified in account 108 for regulatory accounting and reporting purposes. Reclassifying such amounts as a regulatory liability in the FERC Form 1 may have unintended consequences with various state commissions that follow the FERC U.S. of A. Do we want each state commission independently debating whether non-ARO accumulated cost of removal is really a regulatory liability and coming to different conclusions? Nothing has changed from the industry's historical regulatory accounting and reporting model except that someone at the SEC has successfully used SFAS 143 as an opportunity to force a pet agenda item upon the industry without bothering to follow a due process that includes public comment. Let sleeping dogs lie. For your background, [my company] is planning to report non-ARO accumulated cost of removal in account 108 in our FERC Form 1. We are including a footnote on page 123 of the FERC Form 1 that explains the difference between how non-ARO accumulated cost of removal is treated in the FERC report versus in our 10-K.

For reporting this item in our FERC Form 1, [my company] prefers to keep the accumulated cost of removal in Account 108. We believe moving this to a regulatory liability will create difficulties in rate cases before the state commissions, and may be a catalyst to consumer advocates suggesting rapid refunds to customers.

[My company] would prefer to leave it in account 108 for Form 1 purposes – one of our operating company rate plans is based on a return on asset formula and moving these amounts would trigger a rate change unless otherwise excluded.

We believe the FERC has already addressed the issue. Our understanding is that the FERC Order 631, Par. 36 still requires "removal costs that are not asset retirement obligations are included as a component of the depreciation expense and recorded in accumulated depreciation". It would seem to me that the FERC would need to go through a formal rulemaking process to change this (but then the SEC didn't go through a rulemaking process to redefine GAAP either). There have been various times in the past where SEC disclosure and FERC reporting have been different, such differences have been handled in other disclosures in the Form 1.

We're not even sure why companies are asking this question based on paragraphs 37 & 38 of FERC's order on acctg. for AROs. Para. 37 says that non-legal retire. obligations, such as cost of removal, aren't in the scope of FERC's rule. Para. 38 instead requires companies to maintain subsidiary records for cost of removal for non-legal retire. obli. recorded in accum. depr. Based on FERC's rule, Acct. 108 is where COR should remain for FERC reporting so in our mind, FERC has already told us what to do.

We would say a reclassification with regards to FERC reporting is not necessary:

- 1) COR is included in our depreciation rates as approved by the states.
- 2) COR as presented in the SEC documents is based on a theoretical amount of COR included in accumulated depreciation.
- 3) Most (all?) companies do not and will not have systems in place to capture this information through their existing fixed plant systems.
- 4) If COR is reclassified, then should COR as it is incurred be re-pointed against the liability account?

We think FERC should NOT change the current requirements regarding accounting and reporting for cost of removal. Property taxes in some jurisdictions are calculated under the cost approach based on net plant values. Some taxing authorities use FERC forms to calculate the taxable base. If FERC requires non-ARO removal costs to be recorded as a regulatory liability, property taxes could increase for some utilities. Additionally, some regulators could use this as an opportunity to require utilities to refund some or all of the removal amounts to customers even though companies will still continue to incur costs to remove/retire assets.

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Three respondents support breaking out the accumulated cost of removal as a regulatory liability or asset.

Among the comments received -

[C]onform to the SEC presentation. It's one less thing to reconcile between the FERC form and our external financial presentation.

[My] company is planning to show as a regulatory liability for Form 1.

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One respondent favored using Account 108 for 2003, but change for future years -

We have classified the non-ARO COR in a subaccount of Account 108 consistent with FERC's April 2003 accounting ruling. Since our FERC Form 1 is the basis of our state Form 1 (which is due 3/31/04) we are nearing completion of our filing & would not support change at this point for the 12/31/03 filing. However, I do support this change going forward.

**Laub, Peggy**

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**From:** Ritchie, Brett  
**Sent:** Monday, March 29, 2004 2:20 PM  
**To:** 'David Stringfellow (E-mail)'  
**Subject:** RE: Form 1 Classification of non- FAS 143 accumulated cost of removal

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 9 of 286

Cinergy would prefer to leave the amount in 108

-----Original Message-----

**From:** David Stringfellow [mailto:DStringfellow@eei.org]  
**Sent:** Wednesday, March 24, 2004 10:23 AM  
**To:** Accounting Standards Committee  
**Subject:** Form 1 Classification of non- FAS 143 accumulated cost of removal

**TO:** EEI Accounting Standards Committee Members

As everyone is likely very aware, the SEC staff has definitively said that for its filings (Form 10K and 10Q) the non-Statement 143 accumulated cost of removal for operations that continue to be subject to the provisions of Statement 71 should be broken out from accumulated depreciation and reclassified as a regulatory liability on the balance sheet.

What is still uncertain is whether this same format should be used for the FERC Form 1 for 2003. The FERC staff has not issued any definitive guidance on whether the SEC preference should be followed for the FERC Form 1 balance sheet.

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I can pass on your comments on a summary basis (no company names used) back to Jim Guest at the FERC. This would help the FERC in issuing some guidance on this issue.

Thank you.

David Stringfellow  
Edison Electric Institute

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You are currently subscribed to asc as: [brett.ritchie@cinergy.com] To unsubscribe, forward this message to leave-asc-32506W@ls.eei.org

**Barnhart, Christa**

**From:** Laub, Peggy  
**Sent:** Friday, April 11, 2003 2:16 PM  
**To:** Deloitte Auditors  
**Cc:** Ritchie, Brett  
**Subject:** FAS 143- Attention Trisha

Case No. 2005-00042  
AG-DR-01-070  
Page 17 of 172

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 10 of 286

Trisha,

This is a short description of the process that John Spanos went thru to determine the historical cost of removal.

Let me know if you have any questions.

-----Original Message-----

**From:** Spanos, John J. [mailto:jspanos@GFNET.com]  
**Sent:** Monday, March 24, 2003 1:58 PM  
**To:** Laub, Peggy  
**Subject:** Aro theory

Peggy:

The breakdown of the book reserve between true depreciation expense and depreciation expense related to cost of removal and gross salvage was conducted and sent to you for all companies. In order to complete the assignment in a timely and economic manner without losing the ability to maintain reasonable estimates of cost of removal, a theoretical approach was performed.

The theoretical approach included a determination of the best survivor curve and net salvage percent by account to apply to the December 31, 2002 original cost. The life and salvage parameters were estimates as it was not possible to calculate the amounts on a yearly basis all the back to the inception of each company. Once the net salvage parameter was established then the cost of removal and gross salvage components were determined. These percentages were determined based on historical activity of each company and the results of industry averages by account. Each cost of removal and gross salvage component was multiplied by the original cost to determine the amount of cost of removal or gross salvage had been accrued over time. Then the amount of cost of removal and gross salvage incurred over time was subtracted from the accrued amount to get the amount of cost of removal or gross salvage was embedded into the present book reserve amount. In the case of complete data such as Zimmer facilities an actuarial study was conducted.

This methodology was applied to all companies with a few minor exceptions.

John

09603-020479



**Cromer, Becky**

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**From:** Laub, Peggy  
**Sent:** Saturday, April 05, 2003 1:33 PM  
**To:** Deloitte Auditors; Karageorges, Carolyn; Carlson, Kim; Bosse, Nancy; O'Brien, Sean;  
Douglas, Diana  
**Cc:** Bamhart, Christa; Dean, James; Ritchie, Brett  
**Subject:** Entries for FAS 143

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 11 of 286

Here is a summary of the accounting entries related to FAS 143 - Asset Retirement Obligation.



Summary Account  
435.xls

Please contact Christa Bamhart for any details on the entries for the international corps. Any other questions can be directed to Jim Dean or myself.

Peggy Laub  
Fixed Asset Accounting  
513-287-4291

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09603-020480

Summary	Journal Entry	Account 435300 Amount	Accretion EXP (405000)	Deprec Exp Acct 403103	Account 230850 ARO	Account 108410 & 108545 RWIP	Account 108500 Accum reserve	Acct 108850 Reserve - ARO	Acct 101850 Plant - ARO
<b>CGE (Fixed Assets)</b>									
CGE Non-Reg - Historical Cost of Removal	March, 2003 FA100	79,862,659.00 (1)					79,862,659.00		
-RWIP @12/31/2002	March, 2003 FA980	-8,474,743.59 (2)				8,474,743.59			
	March, 2003 FA981	-8,090,112.08 (2)				8,090,112.08			
East Bend ARO	Feb 2003 FA500, FA994	-654,261.84	8,851.85	1,366.73	822,695.81			177,978.83	338,174.02
Zimmer ARO	Mar 2003 FA500	-153,680.70	10,732.09	4,270.83	829,182.58			48,491.51	718,976.59
Miami Fort ARO	Mar 2003 FA500	-119,293.78	2,742.88	525.93	180,855.63			28,822.43	67,318.45
Adjust Power plant entries for Jan & Feb deprec	Mar 2003 FA992	3,197.72							
Adjust Power plant entries for Jan & Feb Accretion	Mar 2003 FA993	8,981.16							
<b>Total for CGE</b>		<b>64,382,705.91 CR</b>	<b>22,326.82 DR</b>	<b>6,163.29 DR</b>	<b>1,812,763.82 CR</b>	<b>14,564,855.67 CR</b>	<b>79,862,659.00 DR</b>	<b>283,292.77 CR</b>	<b>1,122,469.06 DR</b>
Jan		64,382,705.91	7,374.32	1,595.95	1,797,811.32 Activity	14,564,855.67	79,862,659.00	248,725.43	1,122,469.06
Feb			7,476.25	2,283.67	7,476.25 BAL			2,283.67	
Mar			7,476.25	2,283.67	7,476.25 BAL			2,283.67	
	Check	0.00							
<b>PSI (Fixed Assets)</b>									
		Account 182303 Reg Asset	Account 230800 ARO	Acct 108800 Reserve - ARO	Acct 101800 Plant - ARO				
Cadiz (ARO)		119,564.20	777,361.74	38,694.00	898,491.54				
Gibson (ARO)		1,485,959.95	2,333,824.67	310,891.34	1,158,856.06				
Noblesville (ARO)		2,557,482.81	3,844,925.53	2,431,817.55	3,719,250.27				
<b>Total for PSI</b>		<b>4,163,016.96 DR</b>	<b>6,956,111.94 CR</b>	<b>2,781,502.89 CR</b>	<b>5,574,597.87 DR</b>				
	Feb Activity	168,790.35	22,052.15	146,738.20					
	March Activity	168,790.35	22,052.15	146,738.20					
<b>International (Christa Barnhardt)</b>									
Corp 420	Mar 2003 CA999	-180,886.00							
Corp 426	Mar 2003 CA999	-89,292.00							
Corp 427	Mar 2003 CA999	-45,704.00							

Notes:

- (1) Net plant on 1032 report will increase by this amount
- (2) Will show up as decrease in construction expenditures on construction export schedule

Additional Notes:

The cumulative affect entries are effective as of January 1, 2003  
 CGE depreciation expense for CGE production will decrease about 434,000 per month. Annual decrease of \$5.2M.  
 The 1.3 M decrease for the first quarter will all be booked in March  
 This decrease in depreciation expense will be offset by the expensing of current cost of removal costs on CGE's books.

**Cromer, Becky**

**From:** Ritchie, Brett  
**Sent:** Tuesday, March 18, 2003 3:52 PM  
**To:** Bamhart, Christa  
**Subject:** FW: SEC position regarding FAS 143 pro forma disclosures

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 13 of 286

We need to get with Peggy on this as it may accelerate the need for this - let's discuss.

—Original Message—

**From:** Bitter, Robert (US - Cincinnati) [mailto:rbitter@deloitte.com]  
**Sent:** Tuesday, March 18, 2003 3:30 PM  
**To:** Roberts, Bernie; Blackwell, Barry  
**Cc:** Ritchie, Brett; Carlson, Kim; Good, Lynn (US - Cincinnati); Lonbom, Alan (US - Atlanta)  
**Subject:** FW: SEC position regarding FAS 143 pro forma disclosures

Attached below is some information regarding a position the SEC has taken with regard to SFAS No. 143 pro forma disclosures. This looks like another item that should be included in the restated annual financial statements that the Company is contemplating filing on Form 8-K.

Please call me if you would like to discuss.

Thanks,

- Bob

—Original Message—

**From:** Cannon, Albert (US - Cincinnati)  
**Sent:** Tuesday, March 18, 2003 1:54 PM  
**To:** #Cincinnati Audit Managers (US); #Cincinnati Audit Ptrs Dirs Prin at DTT.US.NO.REPLY; Carpenter, Jim C (US - Louisville)  
**Subject:** FW: SEC position regarding FAS 143 pro forma disclosures

FYI

—Original Message—

**From:** Wolfson, John (US - Wilton)  
**Sent:** Tuesday, March 18, 2003 1:31 PM  
**To:** US Professional Practice Dir  
**Subject:** SEC position regarding FAS 143 pro forma disclosures

At the March 11, 2003, AICPA SEC Regulations Committee meeting, the following

topic was discussed with the SEC staff. The staff's tentative position, described below, is consistent with their views regarding the transitional

09603-020482

pro forma disclosures required by paragraph 61 of SFAS 142, Goodwill and Other Intangible Assets. Registrants that are contemplating filing a registration statement in the next year should consider including the FAS 143 pro forma disclosures in their 2002 Form 10-K or 2003 Forms 10-Q. These pro forma disclosures provided in the Form 10-K or Form 10-Q should be provided for the latest three fiscal years and any subsequent interim periods.

**Topic: Transitional Pro Forma Disclosures under FASB Statement No. 143, Accounting for Asset Retirement Obligations (FAS 143)**

**Question: Should annual financial statements issued prior to the adoption of FAS 143 that are included in a registration statement be revised to include the transitional disclosures described in paragraph 27 of FAS 143 if the registration statement also includes interim financial statements which reflect the adoption of FAS 143? Would the conclusion be different if these previously issued annual financial statements are incorporated by reference, rather than included, in a registration statement?**

**Background: Paragraph 27 of FAS 143 states the following:**

...an entity shall compute on a pro forma basis and disclose in the footnotes to the financial statements for the beginning of the earliest year presented and at the end of all years presented the amount of the liability for asset retirement obligations as if this Statement had been applied during all years affected. The pro forma amounts of that liability shall be measured using current (that is, as of the date of adoption of this Statement) information, current assumptions, and current interest rates.

**FAS 143 is effective for fiscal years beginning after June 15, 2002.**

**Earlier**

~~application is encouraged. Initial application is as of the beginning of an entity's fiscal year. If FAS 143 is adopted prior to the effective date and during an interim period other than the first interim period of a fiscal year,~~  
**all prior interim periods of that fiscal year shall be restated.**

~~Discussion: If annual financial statements issued prior to the adoption of FAS 143 are reissued and included in a registration statement subsequent to the~~

issuance of interim financial statements reflecting the initial adoption of FAS

143, the annual financial statements should be revised to include the paragraph

27 transitional disclosures, if the amounts involved are material. This view is

based on paragraph 27, which states that disclosure of pro forma information should be provided "...for the beginning of the earliest year presented and at

the end of all years presented." This view is consistent with the SEC Staff's

position on transitional disclosures required by paragraph 61 of FASB Statement

No. 142, Goodwill and Other Intangible Assets (FAS 142).

If annual financial statements issued prior to the adoption of FAS 143 are reissued via incorporation by reference into a registration statement that also

incorporates by reference interim financial statements reflecting the adoption

of FAS 143, it is not clear whether those annual financial statements should be

revised to include the transitional disclosures required by FAS 143.

**Committee Recommendation:** The committee felt that the annual financial statements generally need not be revised to include the transitional disclosures

required by FAS 143. However, the determination of whether the annual financial

statements should or should not be revised to include the transitional disclosures required by FAS 143 is an assessment that must be made by a registrant and its auditors. Depending on the outcome of that assessment, a registrant may be able satisfy the disclosure requirements by one of the following:

1. Including the transitional disclosures in the registration statement (data for only the three most recent years and interim periods would suffice, even if the transitional disclosures are included in a five-year table);

2. Filing the required disclosures or filing the annual financial statements, revised to include the transitional disclosures, in a Form 8-K that

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is incorporated by reference into the registration statement; or

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3. Including the transitional disclosures in a Form 10-Q that is incorporated by reference into the registration statement.

**Tentative SEC Position:**

The SEC agrees with the Committee Recommendation. Irrespective of the method a registrant chooses for providing the transitional disclosures, the disclosures

should be robust and transparent and should cover all periods for which financial statements are presented. The disclosures should include (or cross reference to) the date that SFAS 143 was adopted, a brief description of the standard, a discussion of the impact that adoption had on the financial statements, and the disclosures required by paragraph 27 .

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09603-020485

**Cromer, Becky**

**From:** Ritchie, Brett  
**Sent:** Friday, February 07, 2003 9:42 AM  
**To:** Barnhart, Christa  
**Subject:** FW: SFAS No. 143 - Q&A with FASB Staff

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 17 of 286

More support for Item 3.

-----Original Message-----

**From:** Umbaugh, Jan (US - Raleigh)  
**Sent:** Thursday, February 06, 2003 1:02 PM  
**To:** Adams, Craig (US - Orlando); Adams, James (US - San Francisco); Aliff, Gregory (US - McLean); Aughton, Jeffery (US - Detroit); Baldwin, Larry (US - Houston); Barton, Trevor (US - Omaha); Battey, William H. (US - Charlotte); Bell, Dave (US - Atlanta); Benesh, Kay (US - Detroit); Bitter, Robert (US - Cincinnati); Bitton, Val (US - Chicago); Black, John (US - Atlanta); Boroch, Kevin (US - Pittsburgh); Bub, Scott (US - Houston); Caspersen, Robyn (US - Seattle); Condon, Patrick J (US - Chicago); Curran, John E (US - Hartford); D'Andrea, F. Craig (US - Houston); Denn, Peter (US - Seattle); DesParte, Duane M. (US - Chicago); Dowds, Joseph (US - San Diego); Durand, Daniel T. (US - Houston); Edmunds, Mark (US - San Francisco); Eichelberger, Tom (US - Atlanta); England, John (US - Houston); Enoch, Jason (US - Columbia); Foote, William G (US - New York); Fredericks, William (US - Parsippany); Giannuzzi, John L (US - Charlotte); Gibbs, Brian (US - Atlanta); Gillam, Tim (US - Raleigh); Golden, Tracey (US - Wilton); Good, Lynn (US - Cincinnati); Gorin, David (US - New York); Graf, William P. (US - Chicago); Hahn, Charles (US - Phoenix); Hahne, Robert (US - McLean); Hall, Robert S (US - McLean); Harrison, Jay (FR - Neully); Harwood, Steve (US - Los Angeles); Henderson, Marjorie (US - Hartford); Heys, Ed (US - Atlanta); Higgins, Karen (CA - Toronto); Hoffman, Cliff (US - Minneapolis); Hoover, Tom (US - Seattle); Horak, Paul (US - Houston); Horner, Dennis (US - Dallas); Hutchinson, Michael (US - Denver); Ihlan, Thomas (US - Portland); Johnston, Randy (US - McLean); Jones, Daniel (US - Wilton); Jones, Jeff (US - San Francisco); Jones, Larry (US - Houston); Keefe, Tom (US - New Orleans); Kilkenny, Thomas (US - Milwaukee); Kurek, Gerard (US - McLean); Larkworthy, Richard (US - McLean); Layton, Mark (US - Dallas); Lonbom, Alan (US - Atlanta); Malloy, Michael (US - New York); Mathews, Dwight (US - Atlanta); Maxant, Robert (US - New York); Maynard, Paul A. (US - Minneapolis); McKnight, Benjamin A (US - Chicago); Milbury, Tom (US - Boston); Monroe, Kevin (US - McLean); Montag, Jeffrey (US - Houston); Montag, Kim (US - Houston); Moseley, Fred (US - Chicago); Muha, Charles (US - Dallas); Newton, Todd (US - Minneapolis); Nicholson, Chris (US - Richmond); Odom, Dan (US - Dallas); Olsen, Clifford (US - Columbus); Omberg, Thomas (US - Parsippany); Parkin, James (US - Seattle); Phillips, Henry (US - Wilton); Pimentel, Armando (US - West Palm Beach); Poche, Tim (US - Houston); Polacek, Steven L. (US - Minneapolis); Prunty, Patrick (US - Minneapolis); Quay, Deborah (US - Raleigh); Ray, Gail (US - West Palm Beach); Rayson, Rick W. (US - Phoenix); Rich, Tom (US - Salt Lake City); Robinson, Jack (US - Charlotte); Roger, Nick (US - Parsippany); Rosenberg, Lawrence (US - New York); Rouch, James (US - Omaha); Rouch, Gary (US - San Antonio); Seelagy, Greg (US - San Francisco); Shehom, John (US - Indianapolis); Shepherd, Donald (US - New Orleans); Slyh, John (US - Boston); Smith, Scott (UK - London); Stenvick, Tim (US - Sacramento); Stephens, Sondria (US - Los Angeles); Stevens, Mark (US - Salt Lake City); Stokx, Randy (US - Dallas); Storer, Glen (US - Boise); Strange, William (US - Houston); Suddeth, Nate (US - St. Louis); Sullivan, Gary (US - Columbus); Sullivan, John B. (US - Houston); Tanguay, Tom (US - Atlanta); Theuer, Stephen (US - Richmond); Thompson, Stephen (US - Los Angeles); Tighe, John (US - New York); Tish, Laurie (US - Seattle); Travers, George (US - New York); Uffelman, Bernard (US - Austin); Umbaugh, Jan (US - Raleigh); Vihman, J. David (US - Philadelphia); Wilson, Todd (US - Chicago); Wiltsie, Karen (US - Detroit); Wisniewski, Carisa (US - San Diego); Zaegel, Robert (US - McLean)  
**Subject:** FW: Is the Removal of Asbestos-Containing Materials in the Scope of FAS 143?

~~Below is an e-mail string that includes a question raised by E&Y to the FASB staff regarding an interpretation of FAS 143, paragraph A15 and application of that guidance to the removal of asbestos from a building. The asbestos example was considered at the January meeting EITF agenda committee (included in my January 13, 2003 distribution of materials that also included the C11 discussion). The EITF agenda committee decided not to add this topic to its agenda but suggested the FASB staff might want to issue more formal guidance. While we cannot determine if or when the FASB will issue anything more formal, we and at least E&Y and PWC have been telling our clients to follow this guidance.~~

-----Original Message-----

**From:** michael.a.berman@us.pwcglobal.com [mailto:michael.a.berman@us.pwcglobal.com]  
**Sent:** Wednesday, December 18, 2002 10:00 AM  
**To:** Carl Gilbert - KPMG; Richard Matheny - Phelps Dunbar; Umbaugh, Jan (US - Raleigh)

09603-020486

6/19/2003

Subject: RE: Is the Removal of Asbestos-Containing Materials in the Scope of FAS 143?

Case No. 2005-00042  
AG-DR-01-070  
Page 28 of 172

----- Forwarded by Michael A. Herman/US/ABAS/PwC on 12/17/2002 01:29 PM -----

michael.doss@ey.com  
10/31/2002 01:22 PM

To: wgraf.deloitte@ey.com, Michael A. Herman/US/ABAS/PwC@Americas-US  
cc: michael.barrett04@ey.com  
Subject: RE: Is the Removal of Asbestos-Containing Materials in the Scope of FAS 143?

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 18 of 286

Bill and Casey,

Here is the response we got from the FASB staff on the asbestos/brick removal (paragraph A15) issues. I would think a similar conclusion would be reached for the telephone pole coating example. Please let me know your thoughts.

Regards,  
Mike

\*\*\*\*\*

Michael J. Doss  
National AABS Professional Practice - Accounting Standards  
Phone: (212) 773-8673 Fax: (212) 773-2361  
EYComm: 4863677

----- Forwarded by Michael J. Doss/Accounting/National/EYLLP/US on  
10/31/2002 02:18 PM -----

Sam Lynn

<michael.doss@ey.com>  
>

<solynn@fasb.org

To: "'michael.doss@ey.com'"

cc: carlo.pippolo@ey.com

Subject: RE: Is the Removal of Asbestos-  
Containing Materials in the Scope of FAS 143?  
10/22/2002 11:35

AM

89693-020487

FASB staff's response:

The obligating event occurs when the building is demolished or renovated (or legally required to be demolished or renovated). Normal operations or business practice may indicate the need to renovate or rebuild a building containing asbestos, but in and of itself does not create an obligation.

Paragraph A15 of Statement 143 addresses a similar situation by providing an

6/19/2003



example of bricks in a kiln that are periodically replaced and must be disposed of in a certain manner. That paragraph says: "...state law requires that WHEN the bricks are removed, they must be disposed of at a special hazardous waste site. The obligation to dispose of those bricks is within the scope of this Statement." It is not clear in the paragraph whether the "obligation to dispose of" the bricks should be accounted for it inception of operations (based on the business plan for removing the bricks every five years) or only when the bricks are removed. The FASB staff believes the obligation should be accounted for under 143 when the obligation is incurred (when the bricks are removed).

-----Original Message-----

From: michael.doss@ey.com [mailto:michael.doss@ey.com]  
Sent: Wednesday, October 09, 2002 7:00 PM  
To: solynn@fasb.org  
Cc: carlo.pippolo@ey.com  
Subject: Is the Removal of Asbestos-Containing Materials in the Scope of FAS 143?

Sam,

As we discussed, here is brief write-up of the issue of whether or not the requirements governing asbestos removal give rise to an asset retirement obligation. Thanks for taking a look at this.

#### Background Information

The Clean Air Act (CAA) requires the EPA to develop and enforce regulations to protect the general public from exposure to airborne contaminants that are known to be hazardous to human health. In accordance with Section 112 of the CAA, the EPA established National Emissions Standards for Hazardous Air Pollutants (NESHAP) to protect the public. Asbestos was one of the first hazardous air pollutants regulated under Section 112. On March 31, 1971, EPA identified asbestos as a hazardous pollutant, and on April 6, 1973, EPA first promulgated the Asbestos NESHAP in 40 CFR Part 61.

The Asbestos NESHAP regulations protect the public by minimizing the release of asbestos fibers during activities involving the processing, handling, and disposal of asbestos-containing material (ACM). Accordingly, the Asbestos NESHAP specifies work practices to be followed during demolitions and renovations of all structures, installations, and buildings (excluding residential buildings that have four or fewer dwelling units). In addition, the regulations require the owner of the building and/or the contractor to notify applicable State and local agencies and/or EPA Regional Offices before all demolitions, or before renovations of buildings that contain a certain threshold amount of asbestos.

Accounting Under Statement 143

09603-020488

~~Nearly all structures built before 1980 contain ACM. Under the Asbestos NESHAP, certain work practices dealing with the proper removal, handling, and disposal of ACM must be followed if a building with ACM is demolished or renovated. The question arises as to whether the requirements of the~~  
Asbestos NESHAP give rise to an asset retirement obligation (ARO). The key question is what is the obligating event? The promulgation of the regulation in 1973 (later amended in 1990) or the demolition of renovation of a structure with ACM? Few, if any, companies established a liability for eventual removal of ACM when the regulation was promulgated and few, if any, companies established liabilities for the removal of ACM upon the acquisition of structures with a known asbestos problem. Statement 143 addresses legal obligations "associated" with the retirement of long-lived

6/19/2003

assets. Usually, however, the scope of Statement 143 is interpreted to mean that the Statement applies when the company is legally obligated to retire the asset itself, not activities that would be required if the company chose to retire the asset when it is not otherwise obligated to do so.

ITF 89-13 addresses the accounting for the cost of asbestos removal. Under the consensus reached, the costs of asbestos treatment incurred within a reasonable time period after the acquisition of a property with a known asbestos problem should be capitalized as part of the cost of the acquired property and the costs incurred in the treatment of asbestos for an existing property may be capitalized as a betterment.

Do the requirements dealing with the removal of ACM constitute an ARO?

When there otherwise is no legal obligation to retire a building with ACM, we believe that the obligating event occurs when the building is demolished or renovated. If the building is demolished, then we believe the costs of asbestos removal should be expensed as incurred (assuming the required activities occur within a single reporting period). If the building is renovated, then we believe the costs of asbestos removal may be capitalized in accordance with EITF 89-13. On the other hand, in cases where there is a legal obligation to retire a building with ACM, then we believe the costs of complying with the regulations governing the removal of ACM should be included in estimating the fair value of the liability for the ARO.

We'd appreciate your views on this issue because it is not clear from Statement 143 whether the FASB intended for companies to recognize liabilities for the costs associated with activities that are required only if the asset (for which there otherwise is no asset retirement obligation) is retired.

Regards,  
Mike

\*\*\*\*\*

\*\*\*

Michael J. Doss  
National AABS Professional Practice - Accounting Standards  
Phone: (212) 773-8673 Fax: (212) 773-2361  
EYComm: 4863677

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00003-020489

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6/19/2003

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KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 21 of 286

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09603-020490

6/19/2003

**Barnhart, Christa**Case No. 2005-00042  
AG-DR-01-070  
Page 33 of 172

**From:** Ritchie, Brett  
**Sent:** Monday, October 21, 2002 9:32 AM  
**To:** Barnhart, Christa  
**Subject:** FW: ARO Q&A document

KyPSC Case No. 2006-00172  
 Attachment AG-DR-02-029  
 Page 22 of 286

FYI

-----Original Message-----

**From:** Bitter, Robert (US - Cincinnati) [mailto:rbitter@deloitte.com]  
**Sent:** Friday, October 18, 2002 1:46 PM  
**To:** Ritchie, Brett  
**Subject:** FW: ARO Q&A document

I think the answer to your ARO question is in here (third question - bottom of page 2)

-----Original Message-----

**From:** Umbaugh, Jan (US - Raleigh)  
**Sent:** Sunday, October 06, 2002 6:19 PM

**To:** .Adams, Craig (US - Orlando); Adams, James (US - San Francisco); Aliff, Gregory (US - McLean); Aughton, Jeffery (US - Detroit); Baldwin, Larry (US - Houston); Barton, Trevor (US - Omaha); Battey, William H. (US - Charlotte); Bell, Dave (US - Atlanta); Benesh, Kay (US - Detroit); Bitter, Robert (US - Cincinnati); Bitton, Val (US - Chicago); Black, John (US - Atlanta); Boroch, Kevin (US - Pittsburgh); Caspersen, Robyn (US - Seattle); Condon, Patrick J (US - Chicago); Curran, John E (US - Hartford); D'Andrea, F. Craig (US - Houston); Denn, Peter (US - Seattle); DesParte, Duane M. (US - Chicago); Dows, Joseph (US - San Diego); Durand, Daniel T. (US - Houston); Edmunds, Mark (US - San Francisco); Eichelberger, Tom (US - Atlanta); England, John (US - Houston); Enoch, Jason (US - Columbia); Foote, William G (US - New York); Fredericks, William (US - Parsippany); Giannuzzi, John L (US - Charlotte); Gibbs, Brian (US - Atlanta); Gillam, Tim (US - Raleigh); Golden, Tracey (US - Wilton); Good, Lynn (US - Cincinnati); Gorin, David (US - New York); Graf, William P. (US - Chicago); Hahn, Charles (US - Phoenix); Hahne, Robert (US - McLean); Hall, Robert S (US - McLean); Harrison, Jay (FR - Neully); Harwood, Steve (US - Los Angeles); Henderson, Marjorie (US - Hartford); Heys, Ed (US - Atlanta); Higgins, Karen (CA - Toronto); Hoffman, Cliff (US - Minneapolis); Hoover, Tom (US - Seattle); Horak, Paul (US - Houston); Homer, Dennis (US - Dallas); Hutchinson, Michael (US - Denver); Ihlan, Thomas (US - Portland); Johnston, Randy (US - McLean); Jones, Daniel (US - Wilton); Jones, Jeff (US - San Francisco); Jones, Larry (US - Houston); Keefe, Tom (US - Dallas); Lonbom, Alan (US - Atlanta); Malloy, Michael (US - New York); Mathews, Dwight (US - Atlanta); Maxant, Robert (US - New York); Maynard, Paul A. (US - Minneapolis); McKnight, Benjamin A (US - Chicago); Milbury, Tom (US - Boston); Monroe, Kevin (US - McLean); Montag, Jeffrey (US - Houston); Montag, Kim (US - Houston); Moseley, Fred (US - Chicago); Muha, Charles (US - Dallas); Newton, Todd (US - Minneapolis); Nicholson, Chris (US - Richmond); Odom, Dan (US - Dallas); Olsen, Clifford (US - Columbus); Orberg, Thomas (US - Parsippany); Parkin, James (US - Seattle); Phillips, Henry (US - Wilton); Pimentel, Armando (US - West Palm Beach); Poche, Tim (US - Houston); Polacek, Steven L. (US - Minneapolis); Prunty, Patrick (US - Minneapolis); Quay, Deborah (US - Raleigh); Ray, Gail (US - West Palm Beach); Rayson, Rick W. (US - Phoenix); Rich, Tom (US - Salt Lake City); Robinson, Jack (US - Charlotte); Roger, Nick (US - Parsippany); Rosenberg, Lawrence (US - New York); Rouch, James (US - Omaha); Rotush, Gary (US - San Antonio); Seelagy, Greg (US - San Francisco); Shehom, John (US - Indianapolis); Shepherd, Donald (US - New Orleans); Slyh, John (US - Boston); Smith, Scott (UK - London); Stenvick, Tim (US - Sacramento); Stephens, Sondria (US - Los Angeles); Stevens, Mark (US - Salt Lake City); Stolor, Randy (US - Dallas); Storer, Glen (US - Boise); Strange, William (US - Houston); Suddeth, Nate (US - St. Louis); Sullivan, Gary (US - Columbus); Sullivan, John B. (US - Houston); Tanguay, Tom (US - Atlanta); Theuer, Stephen (US - Richmond); Thompson, Stephen (US - Los Angeles); Tighe, John (US - New York); Tish, Laurie (US - Seattle); Travers, George (US - New York); Uffelman, Bernard (US - Austin); Umbaugh, Jan (US - Raleigh); Viehman, J. David (US - Philadelphia); Wilson, Todd (US - Chicago); Wiltsie, Karen (US - Detroit); Wisniewski, Carisa (US - San Diego); Zaegel, Robert (US - McLean)

**Subject:** FW: ARO Q&A document

~~Please find attached a summary of the questions submitted during our recent FAS 143 Asset Retirement Obligation web conference. The answers included herein were prepared by Carisa Wisniewski and by Jan Umbaugh, National Audit Partner - Utility Industry. We have not received final comments back from National Office. If there are any changes as a result of those final comments we will re-distribute this document marked to show changes.~~

09603-020491

6/17/2003

<<AROQwithA.doc>>

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 23 of 286

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09603-020492

6/17/2003

## SFAS143 "Accounting for Asset Retirement Obligations"

### Web Conference - Questions and Answers:

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#### Recognition - Removal Costs -

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**Asked:** Many component parts have special disposal requirements, but if there is no legal requirement to retire or remove the component in the first place, we feel that there is no ARO. For example, oil-filled equipment has disposal requirements, but no legal requirement to retire or remove. Do you agree?

**Answered:** The definition of retirement within the standard (footnote 2) includes the "abandonment, recycling or disposal in some other manner". Paragraph A15 includes an example of components that wear out after a period of time and that when removed has a special (legal) disposal requirement. The Standard concludes that the costs associated with the legal obligation for disposal are within the scope of the standard even though there is no legal obligation to remove the component. If there were no legal obligation to remove the component, then removal costs would not be within the scope of the standard.

A15. An asset retirement obligation may exist for component parts of a larger system. In some circumstances, the retirement of the component parts may be required before the retirement of the larger system to which the component parts belong. For example, consider an aluminum smelter that owns and operates several kilns lined with a special type of brick. The kilns have a long useful life, but the bricks wear out after approximately five years of use and are replaced on a periodic basis to maintain optimal efficiency of the kilns. Because the bricks become contaminated with hazardous chemicals while in the kiln, a state law requires that when the bricks are removed, they must be disposed of at a special hazardous waste site. The obligation to dispose of those bricks is within the scope of this Statement. The cost of the replacement bricks and their installation are not part of that obligation.

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**Asked:** If the company has not implemented SFAS 143 and consummates a business combination, how would removal costs be treated? If the company has implemented SFAS143, would the treatment be any different?

~~**Answered:** Prior to the implementation of SFAS143, the acquirer would record the assets and liabilities acquired at fair value at the date of the acquisition in accordance with SFAS 141 and SFAS 142. Upon adoption of SFAS143, the acquirer would be required to inventory the legal obligations of the acquiror and determine if there are unrecorded legal obligations. To the extent legal obligations exist, they would then be recorded in accordance with the standard and PP&E would be grossed up in accordance with SFAS 143. FAS143 Footnote~~

4—If a tangible long-lived asset with an existing asset retirement obligation is acquired, a liability for that obligation shall be recognized at the asset's acquisition date as if that obligation were incurred on that date.

If the acquisition is completed after the implementation of SFAS 143, the assets acquired (including PP&E) and liabilities assumed (including any ARO) would be recorded at fair value in accordance with SFAS 141 and SFAS 142.

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**Asked (2 questions):** Classification of removal cost recovered through rates -- should the gross amount be reclassified out of Accumulated Depreciation whether or not related amounts fall under the scope of FAS 143?

**Answered:** The following example should demonstrate the situation where a company has a current decommissioning accrual based on amounts recovered through rates that is comprised of both contaminated and non-contaminated retirement costs:

- \* Current Decommissioning accrual – contam \$70 (AD)
- \* Current Decommissioning accrual – Non contam \$30 (AD)
- \* Implementation 143 - legal obligation (ARO) for contaminated \$150 (since it has been in service)
- \* Net asset upon Implementation: \$40 (Accreted ARC)
- \* Cum Effect Expense of \$40 = New ARO (\$150) minus new asset (\$40) (= New net balance sheet of \$110) – Removal of old Contam liability (\$70)
- \* If Regulated, Cum Effect Expense recorded as Regulatory asset \$40
- \* \$30 related to the non-contaminated portion of the facility would be removed to Reg. Liability (or quantify and disclose amount of Reg. Liability in A/D)
- \* Net impact is a reclassification

Assuming the company is regulated since it is recovering costs through rates, the liability associated with removal costs that do not have a legal obligation would be considered a regulated liability. The regulated liability could be maintained in accumulated depreciation. The location and amount would need to be disclosed in the footnotes to the financial statements. If the removal costs are determined to be related to a legal obligation, the ARC and ARO amounts should be recorded in accordance with the standard and the existing Contaminated Accrual removed from Accumulated Depreciation (A/D).

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**Asked:** If removal cost is being recovered in rates for distribution lines but the removal cost is for removal related to replacing lines (i.e. indeterminate life), does it have to be removed from account 108 if the ARO is on the final removal of assets?

**Answered:** As a point of clarification, if a company has a long-lived asset with an indeterminate life, the ARO would not be able to be calculated until the company has some information as to timing of settlement (FAS 143, paragraph

B19). Therefore, no ARO would be recorded currently if there is no information as to ARO settlement. If the removal cost is a legal obligation, the amount currently recorded should be removed from Accumulated Depreciation (FERC account 108) and should be disclosed in the footnotes as an indefinite life liability. If it is being recovered in rates, the amount removed will likely be a regulatory liability. If there is no legal obligation, see the response to the previous question. It should be noted that the FERC has not provided a general approval for removal costs to be reclassified from account 108 as a result of SFAS143.

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### **Interim Retirement -**

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**Asked (3 questions):** Paragraph B17 states that interim retirements fall within the scope. Does this mean we should record an ARO liability for these items? An argument has been made that because gas distribution systems have an indefinite life, FAS 143 does not apply to interim retirements. Would like some guidance on this.

**Answered:** Footnote 22 to paragraph B17 cites distribution systems (utility poles and thus gas distribution components) as an example of an interim property retirement and replacement that "may or may not have associated asset retirement obligations." SFAS143 relates to legal obligations associated with retirements and replacements. If the portion of the gas distribution system that has an associated ARO has an indefinite life (after consideration of all information available –see B19), no asset retirement obligation for the system would be recorded at this time. Companies should be reminded of the disclosure requirements outlined in paragraph 22 for assets with indeterminate lives.

However, if the life of the component can be estimated and there is a legal obligation to replace the component, there could very well be a legal obligation for interim removal of the component that would have to be recorded currently. See paragraph A15 in the standard.

If there is no legal obligation to remove the component or to dispose of the removed component, then no ARO exists. On the other hand, an ARO would be recorded, for the respective costs, if there is a legal obligation to either remove or to dispose of the component.

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### **Lease -**

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**Asked:** What is the lessee's treatment for plant that has an operating lease with the lessee responsible for removal?

**Answered:** Paragraphs 17, 18 and B66 indicate that the cost of removal that the lessee is responsible for (has a legal obligation) would be subject to the



standard, to the extent the removal responsibilities are not contemplated in the minimum lease payments or contingent rentals. This would result in the recording of an ARO and an ARC (capital lease) or an Immediate charge to the income statement (operating lease). The ARO would be accreted and adjusted in accordance with the standard. However, many removal obligations under leases would be considered either minimum lease payments or contingent rentals and thus would not be subject to SFAS 143. Such obligations would instead continue to be accounted for in accordance with SFAS 13 as amended.

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### **Promissory Estoppel -**

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**Asked:** Does the recovery through rates of future removal costs create a legal obligation under the doctrine of promissory estoppel?

**Answered:** We do not believe that recovery through rates in and of itself creates an ARO. Recovery through rates may result in a regulatory liability if no removal costs are ultimately incurred. The definition of Promissory estoppel ("The principle that a promise made without consideration may nonetheless be enforced to prevent injustice if the promisor should have reasonably expected the promisee to rely on the promise and if the promisee did actually rely on the promise to his or her detriment.") includes reliance on the promise and the incurrence of a detriment to the promisee. A review of regulatory proceedings should be done to determine that no "promise to remove" the asset was made in order to get the regulator to approve the recovery of the costs in rates as this would result in promissory estoppel. This should be discussed with legal counsel.

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**Asked (2 questions):** Do MGP sites that have not been operation for years continue to be accounted for under SOP 96-1 and not subject to 143?

**Answered:** If the site is idle but operational and an asset remains to be retired, there may be an obligation under either or both standards. The obligation would be accounted for under either standard depending on nature of the costs. If the costs were from the improper use of an asset, they would be accounted for under SOP96-1. If the costs are associated with the future retirement of an existing operational asset and were incurred through the normal operations of the asset they would be accounted for under SFAS 143. However, such costs would likely be expensed immediately as the asset is no longer being operated.

**Note:** Paragraph A6 indicates that an asset is considered retired if the asset is no longer capable of being used. If the asset was previously retired and the company has an existing obligation under SO96-1, it would continue to be monitored under that guidance.

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### **Measurement - Interest Rate -**

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**Asked:** With the current unusually low U.S. Treasury rate, what is the appropriate credit adjusted risk free rate that should be used? Is it more

appropriate to use a rate that is based on an average of the U.S. Treasury rate over recent history or do you have to use the current U.S. Treasury Rate plus your credit spread.

**Answered:** While the current interest rates are low, the standard does not provide for averaging or smoothing of the interest rate. Neither the Standard nor Concept 7 address modification of the risk free rate for perceived economic anomalies. The standard provides guidance as to when a modification would be appropriate. It is assumed that the zero-coupon U.S. Treasury instrument would take into account economic conditions.

FAS143 Footnote 18—In determining the adjustment for the effect of its credit standing, an entity should consider the effects of all terms, collateral, and existing guarantees that would affect the amount required to settle the liability.

The risk-free interest rate is the interest rate on monetary assets that are essentially risk free and that have maturity dates that coincide with the expected timing of the estimated cash flows required to satisfy the asset retirement obligation. 19

FAS143 Footnote 19—In the United States, the risk-free rate is the rate for zero-coupon U.S. Treasury instruments.

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**Asked:** How should we determine the appropriate interest rate given our current status as a debtor in possession? What process should we go through to obtain this rate? What will D&T view as reasonable support for our interest rate assumptions once a rate has been determined?

**Answered:** The standard does provide for the modification of the risk free rate for the company's specific credit standing which, in this case, would result in the company using the current debtor in possession rate. We encourage you to discuss the specific audit evidence that will be requested with your engagement team.

FAS143 Footnote 18—In determining the adjustment for the effect of its credit standing, an entity should consider the effects of all terms, collateral, and existing guarantees that would affect the amount required to settle the liability.

D&T would generally look to the same support as that used to support incremental borrowing rates for other purposes, such as recent financings, bank or other third party quotes, comparable company information, etc.

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**Asked:** The company is considering using the 10-year treasury note rate adjusted for a credit spread or the 30 year treasury note rate adjusted for a credit spread depending on the time horizon of the asset involved. We are

wondering if this is reasonable or if D&T feels another methodology is more appropriate.

**Answered:** Approach appears reasonable.

---

**Asked:** Additionally, should one rate be used for the entire entity or should different rates be used for different countries, segments, or to a level of entities issuing in financial statements?

**Answered:** The rates should be specific for each entity for which the long-lived asset is owned and will be the party settling the obligation. The rate should take into consideration not only the credit standing of the entity that will be settling the obligation, but the country and any other specific facts. (See FAS143 Footnote 18 above)

---

**Asked:** The Standard requires the entity to use its credit adjusted risk free rate. What if the entity is not publicly traded? How can one determine/go about adjusting for the risk considering today's energy environment. (Particularly IPP's)

**Answered:** The Company could use the same source that is used for obtaining discount rates for mark-to-market calculations or determining incremental borrowing rates for leases or other purposes. For example, banks, other potential lenders or comparable public companies might be sources of information.

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#### **Measurement - Cost estimates -**

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**Asked:** In applying Concept 7 to SFAS 143 in determining the cash flows related to retirement obligations, we are struggling with varying views in the company as to how to apply the provisions:

One view is that cash flow assumptions are calculated based on varying degrees of remediation effort to determine various costs. Those costs (efforts) are assigned probabilities that will be weighted to arrive at an estimated probable cash flow. This amount will constitute the ARO.

A second view is that cash flow assumptions are calculated based on one level of remediation effort to determine a cost. That cost is adjusted based on various probabilities as to ultimate outcome and rigor around the estimate. Those probabilities will be used to determine the ultimate weighted average probable cost.

---

~~A third view is that there is an estimate used to calculate cost to retire. This estimate is based on a level of effort agreed to by the commission.~~

~~**Answered:** The first view would be the most appropriate interpretation of Con 7 and SFAS 143. Paragraph 8 of SFAS 143 states that the ARO estimate should reflect uncertainties in both timing (level of effort) and amount (cost).~~

---

Additionally in paragraph 8, there is a conclusion that "the expected cash flow approach will usually be the only appropriate technique for an asset retirement obligation".

---

**Asked:** In converting internal cost estimates to dismantle to third party market rates to dismantle assumptions need to be made around risk premium and contingencies. Some advocate that in the internal cost estimates to dismantle used in determining depreciation rates, there is a 10% cushion for contingencies. They would argue this contingency should be equivalent to the risk premium. Is this acceptable?

**Answered:** The company needs to go back to the cost study to make sure the calculations are in accordance with SFAS 143 and make sure that third party, costs, profit and risk premium assumptions are appropriate. It would be inappropriate just to assume the 10% contingency approximates the risk premium.

---

**Asked:** Doesn't the probability weighting automatically create an error? My point is that if the requirements of 143 mandate the use of a probability weighting (which I have no problem with) and we use the (30-70) example of (\$100/200) in 2010 or 2030, our result is \$130 in year 2016. If the actual event occurs in 2010 or 2030, our weighted estimate cannot be correct.

**Answered:** The probability-weighted cash flows provide the best estimate as of the date the liability is incurred. As soon as it becomes known to the company that the license will or will not be extended beyond 2010, it would be considered a triggering event to re-evaluate the ARO.

---

#### **Impact from Ratemaking -**

---

**Asked:** In a regulated public utility world, what rate making impact do you see?

**Answered:** We are hopeful that there will not be a significant rate making impact. FERC is expected to issue guidance by the end of 2002 and appears to want to make the standard revenue neutral. The Florida PSC has also issued draft guidance to maintain revenue neutrality. In a significant number of jurisdictions, the accrual of retirement obligations already exists. The standard attempts to provide consistency in the calculation of a portion of those costs, those with legal obligations. To the extent the calculation results in a different obligation than previously calculated for ratemaking purposes, we believe that ~~regulatory assets and liabilities will be used to account for such differences if the entity still applies SFAS 71.~~ There maybe adjustments during the next rate case in some instances.

---

**SOP on PPE**

---

**Asked:** Would it be fair to state that 143 would indirectly require/dictate companies to create components for such related tangible asset upon implementation of the SOP on PPE

**Answered:** SFAS 143 and the SOP on PPE were originally intended to be issued with corresponding effective dates. The delay of the SOP has created some confusion with respect to interim retirements and components of larger systems as the SOP is expected to require componentization irrespective of SFAS 143.

---

**Asked:** Is there any indication of when SOP on PPE will be "finalized"?

**Answered:** We are still expecting the SOP on PPE to be effective by the end of 2003. AcSEC still needs to discuss several issues in October and December 2002. The SOP then needs to be sent to the FASB for consideration and approval.

---

**Other -**

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**Asked:** Assuming you've seen the draft of the AGA/EEI white paper, do you agree with its conclusions?

**Answered:** As of now, we have not been requested to review or provide comment on the AGA/EEI white paper. We have seen a very preliminary draft and have responded to questions as requested. We do expect to see a copy of this paper in October prior to it being finalized.

---

**Questions submitted for survey -**

---

**Asked:** Are our clients getting updated cost studies for estimating the ARO liability or are they relying on the cost studies that they have on hand that were used for their most recent rate study (which may be two or three years old).

**Answered:** Results of Survey circularized within D&T (the results of the survey do not indicate D&T agreement or disagreement with the results):

It would appear that most companies are examining their existing cost studies and evaluating the need to obtain new studies on a case-by-case basis:

- (1) Using fairly recent study and comparing it to SFAS143 calculation standards (12 companies)
- (2) Obtaining new cost study (4 companies)
- (3) Not obtaining new cost study & plan was unclear from response (2 companies)
- (4) NA (2 companies)
- (5) Unsure (2 companies)

---

~~As indicated previously, we believe that cost studies will need to reviewed and updated to reflect the ARO calculation based on third party costs as required by SFAS 143.~~

---

**Asked:** Can you circularize a survey as to the number of utility companies that consider any of the following as an ARO (which will be recorded and not only disclosed): Disposal of distribution poles, disposal of PCB oil from transformers, and gas distribution pipe.

**Answered:** Results of the Survey circularized within D&T (the results of the survey do not indicate D&T agreement or disagreement with the results):

Disposal of distribution poles

Yes 2; No 12; NA 3; In process 4; Indefinite life 1

Disposal of PCB oil from transformers

Yes 7; No 4; NA 5; In process 6

Gas distribution pipe

Yes 1; No 13; NA 2; In process 5; Indefinite life 1

As indicated above, removal or disposal costs related to retirement of long-lived assets for which there is a legal obligation represent ARO's that would need to be recorded unless the timing of removal or disposal is indefinite and thus cannot be measured currently.

---

**Asked:** We have determined that our MGP sites are excluded from FAS 143. Have your LDC clients come to a consensus on this subject?

**Answered:** Results of Survey circularized within D&T T (the results of the survey do not indicate D&T agreement or disagreement with the results):

There are no long-term assets to retire so they are excluded from SFAS143.

**SFAS 143**  
**"Accounting for Asset Retirement Obligations"**  
  
**Web Conference**  
**September 3, 2002**

Debitto & Torchio

**Agenda**

Introduction	Joe Winkler - National Health Partner - Public Health
Administrative Business	
Agenda Overview	Order Winkler - National Energy Commission Group Partner
Implementation Issues	
Introduction of SFAS 143 & SFAS 142	
Measurement units in value	
Repeal of previously issued accounting texts	
Component part of a larger system	
Asset Method Fund	
Definite life vs no legal obligation	
Changes in value of investments within a measurement unit	
Update of units of measurement under SFAS	
Introduction of SFAS 143 & SFAS 142	
Introduction of SFAS 143 & SFAS 142	
Introduction of SFAS 143 & SFAS 142	
Other	
Questions and Answers & Closing Remarks	

Debitto & Torchio

**Introduction**

Debitto & Torchio

**Asset Retirement Obligations**

**Implementation Guidance**

Asset Retirement Obligations - Statement of Financial Accounting Standards 143 Implementation

D&T Guidance

AGNEE Guidance

FERC Notice of Proposed rulemaking

Debitto & Torchio

**Asset Retirement Obligations**

**Objective**

The statement establishes accounting standards for recognition and measurement of an asset retirement obligation (liability) for a legal obligation associated with the retirement of a tangible long-lived asset and the associated asset retirement cost.

Debitto & Torchio

**Asset Retirement Obligations**

**Definition of Asset Retirement Obligation (ARO)**

Legal obligation associated with the retirement of a tangible long-lived asset that results from the acquisition, construction, development or normal operation of that long-lived asset.

- Retirement is defined as "other-than-temporary removal" (includes sale, dismantlement or abandonment).
- Legal obligation - an obligation that a party is required to perform as a result of an existing or enforceable law, statute, ordinance, or written or oral contract or by legal construction of a contract under the doctrine of promissory estoppel.

Debitto & Torchio

### Asset Retirement Obligations

**Promissory Estoppel**

The principle that a promise made without consideration may nonetheless be enforced to prevent injustice if the promisor should have reasonably expected the promisee to rely on the promise and if the promisee did actually rely on the promise to his or her detriment."

*Black's Law Dictionary, 7<sup>th</sup> ed*

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### Asset Retirement Obligations

**Disclosures**

- General description of ARO and related long-lived assets
- Fair value of assets that are legally restricted for purposes of settling ARO
- Rollforward of ARO liability showing the changes attributable to:
  - Liabilities incurred during the current period
  - Liabilities settled during the current period
  - Accretion expense
  - Revisions in estimated cash flows
- Disclosure if the fair value of an ARO cannot be reasonably estimated, and the reasons therefore

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### Asset Retirement Obligations

**Effective Date and Transition**

- Effective for fiscal years beginning after June 15, 2002
- Must be adopted at beginning of fiscal year
- Upon initial application must use current information, assumptions, and rates
- Cumulative effect recorded as change in accounting principles under APB 20
- Proforma income statement and balance sheet disclosures

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### Implementation Issues

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### Implementation Issues

**Interaction of SFAS 143 and Proposed Statement of Position on Property Plant and Equipment (SOP-PP&E)**

- Existing practice
  - Accrue removal costs over the life of the asset
  - Or
  - Expense costs as asset is removed (PAYGO)
- SFAS 143
  - Does not address removal costs that are not legal obligations
  - Cannot bifurcate until after adoption
- Interaction
  - Adopt SFAS 143 for legal obligations
  - Non-legal obligation
    - Continue with current policy until SOP is effective
    - Assert PAYGO as preferable

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### Implementation Issues

**Plan to dismantle included in depreciation rates**

- Existing Practice
  - Depreciation is in excess of asset value
  - Result – a credit in accumulated depreciation (AD) before the asset is retired
- Reference to SFAS 19
- No legal obligation SFAS 143 not applicable
- SFAS 143 – when legal obligation exists
  - Existing dismantlement costs included in AD should be reclassified to liability
  - Or
  - Maintained in AD as regulatory liability and disclosed
- Future practice related to legal obligations
  - Dismantlement cost should not be included in depreciation rates

Deloitte & Touche



### Implementation Issues

**Removal of previously accrued costs currently classified as a contra asset (within Accumulated Depreciation) that are determined to be a legal obligation**

- Existing practice
  - Record accrued removal cost in AD
  - Often net of salvage
- SFAS 143
  - Does not specifically address
  - Requires liability to be established for ARO
  - Gross liability (not net liability less salvage) would approximate ARO

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### Implementation Issues

**Example – Gross vs. Net**

Property = \$400

Existing depreciation rate past 4 years

• Depreciation – 10 yr life = \$10	Cumulative = \$40
• Salvage – 10%	(1) Cumulative = (4)
• Removal cost – 30%	3 Cumulative = 12
• Total	\$12 Cumulative = \$48

Remove gross amount (12), not net (8)

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### Implementation Issues

**Indefinite Life vs. No Legal Obligation**

- Example – Rights of way for gas pipeline or distribution line
  - "Obligation for removal if the Company no longer plans to use it for utility purposes"
  - Indefinite life, but if no longer used there is an obligation
- Example – Plant depreciable life vs. economic life
  - Longer economic life if licenses renewed
  - Indefinite life with continuous replacements

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### Implementation Issues

**Component part of a larger system**

- Existing practice
  - Removal costs are normally provided for at a component level
- SFAS 143
  - Applies to component parts and interim retirements
  - Provided the component/interim retirement creates a legal obligation
- Removal obligation vs. maintenance

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### Implementation Issues

**Example – Interim retirement**

- Nuclear steam generator asset to be removed and disposed of at end of life
- Cost of removal and disposal included in original plant ARO
- Generator removed and replaced early
- Generator remains on site
  - Removal cost of ARO is same as original (incurred early) and disposal is still required (at end of life)
  - Cost estimate may change
- New generator installed
  - New ARO established for the new generator's removal and disposal

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### Implementation Issues

**Estimated Future Costs Related to Spent Nuclear Fuel and Nuclear Electric Generating Plants**

- Under SFAS 143 –
  - Nuclear Fuel – Long lived asset
  - Record ARO on the date of insertion – 1mil per KWH of nuclear generation
  - If only payable as generation occurs – expense as paid
  - No ARO associated with interim storage
  - Follow disclosure guidance for ARO determined
- Under SAB 10B –
  - SEC considering consistency with SFAS 143
  - Continue to provide additional disclosure required by SAB

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### Implementation Issues

#### FERC NOPR Implementation Guidance

Preliminary guidance for recording reflects recording of ARC in 220 account with ARC recorded in separate plant account; could record debit in 101 account and an intangible for FERC reporting purposes

- Regulatory assets/liabilities associated with the standard should be recorded in 142.3 / 254 accounts
  - Amounts originally recorded through cost of removal component of depreciation rates may need FERC approval for removal from 108 account
- Recognition of an ARC does not result in a new depreciation rate that would require FERC approval

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### Implementation Issues

#### Changes in Market Value of Available for Sale Securities Included in a Decommissioning Trust

- Edging practice
  - Changes in market value of investments within Trusts are recorded in AD or decommissioning liability (ETF D-41)
- SFAS 143
  - Decommissioning liability (ARO) must represent fair value
  - Changes in market values
    - Regulatory asset or liability
    - Accumulated OCI

Deloitte & Touche

### Implementation Issues

#### Risk-free interest rates used in the calculation of Nuclear Decommissioning obligation

- Settlement is provided for
- SFAS 143
  - Reduction of risk-free rate appropriate
  - Amount of reduction will vary depending on specific facts and circumstances

Deloitte & Touche

### Implementation Issues

#### Estimating retirement costs

- Source of estimates
  - Steam & CTs – Dismantling study
  - Nuclear plants – Decommissioning study
  - Transmission & Distribution – Historical retirement data from depreciation studies
- Re-evaluation of costs and assumptions
  - Standard is not specific as to when
  - New valuation at inception
  - Triggering event has occurred
  - Recurring regulatory studies

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### Implementation Issues

#### What is included in the obligation?

- Contaminated nuclear components
- Non-contaminated portions of nuclear site
- Green field costs – tear down administrative building

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### Implementation Issues

#### Interaction between SFAS 143 and SOP 98-1 "Environmental Remediation Liabilities"

- Normal operations
  - Chemical preservative on wooden poles
  - PCBs in transformers
- Improper operation
  - Ash pond contaminates local water supply

Deloitte & Touche

### Implementation Issues

**Financial statement of international subsidiaries and equity method investee**

- International
  - Adjustment for AROMARC recorded in US GAAP conversion
  - Will vary significantly by country
- Equity method investee
  - USGAAP -- should be reflected in their financial statements already
  - Parent company -- has an obligation to certify themselves that the amounts used in their financial statement are based on USGAAP
  - Co-ownership - need to communicate as to decisions made as to legal obligations (top-side adjustments are dangerous as they could lead to inconsistent treatment)

Deletre & Pasche

### Implementation Issues

**Probability -**

Weighting of potential license amounts into ARO expected future measurement calculation

- Example -
  - 70% chance 2010 \$100
  - 30% chance 2030 \$200
- ARO base \$130

Deletre & Pasche

### Questions & Answers

**Contacts -**

- Jan Umbaugh
- Don Roff
- Carlea Waniewski
- Carrie MacDonald

**Web Conference**  
September 5, 2002

Deletre & Pasche

ARO Webconference

Page 1 of 2

**Cromer, Becky**

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 38 of 286

**From:** Ritchie, Brett  
**Sent:** Thursday, August 01, 2002 5:40 PM  
**To:** Bamhart, Christa  
**Subject:** FW: ARO Webconference  
**Importance:** High

We'll plan on attending.

—Original Message—

**From:** Bitter, Robert (US - Cincinnati) [mailto:rbitter@deloitte.com]  
**Sent:** Thursday, August 01, 2002 5:39 PM  
**To:** Ritchie, Brett; Carlson, Kim; Roberts, Bernie  
**Cc:** Good, Lynn (US - Cincinnati); Karageorges, Carolyn (US - Cincinnati); Pemberton, Tricia (US - Indianapolis)  
**Subject:** ARO Webconference  
**Importance:** High

Brett, Kim and Bernie -

As per the e-mail attached below, our firm will be hosting a web conference on September 5 to discuss the latest developments regarding FASB Statement No. 143. If you are interested in participating, we could plug in together as a group. Please let me know.

- Bob

—Original Message—

**From:** Wilson, Sally (US - McLean) **On Behalf Of** Wisniewski, Carisa (US - San Diego)  
**Sent:** Tuesday, July 30, 2002 2:33 PM

**To:** Allen, Richard (US - Houston); Ambrosio, Michael (US - Parsippany); Armstrong, John (US - San Ramon); Balch, Jeffrey (US - San Diego); Berzins, Zig (US - Chicago); Bettinger, Donn (US - Boston); Bitter, Robert (US - Cincinnati); Breheny, Mark (US - Cedar Rapids); Cathcart, Alan (US - McLean); Concessi, Pat (CA - Toronto); Conrad, Ronald; Harris, Michael (US - Seattle); Hlser, Dennis; Hoffman, Frank (US - Detroit); Jackson, Daryl (US - New Orleans); Jacobi, Jere (US - Irving); Jepsen-Lozano, Lisa (US - Pittsburgh); Kent, Chris (US - Des Moines); Knoblick, Henry (US - New York); Larkworthy, Richard (US - McLean); Morrison, Fraser (US - Washington D.C.); Nappi, James (US - Parsippany); Olson, David A. (US - Minneapolis); Quay, Deborah (US - Raleigh); Radlick, Patricia (US - Indianapolis); Reilly, Michael P.; Riley, Jr., Jay (US - Dallas); Scott, Terry (US - Atlanta); Soder, Victor (US - Seattle); Terzic, Branko (US - McLean); Tish, Laurie (US - Seattle); West, William (US - Columbia); Wetzler, James (US - New York); Wilkinson, Joseph (US - Houston); Young, Mark (US - Austin); Zenk, Joseph (US - Pittsburgh); Adelson, Amy (US - Detroit); Allen, Dwight (US - Washington D.C.); Allen, Jane D (CA - Toronto); Anderson, Dave (US - Stamford); Anderson, Scott Michael (US - Cleveland); Archibald, Victoria (US - San Francisco); Balestrieri, Frank (US - San Francisco); Bartolone, Gregory F. (US - Buffalo); Bates, Bradley Alan (US - Dallas); Behrens, Scott (US - Omaha); Bell, Phil (CA - Calgary); Bharadwaj, Manish (CA - Vancouver); Binkley, Jeffery (US - Atlanta); Brodsky, Michael E (US - Boston); Buffington, Kevin (US - Austin); Buford, Timothy (US - Houston); Burlingame, B.J. (US - Wilton); Camazzi, Christine (US - Columbus); Chiaradonna, Anthony (US - Philadelphia); Chippindale, Lisa (CA - Toronto); Chort, Valerie Jeanne (CA - Toronto); Chronister, Marvin (US - Houston); Chudasama, Nilesh (US - Washington D.C.); Clayton, Michael (US - Denver); Clifton, Trent (US - Wilton); Cohen, Chris (US - New York); Cook, John T (US - Philadelphia); Cupani, Julia (US - McLean); Curtis, Patchin (US - New York); Dawson, Donald (US - Irving); Denny, Margaret (US - Reno); Donovan, Gregg (US - Houston); Driscoll, Ian (US - Washington D.C.); Eisendrath, Allen (US - Washington D.C.); Enoch, Jason (US - Columbia); Fallon, Jim (US - Los Angeles); Faloona, Raymond (US - West Palm Beach); Falukazi, Gary (CA - Calgary); Faruqi, Farah (US - San Jose); Felt, Terry (US - Los Angeles); Fields, Sheree (US - Houston); Fitzgerald, Robert (US - Dallas); Forrester, Tim (US - Nashville); Foster, Chris (US - Tulsa); Francois, Kent (US - McLean); McCormack, Debbie (US - McLean)

**Cc:** Bitton, Val (US - Wilton); Mazor, Christine (US - Wilton); Blitch, Sara (US - McLean)

**Subject:** ARO Summary Version 2 and Webconference

**Importance:** High

~~As an update to our web conference in December 2001, Deloitte & Touche's National Energy Practice will be hosting a web conference to discuss SFAS 143, Accounting for Asset Retirement Obligations on September 5, 2002 from 1:00 pm - 2:00 pm (EST). Please invite your clients and join us as we discuss financial accounting and~~

6/18/2003

09603-020507

ARO Webconference

Page 2 of 2

reporting for obligations associated with the retirement of tangible long-lived assets and the associated asset retirement costs. A limited number of lines are available, so we ask that you bring groups of people together to participate in this web conference.

Please find attached a summary of SFAS 143 Asset Retirement Obligation Consultations Version 2 addressed to date. As companies are just now beginning to inventory their long lived assets with potential asset retirement obligations, questions are expected to continue and guidance evolve. If you have any questions or comments, please contact Carisa Wisniewski 619-237-6528.

<<AROSumm.doc>>

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6/18/2003

09603-020508

**Version 2**

**Asset Retirement Obligations**  
**Statement of Financial Accounting Standards No. 143**

A number of implementation concerns have been highlighted through various recent consultation questions on the implementation and application of SFAS No. 143 "Asset Retirement Obligations" ("SFAS 143"). While each client should review their specific facts and circumstances in connection with their legal and regulatory departments, this general guidance along with audit evidence should be used to evaluate the reasonableness of any adjustments recorded. Implementation questions should be submitted to Carisa Wisniewski so that this document can be updated periodically.

There are a number of organizations, including the American Gas Association ("AGA") and Edison Electric Institute ("EEI"), that are working to address these issues and provide consistency throughout the industry however, we wanted to distribute our preliminary conclusions with respect to these items.

Additionally, we have included selected questions and responses submitted to the FERC in accordance with their informational request RM02-7-000. The FERC is considering the information gathered both from written comment letters as well as at the RM02-7-000 discussion panel held on May 7, 2002.

The following topics are included here:

- General Comment about Legal Obligation and Promissory Estoppel
- Calculation of an Asset Retirement Obligation
- Interaction of SFAS 143 and Proposed Statement of Position on Property Plant and Equipment (SOP-PP&E)
- No legal obligation but a plan to dismantle included in depreciation rates
- Interaction with Regulated Entities under SFAS 71
- Removal of previously accrued costs currently classified as a contra asset (within Accumulated Depreciation) that are determined to be a legal obligation
- Changes in Market value of SFAS 115 "Accounting for Certain Investments in Debt and Equity Securities" investment included in a Decommissioning Trust
- Risk-free interest rate used in the calculation of nuclear decommissioning obligations
- Valuation of costs of decommissioning nuclear plants
- Gas pipeline and transmission systems that are determined not to have a legal obligation to retire.
- Environmental from normal operations
- Component part of a larger system
- Component part of larger system  
As submitted to the FERC in accordance with RM02-7-000
- Spent nuclear fuel and storage casks  
Updated subsequent to the FERC response in accordance with RM02-7-000
- Calculation of the ARC and ARO of a long lived asset acquired with an existing legal obligations
- Can the increase in a long-lived asset (ARC), which is the result of recording an ARO, be immediately written off?
- FERC Focus:
  - Removal of costs from Account 108
  - What types of removal costs would result in ARO's

09603-020510

- **Interim retirements and other removal costs for which there was not a legal obligation**
- **Classification of ARC within Account 303 Intangible property**
- **Accretion Expense**
- **Issues raised by KPMG and PWC at FERC hearing**

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09603-020511



### General Comment about Legal Obligation and Promissory Estoppel

An Asset Retirement Obligation ("ARO") exists when the company determines it has a legal obligation to retire a tangible long-lived asset. SFAS 143 includes the following definition of a legal obligation:

As used in this Statement, a *legal obligation* is an obligation that a party is required to settle as a result of an existing or enacted law, statute, ordinance, or written or oral contract or by legal construction of a contract under the doctrine of promissory estoppel.

Footnote 3 - Black's Law Dictionary, seventh edition, defines *promissory estoppel* as, "The principle that a promise made without consideration may nonetheless be enforced to prevent injustice if the promisor should have reasonably expected the promisee to rely on the promise and if the promisee did actually rely on the promise to his or her detriment."

FAS143 Footnote 2—In this Statement, the term *retirement* is defined as the other-than-temporary removal of a long-lived asset from service. That term encompasses sale, abandonment, recycling, or disposal in some other manner. However, it does not encompass the temporary idling of a long-lived asset.

The determination of a legal obligation is not generally within the skill set of the accounting departments. Several preliminary assessments in the utility industry have determined that few circumstances are believed to have created such legal obligations. The existence of a legal obligation under the principle of promissory estoppel is based upon legal interpretation of contracts, public statements, etc. and would generally require the assistance of attorneys.

### Calculation of an Asset Retirement Obligation

An ARO is required to be recognized if a reasonable estimate of fair value can be made in the period the asset retirement obligation is incurred. If a reasonable estimate cannot be made, there is a disclosure requirement but an ARO is not recorded until a reasonable estimate can be made. Fair value shall be based on the best information available in the circumstances, including prices for similar liabilities and the results of present value techniques. Statement of Financial Accounting Concepts No. 7: Using Cash Flow Information and Present Value in Accounting Measurements ("CON 7") includes guidance on the calculation of fair value:

23. A *present value* measurement that fully captures the economic differences between the five assets described in paragraph 20 would necessarily include the following elements:

- a. An estimate of the future cash flow, or in more complex cases, series of future cash flows at different times. Fn - In complex measurements, such as measurements of liabilities settled by providing services, cash flow estimates necessarily include elements like overhead and profit margins inherent in the price of goods and services.
- b. Expectations about possible variations in the amount or timing of those cash flows

- c. The time value of money, represented by the risk-free rate of interest
- d. The price for bearing the uncertainty inherent in the asset or liability
- e. Other, sometimes unidentifiable, factors including illiquidity and market imperfections.

24. Existing accounting conventions differ in the extent to which they incorporate those five elements.

- a. *Fair value* captures all five elements using the estimates and expectations that marketplace participants would apply in determining the amount at which that asset (or liability) could be bought (or incurred) or sold (or settled) in a current transaction between willing parties.

#### **Interaction of SFAS 143 and Proposed Statement of Position on Property Plant and Equipment (SOP-PP&E)**

There were two acceptable accounting practices for recognition of removal costs prior to the issuance of SFAS 143. The accrual of probable removal cost obligations over the life of the asset (either as a component of depreciation or as a separate liability) was acceptable or recording the cost (expense) as the asset was removed ("PAYGO") were acceptable under generally accepted accounting principles ("GAAP") for non-regulated entities prior to the issuance of SFAS 143. SFAS 143 does not address accounting for removal costs that are not legal obligations. As a result, the current accounting practice should be continued until SFAS 143 is implemented and the current practice would be permitted to continue after the implementation of SFAS 143 for those removal costs not covered by SFAS 143 (see discussion below on the potential balance sheet reclassification of the cumulative amounts accrued for amounts that are not SFAS 143 AROs). The current draft of the AICPA's SOP-PP&E indicates that legal obligations should be accounted for in accordance with SFAS 143 and that other removal costs should be expensed on the PAYGO method once that SOP-PP&E becomes effective. It is reasonable to conclude that the exposure draft SOP-PP&E would not have addressed accounting for removal costs when a SFAS 143 legal obligation does not exist if SFAS 143 addressed those costs. SFAS 143 previously exists and is a higher level of GAAP.

We believe that the current method of recognizing removal costs cannot be changed without implementing SFAS 143 because SFAS 143 has been issued, could be adopted, and prescribes a specific accounting method for at least some removal costs (those for which a legal obligation exists). Thus, it would be inappropriate to adopt a new accounting method for removal costs that represent legal obligations that would be inconsistent with SFAS 143. It would also be inappropriate to piecemeal adopt a new accounting policy only for selected removal costs (those for which a legal obligation does not exist) prior to implementing SFAS 143 as the accepted alternatives prior to implementing SFAS 143 provide no basis for separate accounting policies for removal costs based on whether legal obligations do and do not exist.

Once SFAS 143 has been adopted, but prior to the issuance of the SOP-PP&E, we believe that the PAYGO accounting policy for removal costs would be deemed preferable GAAP. This assumes that the SOP-PP&E is issued in substantially the same form as the current exposure

draft. Thus companies could adopt the PAYGO method as preferable if they are now accruing over time, but could not begin accrual over time if they are not currently accruing such costs. Companies need to consider their facts and circumstances with respect to their consideration and documentation of preferability. Subsequent to adoption of SFAS 143 and prior to the issuance of SOP-PP&E, SEC registrants would need to obtain what is generally referred to as a preferability letter from the Firm [SEC Regulation S-X Rule 10-01(b)(6)]. "Preferability letters" must be reviewed and approved by *both* SEC Services and Accounting Research.

#### **No legal obligation but a plan to dismantle included in depreciation rates**

We believe there may be companies currently depreciating their plant including an anticipated amount of cost for the eventual dismantling of the plant. In other words, when the plant is completely depreciated, there will be a credit balance for dismantling included in accumulated depreciation. There is generally no legal obligation to dismantle but the company plans to dismantle the plant. As there is no legal obligation this is not addressed in SFAS 143. However SFAS 143 does include the following reference to SFAS 19 "Financial Accounting and Reporting by Oil and Gas Producing Companies" and dismantlement:

B22. Paragraph 37 of Statement 19 states that "estimated dismantlement, restoration, and abandonment costs . . . shall be taken into account in determining amortization and depreciation rates." Application of that paragraph has the effect of accruing an expense irrespective of the requirements for liability recognition in the FASB Concepts Statements. In doing so, it results in recognition of accumulated depreciation that can exceed the historical cost of a long-lived asset. The Board concluded that an entity should be precluded from including an amount for an asset retirement obligation in the depreciable base of a long-lived asset unless that amount also meets the recognition criteria in this Statement. When an entity recognizes a liability for an asset retirement obligation, it also will recognize an increase in the carrying amount of the related long-lived asset. Consequently, depreciation of that asset will not result in the recognition of accumulated depreciation in excess of the historical cost of a long-lived asset.[Emphasis added]

While SFAS 19 applies only to oil and gas producing activities, it would appear that by analogy, that the amount associated with the dismantlement should be reclassified to a separate liability. If the company determines classification of the liability as a contra asset is appropriate as a regulatory liability, the amount should be appropriately disclosed in the footnotes to the financial statements

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#### **Interaction with Regulated Entities under SFAS 71**

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There have been a number of questions related to the interaction between SFAS 143 and SFAS 71. The following guidance is provided in SFAS 143:

B73. Many rate-regulated entities currently provide for the costs related to asset retirement obligations in their financial statements and recover those amounts in rates charged to their customers. Some of those costs relate to asset retirement obligations

08803-020514

within the scope of this Statement; others are not within the scope of this Statement and, therefore, cannot be recognized as liabilities under its provisions. The objective of including those amounts in rates currently charged to customers is to allocate costs to customers over the lives of those assets. The amount charged to customers is adjusted periodically to reflect the excess or deficiency of the amounts charged over the amounts incurred for the retirement of long-lived assets. The Board concluded that if asset retirement costs are charged to customers of rate-regulated entities but no liability is recognized [under the provisions of SFAS 143], a regulatory liability should be recognized if the requirements of Statement 71 are met.

**Removal of previously accrued costs currently classified as a contra asset (within Accumulated Depreciation) that are determined to be a legal obligation**

Some companies have determined that they have a legal obligation associated with the retirement of tangible long-lived assets. For those tangible long-lived assets, the company may have been collecting in rates and currently have a credit included within accumulated depreciation.

There is considerable discussion within the industry groups about the appropriateness of removing the gross amount or the net (liability – salvage value) amount. We believe the gross amount of the accrual should be removed from accumulated depreciation and reclassified as a liability. Salvage value, as applicable, should be considered in the determination of depreciation expense.

It would appear if there is not a legal obligation, the company should look to the PP&E SOP when issued or see above on dismantlement.

**Changes in Market value of SFAS 115 “Accounting for Certain Investments in Debt and Equity Securities” investment included in a Decommissioning Trust**

Most companies currently record the changes in the market value of investments in debt and equity securities within Decommissioning Trusts as increases or decreases to the Decommissioning Trust asset and accumulated depreciation or decommissioning liability based on analogy to EITF Topic D-41. As the liability will now represent the fair value of the decommissioning costs, the changes in the market value would be more appropriately classified as a regulatory asset or liability or Accumulated Other Comprehensive Income depending on whether the entity is regulated and under SFAS 71.

B64, in part - This Statement provides for immediate recognition of changes in estimated cash flows related to asset retirement obligations. Changes in certain assets ~~dedicated to satisfy those obligations that are subject to the provisions of FASB~~ Statement No. 115, Accounting for Certain Investments in Debt and Equity Securities, ~~would also be recognized immediately. (see FASB 115 for appropriate~~ recognition guidance). The Board decided that it should not provide an exception to the general principle for offsetting in this Statement. [emphasis added]

### **Risk-free interest rate used in the calculation of nuclear decommissioning obligations**

In determining the risk-free interest to use in the calculation of the ARO, SFAS 143 provides for adjustment of the credit-adjusted risk-free rate when a method for providing settlement assurance exists. We have received a number of questions as to the appropriate rate with respect to a nuclear decommission ARO where a nuclear decommissioning trust exists. After considering their specific facts and circumstances, companies should be directed to paragraph 16 and B60. While these paragraphs do not give specific guidance as to how much adjustment should be made if a decommissioning trust exists, it does provide for modification.

16. Providing assurance that an entity will be able to satisfy its asset retirement obligation does not satisfy or extinguish the related liability. Methods of providing assurance include surety bonds, insurance policies, letters of credit, guarantees by other entities, and establishment of trust funds or identification of other assets dedicated to satisfy the asset retirement obligation. The existence of funding and assurance provisions may affect the determination of the credit-adjusted risk-free rate. For a previously recognized asset retirement obligation, changes in funding and assurance provisions have no effect on the initial measurement or accretion of that liability, but may affect the credit-adjusted risk-free rate used to discount upward revisions in undiscounted cash flows for that obligation. Costs associated with complying with funding or assurance provisions are accounted for separately from the asset retirement obligation.

### **Valuation of costs of decommissioning nuclear plants**

Currently, in the case of decommissioning, most cost studies represent the best estimate of the timing and amounts of cash flows. Those studies generally may not develop a complex probability-weighting scheme, but usually do include a point estimate that is adjusted by a contingency factor to recognize that the actual cost will likely vary from the point estimate. In the absence of market prices, the expected present value model must include various assumptions that would reflect the "marketplace assessment" of the costs and timing of cash flows associated with the ARO.

SFAS 143 requires companies to revisit their assumption (see paragraph A26) but the standard is unclear as to how often such assessment is required. It would appear that a new valuation would be required at inception of the application of FAS 143 if the previous methodology differed; then use the FAS121/144 model of revisiting the assumptions when a triggering event has occurred (e.g., changes in NRC requirements) or each 4 -5 years as normal studies are done for regulatory purposes.

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**Gas pipeline and transmission systems that are determined not to have a legal obligation to retire.**

Several entities in the industry have determined that they are not legally obligated to retire gas pipelines and transmission systems. There may be a specific expectation either through statute or other means that provides for the pipelines or systems to be abandoned rather than removed. In many geographies companies are only required to drain the pipes and cap them at the end of life. The pipes would then be monitored into perpetuity and this would be considered maintenance which is outside the scope of SFAS 143. The conclusion that there is not an ARO associated with the abandonment of gas pipelines and transmission systems should be discussed with the Company's regulatory and legal departments.

#### **Environmental contamination from normal operations**

Environmental contamination from normal operation would generally be something that can be expected. For example, if anticipated operation of an ash pond or coal pile would ultimately require removal, this would be from normal operations and SFAS 143 would apply. However, if an attorney has concluded that ash ponds do not require removal/retirement unless they contaminate the ground water then the clean up cost would not be within the scope of SFAS 143 but subject to the provisions of AICPA SOP 96-1, "Environmental Remediation Liabilities" because the contamination arose from improper use and not from normal operations. The liability would then be accrued as incurred.

#### **Component parts of a larger system**

SFAS 143 does apply to component parts of a larger system:

A15. An *asset retirement obligation may exist for component parts* of a larger system. In some circumstances, the retirement of the component parts may be required before the retirement of the larger system to which the component parts belong. For example, consider an aluminum smelter...[in part, Emphasis added]

Additionally during the deliberation of SFAS 143 the Board considered concerns about interim property retirement in B17 and footnote 22 thereto:

Footnote 22—Examples of interim property retirements and replacements for component parts of larger systems are components of transmission and distribution systems (utility poles), railroad ties, a single oil well that is part of a larger oil field, and aircraft engines. The assets in those examples may or may not have associated retirement obligations.

The Board believes that there is no conceptual difference between interim property retirements and replacements and those retirements that occur in circumstances in which the retired asset is not replaced. Therefore, any asset retirement obligation ~~associated with the retirement of or the retirement and replacement of a component part of a larger system qualifies for recognition provided that the obligation meets the definition of a liability. The cost of replacement components is excluded. (Emphasis added).~~

It should be noted that there must be a legal obligation for replacement of the component part (e.g., utility pole) on an interim basis to meet the SFAS 143 liability definition. It is expected

that the adoption of SFAS143 will require additional systems or system modification if a Company determines that it has component parts with legal obligations apart from the larger system. See FERC response to RM02-7-000 for aggregation comment.

**Component part of larger system**

**As submitted to the FERC in accordance with RM02-7-000**

15. If an existing component part of a larger system asset has a legal obligation associated with its retirement, and the component's useful life is shorter than the life of the larger system asset of which it is a part, must a liability for the asset retirement obligation be recognized for the component and the asset retirement costs be depreciated over the component useful life? At the date of adoption will there be sufficient information and records related to such components to recognize and measure the related asset retirement obligations? Please explain.

**Response:**

Given the facts provided in the question that a legal obligation exists for the retirement of the component part, an ARO would be recognized for the existing component and the asset retirement cost ("ARC") would be depreciated over the remaining asset life (useful life).

We believe that the ARC should be depreciated over the life of the depreciable component to which it relates. We do not believe that further breakdown of components into those that have legal retirement obligations and those that do not would be necessary. For example, nuclear plants have radioactive parts that are required to be retired and non-radioactive parts that may not have a legal obligation for retirement. If the radioactive and non-radioactive parts were included within the same depreciable component, no further determination of separate depreciable life for the radioactive parts would be required.

FAS 143 provides for aggregation of components with legal obligations (paragraph A22) and the use of "estimates and computational shortcuts" in computing ARO's related to components. Given the ability to use such estimates and reasonable computational short cuts, we believe the information and records necessary to recognize and measure the related ARO would be available.

**Spent nuclear fuel and storage casks**

**Updated subsequent to the FERC response in accordance with RM02-7-000**

18. Does "spent nuclear fuel" and "storage casks used for interim storage of spent fuel" result in legal asset retirement obligations? If so, under the Uniform Systems of Accounts, what new or existing balance sheet and income statement accounts should be used to record the amounts related to the asset retirement obligations for "spent nuclear fuel" and the "storage casks used for interim storage of spent fuel"? Please explain.

**Response:**

We believe that there is a legal liability to remove and dispose of spent fuel. Additionally, companies pay a 1 mill per KWH of nuclear generation fee to satisfy that legal obligation. If the fee cannot be avoided the estimated cost should be added to nuclear fuel as an ARC and

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the estimated ARO recorded at the time the fuel is inserted in the reactor (this probably has the benefit of making the amortization a recoverable fuel cost under many FAC's). The ARC would be amortized consistent with nuclear fuel amortization and the ARO would be reduced as the 1 mill fee is paid to the DOE. If the fee is only payable as generation occurs (once the spent fuel is removed from the reactor no additional fee would be incurred regardless of the unused capacity of the fuel), then the fee should be accrued and expensed immediately as the generation occurs (similar to current practice). At the time spent fuel is removed from the reactor, the permanent disposal is the DOE's obligation. We do not believe the interim storage from the date of removal from the reactor until the government takes it is an ARO and would not be covered by FAS 143. Dr. Porter, the former FASB practice fellow on this project, agreed with this position at the FERC hearings. The FERC has not issued any conclusions from their rulemaking yet.

#### **Calculation of the ARC and ARO of a long-lived asset acquired with an existing legal obligation**

For example, Company A acquired Company B, an SEC filer with public debt, in 2000. Company B has legal obligations associated with certain long-lived assets that were placed in service in 1990. Company A did not apply push down accounting to their acquisition of Company B. Given this set of facts, how should Company A and Company B calculate and account for the ARO and ARC? Paragraph A11, refers to the liability layers that are created by the acquisition of a long lived asset that has incurred a legal obligation and will incur additional legal obligations as it operates.

#### **Paragraph A11:**

Whether an obligation results from the acquisition, construction, or development of a long-lived asset should, in most circumstances, be clear. For example, if an entity acquires a landfill that is already in operation, an obligation to perform capping, closure, and post-closure activities results from the acquisition and assumption of obligations related to past normal operations of the landfill. Additional obligations will be incurred as a result of future operations of the landfill.

Assume all of the obligation was incurred prior to acquisition: Company B is still on its historical cost basis and would calculate its ARC as of 1990 and depreciate it forward to 1/1/03 for transition purposes. [Appendix D - Example 2]

In this example, Company A would have first incurred an ARO obligation upon its acquisition of Company B in 2000 (prior to the application of FAS 143). Therefore, upon applying FAS 143 it would calculate its ARC as of 2000 and depreciate it forward to 1/1/03 for a transition purpose. ~~This would result in different not ARC's at transition of Company A and Company B. Since both companies would be required to use the 1/1/03 discount rate at transition, the ARO at transition would generally be the same. The ARC could be different if Company A and Company B had different risk profiles and thus different credit adjusted risk-free discount rates at 1/1/03.~~



**Can the increase in a long-lived asset (ARC), which is the result of recording an ARO, be immediately written off?**

SFAS 143 in paragraph 11 includes a requirement for a company "to allocate the asset retirement cost (ARC) to expense using a systematic and rational method over its useful life." SFAS 143 goes on to include a footnote (10) as follows:

For example, assume an entity acquires a long-lived asset with an estimated life of 10 years. As that asset is operated, the entity incurs one-tenth of the liability for an asset retirement obligation each year. Application of a systematic rational allocation method would not preclude that entity from capitalizing and then expensing one-tenth of the asset retirement costs each year.

The Background Information included in Appendix B paragraphs B44- B46 provides the Board's consideration of distinguishing between which ARC should be capitalized and which should be recognized as an expense of the period. Since the Board could not develop a rationale for distinguishing between these types of costs, they concluded that all ARC amounts would be capitalized and allocated over a systematic and rational method over periods in which the related asset is expected to provide benefit. This may result in the company capitalizing and expensing a like amount in each period if the ARO is recognized over a period of time.

Paragraph 11 requires all ARO's to initially be capitalized as a cost of the related long-lived asset. While it then requires that capitalized amount to be amortized in a "systematic and rational method", it goes on to state that does not preclude amortizing an equal amount (to the amount capitalized) to expense the same accounting period. Thus for ARO's that are incurred in total upon placing the plant in service the initial ARO amount would be capitalized. This capitalized ARC could not be expensed immediately but would be amortized on a straight-line basis over the life of the asset (or some other systematic and rational basis).

Concerns were also raised about situations such as those identified in footnote 10 where the liability might be accrued somewhat ratably over the asset's life. As a practical matter, most ARO's are not incurred ratably over the plant life (landfills may be an exception) and few, such as nuclear decommissioning may increase in a declining pattern over the early years (e.g., 80% of activation, 15% over the next year, and 5% over the second year). Therefore, it would seem rare for a company to recognize the same amount capitalized and expensed each year. As a result, the company would recognize the expense on a straight-line basis over the life of the asset.

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During the drafting of SFAS 143, the discussion in paragraph 11 was included partially to address the concerns of those that did not believe the ARC was a valid asset and should always be expensed. It should be noted that adding the ARC to the asset cost could trigger an impairment charge which would in effect immediately expense all or a portion of the ARC (or potentially cause an impairment even greater than the ARC). Companies should refer to FASB Statement 144 to determine the appropriate criteria.

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**FERC Focus and Summary of discussion at FERC information hearing (discussion of RM 02-7-000 on May 7, 2002):**

**Removal of costs from Account 108 -**

FERC Uniform System of Accounts requires approval to remove amounts from account 108 for other than retirement payments. Thus all companies proposing to remove/transfer amounts from account 108 to regulatory liability upon adoption of SFAS 143 may require FERC approval. This concern was included in discussions with FERC at their informational hearings on SFAS 143 implementation issues on May 7, 2002. The expectation is that FERC will provide guidance prior to SFAS 143 becoming effective.

**What types of removal costs would result in ARO's**

During the FERC discussion everyone agreed that this was a legal interpretation. Each of the accounting firms agreed that nuclear decommissioning was the only ARO that was fairly certain. In many other cases, even if there is a legal obligation, the timing of removal was uncertain or indefinite so that in most cases Company's were not likely to record ARO's under SFAS 143. There would be a disclosure requirement associated with those legal obligation that are not estimable.

**Interim retirements and other removal costs for which there was not a legal obligation**

Our written comments to the FERC (RM02-7-000) indicated that SFAS 143 did not address and thus did not change current accounting (except for the deletion of portions of SFAS 19) for removal costs for which there was not a legal obligation. It was highlighted that the AcSEC draft SOP on PP&E still would not permit accrual of such removal costs in advance and could be effective by 2004 with earlier application permitted. As a result the FERC should address this issue in the current rulemaking. The fact that AcSEC was addressing this issue was further evidence this was not addressed in SFAS 143. Most felt that these costs could still be accrued for regulatory purposes and recorded as regulatory liabilities. This would work in many instances, but the FERC needed to address the fundamental issue as to whether all entities subject to their regulation could still record regulatory assets or liabilities if they had ceased applying SFAS 71 to all or portions of their operations and may not even meet the FERC requirements for regulatory assets and liabilities. It may be that these amounts could be deemed to be deferred revenue (revenue that has been billed to cover the cost but not yet earned) rather than regulatory liabilities in order to avoid this problem in the case of liabilities.

**Classification of ARC within Account 303 Intangible property**

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Our comment letter suggests that account 303 or some other intangible property account be used to record the ARC to avoid property tax implications from implementing SFAS 143 as many states base property tax valuations on book values of property excluding intangible property and certain other specific exclusions. The FERC rate staff was also concerned about the property tax impact. Jim Guest (assistant chief accountant) questioned whether it was good accounting policy to consider tax implications in establishing accounting rules.

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D&T indicated that in this instance property tax relief could be easily accomplished within FERC's existing accounting structure. Dr. Porter (former FASB practice fellow) confirmed that FASB, when indicating the ARC was a property cost rather than a separated intangible was focused only on whether it should be recorded as a separate intangible and not to preclude it from being recorded as an intangible within the property accounts.

This is a significant concern to many companies. At least one company has been contacted by the state authorities and notified that any increase to their property accounts must be added to the tax base for the calculation of increased property taxes.

#### **Accretion Expense**

FERC questioned whether accretion expense could be recorded as an element of depreciation for FERC reporting. D&T indicated that it was a non-cash charge that SFAS 143 required to be in operating expense, but did not specify what component of operating expense; the amount just needs to be disclosed (which Dr. Porter agreed with and said FASB had no preference as to what line item of operating expense). D&T indicated the accretion element of nuclear decommissioning is now comprehended in the depreciation and decommissioning expense line item and that since it was still related to the property could still be included as depreciation, if depreciation is defined to include accretion.

#### **Issues raised by KPMG and PWC at FERC hearing**

KPMG's primary issue was whether the regulatory assets could be recorded for ARO's because the cost might not be an incurred cost (because it included elements of third party profit and overheads based on FAS 143 measurement requirements) and might not be probable of recovery (because regulators would not permit rate recovery of the 3rd party costs that the company would not expect to incur if they would actually do the removal work themselves and because the probability weighted cash flow measure required by FAS 143 might not result in costs that were even probable of being incurred let alone recoverable as "probable" is used in FAS 143).

PWC only raised concerns about the impact of FAS 143 in situations where plants had been subjected to previous plant disallowances under FAS 90, impairments under FAS 121, or plants that had been recently acquired and subjected to purchase accounting valuations. They seem to believe that FAS 143 more significantly impacts entities in these situations. It is unclear as to whether this is a serious issue or not.

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09603-020522

Example - Inventory of Potential SFAS 143 Obligations

Company Name

Asset Retirement Obligations

Inventory and Preliminary Conclusions

Item	Research	Conclusion	Measurement
Scope: Spent fuel	Confirm with legal the company is responsible for spent fuel up until the date the DOE takes possession, which timing is unknown.	An ARO exists	-DOE unknown and effects on ARO -assume dry storage  -Method of spreading - assume fuel is burned ratably over plant life
Decommissioning	Consultants can provide guidance on third party costs and escalation rates.	An ARO exists	how to determine risk premium
Radiated vs. Non-radiated	Review of rate filings, decommissioning filings, legal reviewing	Open Discuss approach	
Gas pipeline	Reviewed DOT regulations on abandonment Requirements Reviewed internal abandonment procedures Both describe procedures for abandonment in place  - digging up of the pipe is not required. Abandonment is generally not a planned event - triggered by loss of a customer, or at request of DOT  (in which case we are reimbursed)	No ARO exists	NA
Mining operations-coal	All surface and deep mines must be reclaimed according to state regulations per permits	An ARO exists	Review reclamation estimates,  accrue as tons mined
Synfuel plants	With the expiration of energy tax credits 12/31/07, each synfuel plant must be dismantled	An ARO exists	Contractor estimates available
Terminats	State permits require property to be reclaimed when	An ARO exists	Probability of abandoning site is

09604-020423

	and if company decides to cease operations and abandon property		zero per management. Sale of operations would transfer permits and liability
T&D system	Reviewing ROW, easements for obligations X number transmission easements X number distribution easements  Distribution standard form doesn't represent any liability - approx. 10% deviate from normal Transmission has changed over time from 1800's to current. Approx. 10% of these deviate from standard.	Discuss next steps	NA
Fossil plant dismantlement:			
Subsidiary A - State	Legal reviewing language in filings	Open	Open
Subsidiary B - State	Review of permits, legal still reviewing	Open	
Environmental Issues	Review by legal	Open	
<b>Accounting:</b>			
COR split from depreciation reserves	Take ratio of current COR rates to overall depreciation rates times the reserve balance (for each different rate- by plant for generation, by FERC for T&D, general)	Reclass to regulatory liability	

09803-020524

**Barnhart, Christa**

**From:** Barnhart, Christa  
**Sent:** Monday, November 25, 2002 4:37 PM  
**To:** 'richard.a.jerch@sargentlundy.com'  
**Cc:** Ritchie, Brett; Wilson, Dale  
**Subject:** cost estimates and FAS 143

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 56 of 286

Below is a list of items that FAS 143 indicates should be taken into consideration when developing cost estimates. We wanted you to have this list to make sure you were aware of everything that needs to be reflected in the cost estimates you are preparing for us. (We have not included the full text of FAS 143 as part of this message, as it is primarily accounting and legal speak that we thought might be more confusing than helpful. Rather, we opted to send a summary of the guidance within FAS 143 on developing cost estimates, as we thought that might be more relevant information for you. However, if you would like us to send you the full standard, we can certainly do that.)

- The costs that a third party would incur to assume responsibility for the removal activity, including management of the removal project.
- Other amounts a third party would include in determining their contract price (for example, overhead, equipment charges, profit margin, technology advances, etc.).
- A market-risk premium that a third party would build into a contract to cover unforeseen circumstances. For example, how much would a third party add to the contract price to make sure it is adequately compensated in the event that the removal project requires additional activities or costs not originally anticipated?

We would like to have a copy of the detail that supports the final cost estimates for our files (at a minimum, we would like to see the total estimates broken down by labor, materials, and risk premium components).

We will also need to know what inflation factors to use for each of these components. Part of the accounting standard requires that we take the cost estimate as if all the activities were being completed in the current year and inflate it up to the year when we anticipate the removal activities will take place. We complete some additional calculations after that. As such, we will need to know the appropriate way in which to inflate the cost estimates you provide to us.

Also, below is the language from the regulatory order approving the construction of the Henry County plant relating to our removal obligation once we are no longer using the plant.

"Future Abandonment Issues. CinCap committed that, upon cessation of operation of the plant, it will dismantle the plant completely, including the concrete foundations, and will restore the land to a conforming use under the County Comprehensive Plan."

Thanks for your assistance, and let me know if you have any questions regarding the above.

Christa Barnhart  
Cinergy  
Accounting Research  
(317) 838-2193

**Tracking:**

Recipient  
'richard.a.jerch@sargentlundy.com'  
Ritchie, Brett  
Wilson, Dale

Read

Read: 11/25/2002 4:37 PM

09603-020525

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 57 of 286



KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 58 of 286

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**Sargent & Lundy LLC**

55 E. Monroe  
Chicago, IL

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Richard A. Jerch  
Project Manager  
Phone No. 312-269-6860  
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Email: richard.a.jerch@sargentlundy.com

February 27, 2003  
09940-003, -004  
Letter No. SLDM007

***Cinergy Corporation***

Subject: *FAS143 Demolition Cost Estimates*

Mr. Dale Wilson  
Cinergy Corporation  
1000 East Main Street  
Plainfield, IN 46168-1782

Dear Mr. Wilson:

Pursuant to your request, Sargent & Lundy LLC has completed the preparation of demolition cost estimates for power plant river structures situated along navigable rivers for Cinergy East and West stations. The estimates are present day and were prepared to satisfy current FAS 143 requirements. The estimates include the costs for demolition and removal of power plant buildings, materials and equipment that is situated at or below the Ordinary High Water Level (OHWL) at each site. Where applicable, costs to backfill intake channels, plug intake piping, grade and re-seed the impacted areas to return them to vegetated ground cover conditions are also included.

The river structure demolition cost estimates were prepared for the following Cinergy stations:

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**Cinergy East**

Beckjord  
Zimmer  
Miami Fort  
East Bend

09603-020526



Mr. Dale Wilson  
FAS 143 Cost Estimates

02/27/03  
Page 2

Cinergy West

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 59 of 286

Cayuga  
Gibson  
Gallagher  
Wabash River  
Dresser

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In addition, S&L completed the total plant demolition cost estimate for structures and equipment associated with the Henry County peaking plant.

The demolition cost estimate and associated scope of work basis for each station is enclosed. Brief scope summaries and estimated associated river structure demolition costs are as follows.

***Beckford***

Demolish and remove enclosed masonry pump house, equipment and associated substructure, river front bay of boiler building and associated materials and equipment, electrical power transformers and equipment in switchyard below OHWL, coal and fuel oil barge unloading facilities located within river and all river barge cells.

Total Demolition Cost Estimate: \$8,333,000  
S&L Estimate No. 21031B (1/31/03)

***Zimmer***

Service/circulating water pump house remains in place. Intake channel filled, associated sheet pile and concrete removed and intake piping plugged. Coal unloading, limestone unloading situated on piles with river and all river barge cells removed.

Total Demolition Cost Estimate: \$3,696,000  
S&L Estimate No. 21030A (1/21/03)

***Miami Fort***

Demolish and remove masonry crib house, equipment and associated substructure. Intake and discharge tunnels below OHWL removed, CW piping plugged and abandoned in place. Coal unloading facility and all coal barge river cells removed.

Total Demolition Cost Estimate: \$2,715,000  
S&L Estimate No. 21029B (1/31/03)

---

09603-020527

Mr. Dale Wilson  
FAS 143 Cost Estimates

02/27/03  
Page 3

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 60 of 286

***East Bend***

Intake structure/pump house remains in place. Intake piping plugged and abandoned. Channel area back-filled. Coal and limestone unloading facility, including foundations, removed. All river barge cells removed.

---

Total Demolition Cost Estimate: \$2,465,000  
S&L Estimate No. 21022B (1/31/03)

***Cayuga***

Demolish and remove masonry pump house, equipment and associated substructure. Intake piping and channel area filled and or plugged.

Total Demolition Cost Estimate: \$1,509,000  
S&L Estimate No. 13240-9R (1/31/03)

***Gibson***

SW intake piping plugged and abandoned. Intake area back-filled and restored.

Total Demolition Cost Estimate: \$461,000  
S&L Estimate No. 14242-8R (1/10/03)

***Gallagher***

Screen house remains in place. Intake channel area back-filled and CW piping plugged. Chimneys remain in place. Coal unloading facility in river and barge cells removed.

Total Demolition Cost Estimate: \$1,373,000  
S&L Estimate No. 13347-8R (1/10/03)

***Wabash River***

Demolish and remove CW plume structure, pump house fore bay and substructure. Circulating water piping plugged and abandoned.

Total Demolition Cost Estimate: \$2,401,000  
S&L Estimate No. 13348-10 (1/31/03)

***Dresser***

---

Remove remaining riverside structures. Plug and abandon CW piping.

---

Total Demolition Cost Estimate: \$391,000  
S&L Estimate No. 21033B (1/31/03)

09603-020528

Sargent & Lundy LLC

Mr. Dale Wilson  
FAS 143 Cost Estimates

02/27/03  
Page 4

**Henry County**

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 61 of 286

**Demolish and remove three combustion turbine units, fuel system, tanks,  
switchyard, foundations and all ancillary equipment.**

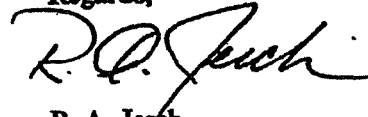
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**Total Demolition Cost Estimate: \$1,826,000**  
S&L Estimate No. 21034B (2/10/03)

---

If you have any questions concerning these estimates, please do not hesitate to call.

Regards,



R. A. Jerch  
Project Manager

RAI:  
Copies:  
R. Presnak 1/1  
P. Garza 1/1  
G. Komanduri 1/1  
Project File 1/1  
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09603-020529

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 62 of 286

DEMOLITION OF "RIVER STRUCTURES "

CONCEPTUAL COST ESTIMATE

PREPARED FOR

CINERGY  
CAYUGA - UNITS 1 & 2

SARGENT & LUNDY

ESTIMATE NO. 13240-9R  
PROJECT NO. 9940-003  
January 31, 2003

REVIEWED BY: 

APPROVED BY: 

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 63 of 286

Estimate No: 13240-9

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**TABLE OF CONTENTS**

<b>Report</b>	<b>Page</b>
Basis of Estimate.....	1
Summary.....	3
Work Sheet Details.....	4

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Chicago

**B A S I S of E S T I M A T E**

CINERGY  
CAYOHA - UNITS 1 & 2  
CONCEPTUAL COST ESTIMATE  
DEMOLITION OF "RIVER STRUCTURES "

Page: 1  
Estimate No: 13240-2R  
Project No: 9940-003  
Prepared by: PAG/BJD/

Estimate Date: 31JAN03

Price level: 2002

Scope

DISMANTLING AND REMOVAL OF ALL EQUIPMENT AND PIPING IN SCREEN HOUSE, PLUGGING OF CW PIPING, DEICING PIPE & DISCHARGE CHANNEL; DEMOLITION AND REMOVAL OF THE SCREEN HOUSE STRUCTURE, AND DEMOLITION AND REMOVAL OF UNDERWATER CONCRETE IN FOREBAY.

Technical Basis

SEE ASSUMPTIONS BELOW

Assumptions

- PLANT GRADE EL. 505FT. OHWL EL. 474FT.
- ALL ABOVE GRADE ITEMS AT THE SITE ARE DEMOLISHED AND DISPOSED OF ON SITE, AND HAVE NO SCRAP VALUE UNLESS INDICATED OTHERWISE IN THE ESTIMATE
- TRANSPORTATION OF SCRAP MATERIAL TO A PROCESSOR IS NOT INCLUDED
- ALL SOIL BORROW MATERIAL IS FROM ON SITE
- BASED ON 40 HOUR WORKWEEK

Commercial Basis

1. Equipment/Material Cost

THE QUOTED PRICES FOR METAL SCRAP VALUES ARE:

- COPPER \$1400.00 PER TON
- STEEL \$85.00 PER TON

2. Labor Wage Rates

THE FOLLOWING VALUES INCLUDE WAGES, DEMOLITION EQUIPMENT, ON-SITE TRANSPORTATION, DISPOSAL, INSURANCE COSTS, AND OVERHEAD & PROFIT:

- WRECKING CREW \$ 70.30/hr
- ASBESTOS & PCB WORK \$100.40/hr
- EARTHWORK \$139.27/hr
- SEEDING & MULCHING \$ 42.23/hr
- ELECTRICIAN \$ 50.70/hr
- CARPENTER \$ 41.50/hr

3. Labor Crews

S & L STANDARD FOR THIS TYPE OF WORK

4. Productivity

AS THOSE APPLIED TO INDIANA

5. Quantity Sources

BASED ON S & L GENERAL ARRANGEMENT DRAWINGS, RIVER STRUCTURE DRAWINGS AND PHOTOGRAPHS.

6. Project Schedule

3 MONTHS DURATION

7. Indirect Expenses

CINERGY INDIRECT EXPENSES - 10% OF TOTAL DIRECT CONSTRUCTION COST

09603-020532

Robert L. Lundy  
Chicago

**B A S I S o f E S T I M A T E**

Commercial Basis continued

8. Escalation Rates (See Cost Summary for rates)

NOT INCLUDED, ESCALATION RATE EXPECTED TO BE 3% P.A.

9. Sales/Use Taxes (See Cost Summary for rates)

NOT INCLUDED

10. Contingency (See Cost Summary for rates)

SEE COST SUMMARY FOR RATES

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Chicago

**C O S T   S U M M A R Y   R E P O R T**

**ENERGY**  
**CAYUGA - UNITS 1 & 2**  
**CONCEPTUAL COST ESTIMATE**  
**DEMOLITION OF "RIVER STRUCTURES"**

Page: 3  
Estimate No: 13240-9R  
Project No: 9940-003  
Prepared by: PAG/BJD/

Estimate Date: 31JAN03

rice level: 2002

ACCT. NO.	DESCRIPTION	TOTAL EQUIPMENT COST	TOTAL MATERIAL COST	TOTAL LABOR COST	TOTAL COST
311	STRUCTURES AND IMPROVEMENTS - DEMOLITION AND MODIFICATIONS		180,000	760,000	940,000
314	TURBINE PLANT			102,000	102,000
315	ELECTRICAL PLANT			32,000	32,000
317	SCRAP VALUE (SEE BASIS)				
<b>TOTAL CONSTRUCTION COSTS</b>			<b>180,000</b>	<b>894,000</b>	<b>1,074,000</b>
INDIRECT EXPENSES					157,000
ESCALATION					
SALES/USE TAX					308,000
CONTINGENCY					
<b>TOTAL PROJECT COST</b>					<b>1,539,000</b>
SALVAGE VALUE					-30,000
<b>GRAND TOTAL COST</b>					<b>1,509,000</b>

**FINANCIAL ASSUMPTIONS:**

ESCALATION RATES: Equipment 0.000%  
Material 3.000%  
Labor 3.000%  
Indirects 3.000%

SALES/USE TAX RATES: Equipment 0.000% Material 0.000%

CONTINGENCY RATES: Equipment 0.0% Material 25.0% Labor 25.0% Indirects 25.0%



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**ESTIMATE WORKSHEET**

CINERGY  
CAYUGA - UNITS 1 & 2  
CONCEPTUAL COST ESTIMATE  
DEMOLITION OF "RIVER STRUCTURES"

Page: 4  
Estimate No: 13240-9R  
Project No: 9940-003  
Prepared by: PAG/BJD/

Estimate Date: 31JAN03

Price Level: 2002

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	MATERIAL			LABOR			TOTAL COST	
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MHR RATE	MHRS	WAGE RATE		LABOR COST
311		STRUCTURES AND IMPROVEMENTS - DEMOLITION AND MODIFICATIONS										
311.1		SITE STRUCTURES DEMOLITION										
311.14		FILL SITE AREAS WHERE REQUIRED	25000	CY				0.025	625	139.27	87,000	87,000
311.15		PLUG CIRCULATING WATER PIPES WITH SLURRY & PLACE CONCRETE AT ENDS (TWO 120" LINES, 100LF EACH, 580 CY)	1	LS	29000		29,000	425.000	425	70.30	30,000	59,000
311.16		SEED & MULCH SITE INCLUDING TOPSOIL	2	AC	1100.00		2,000	30.000	60	42.23	3,000	5,000
311.17		PLUG DEICING & COOLING PIPE WITH SLURRY & PLACE CONCRETE AT ENDS (120" LINE, 300LF, 900 CY)	1	LS	33000		33,000	400.000	400	70.30	28,000	61,000
311.18		RIP RAP (AT INTAKE & DISCHARGE)	800	SY	35.00		28,000	1.000	800	42.23	34,000	62,000
		<b>SUB TOTAL 311.1</b>					92,000		2,310		182,000	274,000
311.2		OUTLYING BUILDINGS DEMOLITION										
311.21		CRIB HOUSE SUPERSTRUCTURE	245000	CF				0.006	1470	70.30	103,000	103,000
311.22		CRIB HOUSE SUBSTRUCTURE	3700	CY				0.800	2960	70.30	208,000	208,000
311.23		CRIB HOUSE FOREBAY AND TUNNELS	1100	CY				2.400	2640	70.30	186,000	186,000
311.24		CRIB HOUSE FOREBAY SHEET PILING										
												REMAINS IN PLACE
311.25		CRIB HOUSE MISC. STRUCTURES	20	TN				3.000	60	70.30	4,000	4,000
		<b>SUB TOTAL 311.2</b>							7,130		501,000	501,000
311.3		OUTLYING STRUCTURES CONSTRUCTION										
311.31		DISCHARGE PLUME CONCRETE PLUG	1100	CY	80.00		88,000	1.000	1100	70.30	77,000	165,000
		<b>SUB TOTAL 311.3</b>					88,000		1,100		77,000	165,000
		<b>TOTAL 311</b>					180,000		10,540		760,000	940,000

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**ESTIMATE WORKSHEET**

Page: 5  
Estimate No: 13240-9R

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	MATERIAL			LABOR		TOTAL COST		
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	MNHR		WAGE RATE	LABOR COST
114		TURBINE PLANT										
114.21		CIRCULATING WATER PUMPS	283	TN				3.000	849	70.30	60,000	60,000
114.22		SERVICE WATER PUMPS	30	TN				3.000	90	70.30	6,000	6,000
114.23		SCREENS AND SCREENWASH EQUIPMENT	50	TN				3.000	150	70.30	11,000	11,000
114.24		ABOVE GROUND PIPING	60	TN				6.000	360	70.30	25,000	25,000
		SUB TOTAL 314.2							1,449		102,000	102,000
		TOTAL 314							1,449		102,000	102,000

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**ESTIMATE WORKSHEET**

Page: 6  
 Estimate No: 13240-9R

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	*** MATERIAL ***		*** LABOR ***		TOTAL COST			
				RATE	EQUIPMENT COST	MATERIAL COST	MNR RATE		MHRS	WAGE RATE	LABOR COST
15		ELECTRICAL PLANT									
15.21		TRANSFORMERS, SWITCHGEAR, WIRING, CONDUIT, LIGHTING	1				640.000	640	50.70	32,000	32,000
		TOTAL 315						640		32,000	32,000

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**ESTIMATE WORKSHEET**

Page: 7  
Estimate No: 13240-98

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY UN	*** MATERIAL ***			*** LABOR ***			TOTAL COST
				MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	MNHR	WAGE RATE	
317		SCRAP VALUE (SEE BASIS)								
317.11		SCRAP VALUE OF STEEL	165 TN							
317.12		SCRAP VALUE OF COPPER	10 TN							
		SUB TOTAL 317.1								
		TOTAL 317								

ent. L. Lundy  
 Chicago

**ESTIMATE WORKSHEET**

Page: 8  
 Estimate No: 13240-9R

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UNIT	*** MATERIAL ***		*** LABOR ***		TOTAL COST
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	
900		INDIRECT EXPENSES							
900.1		CINERGY INDIRECT EXPENSES							
900.11		PERMITTING	1	LS					50,000
900.12		PROJECT ADMINISTRATION	1	LS					107,000
		<b>SUB TOTAL 900.1</b>							<b>157,000</b>
		<b>TOTAL 900</b>							<b>157,000</b>
		<b>TOTAL DIRECT &amp; INDIRECT COSTS</b>							<b>180,000</b>
									<b>12,629</b>
									<b>1,051,000</b>
									<b>1,231,000</b>

09603-020539

**CINERGY  
 CAYUGA STATION, INDIANA  
 PERMITTING AND DEMOLITION FOR RIVER STRUCTURES**

	<b>STRUCTURES AFFECTED BY HIGH WATER LEVEL ( OHWL )</b>	<b>474 FT</b>	
	<b>PLANT GRADE ELEVATION</b>	<b>500 FT</b>	
	<b>SCREEN (PUMP) HOUSE</b>		REMOVE ENCLOSED PUMPHOUSE WITH CONCRETE SUBSTRUCTURE ON SHORE
	<b>SCREEN HOUSE FOREBAY AND TUNNELS</b>		REMOVE UNDERWATER CONCRETE STRUCTURE
	<b>FOREBAY SHEET PILING</b>		REMAINS IN PLACE
	<b>DEICING AND COOLING PIPE</b>		10FT DIA PIPE - PLUG AT BOTH ENDS AND ABANDON IN PLACE
	<b>F.P. PUMPHOUSE</b>		REMAINS IN PLACE
	<b>DISCHARGE CHANNEL</b>		CONCRETE STRUCTURE - FILL 100LF WITH CONCRETE
<b>1</b>	<b>REMOVAL OF PLANT PRIOR TO DEMOLITION</b>		
	<b>ELECTRICAL BULKS</b>		CABLES
	<b>MECHANICAL BULKS</b>		AG PIPING, VALVES
	<b>ELECTRICAL EQUIPMENT</b>		SCREENS, PUMPS, STRAINERS
	<b>ELECTRICAL EQUIPMENT</b>		TRANSFORMERS, DISTRIB EQPT
	<b>CIRC WATER LINE</b>		PLUG & FILL 100LF
<b>2</b>	<b>DEMOLITION METHOD</b>		
	<b>EXPLOSIVES</b>		NOT REQD
	<b>HAMMER WITH LONG BOOM</b>		NOT REQD
	<b>CONVENTIONAL HAMMER</b>		DEMOLISH SCREEN HOUSE SUPERSTRUCTURE AND SUBSTRUCTURE TO RIVER BED
	<b>PULL PILES</b>		NOT REQD
	<b>PULL CELLS</b>		NOT REQD
<b>3</b>	<b>COLLECTION</b>		
	<b>STEEL</b>		REQD
	<b>CONCRETE</b>		REQD
	<b>COPPER</b>		CABLE
<b>4</b>	<b>RECYCLING</b>		
	<b>STEEL</b>		REQD
	<b>CONCRETE</b>		REQD
	<b>COPPER</b>		REQD
<b>5</b>	<b>DISPOSAL</b>		
	<b>RUBISH</b>		REQD
	<b>HAZMATL</b>		NONE
<b>6</b>	<b>OTHER</b>		
	<b>LAND EQUIPMENT REQD ( CRANES, TRUCKS, ETC. )</b>		REQD
	<b>BARGE EQUIPMENT REQD ( CRANES, TRUCKS, ETC )</b>		REQD
	<b>TEMPORARY CONSTRUCTION ( SHEET PILING, COFFERDAM )</b>		NOT REQD
	<b>DIVERS</b>		REQD
	<b>DEWATERING</b>		NOT REQD
<b>7</b>	<b>SAFETY PRECAUTION REQUIREMENTS</b>		
	<b>NORMAL</b>		REQD
	<b>ABNORMAL</b>		
<b>8</b>	<b>PERMITTING REQUIREMENTS</b>		
			PER US COAST GUARD REQMTS
			PER US ARMY COE REQMTS
			PER LOCAL AND STATE REQMTS
<b>9</b>	<b>SITWORK</b>		
			50FT LONG CONCRETE PLUG AT DISCHARGE FLUME RIVER END

**DEMOLITION OF "RIVER STRUCTURES"**

**CONCEPTUAL COST ESTIMATE**

**PREPARED FOR**

**CINERGY**

**GIBSON - UNITS 1, 2, 3, 4 & 5**

**SARGENT & LUNDY**

**ESTIMATE NO. 13242-8R  
PROJECT NO. 9940-003  
January 10, 2003**

09603-020541

REVIEWED BY: \_\_\_\_\_

APPROVED BY: \_\_\_\_\_

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*[Handwritten signature]*

Estimate No: 13242-8

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TABLE OF CONTENTS

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Report	Page
Basis of Estimate.....	1
Summary.....	3
Work Sheet Details.....	4



Argent & Lundy  
Chicago

**B A S I S o f E S T I M A T E**

CINERGY  
GIBSON - UNITS 1, 2, 3, 4 & 5  
CONCEPTUAL COST ESTIMATE  
DEMOLITION OF "RIVER STRUCTURES"

Page: 1  
Estimate No: 13242-8R  
Project No: 9940-003  
Prepared by: PAQ/BJD/

Estimate Date: 10JAN03

Price level: 2002

Scope

DISMANTLING AND REMOVAL OF ALL EQUIPMENT AND PIPING, DEMOLITION AND REMOVAL OF LAKE WATER MAKEUP STRUCTURES.

Technical Basis

SEE ASSUMPTIONS BELOW

Assumptions

- PLANT GRADE EL. 408FT, LEVEE HT EL. 403. OHWL 380FT.
- ALL ABOVE GRADE ITEMS AT THE SITE ARE DEMOLISHED AND DISPOSED OF ON SITE, AND HAVE NO SCRAP VALUE UNLESS INDICATED OTHERWISE IN THE ESTIMATE
- TRANSPORTATION OF SCRAP MATERIAL TO A PROCESSOR IS NOT INCLUDED
- ALL SOIL BORROW MATERIAL IS FROM ON SITE
- BASED ON 40 HOUR WORKWEEK

Commercial Basis

1. Equipment/Material Cost

THE QUOTED PRICES FOR METAL SCRAP VALUES ARE:

- COPPER \$1400.00 PER TON
- STEEL \$85.00 PER TON

2. Labor Wage Rates

THE FOLLOWING VALUES INCLUDE WAGES, DEMOLITION EQUIPMENT, ON-SITE TRANSPORTATION, DISPOSAL, INSURANCE COSTS, AND OVERHEAD & PROFIT:

- |                       |             |
|-----------------------|-------------|
| - WRECKING CREW       | \$ 70.30/hr |
| - ASBESTOS & PCB WORK | \$100.40/hr |
| - EARTHWORK           | \$139.27/hr |
| - SEEDING & MULCHING  | \$ 42.23/hr |
| - ELECTRICIAN         | \$ 50.70/hr |
| - CARPENTER           | \$ 41.50/hr |

3. Labor Crews

S & L STANDARD FOR THIS TYPE OF WORK

4. Productivity

AS THOSE APPLIED TO INDIANA

5. Quantity Sources

BASED ON S & L GENERAL ARRANGEMENT DRAWINGS, RIVER STRUCTURE DRAWINGS AND PHOTOGRAPHS.

6. Project Schedule

3 MONTHS DURATION

7. Indirect Expenses

CINERGY INDIRECT EXPENSES - 10% OF TOTAL DIRECT CONSTRUCTION COST

09603-020543

Sargent & Lundy  
Chicago

**B A S I S o f E S T I M A T E**

Page: 2  
Estimate No: 13242-8R

Commercial Basis continued

8. Escalation Rates (See Cost Summary for rates)

NOT INCLUDED, ESCALATION RATE EXPECTED TO BE 3% P.A.

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9. Sales/Use Taxes (See Cost Summary for rates)

~~NOT INCLUDED~~

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10. Contingency (See Cost Summary for rates)

SEE COST SUMMARY FOR RATES

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 Chicago

**C O S T S U M M A R Y R E P O R T**

CTENERGY  
 GIBSON - UNITS 1, 2, 3, 4 & 5  
 CONCEPTUAL COST ESTIMATE  
 DEMOLITION OF "RIVER STRUCTURES"

Page: 3  
 Estimate No: 13242-BR  
 Project No: 9940-003  
 Prepared by: PAG/BJD/

Estimate Date: 10JAN03

Price level: 2002

ACCT.NO.	DESCRIPTION	TOTAL EQUIPMENT COST	TOTAL MATERIAL COST	TOTAL LABOR COST	TOTAL COST
311	STRUCTURES AND IMPROVEMENTS - DEMOLITION AND MODIFICATIONS		98,000	169,000	267,000
314	TURBINE PLANT			8,000	8,000
315	ELECTRICAL PLANT			14,000	14,000
317	SCRAP VALUE (SEE BASIS)				
TOTAL CONSTRUCTION COSTS			98,000	191,000	289,000
INDIRECT EXPENSES					80,000
ESCALATION					
SALES/USE TAX					
CONTINGENCY					92,000
TOTAL PROJECT COST					461,000
AFUDC					
GRAND TOTAL COST					461,000

FINANCIAL ASSUMPTIONS:

ESCALATION RATES: Equipment 0.000%  
 Material 3.000%  
 Labor 3.000%  
 Indirects 3.000%

SALES/USE TAX RATES: Equipment 0.000% Material 0.000%

CONTINGENCY RATES: Equipment 0.0% Material 25.0% Labor 25.0% Indirects 25.0%

Sargent & Lundy  
 Chicago

**ESTIMATE WORKSHEET**

CINERGY  
 SIBSON - UNITS 1, 2, 3, 4 & 5  
 CONCEPTUAL COST ESTIMATE  
 DEMOLITION OF "RIVER STRUCTURES"

Page: 4  
 Estimate No: 13242-08  
 Project No: 9940-003  
 Prepared by: PAG/BJD/  
 Estimate Date: 10JAN03

Price level: 2002

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***		*** LABOR ***		TOTAL COST			
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE		MNRS	WAGE RATE	LABOR COST
311		STRUCTURES AND IMPROVEMENTS - DEMOLITION AND MODIFICATIONS										
311.1		SITE STRUCTURES DEMOLITION										
311.14		FILL SITE AREAS WHERE REQUIRED	3700	CY			0.025	93	139.27	13,000	13,000	
311.15		PLUG LAKE WATER N-U WATER PIPE WITH SLURRY & PLACE CONCRETE AT ENDS ( 1400LF 96IN LINE 2600CY )	1	LS	84000		84,000	900.000	900	70.30	63,000	147,000
311.16		SEED & MULCH SITE INCLUDING TOPSOIL	2	AC	1100.00		2,000	30.000	60	42.23	3,000	5,000
		SUB TOTAL 311.1					86,000		1,053		79,000	165,000
311.2		OUTLYING BUILDINGS DEMOLITION										
311.21		LAKE WATER MU PUMP HOUSE SUPERSTRUCTURE	5000	CF							REMAINS IN PLACE	
311.22		LAKE WATER MU PUMP HOUSE SUBSTRUCTURE	600	CY							REMAINS IN PLACE	
311.23		LAKE WATER MU INTAKE STRUCTURE	240	CY				0.800	192	70.30	13,000	13,000
311.24		LAKE WATER MU INTAKE TEMPORARY COFFERDAM	1	LT	4000.00		4,000	200.000	200	70.30	14,000	18,000
311.25		DEWATERING (2 MONTHS)	1	LT			4,000	200.000	200	50.70	10,000	14,000
311.26		REMOVE 200' OF 96" PIPE (SOIL EXCAVATION AND PIPE REMOVAL)	1	LT			4,000	760.000	760	70.30	53,000	57,000
311.27		LAKE WATER MU VALVE PIT STRUCTURE	150	CY							REMAINS IN PLACE	
		SUB TOTAL 311.2					12,000		1,352		90,000	102,000
		TOTAL 311					98,000		2,405		169,000	267,000

gent & Lundy  
 Chicago

**ESTIMATE WORKSHEET**

Page: 5  
 Estimate No: 13242-8R

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	LN	*** MATERIAL ***		*** LABOR ***		TOTAL COST		
					MATERIAL RATE	EQUIPMENT COST	MNHR RATE	MNHR		WAGE RATE	LABOR COST
314		TURBINE PLANT									
314.21		LAKE WATER MU PUMPS	30	TH			3.000	90	70.30	6,000	6,000
314.22		LAKE WATER MU PIPES AND VALVES	10	TH			3.000	30	70.30	2,000	2,000
		SUB TOTAL 314.2						120		8,000	8,000
		TOTAL 314						120		8,000	8,000

Sargent & Lundy  
Chicago

**ESTIMATE WORKSHEET**

Page: 6  
Estimate No: 33262-DR

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***		*** LABOR ***		TOTAL COST		
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE		MNHR	WAGE RATE
315		ELECTRICAL PLANT									
315.26		TRANSFORMERS, SWITCHGEAR, WIRING, CONDUIT, LIGHTING	1	LT			200.000	200	70.30	14,000	14,000
		TOTAL 315						200		14,000	14,000

gent & Lundy  
Chicago

**ESTIMATE WORKSHEET**

Page 7  
Estimate No: 13242-8R

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***		*** LABOR ***		TOTAL COST
					MATERIAL RATE	EQUIPMENT COST	MNHR RATE	WAGE RATE	
317		SCRAP VALUE (SEE BASIS)							
317.11		SCRAP VALUE OF STEEL		TN					
317.12		SCRAP VALUE OF COPPER		TN					
		SUB TOTAL 317.1							
		TOTAL 317							

Argent & Lundy  
 Chicago

**ESTIMATE WORKSHEET**

Page: 8  
 Estimate No: 13242-8R

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***		*** LABOR ***		TOTAL COST			
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE		MNHR	WAGE RATE	LABOR COST
900		INDIRECT EXPENSES										
900.1		CINERGY INDIRECT EXPENSES										
900.11		PERMITTING	1	LS					50,000	50,000		
900.12		PROJECT ADMINISTRATION	1	LS					30,000	30,000		
		SUB TOTAL 900.1							80,000	80,000		
		TOTAL 900							80,000	80,000		
		TOTAL DIRECT & INDIRECT COSTS							98,000	2,725	271,000	369,000



**CINERGY  
 GIBSON STATION, INDIANA  
 PERMITTING AND DEMOLITION FOR RIVER STRUCTURES**

<p>STRUCTURES AFFECTED BY HIGH WATER LEVEL ( OHWL ) : 366 FT          PLANT GRADE ELEVATION 408 FT</p>	
<p>LAKE WATER MAKEUP PUMPHOUSE</p>	<p>OPEN PUMPHOUSE WITH ELEC EQPT          ENCLOSURE AND CONCRETE          SUBSTRUCTURE - REMAINS IN PLACE</p>
<p>LAKE WATER MAKEUP LINE</p>	<p>REMOVE 200LF 88IN C.S. PIPE, PLUG AND          ABANDON IN PLACE 1600LF</p>
<p>LAKE WATER MAKEUP LINE VALVE PIT          LAKE WATER INTAKE STRUCTURE</p>	<p>CONCRETE STRUCTURE - FILL AND          ABANDON IN PLACE          REMOVE CONCRETE STRUCTURE</p>
<p>LEVEE TOP EL. 403.5 +/-</p>	<p>LEVEE STAYS IN PLACE</p>
<p>1 REMOVAL OF PLANT PRIOR TO DEMOLITION          ELECTRICAL BULKS          MECHANICAL BULKS          MECHANICAL EQUIPMENT          ELECTRICAL EQUIPMENT            LAKE WATER MAKEUP LINE</p>	<p>CABLES          AG PIPING, VALVES          PUMPS, STRAINERS          TRANSFORMERS, DISTRIB EQPT          PLUG WITH CONCRETE AT BOTH ENDS AND          ABANDON IN PLACE</p>
<p>2 DEMOLITION METHOD          EXPLOSIVES          HAMMER WITH LONG BOOM            CONVENTIONAL HAMMER          PULL PILES          PULL CELLS</p>	<p>NOT REQD          NOT REQD          DEMOLISH UPPER SECTION OF          STRUCTURE, USE CAVITY FOR FILL          NOT REQD          NOT REQD</p>
<p>3 COLLECTION          STEEL          CONCRETE          COPPER</p>	<p>NOT REQD          NOT REQD          CABLE</p>
<p>4 RECYCLING          STEEL          CONCRETE          COPPER</p>	<p>NOT REQD          NOT REQD          REQD</p>
<p>5 DISPOSAL          RUBISH          HAZMATL</p>	<p>NOT REQD          NONE</p>
<p>6 OTHER          LAND EQUIPMENT REQD ( CRANES, TRUCKS, ETC. )          BARGE EQUIPMENT REQD ( CRANES, TRUCKS, ETC )          TEMPORARY CONSTRUCTION ( SHEET PILING, COFFERDAM )          DIVERS          DEWATERING</p>	<p>REQD          NOT REQD          TEMP SHEET PILING AT INTAKE          NOT REQD          REQD FOR INTAKE STRUCTURE DEMO</p>
<p>7 SAFETY PRECAUTION REQUIREMENTS          NORMAL          ABNORMAL</p>	<p>REQD</p>
<p>8 PERMITTING REQUIREMENTS</p>	<p>PER US ARMY COE REQMTS          PER LOCAL AND STATE REQMTS</p>

DEMOLITION OF "RIVER STRUCTURES"

CONCEPTUAL COST ESTIMATE

PREPARED FOR

CINERGY  
GALLAGHER - UNITS 1, 2, 3 & 4

SARGENT & LUNDY

ESTIMATE NO. 13347-8R  
PROJECT NO. 9940-003  
January 10, 2003

REVIEWED BY: *[Signature]*

APPROVED BY: *[Signature]*

Estimate No: 13347-8

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TABLE OF CONTENTS

Report	Page
Basis of Estimate.....	1
Summary.....	3
Work Sheet Details.....	4

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Chicago

**B A S I S of E S T I M A T E**

CINERGY  
RELEASED - DATE 1, 2, 3, 4  
CONCEPTUAL COST ESTIMATE  
DEMOLITION OF "RIVER STRUCTURES"

Page: 1  
Estimate No: 13347-8R  
Project No: 0048-003  
Prepared by: PAG/BJD/  
Estimate Date: 10JAN03

Price level: 2002

Scope

DISMANTLING AND REMOVAL OF ALL EQUIPMENT AND PIPING, DEMOLITION AND REMOVAL OF INTAKE AND DISCHARGE STRUCTURES AND COAL UNLOADING FACILITY. CHIMNEYS AND SCREEN HOUSES REMAIN IN PLACE.

Technical Basis

SEE ASSUMPTIONS BELOW

Assumptions

- PLANT GRADE ELEV. VARIES 440 TO 460FT. OHWL 409FT.
- ALL ABOVE GRADE ITEMS AT THE SITE ARE DEMOLISHED AND DISPOSED OF ON SITE, AND HAVE NO SCRAP VALUE UNLESS INDICATED OTHERWISE IN THE ESTIMATE
- TRANSPORTATION OF SCRAP MATERIAL TO A PROCESSOR IS NOT INCLUDED
- ALL SOIL BORROW MATERIAL IS FROM ON SITE
- BASED ON 40 HOUR WORKWEEK

Commercial Basis

1. Equipment/Material Cost

THE QUOTED PRICES FOR METAL SCRAP VALUES ARE:

- COPPER \$1400.00 PER TON
- STEEL \$85.00 PER TON

2. Labor Wage Rates

THE FOLLOWING VALUES INCLUDE WAGES, DEMOLITION EQUIPMENT, ON-SITE TRANSPORTATION, DISPOSAL, INSURANCE COSTS, AND OVERHEAD & PROFIT:

- WRECKING CREW \$ 70.30/hr
- ASBESTOS & PCB WORK \$100.40/hr
- EARTHWORK \$139.27/hr
- SEEDING & MULCHING \$ 42.23/hr
- ELECTRICIAN \$ 50.70/hr
- CARPENTER \$ 41.50/hr

3. Labor Crews

S & L STANDARD FOR THIS TYPE OF WORK

4. Productivity

AS THOSE APPLIED TO INDIANA

5. Quantity Sources

BASED ON S & L GENERAL ARRANGEMENT DRAWINGS, RIVER STRUCTURE DRAWINGS AND PHOTOGRAPHS.

6. Project Schedule

3 MONTHS DURATION

7. Indirect Expenses

CINERGY INDIRECT EXPENSES - 10% OF TOTAL DIRECT CONSTRUCTION COST

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Chicago

**B A S I S O F E S T I M A T E**

Page: 2  
Estimate No: 13347-BR

Commercial Basis continued

**8. Escalation Rates (See Cost Summary for rates)**

NOT INCLUDED, ESCALATION RATE EXPECTED TO BE 3% P.A.

**9. Sales/Use Taxes (See Cost Summary for rates)**

NOT INCLUDED

**10. Contingency (See Cost Summary for rates)**

SEE COST SUMMARY FOR RATES

09603-020555

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Chicago

**C O S T S U M M A R Y R E P O R T**

CINERGY  
SALLASER - UNITS 1, 2, 3 & 4  
CONCEPTUAL COST ESTIMATE  
DEMOLITION OF "RIVER STRUCTURES"

Page: 3  
Estimate No: 13347-BR  
Project No: 9940-000  
Prepared by: PAG/BJD/

Estimate Date: 10JAN03

Price level: 2002

ACCT.NO.	DESCRIPTION	TOTAL EQUIPMENT COST	TOTAL MATERIAL COST	TOTAL LABOR COST	TOTAL COST
311	STRUCTURES AND IMPROVEMENTS - DEMOLITION AND MODIFICATIONS		55,000	939,000	994,000
314	TURBINE PLANT				
315	ELECTRICAL PLANT			14,000	14,000
317	SCRAP VALUE (SEE BASIS)				\$ BELOW
TOTAL CONSTRUCTION COSTS			55,000	953,000	1,008,000
INDIRECT EXPENSES					150,000
ESCALATION					
SALES/USE TAX					290,000
CONTINGENCY					
TOTAL PROJECT COST					1,448,000
AFUDC					-75,000
GRAND TOTAL COST					1,373,000

FINANCIAL ASSUMPTIONS:

ESCALATION RATES: Equipment 0.000%  
Material 3.000%  
Labor 3.000%  
Indirects 3.000%

SALES/USE TAX RATES: Equipment 0.000% Material 0.000%

CONTINGENCY RATES: Equipment 0.0% Material 25.0% Labor 25.0% Indirects 25.0%

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 89 of 286

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**ESTIMATE WORKSHEET**

CINERGY  
GALLAGHER - UNITS 1, 2, 3 & 4  
CONCEPTUAL COST ESTIMATE  
DEMOLITION OF "RIVER STRUCTURES"

Page: 4  
Estimate No: 13347-8R  
Project No: 9940-003  
Prepared by: PAG/BJD/

Estimate Date: 10JAN03

Price level: 2002

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***		*** LABOR ***			TOTAL COST	
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	MNHR		WAGE RATE
311		STRUCTURES AND IMPROVEMENTS - DEMOLITION AND MODIFICATIONS									
311.1		SITE STRUCTURES DEMOLITION									
311.14		FILL SITE AREAS WHERE REQUIRED ( INTAKE AND DISCHARGE STRUCTURES )	8100	CY			0.025	203	139.27	28,000	28,000
311.16		SEED & MULCH SITE INCLUDING TOPSOIL	2	AC	1100.00	2,000	30.000	60	42.23	3,000	5,000
311.17		RIP RAP ( INTAKE AND DISCHARGE STRUCTURES )	1500	SY	35.00	53,000	1.000	1500	42.23	63,000	116,000
		<b>SUB TOTAL 311.1</b>				<b>55,000</b>		<b>1,763</b>		<b>94,000</b>	<b>149,000</b>
311.2		OUTLYING BUILDINGS DEMOLITION									
1.21		(2) CRIB HOUSE / CHIMNEY									REMAINS IN PLACE
311.22		COAL UNLOADER STEEL STRUCTURE AND EQUIPMENT	100	TN			8.000	800	70.30	56,000	56,000
311.23		COAL UNLOADER CONCRETE STRUCTURE	200	CY			2.500	500	70.30	35,000	35,000
311.24		COAL UNL CELLS AND DEADMEN ( REMOVAL OF 9 20FT DIA CELLS AND PARTIAL REMOVAL OF 8 DEADMEN )	1	LT			3925.000	3925	70.30	276,000	276,000
311.25		DISCHARGE CELLS ( REMOVAL OF 7 CELLS )	1	LT			1000.000	1000	70.30	70,000	70,000
311.26		(2) INTAKE STRUCTURES SHEET PILING AND STRUCTURAL STEEL COVER	240	TN			8.000	1920	70.30	135,000	135,000
311.27		DISCHARGE TUNNEL 200FT LONG	1555	CY			2.500	3888	70.30	273,000	273,000
		<b>SUB TOTAL 311.2</b>						<b>12,033</b>		<b>845,000</b>	<b>845,000</b>
		<b>TOTAL 311</b>				<b>55,000</b>		<b>13,796</b>		<b>939,000</b>	<b>994,000</b>

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**E S T I M A T E   W O R K S H E E T**

Page: 5  
Estimate No: 13347-8R

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	*** MATERIAL ***			*** LABOR ***			TOTAL COST
			QTY	UNIT	RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	
314		TURBINE PLANT							
314.26		CIRCULATING WATER PUMPS						REMAIN IN PLACE	
		TOTAL 314							



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**ESTIMATE WORKSHEET**

Page: 6  
 Estimate No: 13347-8R

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UN	*** MATERIAL ***			*** LABOR ***			TOTAL COST	
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MHR RATE	WAGE RATE	LABOR COST		
315		ELECTRICAL PLANT										
315.26		TRANSFORMERS, SWITCHGEAR, WIRING, CONDUIT, LIGHTING AT COAL UNL	1	LT				200.000	200	70.30	14,000	14,000
		TOTAL 315							200		14,000	14,000

09803-020559

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Chicago

**ESTIMATE WORKSHEET**

Page: 7  
Estimate No: 13347-88

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UN	*** MATERIAL ***		*** LABOR ***		TOTAL COST
					RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	
317		SCRAP VALUE (SEE BASIS)							\$ BELOW
317.11		SCRAP VALUE OF STEEL	640	TH					
317.12		SCRAP VALUE OF COPPER	10	TH					
		SUB TOTAL 317.1							
		TOTAL 317							

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 Chicago

**ESTIMATE WORKSHEET**

Page: 8  
 Estimate No: 13347-8R

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***		*** LABOR ***		TOTAL COST			
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE		MNHR	WAGE RATE	LABOR COST
900		INDIRECT EXPENSES										
900.1		CINERGY INDIRECT EXPENSES										
900.11		PERMITTING	1	LS					50,000	50,000		
900.12		PROJECT ADMINISTRATION	1	LS					100,000	100,000		
		SUB TOTAL 900.1							150,000	150,000		
		TOTAL 900							150,000	150,000		
		TOTAL DIRECT & INDIRECT COSTS							55,000	13,996	1,103,000	1,158,000

09603-020561

**CINERGY  
 GALLAGHER STATION, INDIANA  
 PERMITTING AND DEMOLITION FOR RIVER STRUCTURES**

STRUCTURES AFFECTED BY HIGH WATER LEVEL ( OHWL ):	400 FT VARIES	
PLANT GRADE ELEVATION	440 TO 460 FT	
INTAKE STRUCTURES		REMOVE SHEET PILING AND COVER UP TO CHIMNEY CONCRETE STRUCTURE PART OF CHIMNEY, REMAINS IN PLACE
SCREEN (PUMP) HOUSES		REMOVE 8 26FT DIA CELLS AND 8 PARTIAL REMOVAL OF DEADMEN, REMOVAL OF (?) DICHARGE CELLS
CELLS COAL UNLOADING DISCHARGE TUNNEL 200FT LONG CHIMNEYS (2) AND FOUNDATIONS		REMOVE STRUCTURAL STEEL STRUCTURE REMOVE CONCRETE STRUCTURE CHIMNEYS REMAINS IN PLACE
1 REMOVAL OF PLANT PRIOR TO DEMOLITION ELECTRICAL BULKS MECHANICAL BULKS  MECHANICAL EQUIPMENT ELECTRICAL EQUIPMENT CIRC WATER LINE		CABLES AT COAL UNL A/G PIPING, VALVES AT COAL UNL COAL UNL EQPT ONLY, SCREENS, PUMPS, STRAINERS REMAIN IN PLACE TRANSFORMERS, DISTRIB EQPT AT COAL UNL REMAIN IN PLACE
2 DEMOLITION METHOD		
EXPLOSIVES HAMMER WITH LONG BOOM CONVENTIONAL HAMMER / CUT PULL PILES PULL CELLS PULL SHEET PILING		NOT REQD NOT REQD REQD NOT REQD REQD REQD
3 COLLECTION		
STEEL CONCRETE COPPER		REQD REQD CABLE
4 RECYCLING		
STEEL CONCRETE COPPER		REQD REQD REQD
5 DISPOSAL		
RUBISH HAZMATL		REQD NONE
6 OTHER		
LAND EQUIPMENT REQD ( CRANES, TRUCKS, ETC ) BARGE EQUIPMENT REQD ( CRANES, TRUCKS, ETC ) TEMPORARY CONSTRUCTION ( SHEET PILING, COFFERDAM ) DIVERS DEWATERING		REQD REQD NOT REQD NOT REQD NOT REQD
7 SAFETY PRECAUTION REQUIREMENTS		
NORMAL ABNORMAL		REQD
8 PERMITTING REQUIREMENTS		
		PER US ARMY COE REQMTS PER LOCAL AND STATE REQMTS
9 SITEWORK		EARTHFILL AT INTAKE STRUCTURE AND RIPRAP COVER

09603-020562

**DEMOLITION OF "RIVER STRUCTURES "**

**CONCEPTUAL COST ESTIMATE**

**PREPARED FOR**

**CINERGY  
WABASH RIVER UNITS 1,2,3,4,5,6**

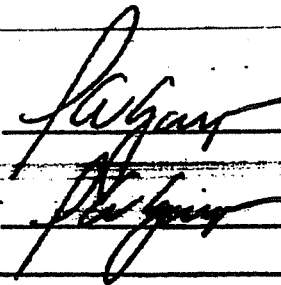
**SARGENT & LUNDY**

**ESTIMATE NO. 13348-10  
PROJECT NO. 9940-003  
January 31, 2003**

09603-020563

REVIEWED BY: \_\_\_\_\_

APPROVED BY: \_\_\_\_\_



Estimate No: 13348-1

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**TABLE OF CONTENTS**

---

Report	Page
Basis of Estimate.....	1
Summary.....	3
Work Sheet Details.....	4

KypSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 97 of 286

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Chicago

**B A S I S O F E S T I M A T E**

CINERGY  
WABASH RIVER UNITS 1,2,3,4,5,6  
CONCEPTUAL COST ESTIMATE  
DEMOLITION OF "RIVER STRUCTURES"

Page: 1  
Estimate No: 13348-10  
Project No: 9940-003  
Prepared by: PAG/BJD/

Estimate Date: 31JAN03

Price level: 2002

Scope

DISMANTLING AND REMOVAL OF ALL ELECTRICAL EQUIPMENT, DEMOLITION AND REMOVAL OF FOREBAYS AND DISCHARGE TUNNEL. SCREEN HOUSE REMAINS IN PLACE WITH INLET OPENINGS PLUGGED.

Technical Basis

SEE ASSUMPTIONS BELOW

Assumptions

- PLANT GRADE 481FT, OHWL 455FT.
- ALL ABOVE GRADE ITEMS AT THE SITE ARE DEMOLISHED AND DISPOSED OF ON SITE, AND HAVE NO SCRAP VALUE UNLESS INDICATED OTHERWISE IN THE ESTIMATE
- TRANSPORTATION OF SCRAP MATERIAL TO A PROCESSOR IS NOT INCLUDED
- ALL SOIL BORROW MATERIAL IS FROM ON SITE
- BASED ON 40 HOUR WORKWEEK

Commercial Basis

1. Equipment/Material Cost

THE QUOTED PRICES FOR METAL SCRAP VALUES ARE:

- COPPER \$1400.00 PER TON
- STEEL \$85.00 PER TON

2. Labor Wage Rates

THE FOLLOWING VALUES INCLUDE WAGES, DEMOLITION EQUIPMENT, ON-SITE TRANSPORTATION, DISPOSAL, INSURANCE COSTS, AND OVERHEAD & PROFIT:

- WRECKING CREW \$ 70.30/hr
- ASBESTOS & PCB WORK \$100.40/hr
- EARTHWORK \$139.27/hr
- SEEDING & MULCHING \$ 42.23/hr
- ELECTRICIAN \$ 50.70/hr
- CARPENTER \$ 41.50/hr

3. Labor Crews

S & L STANDARD FOR THIS TYPE OF WORK

4. Productivity

AS THOSE APPLIED TO INDIANA

5. Quantity Sources

BASED ON S & L GENERAL ARRANGEMENT DRAWINGS, RIVER STRUCTURE DRAWINGS AND PHOTOGRAPHS.

6. Project Schedule

3 MONTHS DURATION

7. Indirect Expenses

CINERGY INDIRECT EXPENSES - 10% OF TOTAL DIRECT CONSTRUCTION COST

09603-020565

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Chicago

**B A S I S of E S T I M A T E**

Page 2  
Estimate No: 13348-10

Commercial Basis continued

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 98 of 286

8. Escalation Rates (See Cost Summary for rates)  
NOT INCLUDED, ESCALATION RATE EXPECTED TO BE 3% P.A.

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9. Sales/Use Taxes (See Cost Summary for rates)  
NOT INCLUDED

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10. Contingency (See Cost Summary for rates)  
SEE COST SUMMARY FOR RATES



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 Chicago

**C O S T S U M M A R Y R E P O R T**

~~ENERGY~~  
 WABASH RIVER UNITS 1,2,3,4,5,6  
 CONCEPTUAL COST ESTIMATE  
 DEMOLITION OF "RIVER STRUCTURES"

Page: 3  
 Estimate No: 13348-10  
 Project No: 9940-003  
 Prepared by: PAG/BJD/  
 Estimate Date: 31JAN03

Price level: 2002

ACCT.NO.	DESCRIPTION	TOTAL EQUIPMENT COST	TOTAL MATERIAL COST	TOTAL LABOR COST	TOTAL COST
311	STRUCTURES AND IMPROVEMENTS - DEMOLITION AND MODIFICATIONS		78,000	1,602,000	1,680,000
314	TURBINE PLANT				
315	ELECTRICAL PLANT			21,000	21,000
317	SCRAP VALUE (SEE BASIS)				
TOTAL CONSTRUCTION COSTS			78,000	1,623,000	1,701,000
INDIRECT EXPENSES					220,000
ESCALATION					
SALES/USE TAX					480,000
CONTINGENCY					
TOTAL PROJECT COST					2,401,000
SALVAGE VALUE					
GRAND TOTAL COST					2,401,000

FINANCIAL ASSUMPTIONS:

ESCALATION RATES: Equipment 0.000%  
 Material 3.000%  
 Labor 3.000%  
 Indirects 3.000%

SALES/USE TAX RATES: Equipment 0.000% Material 0.000%  
 CONTINGENCY RATES: Equipment 0.0% Material 25.0% Labor 25.0% Indirects 25.0%

09603-020567

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Chicago

**ESTIMATE WORKSHEET**

CINERGY  
WABASH RIVER UNITS 1,2,3,4,5,6  
CONCEPTUAL COST ESTIMATE  
DEMOLITION OF "RIVER STRUCTURES"

Page: 4  
Estimate No: 13348-10  
Project No: 9910-003  
Prepared by: PAG/B4D/

Estimate Date: 31JAN03

Price level: 2002

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UNIT	*** MATERIAL ***		*** LABOR ***		TOTAL COST			
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE		WAGE MNRS	LABOR COST	
311		STRUCTURES AND IMPROVEMENTS - DEMOLITION AND MODIFICATIONS										
311.1		SITE STRUCTURES DEMOLITION										
311.14		FILL SITE AREAS WHERE REQUIRED	2500	CY			0.025	63	139.27	9,000	9,000	
311.15		CIRCULATING WATER PIPE							REMAINS IN PLACE			
311.16		SCREEN HOUSE INLET CONCRETE PLUGS	800	CY	80.00			1.000	800	70.30	56,000	120,000
311.17		SEED & MULCH SITE INCLUDING TOPSOIL	2	AC	1100.00			30.000	60	42.25	3,000	5,000
311.18		RIP RAP (AT DISCHARGE)	350	SY	35.00			1.000	350	42.23	15,000	27,000
		SUB TOTAL 311.1							78,000	1,273	83,000	161,000
311.2		OUTLYING BUILDINGS DEMOLITION										
311.21		CRIB HOUSE							REMAINS IN PLACE			
311.22		FOREBAY LOG CELLS (6300SF)	1	LT				1200.000	1200	70.30	84,000	84,000
311.23		FOREBAY CELL GRAVEL	1800	CY				0.500	900	70.30	63,000	63,000
311.24		FOREBAY CUT / DREDGE	1500	CY				0.500	750	70.30	53,000	53,000
311.25		FOREBAY EXCAVATE / DREDGE	19500	CY				0.500	9750	70.30	685,000	685,000
311.26		FOREBAY FILL	9750	CY				0.500	4875	70.30	343,000	343,000
311.27		DISCHARGE TUNNEL CONCRETE (90FT LONG)	290	CY				0.750	218	70.30	15,000	15,000
311.28		DISCHARGE FLUME CELLS ( EQUIV 24 CELLS 20FT LONG , 1600SF SHEET PILE, 3000CY GRAVEL )	24	EA				140.000	3360	70.30	236,000	236,000
311.29		BARGE RENTAL	1	LT							40,000	40,000
		SUB TOTAL 311.2							21,053		1,519,000	1,519,000
		<b>TOTAL 311</b>							<b>78,000</b>	<b>22,326</b>	<b>1,602,000</b>	<b>1,680,000</b>

09603-020568

ent & Lundy  
Chicago

### ESTIMATE WORKSHEET

Page: 5  
Estimate No: 13548-10

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***			*** LABOR ***			TOTAL COST
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	MNHR	WAGE RATE	
314		TURBINE PLANT									
314.26		CIRCULATING WATER PUMPS									REMAINS IN PLACE
		TOTAL 314									

Argent & Lundy  
 Chicago

**ESTIMATE WORKSHEET**

Page: 6  
 Estimate No: 13348-10

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***			*** LABOR ***			TOTAL COST	
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	MHRS	WAGE RATE		LABOR COST
<b>315</b>		<b>ELECTRICAL PLANT</b>										
315.26		TRANSFORMERS, SWITCHGEAR, WIRING, CONDUIT, LIGHTING	1	LT				300.000	300	70.30	21,000	21,000
		<b>TOTAL 315</b>							<b>300</b>		<b>21,000</b>	<b>21,000</b>

**ESTIMATE WORKSHEET**

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Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UN	*** MATERIAL ***			*** LABOR ***			TOTAL COST
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	MNHR	WAGE RATE	
317		SCRAP VALUE (SEE BASIS)									
317.11		SCRAP VALUE OF STEEL		TN							
317.12		SCRAP VALUE OF COPPER		TN							
		SUB TOTAL 317.1									
		TOTAL 317									

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Chicago

**ESTIMATE WORKSHEET**

Pages 8  
Estimate No: 13348-10

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UN	*** MATERIAL ***		*** LABOR ***		TOTAL COST
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	
900		INDIRECT EXPENSES							
900.1		CINERGY INDIRECT EXPENSES							
900.11		PERMITTING	1	LS					50,000
900.12		PROJECT ADMINISTRATION	1	LS					170,000
		SUB TOTAL 900.1							220,000
		TOTAL 900							220,000
		TOTAL DIRECT & INDIRECT COSTS					78,000	22,626	1,843,000
									1,921,000

**CINERGY  
 WABASH RIVER STATION, INDIANA  
 PERMITTING AND DEMOLITION FOR RIVER STRUCTURES**

<b>STRUCTURES AFFECTED BY HIGH WATER LEVEL (OHWL)</b>		<b>448 FT</b>	
<b>PLANT GRADE ELEVATION</b>		<b>481 FT</b>	
	<b>SCREEN (PUMP) HOUSES</b>		<b>ENCLOSED MASONRY PUMPHOUSE WITH CONCRETE SUBSTRUCTURE - REMAINS IN PLACE - PLUG INLET OPENINGS WITH CONCRETE</b>
	<b>SCREEN HOUSE FOREBAY</b>		<b>REMOVE UNDERWATER EARTHEN STRUCTURES</b>
	<b>DISCHARGE FLUME - 150 FT LONG</b>		<b>REMOVE CONCRETE STRUCTURE</b>
	<b>DISCHARGE FLUME CONCRETE CELLS</b>		<b>REMOVE CELLS</b>
	<b>TOP OF BERM 481 LF</b>		<b>BERM REMAINS IN PLACE</b>
	<b>DRAIN DISCHARGE</b>		<b>84 IN RCP - REMAINS IN PLACE</b>
<b>1</b>	<b>REMOVAL OF PLANT PRIOR TO DEMOLITION</b>		
	<b>ELECTRICAL BULKS</b>		<b>CABLES REMAIN IN PLACE</b>
	<b>MECHANICAL BULKS</b>		<b>AVG PIPING, VALVES REMAIN IN PLACE</b>
	<b>MECHANICAL EQUIPMENT</b>		<b>SCREENS, PUMPS, STRAINERS - REMAIN IN PLACE</b>
	<b>ELECTRICAL EQUIPMENT</b>		<b>TRANSFORMERS, DISTRIB EQPT REMAIN IN PLACE</b>
	<b>CIRC WATER LINE</b>		<b>REMAINS IN PLACE</b>
<b>2</b>	<b>DEMOLITION METHOD</b>		
	<b>EXPLOSIVES</b>		<b>NOT REQD</b>
	<b>HAMMER WITH LONG BOOM</b>		<b>NOT REQD</b>
	<b>CONVENTIONAL HAMMER</b>		<b>REQD</b>
	<b>PULL PILES</b>		<b>NOT REQD</b>
	<b>PULL CELLS</b>		<b>NOT REQD</b>
	<b>DREDGING / EXCAVATION</b>		<b>DREDGING OF EARTH / RIPRAP INTAKE STRUCTURES</b>
<b>3</b>	<b>COLLECTION</b>		
	<b>STEEL</b>		<b>NOT REQD</b>
	<b>CONCRETE</b>		<b>NOT REQD</b>
	<b>COPPER</b>		<b>NOT REQD</b>
<b>4</b>	<b>RECYCLING</b>		
	<b>STEEL</b>		<b>NOT REQD</b>
	<b>CONCRETE</b>		<b>NOT REQD</b>
	<b>COPPER</b>		<b>NOT REQD</b>
<b>5</b>	<b>DISPOSAL</b>		
	<b>RUBISH</b>		<b>REQD</b>
	<b>HAZMATL</b>		<b>NONE</b>
<b>6</b>	<b>OTHER</b>		
	<b>LAND EQUIPMENT REQD ( CRANES, TRUCKS, ETC. )</b>		<b>REQD</b>
	<b>BARGE EQUIPMENT REQD ( CRANES, TRUCKS, ETC )</b>		<b>REQD</b>
	<b>TEMPORARY CONSTRUCTION ( SHEET PILING, COFFERDAM )</b>		<b>NOT REQD</b>
	<b>DIVERS</b>		<b>NOT REQD</b>
	<b>DEWATERING</b>		<b>NOT REQD</b>
<b>7</b>	<b>SAFETY PRECAUTION REQUIREMENTS</b>		
	<b>NORMAL</b>		<b>REQD</b>
	<b>ABNORMAL</b>		
<b>8</b>	<b>PERMITTING REQUIREMENTS</b>		<b>PER US COAST GUARD REQMTS. PER US ARMY COE REQMTS PER LOCAL AND STATE REQMTS</b>
<b>9</b>	<b>SITWORK</b>		<b>BACKFILL AND RIPRAP AT INTAKE BAYS</b>

09603-020573

DEMOLITION OF "RIVER STRUCTURES "

CONCEPTUAL COST ESTIMATE

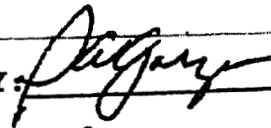
PREPARED FOR

CINERGY  
DRESSER

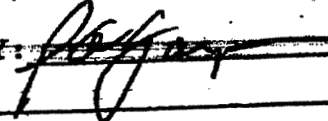
SARGENT & LUNDY

ESTIMATE NO. 21033B  
PROJECT NO. 9940-003  
January 31, 2003

REVIEWED BY:



APPROVED BY:





**Estimate No: 21033B**

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**TABLE OF CONTENTS**

---

<b>Report</b>	<b>Page</b>
<b>Basis of Estimate.....</b>	<b>1</b>
<b>Summary.....</b>	<b>3</b>
<b>Work Sheet Details.....</b>	<b>4</b>

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Chicago

**B A S I S o f E S T I M A T E**

**CINERGY  
ENERGY  
CONCEPTUAL COST ESTIMATE  
DEMOLITION OF "RIVER STRUCTURES"**

Page: 1  
Estimate No: 21033B  
Project No: 0202-002  
Prepared by: PAG/BJD/

Estimate Date: 31JAN03

Price level: 2002

Scope

DISMANTLING AND REMOVAL OF ALL EQUIPMENT AND PIPING, DEMOLITION AND REMOVAL OF  
~~THE MISCELLANEOUS RIVER STRUCTURES. PLANT HAS BEEN DECOMMISSIONED.~~

Technical Basis

SEE ASSUMPTIONS BELOW

Assumptions

- PLANT GRADE EL. 500FT. OHWL EL. 455FT.
- ALL ABOVE GRADE ITEMS AT THE SITE ARE DEMOLISHED AND DISPOSED OF ON SITE, AND HAVE NO SCRAP VALUE UNLESS INDICATED OTHERWISE IN THE ESTIMATE
- TRANSPORTATION OF SCRAP MATERIAL TO A PROCESSOR IS NOT INCLUDED
- ALL SOIL BORROW MATERIAL IS FROM ON SITE
- BASED ON 40 HOUR WORKWEEK
- THE RETAINING WALL ALONG THE SHORE LINE REMAINS IN PLACE.

Commercial Basis

1. Equipment/Material Cost

THE QUOTED PRICES FOR METAL SCRAP VALUES ARE:

- COPPER \$1400.00 PER TON
- STEEL \$85.00 PER TON

2. Labor Wage Rates

THE FOLLOWING VALUES INCLUDE WAGES, DEMOLITION EQUIPMENT, ON-SITE TRANSPORTATION, DISPOSAL, INSURANCE COSTS, AND OVERHEAD & PROFIT:

- |                       |             |
|-----------------------|-------------|
| - WRECKING CREW       | \$ 70.30/hr |
| - ASBESTOS & PCB WORK | \$100.40/hr |
| - EARTHWORK           | \$139.27/hr |
| - SEEDING & MULCHING  | \$ 42.23/hr |
| - ELECTRICIAN         | \$ 50.70/hr |
| - CARPENTER           | \$ 41.50/hr |

3. Labor Crews

S & L STANDARD FOR THIS TYPE OF WORK

4. Productivity

AS THOSE APPLIED TO INDIANA

5. Quantity Sources

BASED ON S & L AND CINERGY GENERAL ARRANGEMENT DRAWINGS, RIVER STRUCTURE DRAWINGS AND PHOTOGRAPHS.

6. Project Schedule

3 MONTHS DURATION

7. Indirect Expenses

CINERGY INDIRECT EXPENSES - PERMITTING FEE ALLOWANCE OF \$50,000 AND PROJECT ADMINISTRATION EXPENSES OF 10% OF TOTAL DIRECT CONSTRUCTION COST

09603-020576

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Chicago

**B A S I S of E S T I M A T E**

Page: 2  
Estimate No: 210338

Commercial Basis continued

8. Escalation Rates (See Cost Summary for rates)

NOT INCLUDED, ESCALATION RATE EXPECTED TO BE 3X P.A.

9. Sales/Use Taxes (See Cost Summary for rates)

NOT INCLUDED

10. Contingency (See Cost Summary for rates)

SEE COST SUMMARY FOR RATES

09603-020577

Sargent & Lundy  
 Chicago

**C O S T S U M M A R Y R E P O R T**

~~CINERY~~  
~~DRIVER~~  
**CONCEPTUAL COST ESTIMATE**  
 DEMOLITION OF "RIVER STRUCTURES"

Page: 3  
 Estimate No: 21033B  
 Project No: 0478-003  
 Prepared by: PAG/BJD/  
 Estimate Date: 31JAN03

Price level: 2002

ACCT.NO.	DESCRIPTION	TOTAL EQUIPMENT COST	TOTAL MATERIAL COST	TOTAL LABOR COST	TOTAL COST
311	STRUCTURES AND IMPROVEMENTS - DEMOLITION AND MODIFICATIONS		26,000	212,000	238,000
317	SCRAP VALUE (SEE BASIS)				
TOTAL CONSTRUCTION COSTS			26,000	212,000	238,000
INDIRECT EXPENSES					75,000
ESCALATION					
SALES/USE TAX					
CONTINGENCY					78,000
TOTAL PROJECT COST					391,000
SALVAGE VALUE					
GRAND TOTAL COST					391,000

FINANCIAL ASSUMPTIONS:

ESCALATION RATES: Equipment 0.000%  
 Material 3.000%  
 Labor 3.000%  
 Indirects 3.000%

SALES/USE TAX RATES: Equipment 0.000% Material 0.000%

CONTINGENCY RATES: Equipment 0.0% Material 25.0% Labor 25.0% Indirects 25.0%

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**ESTIMATE WORKSHEET**

CITRERO  
 DRESSER  
 CONCEPTUAL COST ESTIMATE  
 DEMOLITION OF "RIVER STRUCTURES"

Page: 4  
 Estimate No: 210338  
 Project No: 9940-003  
 Prepared by: PAG/BJD/

Estimate Date: 31JAN03

Price level: 2002

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UN	*** MATERIAL ***		*** LABOR ***			TOTAL COST		
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MHR RATE	MHRS		WAGE RATE	LABOR COST
311		STRUCTURES AND IMPROVEMENTS - DEMOLITION AND MODIFICATIONS										
311.1		SITE STRUCTURES DEMOLITION										
311.14		FILL SITE AREAS WHERE REQUIRED	2000	CY				0.025	50	139.27	7,000	7,000
311.15		CIRCULATING WATER PIPES - PLUG WITH CONCRETE AT ENDS (TWO 120" LINES)	1	LS	12000		12,000	250.000	250	70.30	18,000	30,000
311.16		SEED & MULCH SITE INCLUDING TOPSOIL	2	AC	1100.00		2,000	30.000	60	42.23	3,000	5,000
311.17		RIP RAP	350	SY	35.00		12,000	1.000	350	42.23	15,000	27,000
		SUB TOTAL 311.1					26,000		710		43,000	69,000
311.2		OUTLYING BUILDINGS DEMOLITION										
311.23		MISCELLANEOUS STRUCTURES	1000	CY				2.400	2400	70.30	169,000	169,000
		SUB TOTAL 311.2						2,400			169,000	169,000
		TOTAL 311					26,000		3,110		212,000	238,000

Argent & Lundy  
 Chicago

**ESTIMATE WORKSHEET**

Page: 5  
 Estimate No: 210338

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	LN	*** MATERIAL ***			*** LABOR ***		TOTAL COST
					RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	MNHR	
317		SCRAP VALUE (SEE BASIS)								
317.11		SCRAP VALUE OF STEEL								
317.12		SCRAP VALUE OF COPPER								
		SUB TOTAL 317.1								
		TOTAL 317								

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 113 of 286

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Chicago

**ESTIMATE WORKSHEET**

Page: 6  
Estimate No. 31933

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***		*** LABOR ***		TOTAL COST
					RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	
900		INDIRECT EXPENSES							
900.1		ENERGY INDIRECT EXPENSES							
900.11		PERMITTING	1	LS					50,000
900.12		PROJECT ADMINISTRATION	1	LS					25,000
		<b>SUB TOTAL 900.1</b>							<b>75,000</b>
		<b>TOTAL 900</b>							<b>75,000</b>
		<b>TOTAL DIRECT &amp; INDIRECT COSTS</b>					<b>26,000</b>	<b>3,110</b>	<b>287,000</b>

09603-020581

Last Page of Estimate

**CINERGY  
DRESSER STATION, INDIANA  
PERMITTING AND DEMOLITION FOR RIVER STRUCTURES**

STRUCTURES AFFECTED BY HIGH WATER LEVEL (ORWL) 480 FT		480 FT
PLANT GRADE ELEVATION 600 FT		600 FT
<b>MISCELLANEOUS STRUCTURES</b>		REMOVE RIVERSIDE STRUCTURES. PLANT HAS BEEN DECOMMISSIONED.
<b>1</b>	<b>REMOVAL OF PLANT PRIOR TO DEMOLITION</b>	
	ELECTRICAL BULBS	NOT REQD
	MECHANICAL BULKS	NOT REQD
	MECHANICAL EQUIPMENT	NOT REQD
	ELECTRICAL EQUIPMENT	NOT REQD
	CIRC WATER LINE	PLUG AND ABANDON IN PLACE
<b>2</b>	<b>DEMOLITION METHOD</b>	
	EXPLOSIVES	NOT REQD
	HAMMER WITH LONG BOOM	NOT REQD
	CONVENTIONAL HAMMER	REQD
	PULL PILES	NOT REQD
	PULL CELLS	NOT REQD
<b>3</b>	<b>COLLECTION</b>	
	STEEL	NOT REQD
	CONCRETE	NOT REQD
	COPPER	NOT REQD
<b>4</b>	<b>RECYCLING</b>	
	STEEL	NOT REQD
	CONCRETE	NOT REQD
	COPPER	NOT REQD
<b>5</b>	<b>DISPOSAL</b>	
	RUBISH	REQD
	HAZMATL	NONE
<b>6</b>	<b>OTHER</b>	
	LAND EQUIPMENT REQD ( CRANES, TRUCKS, ETC. )	REQD
	BARGE EQUIPMENT REQD ( CRANES, TRUCKS, ETC )	NOT REQD
	TEMPORARY CONSTRUCTION ( SHEET PILING, COFFERDAM )	NOT REQD
	DIVERS	NOT REQD
	DEWATERING	NOT REQD
<b>7</b>	<b>SAFETY PRECAUTION REQUIREMENTS</b>	
	NORMAL	REQD
	ABNORMAL	
<b>8</b>	<b>PERMITTING REQUIREMENTS</b>	
		PER US COAST GUARD REQMTS
		PER US ARMY COE REQMTS
		PER LOCAL AND STATE REQMTS
<b>9</b>	<b>SITWORK</b>	
		RESTORE SHORELINE TO ORIGINAL CONDITION

09603-020582



**DEMOLITION OF GAS TURBINE (3) CT AND BALANCE OF PLANT**

**CONCEPTUAL COST ESTIMATE**

**PREPARED FOR**  
**CINERGY**  
**HENRY COUNTY GAS TURBINE PLANT**

**SARGENT & LUNDY**

**ESTIMATE NO. 21034B**  
**PROJECT NO. 9940-003**  
**February 10, 2003**

REVIEWED BY: 

APPROVED BY: 

Estimate No: 21034B

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TABLE OF CONTENTS

---

Report	Page
Basis of Estimate.....	1
Summary.....	3
Work Sheet Details.....	4

Sargent & Lundy  
Chicago

**B A S I S of E S T I M A T E**  
CINERGY  
HENRY COUNTY GAS TURBINE PLANT  
CONCEPTUAL COST ESTIMATE  
DEMOLITION OF GAS TURBINE (3) CT AND BALANCE OF PLANT

Page: 1  
Estimate No: 210348  
Project No: 9940-003  
Prepared by: PMG/BJD/  
Estimate Date: 10FEB03

Price level: 2002

SCOPE

DISMANTLING AND REMOVAL OF ALL EQUIPMENT CONSISTING OF 3 LM6000 COMBUSTION TURBINES AND ASSOCIATED BALANCE OF PLANT, PIPING, DEMOLITION AND REMOVAL OF STRUCTURES AND RETURNING THE SITE TO GREEN FIELD. IN ADDITION, DISMANTLING AND REMOVAL OF POND EQUIPMENT, STRUCTURES, FOUNDATIONS AND REMOVAL OF 3 ACRE POND BERM AND LINER, BACKFILL AND RETURNING THE SITE TO GREEN FIELD.

SWITCHYARD AREA IS NOT INCLUDED IN THIS ESTIMATE.

Technical Basis

SEE ASSUMPTIONS BELOW

Assumptions

- ALL ABOVE GRADE ITEMS AT THE SITE ARE DEMOLISHED AND DISPOSED OF ON SITE, AND HAVE NO SCRAP VALUE UNLESS INDICATED OTHERWISE IN THE ESTIMATE
- TRANSPORTATION OF SCRAP MATERIAL TO A PROCESSOR IS NOT INCLUDED
- ALL SOIL BORROW MATERIAL IS FROM ON SITE
- BASED ON 40 HOUR WORKWEEK
- SWITCHYARD REMAINS IN PLACE
- NO HAZARDOUS MATERIALS AT THE SITE

Commercial Basis

1. Equipment/Material Cost

THE QUOTED PRICES FOR METAL SCRAP VALUES ARE:

- COPPER \$1400.00 PER TON
- STEEL \$85.00 PER TON

2. Labor Wage Rates

THE FOLLOWING VALUES INCLUDE WAGES, DEMOLITION EQUIPMENT, ON-SITE TRANSPORTATION, DISPOSAL, INSURANCE COSTS, AND OVERHEAD & PROFIT:

- WRECKING CREW	\$ 83.33/hr
- ASBESTOS & PCB WORK	\$100.00/hr
- EARTHWORK	\$127.88/hr
- SEEDING & MULCHING	\$ 40.34/hr
- ELECTRICIAN	\$ 61.27/hr
- CARPENTER	\$ 45.55/hr

3. Labor Crews

S & L STANDARD FOR THIS TYPE OF WORK

4. Productivity

AS THOSE APPLIED TO INDIANA

5. Quantity Sources

BASED ON S & L GENERAL ARRANGEMENT DRAWINGS, SITE AND FOUNDATION DRAWINGS AND PLANT PHOTOGRAPHS.

6. Project Schedule

6 MONTHS DURATION

09603-020585

Sargent & Lundy  
Chicago

**B A S I S O F E S T I M A T E**

Page: 2  
Estimate No: 210349

Commercial Basis continued

7. Indirect Expenses

CINERGY INDIRECT EXPENSES - 10% OF TOTAL DIRECT CONSTRUCTION COST

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8. Escalation Rates (See Cost Summary for rates)

NOT INCLUDED, ESCALATION RATE EXPECTED TO BE 3% P.A.

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9. Sales/Use Taxes (See Cost Summary for rates)

NOT INCLUDED

10. Contingency (See Cost Summary for rates)

SEE COST SUMMARY FOR RATES

Sargant & Lundy  
 Chicago

**C O S T S U M M A R Y R E P O R T**

CINERGY  
 HENRY COUNTY GAS TURBINE PLANT  
 CONCEPTUAL COST ESTIMATE  
 DEMOLITION OF GAS TURBINE (3) CT AND BALANCE OF PLANT

Page: 1  
 Estimate No: 21034B  
 Project No: 9940-003  
 Prepared by: PAG/BJD/  
 Estimate Date: 10FEB03

Price level: 2002

ACCE. NO.	DESCRIPTION	TOTAL EQUIPMENT COST	TOTAL MATERIAL COST	TOTAL LABOR COST	TOTAL COST
341	PEAKERS COMMON FACILITIES - STRUCTURES AND IMPROVEMENTS			1,013,000	1,013,000
342	PEAKERS 1 THRU 3 - STRUCTURES AND IMPROVEMENTS			150,000	150,000
343	PEAKERS COMMON FACILITIES - WATER STORAGE / WAREHOUSE, COOLING TOWER AND BALANCE OF PLANT EQUIPMENT			166,000	166,000
344	PEAKERS 1 THRU 3 - GAS TURBINE PLANT			277,000	277,000
345	PEAKERS 1 THRU 3 - ACCESSORY ELECTRICAL EQUIPMENT			165,000	165,000
<b>TOTAL CONSTRUCTION COSTS</b>				<b>1,771,000</b>	<b>1,771,000</b>
INDIRECT EXPENSES					170,000
ESCALATION					
SALES/USE TAX					
CONTINGENCY					485,000
<b>TOTAL PROJECT COST</b>					<b>2,426,000</b>
SALVAGE VALUE					-600,000
<b>GRAND TOTAL COST</b>					<b>1,826,000</b>

FINANCIAL ASSUMPTIONS:  
 ESCALATION RATES: Equipment 0.000%  
                           Material 3.000%  
                           Labor 3.000%  
                           Indirects 3.000%  
 SALES/USE TAX RATES: Equipment 0.000% Material 0.000%  
 CONTINGENCY RATES: Equipment 0.0% Material 25.0% Labor 25.0% Indirects 25.0%

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 Chicago

**ESTIMATE WORKSHEET**

~~HENRY COUNTY GAS TURBINE PLANT~~  
 CONCEPTUAL COST ESTIMATE  
 DEMOLITION OF GAS TURBINE (3) CT AND BALANCE OF PLANT

Page: 4  
 Estimate No: 210348  
 Project No: 2005-00042  
 Prepared by: FAG/BJD/

Estimate Date: 10FEB03

Price level: 2002

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	PACKAGE	WORK DESCRIPTION	QTY	UNIT	*** MATERIAL ***		*** LABOR ***		TOTAL COST	
					RATE	EQUIPMENT COST	HR	RATE		LABOR COST
341.C		PEAKERS COMMON FACILITIES - STRUCTURES AND IMPROVEMENTS								
341.C1		SITWORK AND SITE STRUCTURE DEMOLITION								
341.C11		SITE EXCAVATION	2700	CY			0.100	270	127.88	35,000
									ETWK	
341.C12		ROADS AND PAVEMENTS	3000	CY			0.100	300	127.88	38,800
									ETWK	
341.C14		POND ACCESS GRAVEL ROAD	800	CY			0.100	80	127.88	10,000
									ETWK	
341.C15		POND FENCE	1	LT			180.000	180	83.33	15,000
									WRKG	
341.C16		POND BERM	10000	CY			0.100	1000	127.88	128,000
									ETWK	
341.C17		POND SLUDGE	4500	CY			0.100	450	127.88	58,000
									ETWK	
		SUB TOTAL 341.C1						2,280		284,000
341.C2		OUTLYING STRUCTURE DEMOLITION								
341.C21		MECHANICAL AND MAINTENANCE BLDG, CONTROL BLDG, GAS METERING BLDG	270000	CF			0.006	1620	83.33	135,000
									WRKG	
341.C22		TANK FOUNDATIONS AND BERMS	100	CY			1.100	110	83.33	9,000
									WRKG	
341.C23		MISC. EQUIPMENT AND SITE BLDG. FOUNDATIONS	1000	CY			1.100	1100	83.33	92,000
									WRKG	
341.C24		POND EQUIPMENT, BUILDING AND FOUNDATIONS	1	LT			180.000	180	83.33	15,000
									WRKG	
		SUB TOTAL 341.C2						3,010		251,000
341.C3		SITE FILL AND LANDSCAPING								
341.C31		COVER DISTURBED AREAS OF SITE WITH 2PT OF SOIL (650' X 475' )	22000	CY			0.050	1100	127.88	141,000
									ETWK	
341.C32		SEED AND MULCH SITE	8	AC			19.000	152	40.34	6,000
									LAND	
341.C34		COVER DISTURBED AREAS OF POND	9000	CY			0.050	450	127.88	58,000
									ETWK	

**ESTIMATE WORKSHEET**

Chicago

Page: 1  
Estimate No: 21034B

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY UN	*** MATERIAL ***		*** LABOR ***		TOT CC			
				MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MMHR RATE		MMHRS	WAGE RATE	LABOR COST
341.C35		SEED AND MULCH POND AREA	3 AC				19.000	57	40.34	2,000	2,0
									LAND		
		SUB TOTAL 341.C3						1,759		207,000	207,0
341.C4		OFF-SITE DISPOSAL									
341.C41		SPECIAL WASTE - NONHAZ	2700 CY				0.433	1169	83.33	97,000	97,0
									WRKG		
341.C42		RUBBISH AND TENANT DEBRIS - TRANSPORT AND DISPOSAL	800 CY				0.180	144	83.33	12,000	12,0
									WRKG		
341.C44		SPECIAL WASTE - NONHAZ POND WASTE	4500 CY				0.433	1949	83.33	162,000	162,0
									WRKG		
		SUB TOTAL 341.C4						3,262		271,000	271,0
		SUB TOTAL 341.C						10,311		1,013,000	1,013,0
		TOTAL 341						10,311		1,013,000	1,013,0

**ESTIMATE WORKSHEET**

Sargent & Lundy  
 Chicago

Page: 6  
 Estimate No: 210348

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***			*** LABOR ***			TOTAL COST
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MMHR RATE	MMHRS	WAGE RATE	
342.P		BEARERS 1 THRU 3 STRUCTURES AND IMPROVEMENTS									
342.P1		COMBUSTION TURBINE STRUCTURE DEMOLITION									
342.P11		COMB. TURB FOUNDATIONS - 1600 CY COMMON MAT AND PEDESTALS					1.125	1800	83.33	150,000	150,000
									WRKG		
		SUB TOTAL 342.P1						1,800		150,000	150,000
		SUB TOTAL 342.P						1,800		150,000	150,000
		TOTAL 342						1,800		150,000	150,000



~~Sergent & Lundy~~  
 Chicago

**ESTIMATE WORKSHEET**

Page: 7  
 Estimate No: 210348

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	CITY	SQ FT	*** MATERIAL ***		*** LABOR ***		TOTAL COST		
					EQUIPMENT COST	MATERIAL COST	HR	WAGE RATE		LABOR COST	
343.C		PEAKERS COMMON FACILITIES WATER STORAGE / WAREHOUSE, COOLING TOWER AND BALANCE OF PLANT EQUIPMENT									
343.C1		WATER STORAGE SYSTEM									
343.C11		RAW WATER AND CONDENSATE STORAGE TANKS 2 500,000 GAL.	445	TN			2.672	1189	83.33 WRKG	99,000	99,000
343.C12		WATER TRANSFER PUMPS, MOTORS AND MISC. EQPT	40	TN			2.672	107	83.33 WRKG	9,000	9,000
343.C13		PIPE RACK AND PIPE ( 330LP )	130	TN			2.672	321	83.33 WRKG	27,000	27,000
		SUB TOTAL 343.C1						1,617		135,000	135,000
343.C2		COOLING SYSTEM									
343.C22		COOLING TOWER	40	TN			2.672	107	83.33 WRKG	9,000	9,000
343.C23		COOLING AND MISC. PIPING	80	TN			2.025	162	83.33 WRKG	13,000	13,000
		SUB TOTAL 343.C2						269		22,000	22,000
343.C3		BALANCE OF PLANT									
343.C32		BALANCE OF PLANT EQUIPMENT	40	TN			2.672	107	83.33 WRKG	9,000	9,000
		SUB TOTAL 343.C3						107		9,000	9,000
		SUB TOTAL 343.C						1,993		166,000	166,000
		TOTAL 343						1,993		166,000	166,000

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 124 of 286

Sargent & Lundy  
Chicago

**ESTIMATE WORKSHEET**

Page: 8

Estimate No. 213345

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***			*** LABOR ***			TOTAL COST	
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MHR RATE	MHRS	WAGE RATE		LABOR COST
344.P		PEAKERS 1 THRU 3 - GAS TURBINE PLANT										
344.P1		COMBUSTION TURBINES 1 THRU 3										
344.P11		COMBUSTION TURBINES 3EA @ 50MW LM6000 AND ACCESSORIES	300	TN				3.570	3213	83.33	268,000	268,000
										WRKG		
344.P12		COMBUSTION TURBINE STACKS 3 EA.	30	TN				3.570	107	83.33	9,000	9,000
										WRKG		
SUB TOTAL 344.P1								3,320			277,000	277,000
SUB TOTAL 344.P								3,320			277,000	277,000
TOTAL 344								3,320			277,000	277,000

KyPSC Case No. 2006-00172  
 Attachment AG-DR-02-029  
 Page 125 of 286

Sargent & Lundy  
 Chicago

**ESTIMATE WORKSHEET**

Page: 3  
 Estimate No: 21034B

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UN	*** MATERIAL ***		*** LABOR ***		TOTAL COST		
					RATE	EQUIPMENT COST	RATE	HOURS		WAGE RATE	LABOR COST
345.P		PEAKERS 1 THRU 3 - ACCESSORY ELECTRICAL EQUIPMENT									
345.P1		COMBUSTION TURBINES 1 THRU 3									
345.P11		INTERCONNECTING ELECTRICAL EQUIPMENT									
345.P111		TRANSFORMERS	90	TN			7.000	630	61.27	39,000	39,000
									WIRE		
345.P112		SWITCHGEAR AND MCC'S	30	TN			7.000	210	61.27	13,000	13,000
									WIRE		
345.P113		CABLE	30	TN			21.000	630	61.27	39,000	39,000
									WIRE		
345.P114		RACEWAY	15	TN			40.000	600	61.27	37,000	37,000
									WIRE		
345.P115		MISC. ELECTRICAL INCLUDING CONTROL PANELS, LIGHTING, COMM. ETC.	15	TN			40.000	600	61.27	37,000	37,000
									WIRE		
345.P12		SCRAP VALUE	25000	LB							
									WIRE		
		SUB TOTAL 345.P1						2.670		165,000	165,000
345.P2		SCRAP VALUE									
		SUB TOTAL 345.P						2.670		165,000	165,000
		TOTAL 345						2.670		165,000	165,000

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 126 of 286

Sargent & Lundy  
Chicago

**ESTIMATE WORKSHEET**

Page: 10  
Estimate No. 219118

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***		*** LABOR ***		TOTAL COST
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MGHR RATE	
900		INDIRECT EXPENSES							
900.1		<del>GENERAL</del> <del>INDIRECT</del> EXPENSES							170,000 170,000
		TOTAL 900							170,000 170,000
		TOTAL DIRECT & INDIRECT COSTS					20,094	1,941,000	1,941,000

Last Page of Estimate

09603-020594





GANNETT FLEMING, INC.  
P.O. Box 67100  
Harrisburg, PA 17106-7100  
Location:  
207 Senate Avenue  
Camp Hill, PA 17011  
Office: (717) 763-7211  
Fax: (717) 763-4590  
www.gannettfleming.com

April 30, 2003

VIA FEDERAL-EXPRESS

Ms. Peggy Laub  
Manager, Fixed Asset Accounting  
Cinergy Corporation  
139 East Fourth Street  
Cincinnati, OH 45202

Dear Peggy:

The Valuation and Rate Division of Gannett Fleming, Inc. was retained by Cinergy Corp. to perform a study that would result in a determination of the portion of Account 108, Accumulated Provision for Depreciation, that relates to cost of removal as of December 31, 2002. The results of the study are presented in the attached tabulations. In our opinion, the amounts set forth on the attachments provide a reasonable estimate of the net amount of the historical accumulated accruals and charges related to cost of removal. The remainder of this letter provides background on this issue and the methods that we used to estimate the portion of accumulated depreciation related to cost of removal.

Cinergy Corp. has for many years provided for and charged the cost of removing plant in service to Account 108, Accumulated Provision for Depreciation. Such entries were in accordance with both the Uniform System of Accounts as promulgated by the Federal Energy Regulatory Commission and Generally Accepted Accounting Principles (GAAP) as defined by the Financial Accounting Standards Board (FASB). With the issuance of FAS 143, Accounting for Asset Retirement Obligations (ARO), the FASB has changed GAAP for "legal obligations associated with the retirement of long-lived assets..." FAS 143 requires that the liability for the ARO be recognized at fair value when it is incurred and that asset retirement costs be capitalized as part of the asset. The amount to be reported as the cumulative effect of implementing this financial standard is the difference between the amounts previously recognized, i.e., the cost of removal entries recorded to Account 108, and the net amount to be recognized pursuant to the statement.

There are two alternatives for the determination of the portion of the Accumulated Provision for Depreciation that relates to costs of removal and the accruals for such costs. The first alternative is the identification of the portion of historical accruals that represented accruals for cost of removal and the historical costs of removal charged to accumulated depreciation. This approach is neither practical nor feasible. The time required to research such entries over a period of at least 60 years would exceed the time limits of implementation. Further, it is questionable if the records required for such a determination could be located, if they exist at this point.

Gannett Fleming

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 129 of 286

Ms. Peggy Laub  
Cincinnati, OH 45202

- 2 -

April 30, 2003

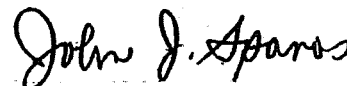
The second alternative is to estimate the net amount of these entries using two calculations of the theoretical accumulated depreciation, one that includes and one that excludes a factor for cost of removal. The theoretical accumulated depreciation is also referred to as the theoretical reserve or the calculated accrued depreciation. The theoretical calculation is used regularly to measure the adequacy of the book accumulated depreciation. Although it represents the portion of service value (original cost less net salvage) that will not be recovered through future depreciation expense if the current estimates of service life and net salvage are used for the remaining life of the plant in service (the prospective view), it also can be considered as a measure of the accumulation of historical entries of accruals, retirements, cost of removal and gross salvage (the retrospective view). This is particularly true when the overall history is the primary basis for the estimates of service life and net salvage. By calculating the theoretical reserve with and without an adjustment for cost of removal, the ratio of the difference between these two calculations to the calculation with cost of removal can be applied to the actual book amount as an estimate of the portion of the accumulated depreciation that relates to cost of removal entries.

However, when there has been a trend in the historical data such as the ever increasing levels of cost of removal as a percent of the original cost retired, the results of applying the ratio developed from the theoretical accumulated depreciation calculations described above require adjustment. That is, the use of the forecasted cost of removal percent that is used in depreciation studies overstates the level of historical entries that occurred when cost of removal was not as great. The adjustment in this case is the deduction of identifiable cost of removal charges to the accumulated depreciation account.

We believe that the result of the calculation described above including the adjustment for actual cost of removal entries provides a reasonable estimate of the portion of Account 108, Accumulated Provision for Depreciation, that relates to cost of removal.

Very truly yours,

GANNETT FLEMING, INC.



JOHN J. SPANOS

Vice President

Valuation and Rate Division

JJS:krm

Attachments

09603-020596

PSI ENERGY, INC.  
PERCENTAGE OF BOOK RESERVE ASSOCIATED WITH COST OF REMOVAL AND GROSS SALVAGE  
AS OF DECEMBER 31, 2002

ACCOUNT	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
	NONDEPRECIABLE	SURVIVOR CURVE	ORIGINAL COST	BOOK RESERVE	COST OF REMOVAL PERCENT	COST OF REMOVAL	GROSS SALVAGE PERCENT	GROSS SALVAGE
STEAM PRODUCTION PLANT			6,181,786.04					
3108 HEIGHTS OF WAY								
3118 STRUCTURES AND IMPROVEMENTS	100-R2.5	100-R2.5	114,413,940.35	49,443,087	(35)	8,359,909	0	0
ALL OTHER UNITS	100-R2.5	100-R2.5	289,184,828.01	189,821,489	(35)	34,338,883	0	0
TOTAL ACCOUNT 311			403,578,868.36	248,764,593		42,698,772		0
3128 BOILER PLANT								
BOILER UNIT 6	50-S0.5	50-S0.5	187,848,738.48	109,104,708	(32)	9,078,854	2	(554,283)
ALL OTHER UNITS	50-S0.5	50-S0.5	1,278,881,034.51	672,048,034	(32)	89,408,182	2	(4,821,783)
TOTAL ACCOUNT 312			1,466,630,771.00	881,152,742		78,487,036		(5,376,066)
3122 BOILER PLANT - COAL CARS								
3142 TURBOGENERATOR UNITS	30-R3	30-R3	9,285,282	3,739,464	(30)	508,486	5	(104,705)
BOILER UNIT 6	65-S1	65-S1	29,704,639.85	16,846,221	(34)	2,284,189	4	(27,847)
ALL OTHER UNITS	65-S1	65-S1	289,485,801.63	183,483,593	(34)	31,318,223	4	(3,881,429)
TOTAL ACCOUNT 314			319,200,441.48	209,129,724		33,571,392		(4,000,078)
3158 ACCESSORY ELECTRIC EQUIPMENT								
BOILER UNIT 6	65-R2	65-R2	21,387,187.41	18,880,822	(12)	1,171,578	2	(512,488)
ALL OTHER UNITS	65-R2	65-R2	85,973,942.85	61,915,350	(12)	3,624,533	2	(87,817)
TOTAL ACCOUNT 315			118,741,110.26	78,805,972		4,898,112		(789,983)
3168 ACCESSORY ELECTRIC EQUIPMENT								
BOILER UNIT 6	40-S0	40-S0	20,371,407.38	8,514,424	(9)	408,394	3	(170,289)
ALL OTHER UNITS	40-S0	40-S0	77,504,088.47	28,441,177	(9)	791,898	3	(998,452)
TOTAL ACCOUNT 318			97,875,475.85	34,955,601		1,187,000		(829,893)
TOTAL STEAM PRODUCTION PLANT			2,420,482,712.88	1,258,348,088		181,424,578		(10,879,873)
HYDRO PLANT								
3310 STRUCTURES AND IMPROVEMENTS	SQUARE	SQUARE	3,838,309.85	1,815,279	(20)	289,304	0	0
3320 RESERVOIRS, DAMS AND WATERWAYS	SQUARE	SQUARE	12,220,628.27	6,508,048	(20)	1,351,978	0	0
3330 WATER WHEELS, TURBINES AND GENERATORS	70-R2.5	70-R2.5	7,828,476.77	4,324,402	(10)	357,376	0	0
3340 ACCESSORY ELECTRIC EQUIPMENT	65-R3	65-R3	885,289.45	482,287	0	0	0	0
3360 MISCELLANEOUS POWER PLANT EQUIPMENT	60-R2.5	60-R2.5	881,283.21	178,314	0	0	0	0
TOTAL HYDRO PLANT			25,122,186.35	18,308,331		1,998,688		0



PSI ENERGY, INC.  
 PERCENTAGE OF BOOK RESERVE ASSOCIATED WITH COST OF REMOVAL AND GROSS SALVAGE  
 AS OF DECEMBER 31, 2002

	ACCOUNT (1)	SURVIVOR CURVE (2)	ORIGINAL COST (3)	BOOK RESERVE (4)	COST OF REMOVAL PERCENT (5)	COST OF REMOVAL (6)	GROSS SALVAGE PERCENT (7)	GROSS SALVAGE (8)
	<b>OTHER PRODUCTION PLANT</b>							
3404	LAND AND LAND RIGHTS	NONDEPRECIABLE	382,541.34					
3410	STRUCTURES AND IMPROVEMENTS	SQUARE	11,806,881.92	2,987,833	(5)	130,729	0	0
3420	FUEL HOLDERS, PRODUCERS AND ACCESSORIES	SQUARE	3,115,616.13	759,777	(5)	33,119	0	0
3430	PRIME MOVERS	52-R2.5	130,007,062.25	43,320,470	(15)	5,879,464	5	(1,886,179)
3431	PRIME MOVERS - DYNERGY	52-R2.5	13,134,350.34	685,018	(15)	62,411	5	(35,137)
3440	GENERATORS	44-R4	47,442,410.77	17,739,239	0	0	0	0
3442	GENERATORS - DYNERGY	44-R4	13,134,351.98	685,017	0	0	0	0
3450	ACCESSORY ELECTRIC EQUIPMENT	45-S1.5	18,566,037.60	4,871,778	0	0	0	0
3460	MISCELLANEOUS POWER PLANT EQUIPMENT	40-R1.5	1,918,828.72	291,031	0	0	0	0
	<b>TOTAL OTHER PRODUCTION PLANT</b>		<b>238,308,060.05</b>	<b>71,320,281</b>		<b>5,914,723</b>		<b>(1,917,315)</b>
	<b>TRANSMISSION PLANT</b>							
3500	LAND AND LAND RIGHTS	NONDEPRECIABLE	2,852,361.98					
3501	RIGHTS OF WAY	75-R4	30,215,370.24	13,414,888	0	0	0	0
3520	STRUCTURES AND IMPROVEMENTS	75-R3	14,519,885.72	5,085,008	0	0	0	0
3530	STATION EQUIPMENT	60-R2	324,103,455.54	111,401,506	(17)	15,440,488	7	(6,391,269)
3540	TOWERS AND FIXTURES	70-R2.5	70,088,209.24	45,841,778	(14)	5,514,237	4	(1,601,804)
3550	POLES AND FIXTURES	66-S0	118,027,581.49	63,742,088	(71)	19,849,062	11	(3,016,300)
3560	OVERHEAD CONDUCTORS AND DEVICES	65-R2	148,649,187.79	63,448,988	(66)	22,985,688	16	(6,614,888)
3570	UNDERGROUND CONDUIT	65-R3	1,314,297.03	18,381	(35)	2,129	10	(1,010)
3580	UNDERGROUND CONDUCTORS AND DEVICES	30-SQ	63,110.48	28,632	0	0	0	0
	<b>TOTAL TRANSMISSION PLANT</b>		<b>709,623,489.49</b>	<b>292,957,283</b>		<b>63,801,884</b>		<b>(17,821,789)</b>
	<b>DISTRIBUTION PLANT</b>							
3600	LAND AND LAND RIGHTS	NONDEPRECIABLE	6,653,655.88					
3601	RIGHTS OF WAY	70-R3	1,080,237.34	742,289	0	0	0	0
3610	STRUCTURES AND IMPROVEMENTS	60-R1.5	10,433,554.25	3,852,829	0	0	0	0
3620	STATION EQUIPMENT	50-R0.5	276,955,911.23	83,824,987	(23)	13,349,987	8	(4,796,209)
3640	POLES, TOWERS AND FIXTURES	43-R0.5	280,288,784.37	118,241,993	(67)	29,748,670	7	(3,678,134)
3650	OVERHEAD CONDUCTORS AND DEVICES	50-R0.5	160,483,897.16	51,351,289	(64)	12,093,097	9	(1,831,114)
3660	UNDERGROUND CONDUIT	65-R3	7,269,083.15	1,922,308	(27)	389,781	2	(21,713)
3670	UNDERGROUND CONDUCTORS AND DEVICES	55-R2	255,547,029.47	51,850,805	(28)	8,105,821	1	(384,373)
3680	LINE TRANSFORMERS	35-R1	319,883,392.62	142,376,849	(18)	14,151,267	6	(6,021,717)
3691	SERVICES - UNDERGROUND	40-R1.5	139,908,937.48	57,834,851	(31)	9,077,185	1	(116,845)
3692	SERVICES - OVERHEAD	35-R1	36,138,475.69	27,399,570	(67)	8,632,516	7	(794,614)
3700	METERS	32-R2	124,447,115.34	62,981,493	(10)	3,673,280	10	(3,771,157)
3710	INSTALLATIONS ON CUSTOMER PREMISES	14-L0	22,472,390.69	9,233,405	(13)	96,479	8	(121,614)
3730	STREET LIGHTING & SIGNAL SYSTEM	24-R1	27,291,391.39	13,196,784	(23)	1,088,742	3	(231,513)
	<b>TOTAL DISTRIBUTION PLANT</b>		<b>1,888,611,605.94</b>	<b>614,788,820</b>		<b>100,324,204</b>		<b>(21,816,803)</b>

PSI ENERGY, INC.  
 PERCENTAGE OF BOOK RESERVE ASSOCIATED WITH COST OF REMOVAL AND GROSS SALVAGE  
 AS OF DECEMBER 31, 2002

	ACCOUNT (1)	SURVIVOR CURVE (2)	ORIGINAL COST (3)	BOOK RESERVE (4)	COST OF REMOVAL PERCENT (5)	COST OF REMOVAL (6)	GROSS SALVAGE PERCENT (7)	GROSS SALVAGE (8)
	GENERAL PLANT							
3890	LAND AND LAND RIGHTS	NONDEPRECIABLE	2,500,365.91					
3900	STRUCTURES AND IMPROVEMENTS - MAJOR	60-R1	75,588,119.59	27,770,895	(5)	387,274	5	(598,284)
3900	STRUCTURES AND IMPROVEMENTS - MINOR	40-R3	14,544,330.87	4,649,551	(10)	222,534	5	(82,173)
	TOTAL ACCOUNT 3900		90,130,450.48	32,420,446		589,808		(680,457)
3901	STRUCTURES AND IMPROVEMENTS - AMORTIZED	SQUARE	984,374.35	873,787	0	0	0	0
3910	OFFICE FURNITURE AND EQUIPMENT	20-SQ	12,208,307.08	7,195,951	0	0	0	0
3911	OFFICE FURNITURE AND EQUIPMENT - INFO. SYSTEM	5-SQ	3,045,995.72	254,690	0	0	0	0
3920	TRAILERS	28-L1.5	3,459,082.95	514,024	0	0	10	(51,182)
3930	STORES EQUIPMENT	20-SQ	830,081.87	435,978	0	0	0	0
3940	TOOLS, SHOP AND GARAGE EQUIPMENT	25-SQ	6,070,999.42	1,965,444	0	0	0	0
3950	LABORATORY EQUIPMENT	20-SQ	6,858,732.38	1,229,370	0	0	0	0
3960	POWER OPERATED EQUIPMENT	20-SQ.5	1,035,188.24	252,356	0	0	0	0
3970	COMMUNICATION EQUIPMENT	19-L2	44,695,441.14	20,425,319	0	0	0	0
3980	MISCELLANEOUS EQUIPMENT	15-SQ	4,154,166.40	2,018,660	0	0	0	0
	TOTAL GENERAL PLANT		175,953,143.80	67,594,223		589,808		(742,839)
	TOTAL ELECTRIC PLANT		5,239,111,148.71	2,318,300,954		334,063,675		(59,575,180)

09603-020599

CINCINNATI GAS & ELECTRIC COMPANY - COMMON AND ELECTRIC  
 PERCENTAGE OF BOOK RESERVE ASSOCIATED WITH COST OF REMOVAL AND GROSS SALVAGE  
 AS OF DECEMBER 31, 2002

+ 275,288 step transformers  
 79,062,658 cost of removal ad.  
 12/31/2002 for CG&E  
 generation.

ACCOUNT (1)	SURVIVOR CURVE (2)	ORIGINAL COST (3)	BOOK RESERVE (4)	COST OF REMOVAL PERCENT (5)	COST OF REMOVAL (6)	GROSS SALVAGE PERCENT (7)	GROSS SALVAGE (8)
<b>COMMON PLANT</b>							
1710	STRUCTURES AND IMPROVEMENTS - MAJOR	100-R1	87,291,484.09	19,273,938	0	0	0
1710	STRUCTURES AND IMPROVEMENTS - MINOR	40-R3	3,916,435.25	3,703,724	(5)	176,368	0
<b>TOTAL ACCOUNT 1710</b>			91,207,899.34	22,977,362		176,368	0
1720	OFFICE FURNITURE AND EQUIPMENT	20-SQ	17,292,098.65	7,401,963	0	0	0
1721	OFFICE FURNITURE AND EQUIPMENT - EDP EQUIP.	5-SQ	242,220.24	232,943	0	0	0
1733	TRAILERS	21-L2	270,880.29	77,257	0	0	20 (18,314)
1740	STORES EQUIPMENT	20-SQ	1,082,083.29	585,863	0	0	0
1760	LABORATORY AND TEST EQUIPMENT	15-SQ	15,551.34	10,561	0	0	0
1770	TOOLS, SHOP AND GARAGE EQUIPMENT	25-SQ	1,018,185.85	487,338	0	0	0
1780	COMMUNICATION EQUIPMENT	23-S1.5	7,739,237.78	2,897,822	0	0	0
1790	MISCELLANEOUS EQUIPMENT	15-SQ	68,280.29	58,360	0	0	0
<b>TOTAL COMMON PLANT</b>			118,934,397.07	34,727,469		176,368	(18,314)
<b>STEAM PRODUCTION PLANT</b>							
3010	STRUCTURES AND IMPROVEMENTS - ZIMMER	100-R2.5	304,085,582.69	97,295,616	(3)	2,880,969	2 (1,223,648)
3020	BOILER PLANT - ZIMMER	55-S0.5	583,555,469.17	182,723,232	(1)	1,808,141	0
3040	TURBOGENERATOR UNITS - ZIMMER	55-R2.5	175,131,960.28	59,847,588	(4)	2,370,201	3 (1,777,651)
3050	ACCESSORY ELECTRIC EQUIPMENT - ZIMMER	55-R2.5	159,488,550.19	55,090,915	(1)	545,455	0
3060	MISCELLANEOUS POWER PLANT - ZIMMER	75-R1	28,425,201.48	7,378,287	(2)	148,104	1 (73,062)
3110	STRUCTURES AND IMPROVEMENTS	100-R2.5	185,872,009.10	138,944,378	(5)	6,583,884	1 (1,316,773)
3120	BOILER PLANT	55-S0.5	918,083,375.78	558,567,396	(8)	41,227,215	0
3122	BOILER PLANT - SCRUBBER	35-S2	78,045,088.59	927,692	(5)	44,178	0
3129	BOILER PLANT - RETROFIT PRECIPITATORS	55-S0.5	43,384,973.50	44,719,098	(10)	4,085,373	0
3130	BOILER PLANT - KENTUCKY	55-S0.5	1,883,974.54	969,703	(8)	71,830	0
3140	TURBOGENERATOR UNITS	55-R1.5	313,841,148.24	187,314,122	(7)	12,487,808	2 (3,567,688)
3150	ACCESSORY ELECTRIC EQUIPMENT	55-R2.5	87,725,739.29	68,670,589	(5)	3,174,790	0
3160	MISCELLANEOUS POWER PLANT	75-R1	40,552,630.44	13,865,892	(5)	686,620	1 (133,324)
<b>TOTAL STEAM PRODUCTION PLANT</b>			2,905,875,389.29	1,410,314,284		78,082,346	(8,785,334)
<b>OTHER PRODUCTION PLANT</b>							
3310	STRUCTURES AND IMPROVEMENTS	SQUARE	2,042,798.44	1,753,978	(5)	83,523	0
3310	STRUCTURES AND IMPROVEMENTS - WOODSDALE	SQUARE	33,725,782.31	18,225,771	(15)	2,118,405	0
<b>TOTAL ACCOUNT 3310</b>			35,768,578.75	17,979,747		2,199,928	0
3320	FUEL HOLDERS, PRODUCERS AND ACCESSORIES	SQUARE	2,757,220.63	2,880,225	(5)	137,680	0
3320	FUEL HOLDERS, PRODUCERS AND ACCESSORIES - WOODSDALE	SQUARE	15,484,813.29	8,950,578	(15)	1,167,488	0
<b>TOTAL ACCOUNT 3320</b>			18,241,833.82	11,840,801		1,305,098	0
3330	PRIME MOVERS	SQUARE	28,799,889.51	3,780,883	0	0	0
3340	GENERATORS	70-R2.5	45,065,171.31	39,978,808	0	0	0
3340	GENERATORS - WOODSDALE	70-R2.5	165,773,624.91	73,740,561	0	0	0
<b>TOTAL ACCOUNT 3340</b>			210,838,796.12	113,714,357		0	0

CINCINNATI GAS & ELECTRIC COMPANY - COMMON AND ELECTRIC  
 PERCENTAGE OF BOOK RESERVE ASSOCIATED WITH COST OF REMOVAL AND GROSS SALVAGE  
 AS OF DECEMBER 31, 2002

	ACCOUNT (1)	SURVIVOR CURVE (2)	ORIGINAL COST (3)	BOOK RESERVE (4)	COST OF REMOVAL PERCENT (5)	COST OF REMOVAL (6)	GROSS SALVAGE PERCENT (7)	GROSS SALVAGE (8)
3350	ACCESSORY ELECTRIC EQUIPMENT	55-S0.5	2,510,834.38	2,220,402	0	0	0	0
3350	ACCESSORY ELECTRIC EQUIPMENT - WOODSDALE	55-S0.5	16,911,503.05	8,463,281	0	0	0	0
	TOTAL ACCOUNT 3350		19,431,337.41	10,683,683		0		0
3360	MISCELLANEOUS POWER PLANT EQUIPMENT	30-S3	6,889,329.75	1,429,748	0	0	0	0
3360	MISCELLANEOUS POWER PLANT EQUIPMENT - WOODSDALE	30-S3	3,712,919.59	1,747,373	0	0	0	0
	TOTAL ACCOUNT 3360		10,582,249.34	3,177,119		0		0
	TOTAL OTHER PRODUCTION PLANT		323,662,684.95	161,186,390		① 3,505,024		0
	TRANSMISSION PLANT							
3410	RIGHTS OF WAY	75-R4	23,819,368.85	3,306,183	0	0	0	0
3420	STRUCTURES AND IMPROVEMENTS	75-R3	9,263,138.39	3,376,452	(12)	368,340	2	(61,390)
3430	STATION EQUIPMENT	55-R1	250,660,619.76	69,423,980	(3)	2,082,719	3	(2,082,719)
3440	TOWERS AND FIXTURES	70-R3	37,416,268.50	26,594,723	(25)	5,603,067	5	(1,120,643)
3450	POLES AND FIXTURES	45-R1.5	50,711,038.58	20,219,089	(30)	6,739,898	40	(8,986,262)
3460	OVERHEAD CONDUCTORS AND DEVICES	55-R2	77,693,285.35	41,586,568	(15)	7,338,806	30	(14,577,612)
3470	UNDERGROUND CONDUIT	70-R3	4,739,398.00	2,527,944	0	0	0	0
3480	UNDERGROUND CONDUCTORS AND DEVICES	45-R3	4,389,012.54	1,611,111	(1)	17,901	11	(198,914)
3490	OTHER EQUIPMENT - SSU EQUIPMENT	40-R3	0.00	0	0	0	0	0
	TOTAL TRANSMISSION PLANT		458,692,107.95	168,948,048		22,150,529		(27,125,510)
	DISTRIBUTION PLANT							
3603	RIGHTS OF WAY	75-R4	24,898,442.69	(19,401)	0	0	0	0
3610	STRUCTURES AND IMPROVEMENTS	55-R1.5	4,933,613.00	3,278,529	(10)	268,048	0	0
3620	STATION EQUIPMENT	55-S0.5	185,109,183.83	69,968,617	(8)	5,330,935	3	(1,999,180)
3640	POLES, TOWERS AND FIXTURES	46-R0.5	192,558,703.82	79,515,741	(31)	22,408,982	21	(15,540,278)
3650	OVERHEAD CONDUCTORS AND DEVICES	50-R0.5	240,368,780.82	71,925,492	(13)	8,905,060	3	(5,330,037)
3660	UNDERGROUND CONDUIT	65-R3	81,524,049.00	20,441,553	(40)	5,840,444	0	0
3670	UNDERGROUND CONDUCTORS AND DEVICES	55-R1	174,987,621.50	41,613,551	(10)	3,963,195	5	(1,991,596)
3681	LINE TRANSFORMERS	35-R1	268,179,748.04	95,182,689	(12)	(8,460,883)	2	(23,966,680)
3683	LINE TRANSFORMERS - CUSTOMER	40-O1	4,722,718.81	1,603,717	(2)	35,638	12	(213,629)
3691	SERVICES - UNDERGROUND	60-R1.5	2,194,510.82	1,302,253	(30)	339,718	15	(99,896)
3692	SERVICES - OVERHEAD	45-S0	45,040,555.69	27,748,139	(65)	11,271,869	5	(67,067)
3699	METERS	28-R1.5	71,110,722.08	18,887,685	(0)	0	20	(4,721,916)
3620	LEASED PROPERTY ON CUSTOMER PREMISES	22-L2	102,602.52	(108,637)	(0)	0	0	0
3631	STREET LIGHT - OVERHEAD	27-L0.5	8,983,988.82	8,578,669	(14)	1,143,849	9	(735,332)
3633	STREET LIGHT - BOULEVARD	37-R0.5	12,000,112.10	3,049,825	(5)	162,481	6	(32,481)
3637	STREET LIGHT - CUSTOMER POLES	28-O1	7,687,279.05	3,370,073	(16)	490,182	6	(83,622)
	TOTAL DISTRIBUTION PLANT		1,324,382,610.49	448,336,485		51,719,728		(54,652,199)
	GENERAL PLANT							
3710	STRUCTURES AND IMPROVEMENTS	100-R1	14,465,375.20	7,805,009	(1)	78,267	0	0
3720	OFFICE FURNITURE AND EQUIPMENT	20-SQ	722,365.74	371,116	0	0	0	0
3724	OFFICE FURNITURE AND EQUIPMENT - EDP EQUIP.	5-SQ	518,735.39	53,925	0	0	0	0
3733	TRAILERS	21-L2	2,352,318.27	556,786	0	0	25	(185,595)

09603-020601

ORIGINATI GAS & ELECTRIC COMPANY - COMMON AND ELECTRIC  
 PERCENTAGE OF BOOK RESERVE ASSOCIATED WITH COST OF REMOVAL AND GROSS SALVAGE  
 AS OF DECEMBER 31, 2002

ACCOUNT	SURVIVOR CURVE	ORIGINAL COST	BOOK RESERVE	COST OF REMOVAL PERCENT	COST OF REMOVAL	GROSS SALVAGE PERCENT	GROSS SALVAGE
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
3740 STORES EQUIPMENT	20-SQ	42,890.08	34,600	0	0	0	0
3760 LABORATORY AND TEST EQUIPMENT	15-SQ	3,702,846.78	1,068,565	0	0	0	0
3770 TOOLS, SHOP AND SLAG EQUIPMENT	25-SQ	7,780,286.85	2,218,885	0	0	0	0
3780 COMMUNICATIONS EQUIPMENT	23-S1,5	1,573,026.72	646,781	0	0	0	0
3790 MISCELLANEOUS EQUIPMENT	15-SQ	48,711.57	22,884	0	0	0	0
TOTAL GENERAL PLANT		31,176,298.85	12,778,351		78,287		(188,995)
TOTAL ELECTRIC PLANT		5,182,723,358.30	2,234,290,007		153,712,282		(91,077,858)

Curve shown is historic survivor curve. Each facility in the account is assigned an individual probable refinement year.

09603-020602

LAWRENCEBURG GAS COMPANY

PERCENTAGE OF BOOK RESERVE ASSOCIATED WITH COST OF REMOVAL AND GROSS SALVAGE  
 AS OF DECEMBER 31, 2002

	Account (1)	Survivor Curve (2)	Original Cost (3)	Book Reserve (4)	Cost of Removal Percent (5)	Cost of Removal (6)	Gross Salvage Percent (7)	Gross Salvage (8)
<b>DISTRIBUTION PLANT</b>								
274	Rights of Way - General		117,365.60	17,325	0	0	0	0
2750	Structures and Improvements - General		107,376.20	27,490	(10)	2,499	0	0
<b>MAINS</b>								
2761	Cast Iron, Copper and All Valves		36,371.76	18,906	(30)	4,537	5	(756)
2763	Steel		8,748,244.39	2,999,909	(30)	503,985	5	(89,996)
2763	Plastic		3,701,843.76	455,503	(30)	78,525	5	(15,058)
	Total Mains		12,486,459.91	3,474,318		585,047		(105,812)
2760	M & R - Gen-System - Excl. Elect. Equip.		680,369.30	281,387	(10)	25,581	0	0
2761	M & R - Gen-System - Elect. Equip.		186,631.54	99,902	(10)	9,082	0	0
2763	Measuring and Regulating - Gen-Dist		54,238.03	29,028	(79)	13,104	4	(863)
2763	Measuring and Regulating - City Gate		54,680.47	13,508	(10)	1,228	0	0
<b>SERVICES</b>								
2801	Cast Iron, Copper and All Valves		6,522.97	6,788	(31)	1,619	1	(52)
2801	Steel		947,358.78	472,771	(31)	78,917	1	(2,508)
2803	Plastic		3,105,198.49	988,063	(31)	189,643	1	(5,132)
	Total Services		4,059,080.24	1,467,622		250,179		(7,690)
2810	Meters		798,199.01	174,578	0	0	10	(19,368)
2820	Meter Installations		313,918.33	181,775	(20)	30,298	0	0
2830	House Regulators		394,194.73	78,265	0	0	25	(28,088)
2840	House Regulator Installations		254,923.51	34,949	0	0	10	(3,883)
2850	Industrial Meas & Reg - Sta. Equip.		93,756.71	63,931	(12)	6,974	2	(1,162)
2851	Industrial Meas & Reg - Sta. Eq. - Comm.		13,732.05	7,214	(10)	656	0	0
	Total Distribution Plant		19,594,823.63	5,951,292		924,646		(164,696)
<b>GENERAL PLANT</b>								
2910	Office Furniture and Equipment		7,996.19	2,256	0	0	0	0
2921	Trailers		3,165.75	2,398	0	0	0	0
2940	Tools, Shop and Garage Equipment		129,046.67	72,415	0	0	0	0
2960	Power Operated Equipment		24,202.90	18,320	0	0	0	0
2970	Communication Equipment		45,173.89	25,590	0	0	0	0
	Total General Plant		209,585.40	120,979		0		0
	<b>TOTAL GAS PLANT</b>		<b>19,804,409.03</b>	<b>6,072,272</b>		<b>924,646</b>		<b>(164,696)</b>

CINCINNATI GAS & ELECTRIC COMPANY - GAS  
PERCENTAGE OF BOOK RESERVE ASSOCIATED WITH COST OF REMOVAL AND GROSS SALVAGE  
AS OF DECEMBER 31, 2002

Account	Survivor Curve	Original Cost	Book Reserve	Cost of Removal Percent	Cost of Removal	Gross Salvage Percent	Gross Salvage
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
<b>PRODUCTION PLANT</b>							
Right-of-Way	50-SQ	4,147,12	3,349	0	0	0	0
Structures and Improvements	50-R2.5	3,799,963.03	3,287,952	(10)	293,259	0	0
Liquid Petroleum Gas Equipment	45-R1	4,514,582.32	4,273,118	(7)	245,995	0	(69,900)
Other Equipment	14-L0.5	30,094.62	30,095	0	0	0	0
Total Production Plant		8,348,767.09	7,594,514		539,244		(69,900)
<b>DISTRIBUTION PLANT</b>							
Right-of-Way - General	75-R3	2,178,941.03	213,325	0	0	0	0
Structures and Improvements - General	47-S0.5	813,742.92	422,192	(2)	5,595	0	(5,595)
<b>MAINS</b>							
Gas Iron, Copper and All Valves	45-R2.5	20,559,551.10	19,704,936	(66)	6,175,119	0	(525,956)
Steel	60-R3	220,897,507.50	77,689,144	(66)	25,462,309	0	(2,319,444)
Plastic	50-R3	142,379,020.33	17,598,173	(66)	5,388,595	0	(441,985)
Steel Feeder Lines	60-R3	55,030,300.86	22,579,287	(66)	7,247,837	0	(640,990)
Total Mains		438,866,379.79	137,550,540		44,263,860		(3,926,776)
M & R Gen-System - Excl. Elect. Equip.	39-R0.5	10,605,386.30	1,208,853	(8)	92,103	0	(34,839)
M & R Gen-System - Elect. Equip.	12-S2	2,080,735.66	1,375,103	(5)	65,481	0	0
Messing and Regulating - Gen-Dist	48-S0.5	3,158,844.66	1,442,866	(67)	422,978	0	(15,909)
Messing and Regulating - City Gate	10-L0.5	263,231.94	137,255	0	0	0	0
<b>SERVICES</b>							
Cast Iron, Copper and All Valves	35-R2	13,069,273.88	13,791,182	(27)	2,575,673	0	(116,457)
Steel	40-R1	17,893,694.20	8,211,317	(27)	1,536,980	0	(40,406)
Plastic	42-R2	167,327,910.92	46,244,590	(27)	4,659,919	0	(300,716)
Total Services		198,360,879.00	68,247,089		8,774,572		(456,579)
<b>Meters</b>							
Meter Installations	43-R2	31,815,066.89	7,457,008	(3)	36,884	0	(173,400)
Meter Regulations	43-R3	19,763,909.28	6,599,369	(2)	106,630	0	(50,479)
House Regulators	48-R2	11,085,866.77	1,978,839	(4)	64,385	0	(198,444)
House Regulator Installations	48-R2	8,552,830.62	1,994,620	0	0	0	0
Industrial Meas & Reg - Sta. Equip.	30-R1	2,562,682.66	645,032	(12)	52,570	0	(4,914)
Industrial Meas & Reg - Sta. Eq. - Comm.	30-R1	419,375.31	214,363	(10)	19,488	0	0

0960 D4

CINCINNATI GAS & ELECTRIC COMPANY - GAS  
 PERCENTAGE OF BOOK RESERVE ASSOCIATED WITH COST OF REMOVAL AND GROSS SALVAGE  
 AS OF DECEMBER 31, 2002

Account	Survivor Curve	Original Cost	Book Reserve	Cost of Removal Percent	Cost of Removal	Gross Salvage Percent	Gross Salvage
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
2670 Other Equipment	26-R3	156,572.88	42,287	0	0	0	0
2871 Other Equipment - Street Lighting	38-R1	765,822.28	339,473	(23)	66,096	3	(8,487)
Total Distribution Plant		731,480,270.70	228,868,144		53,958,912		(4,975,185)
<b>GENERAL PLANT</b>							
2800 Structures and Improvements	26-S1	274,744.76	179,834	0	0	0	0
2810 Office Furniture and Equipment	20-SQ	1,234,182.44	315,119	0	0	0	0
2811 Office Furniture and Equipment - Equip Eq.	6-SQ	141,147.15	52,772	0	0	0	0
2820 Transportation Equipment - Autos	10-R3	1,482,725.86	1,481,978	0	0	10	(16,804)
2821 Trailers	12-R2.5	617,955.04	178,486	0	0	25	(4,900)
2840 Tools, Shop and Garage Equipment	25-SQ	6,864,912.19	2,141,481	0	0	0	0
2850 Laboratory and Test Equipment	15-SQ	332,783.49	106,177	0	0	0	0
2860 Polymer Operated Equipment	11-R2.5	584,061.07	382,206	0	0	35	(142,723)
2870 Communication Equipment	13-S2.5	118,431.31	17,981	0	0	0	0
Total General Plant		10,530,933.01	4,855,844		0		(35,187)
TOTAL GAS PLANT		750,359,970.80	242,318,502		54,497,856		(5,298,382)

09603-020605



UNION LIGHT, HEAT AND POWER COMPANY - GAS  
 PERCENTAGE OF BOOK RESERVE ASSOCIATED WITH COST OF REMOVAL AND GROSS SALVAGE  
 AS OF DECEMBER 31, 2002

Account	Survivor Curve	Original Cost	Book Reserve	Cost of Removal Percent	Cost of Removal	Gross Salvage Percent	Gross Salvage
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
<b>PRODUCTION PLANT</b>							
2203 Rights of Way	50-SQ	24,438.55	24,439	0	0	0	0
2211 Structures and Improvements	45-R3	1,413,005.63	1,368,602	(10)	124,418	0	0
2280 Liquid Petroleum Gas Equipment	35-S1.5	2,821,288.88	1,796,327	(6)	96,822	1	(17,108)
Total Production Plant		4,258,733.06	3,189,368		221,240		(17,108)
<b>DISTRIBUTION PLANT</b>							
2503 Rights of Way - General	65-R4	1,020,156.20	418,183	0	0	0	0
2505 Rights of Way - Feeder Lines	65-R4	8,228.92	0	0	0	0	0
2510 Structures and Improvements - General	45-R3	126,984.32	117,419	(10)	10,674	0	0
2520 M & R - Gen-System - Elect. Equip.	15-S2.5	371,004.91	321,924	(6)	18,396	1	(3,066)
2522 M & R - Gen-System - Excl. Elect. Equip.	35-R1	2,589,856.88	1,427,292	(7)	29,881	2	(7,193)
2523 Measuring and Regulating - Gen-Dist	50-S0.5	590,592.75	485,730	(78)	156,340	3	(3,880)
2524 Industrial Meas & Reg - Sta. Equip.	25-R2	413,128.38	181,705	(13)	9,961	3	(2,609)
2525 Industrial Meas & Reg - Sta. Eq. - Comm.	25-R2	41,727.01	22,001	(12)	2,400	2	(400)
<b>MAINS</b>							
2531 Cast Iron, Copper and All Valves	41-R2.5	2,810,050.71	2,454,656	(27)	488,308	7	(124,191)
2532 Steel	50-R2	63,888,978.82	21,994,316	(27)	3,233,758	7	(627,185)
2533 Plastic	50-R2.5	47,448,543.04	4,948,413	(27)	984,186	7	(196,596)
2537 Steel - Feeder Lines	50-R2	17,684,480.55	9,225,087	(27)	1,818,178	7	(378,879)
Total Mains		131,832,053.12	38,622,452		6,524,430		(1,326,851)
<b>SERVICES</b>							
2561 Cast Iron, Copper and Valves	33-R0.5	2,854,189.83	3,427,482	(36)	821,380	6	(134,079)
2562 Steel	36-R1	3,257,392.38	2,334,299	(36)	532,881	6	(88,686)
2563 Plastic	45-R1	46,186,701.15	17,171,280	(36)	3,206,681	6	(756,443)
Total Services		52,248,223.36	22,933,061		4,560,942		(979,208)

09603-020606

UNION LIGHT, HEAT AND POWER COMPANY - GAS

PERCENTAGE OF BOOK RESERVE ASSOCIATED WITH COST OF REMOVAL AND GROSS SALVAGE  
 AS OF DECEMBER 31, 2002

Account (1)	Survivor Curve (2)	Original Cost (3)	Book Reserve (4)	Cost of Removal Percent (5)	Cost of Removal (6)	Gross Salvage Percent (7)	Gross Salvage (8)	
2601	Meters	34-R3	9,217,400.73	2,005,031	(2)	29,085	17	(183,347)
2602	Meter Installations	34-R3	5,926,170.34	1,126,407	0	0	0	0
2603	House Regulators	39-R1.5	2,490,931.88	412,238	(3)	10,320	33	(132,237)
2605	House Regulator Installations	39-R1.5	1,752,691.24	364,355	(1)	2,943	1	(1,718)
2630	Other Equipment - Street Lighting	30-S2.5	30,411.24	5,756	0	0	0	0
2640	Other Equipment	20-R2	86,636.93	22,975	0	0	0	0
<b>Total Distribution Plant</b>			<b>208,746,198.21</b>	<b>68,446,529</b>		<b>11,355,372</b>		<b>(2,640,540)</b>
<b>GENERAL PLANT</b>								
2720	Office Furniture and Equipment	20-SQ	21,861.24	11,069	0	0	0	0
2731	Autos and Trucks	10-R2.5	111,957.85	112,173	0	0	0	0
2732	Power Operated Equipment	12-R3	74,870.59	74,871	0	0	0	0
2733	Trailers	15-SQ	96,157.81	49,414	0	0	0	0
2770	Tools, Shop and Garage Equipment	25-SQ	1,801,315.97	739,307	0	0	0	0
2790	Miscellaneous Equipment	20-SQ	18,430.11	18,430	0	0	0	0
<b>Total General Plant</b>			<b>2,124,593.57</b>	<b>1,005,264</b>		<b>0</b>		<b>0</b>
<b>Total Gas Plant</b>			<b>215,129,524.84</b>	<b>72,641,161</b>		<b>11,576,612</b>		<b>(2,657,657)</b>

UNION LIGHT, HEAT AND POWER COMPANY - COMMON AND ELECTRIC

PERCENTAGE OF BOOK RESERVE ASSOCIATED WITH COST OF REMOVAL AND GROSS SALVAGE  
 AS OF DECEMBER 31, 2002

ACCOUNT	SURVIVOR CURVE	ORIGINAL COST	BOOK RESERVE	COST OF REMOVAL PERCENT	COST OF REMOVAL	GROSS SALVAGE PERCENT	GROSS SALVAGE
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
<b>COMMON PLANT</b>							
1710	STRUCTURES AND IMPROVEMENTS - MAJOR	100-R1	8,399,783.58	3,170,955	(2)	62,178	0
1720	OFFICE FURNITURE AND EQUIPMENT	20-SQ	678,614.57	387,780	0	0	0
1721	OFFICE FURNITURE AND EQUIPMENT - EDP EQUIP.	6-SQ	12,981.20	12,880	0	0	0
1740	STORES EQUIPMENT	20-SQ	6,562.77	(24,080)	0	0	0
1770	TOOLS, SHOP AND GARAGE EQUIPMENT	25-SQ	160,057.28	77,366	0	0	0
1780	MISCELLANEOUS EQUIPMENT	15-SQ	19,735.23	14,804	0	0	0
	<b>TOTAL COMMON PLANT</b>		<b>9,278,934.63</b>	<b>3,638,805</b>		<b>62,178</b>	
<b>TRANSMISSION PLANT</b>							
3401	LAND	NONDEPRECIABLE	519,072.60				
3403	RIGHTS OF WAY	75-R4	905,970.01	418,463	0	0	0
3420	STRUCTURES AND IMPROVEMENTS	75-R3	483,676.51	397,274	(10)	36,116	0
3430	STATION EQUIPMENT	55-R1	7,827,122.49	3,116,090	(3)	93,483	3 (93,483)
3450	POLES AND FIXTURES	45-R1.5	4,352,217.28	2,598,535	(30)	808,325	40 (182,843)
3460	OVERHEAD CONDUCTORS AND DEVICES	55-R2	3,804,019.39	1,992,891	(18)	281,250	30 (407,193)
	<b>TOTAL TRANSMISSION PLANT</b>		<b>17,892,278.28</b>	<b>6,523,243</b>		<b>1,017,274</b>	<b>(693,617)</b>
<b>DISTRIBUTION PLANT</b>							
3501	LAND	NONDEPRECIABLE	656,392.97				
3503	RIGHTS OF WAY	75-R4	4,459,567.38	1,957,677	0	0	0
3510	STRUCTURES AND IMPROVEMENTS	55-R1.5	202,429.64	184,920	(10)	17,720	0
3520	STATION EQUIPMENT	55-S0.5	26,180,770.85	6,813,281	(5)	340,663	5 (340,663)
3540	POLES, TOWERS AND FIXTURES	45-R0.5	38,838,283.51	14,496,400	(30)	2,571,538	15 (1,807,210)
3550	OVERHEAD CONDUCTORS AND DEVICES	50-R0.5	51,016,242.82	25,935,632	(44)	4,740,236	14 (2,262,366)
3560	UNDERGROUND CONDUIT	65-R3	12,435,082.37	2,025,985	(45)	455,848	5 (72,357)
3570	UNDERGROUND CONDUCTORS AND DEVICES	55-R1	29,817,190.34	5,528,480	(33)	1,091,439	15 (665,720)
3581	LINE TRANSFORMERS	35-R1	43,671,438.21	18,620,806	(13)	2,571,669	33 (5,299,943)
3583	LINE TRANSFORMERS - CUSTOMER	40-O1	273,660.52	273,661	(2)	5,761	7 (20,160)
3591	SERVICES - UNDERGROUND	60-R1.5	178,756.29	131,334	(35)	36,774	10 (10,507)
3592	SERVICES - OVERHEAD	45-S0	9,191,391.55	7,119,832	(68)	1,416,065	3 (323,944)
3600	METERS	26-R1.5	13,643,327.66	2,794,448	(1)	32,576	16 (436,592)
3620	LEASED PROPERTY ON CUSTOMER PREMISES	22-L2	9,647.36	9,648	0	0	0
3631	STREET LIGHT - OVERHEAD	27-L0.5	2,407,929.93	2,342,397	(15)	279,723	12 (242,852)
3633	STREET LIGHT - BOULEVARD	37-R0.5	2,352,113.06	946,476	(4)	42,021	14 (132,073)
3637	STREET LIGHT - CUSTOMER POLES	26-O1	1,464,548.76	1,374,029	(30)	239,830	20 (187,367)
	<b>TOTAL DISTRIBUTION PLANT</b>		<b>236,568,733.20</b>	<b>90,881,766</b>		<b>13,842,519</b>	<b>(11,631,617)</b>

09804-020608

**UNION LIGHT, HEAT AND POWER COMPANY - COMMON AND ELECTRIC**  
**PERCENTAGE OF BOOK RESERVE ASSOCIATED WITH COST OF REMOVAL AND GROSS SALVAGE**  
**AS OF DECEMBER 31, 2002**

	ACCOUNT (1)	SURVIVOR CURVE (2)	ORIGINAL COST (3)	BOOK RESERVE (4)	COST OF REMOVAL PERCENT (5)	COST OF REMOVAL (6)	GROSS SALVAGE PERCENT (7)	GROSS SALVAGE (8)
<b>GENERAL PLANT</b>								
3710	STRUCTURES AND IMPROVEMENTS - MINOR	40-R3	39,189.75	18,408	(5)	781	0	0
3720	OFFICE FURNITURE AND EQUIPMENT	20-SQ	48,575.99	23,836	0	0	0	0
3733	TRAILERS	21-L2	103,992.88	33,252	0	0	20	(6,882)
3770	TOOLS, SHOP AND GARAGE EQUIPMENT	25-SQ	478,643.19	178,937	0	0	0	0
5780	COMMUNICATION EQUIPMENT	23-S1.5	84,462.78	52,932	0	0	0	0
	<b>TOTAL GENERAL PLANT</b>		<u>752,864.27</u>	<u>303,165</u>		<u>781</u>		<u>(6,882)</u>
	<b>TOTAL ELECTRIC AND COMMON PLANT</b>		<u>284,520,810.38</u>	<u>103,127,999</u>		<u>14,922,750</u>		<u>(12,332,118)</u>

\* Curve shown is interim survivor curve. Each facility in the account is assigned an individual probable retirement year.



**Welles, Sarah**

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**From:** Laub, Peggy  
**Sent:** Friday, July 01, 2005 9:52 AM  
**To:** Melendez, Brenda; Glenn, Erica; Sheppard, Amy  
**Subject:** FW: ARO White Paper - Final Review  
**Follow Up Flag:** Follow up  
**Due By:** Friday, July 08, 2005 1:00 AM  
**Flag Status:** Red  
**Attachments:** FIN 47 Whitepaper\_063005.doc

FYI

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**From:** Allen, Doug [mailto:DAllen@aga.org]  
**Sent:** Friday, July 01, 2005 9:35 AM  
**To:** Rocha, Alina; Breyer, Anne; McFarland, Annette; Reese, Mary Beth.; Mincer, Betty; Ross, Bill; Fitzpatrick, Brian; Little, Brian; Bollert, Bruce; Shrein, Carol; Perron, Carole; Schwartz, Cathy; Ralston, Denise; Mistry, Dinyar; Allen, Doug; Capomacchio, Edward; Mendel, Elena; Stanbrough, Frank; Sciallo, Gregory A.; Heiner, Gregory; Geisenheimer, Howard; Timmerman, Jack L.; Hackbarth, James; Davis, James A.; Dore, Jay; Oakes, Jeanne; Heinrichs, Jeffrey; Vineyard, Jerry; Janow, Jerry; Keith, John V.; Brown, John; Croshier, Joseph; Golden, Joseph; Syta, Joseph J.; White, Kathy; Menge, Ken; Poore, Lawrence; Delozier Jr, Leonard A.; Perkett, Lisa H.; Dabello, Lisa; Patton, Lon; Sicotte, Luc; Morrison, Margaret; Walker, Mark; Cresalia, Marty; Clausen, Pamela R.; Fitzgerald, Patrick; Davenport, Patrick; Baird, Paul; Laub, Peggy; Cappiello, Peter; Berger, Richard; Kriner, Robert G.; Harrington, Sabra; Loreda, San Juanita; Jennings, Scott; Madison, Scott; Maggard, Stephanie; Warsinske, Steven W.; Cushman, Steven W.; Stringer, Susan; Lassiter, Wayne; Fleming, Terrence; Greenberg, Thomas; Cox, Thomas; Baglini, Thomas; Cranford, William L.  
**Cc:** Martin, Joe; David Stringfellow (E-mail)  
**Subject:** ARO White Paper - Final Review

Here is the latest draft of the ARO white paper after comments were received from the committee and sent back to the task force for a final review. Most of the revisions were minor but the discussion on subsequent accounting for indeterminate AROs under the effective date section was changed substantially.

This white paper should be in its final form but we're submitting it for a few days of final high-level review. Please submit your comments to Lisa Perkett at [lisa.h.perkett@xcelenergy.com](mailto:lisa.h.perkett@xcelenergy.com) and Doug Allen at [dallen@aga.org](mailto:dallen@aga.org) by noon on Friday, July 8<sup>th</sup>.

After this final go-round, we will prepare the document for final review and approval by the top committees at AGA and EEI.

Thank you.

*Doug*

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8/17/2006



***DRAFT***  
***FASB Interpretation No. 47***  
***Accounting for Conditional Asset Retirement Obligations***  
***An Industry White Paper***

<i>Introduction</i> .....	<i>1</i>
<i>Reasons for an Interpretation</i> .....	<i>3</i>
<i>Sufficient Information</i> .....	<i>3</i>
<i>Change in the Way Disposal is Viewed</i> .....	<i>4</i>
<i>Date of Obligating Event</i> .....	<i>6</i>
<i>Indefinite Life</i> .....	<i>7</i>
<i>Materiality</i> .....	<i>8</i>
<i>Decision Tree</i> .....	<i>9</i>
<i>Specific Property Considerations</i> .....	<i>12</i>
<i>Mass Assets, Electric and Gas</i> .....	<i>12</i>
<i>Minor Items</i> .....	<i>19</i>
<i>Asbestos, PCBs, and Other Contaminants</i> .....	<i>20</i>
<i>Rights-of-Way and Franchises</i> .....	<i>24</i>
<i>General Property</i> .....	<i>26</i>
<i>Hydro Generation</i> .....	<i>28</i>
<i>Overall Recommendation</i> .....	<i>29</i>
<i>Effective Date</i> .....	<i>30</i>

***Introduction***

“This Interpretation clarifies that the term *conditional asset retirement* obligation as used in FASB Statement No. 143, *Accounting for Asset Retirement Obligations*, refers to a legal obligation to perform the asset retirement activity in which the timing and (or) method of settlement are conditional on a future event

that may or may not be within the control of the entity. The obligation to perform the asset retirement activity is unconditional even though uncertainty exists about the timing and (or) method of settlement. Thus, the timing and (or) method of settlement may be conditional on a future event.”

This white paper has been written with an eye toward the Electric and Gas utility business. It is intended to assist one in doing the investigation and review necessary to properly recognize and disclose any new asset retirement obligations resulting from the adoption of this Interpretation. Each company will need to work through their particular issues and review all assumptions with their legal staff to assure proper representation of this topic. At first glance, this Interpretation can appear overwhelming. But one needs to approach this in a thoughtful and reasonable manner that represents the intent and purpose of the Interpretation without getting so lost in the details that the accounting becomes impossible to maintain within a cost effective manner. Without careful thought to the intent and the process to achieve it, the accounting for this Interpretation may not be manageable as the issue moves throughout time.

Another white paper was prepared by EEI and AGA shortly after SFAS 143 was issued. This white paper is supplemental to that earlier one. The following terms and acronyms are used throughout this document.

<u>Term or Acronym</u>	<u>Description</u>
ARC	Asset Retirement Cost (Plant Asset)
ARO	Asset Retirement Obligations
FERC Order 631	Accounting, Financial Reporting, and Rate Filing Docket No. RM02-7-000, <i>Requirements for Asset Retirement Obligations</i>
FERC Order 552	Revision to Uniform Systems of Accounts to Account for Allowances under the Clean Air Act Amendments of 1990 and Regulatory-Created Assets and Liabilities and to Form Nos. 1, 1-F, 2 and 2-A
FIN 47 or Interpretation	FASB Interpretation No. 47, <i>Accounting for Conditional Asset Retirement Obligations</i>
FSP	FASB Statement of Position
SAB 99	SEC Staff Accounting Bulletin No. 99, <i>Materiality</i>
SFAS 71	FASB Statement No. 71, <i>Accounting for the Effects of Certain Types of Regulation</i>
SFAS 143	FASB Statement No. 143, <i>Accounting for Asset Retirement Obligations</i>



### ***Reasons for an Interpretation***

Diverse accounting practices have been developed with respect to the timing of liability recognition for legal obligations associated with the retirement of a tangible long-lived asset when the timing and (or) method of settlement of the obligation are conditional on a future event. For example, some entities have recognized the fair value of the obligation prior to the retirement of the asset with the uncertainty about the timing and (or) method of settlement incorporated into the liability's fair value. Other entities, however, have recognized the fair value of the obligation only when it is probable the asset will be retired as of a specified date using a specified method or when the asset is actually retired.

The Interpretation clarifies that an entity is required to recognize a liability for the fair value of a conditional ARO when incurred if the liability's fair value can be reasonably estimated. The Interpretation clarifies when an entity would have sufficient information to reasonably estimate the fair value of the ARO. This clarification should improve the relevance, reliability, and comparability of the amounts recognized in the financial statements.

The FASB believes application of the Interpretation will result in a more consistent recognition of liabilities relating to AROs, in more information about expected future cash outflows associated with those obligations, and in more information about investments in long-lived assets because additional asset retirement costs will be recognized as part of the carrying amounts of the assets. At the January 26, 2005 meeting, the FASB addressed a request to reconsider the entire concept of recording AROs (see FASB Board minutes at [www.fasb.org/board\\_meeting\\_minutes/board\\_meeting\\_minutes.shtml](http://www.fasb.org/board_meeting_minutes/board_meeting_minutes.shtml)). This discussion provides significant insight to the FASB's expectations and considerable support for the role of management's judgment and reasonableness in the recognition of AROs. In summary, the FASB essentially establishes what disclosure is expected whenever there is an ARO while also narrowing the circumstances in which the measurement could be avoided.

### ***Sufficient Information***

In SFAS 143, the term *retirement* is defined as the other-than-temporary removal of a long-lived asset from service. The term *retirement* encompasses sale, abandonment, recycling, or disposal in some other manner. The term does not encompass the temporary idling of a long-lived asset.

- “If an entity has sufficient information to reasonably estimate the fair value of an asset retirement obligation, it must recognize a liability at the time the liability is incurred. An asset retirement obligation would be reasonably estimable if (a) it is evident that the fair value of the obligation is embodied in the acquisition price of the asset, (b) an active market exists for the transfer of the obligation, or (c) sufficient information exists to apply an expected present value technique.” This is from paragraph 4 of the Interpretation.
- The Interpretation states that when the method of settlement and settlement date have been specified by others such as in a law, regulation or contract, the entity has sufficient information to apply an expected present value technique. Therefore the ARO would be reasonably estimable and a liability must be recorded. The only uncertainty in these situations is whether performance will be required.

From paragraph 5a, “uncertainty about whether performance will be required does not defer the recognition of an asset retirement obligation because a legal obligation to stand ready to perform the retirement activities still exists”, and that uncertainty does not prevent the determination of a reasonable estimate of fair value. There are two possible outcomes in situations in which the only uncertainty is whether performance will be required—the entity will be required to perform or the entity will not be required to perform.

If there is no information about which outcome is more probable, paragraph A23 of SFAS 143 requires 50 percent likelihood for each outcome to be used until additional information is available. In certain cases, determining the settlement date for the obligation that has been specified by others is a matter of judgment that depends on the relevant facts and circumstances.

- In situations where the date and method of settlement are not specified by others, if information is available to reasonably estimate (1) the settlement date or the range of potential settlement dates, (2) the method of settlement or potential methods of settlement and (3) the probabilities associated with the potential settlement dates and potential methods of settlement, the FASB believes sufficient information is present to apply an expected present value technique. Therefore, the ARO would be reasonably estimable and a liability must be recorded.

Information that is derived from an entity’s past practice, industry practice, and management’s intent can provide a basis for estimating the potential methods of settlement. Entities must take into account only the methods of settling the obligation that are currently available to the entity.

The ability of an entity to indefinitely defer settlement of an ARO does not relieve the entity of the obligation. Implicit in this conclusion is the belief that no tangible asset will last forever (except land) and, accordingly, the asset retirement activities will eventually be performed. Furthermore, the ability of an entity to sell the asset prior to its disposal does not relieve the entity of its present duty or responsibility to settle the obligation. The sale would cause the buyer to assume the obligation, in turn affecting the sales price.

### *Change in the Way Disposal is Viewed*

The FASB believes that if a current law, regulation, or contract requires an entity to perform an asset retirement activity; there is an unambiguous requirement to perform the retirement activity even if that activity can be indefinitely deferred. As noted above, no tangible asset will last forever (except land) and, accordingly, the asset retirement activities will eventually be performed. Therefore, the obligation to perform the asset retirement activity is unconditional even though uncertainty exists about the timing and (or) method of settlement.

- A law or entity’s promise may create a duty or responsibility, but that law or promise in and of itself may not be the obligating event that results in an entity having little or no discretion to avoid a future transfer or use of assets.
- SFAS 143 states that the obligating event is the acquisition, construction, or development and (or) the normal operation of the long-lived asset when a law or promise exists that creates a

duty or responsibility relating to the retirement of the asset. At this point, the obligation cannot be realistically avoided if the asset is operated for its intended use.

All companies are subject to federal and state solid waste disposal requirements for non-hazardous materials and refuse<sup>1</sup>. These laws require such materials to be disposed in a licensed public landfill with other household garbage. Although there is no legal obligation to retire assets under these solid waste laws, these retired and dismantled assets must be transported to licensed public landfills. Companies regularly incur monthly expenses for use of these public landfills for disposal of non-hazardous materials and refuse (i.e. garbage) which in most cases would cover disposal of non-hazardous retired assets.

The scope of SFAS 143 and FIN 47 focuses on “special” requirements for disposal of retired assets that would add incremental costs to the retirement of those assets above what a company expenses monthly for non-hazardous material and refuse disposal. This is evidenced by the reference to “special” requirements in the examples to FIN 47 and the proposed FSP on SFAS 143 relating to the European Union (EU) Directive on Waste Electrical and Electronic Equipment that requires EU members to adopt legislation for environmentally sound disposal of electrical and electronic waste equipment.

This white paper assumes that even though some legal obligation may exist to dispose of non-hazardous materials and refuse resulting from retirements of fixed assets, the disposal costs for non-hazardous materials and refuse may be inconsequential for many assets and may not add significant incremental costs to the asset retirement activities. A company may decide that there is not a legal obligation for removal whereby an asset is disposed within the cost boundaries of the standard garbage fees and only incremental charges above this standard may constitute a removal obligation. Moreover, the incremental charge associated with additional service may be considered part of the standard costs. To illustrate this analysis with an example, consider the following removal activities typical for a treated and a non-treated pole:

**Pole Removal Example**

	Non- treated	Treated
1. Labor to removal the pole and haul it to the yard	\$75	\$75
2. Grinding the pole into small pieces (not required by regular landfill)	0	10
3. Transporting the pole to the landfill	15	15
4. Landfill Fees	10	40

The costs to remove and transport the pole, for both types of pole, would not be considered an ARO in this example. The landfill fees for the treated pole would be considered an ARO, but one would need to determine if the incremental cost would be the ARO basis or would one use the total cost. If the landfill accepting the treated pole is different than the one accepting the non-treated pole, the total cost would be used and if the same facility then the incremental would be applicable. Lastly, the cost to grind the pole would be considered part of the ARO, as this cost is not incurred for non-treated poles.

<sup>1</sup> These rules federal and state regulations are governed under Subtitle D of the Resource Conservation and Recovery Act. Subtitle D regulates garbage, refuse, sludge from waste treatment plants, non-hazardous industrial waste and other discard materials including solid, semi-solid and liquid materials resulting form commercial and industrial activities (e.g. demolition debris, mining waste, oil & gas waste).

As always, a full review of the company position on this issue is paramount to defining the magnitude of potential AROs. Each company needs to decide if these laws constitute a legal obligation in respect to the SFAS 143 and the Interpretation. In instances where the legal requirement relates only to the disposal of the asset subject to the ARO, the cost to remove the asset is not included in the ARO. However, if there were a legal requirement to remove the asset, the cost of removal would be included.

### *Date of Obligating Event*

There has been some discussion around when the obligating event occurs. Quickly, most would point to the in-service date of the asset if a law, regulation, or contract creating the obligation was in place before the in-service date. Similarly, one would choose the date the law, regulation, or contract created the obligation if it came to be after the in-service date. However, SFAS 143 refers to obligations that “result from the acquisition, construction, or development and (or) the normal operation of the long-lived asset”. One could question if this infers the purchase of material during the construction process or to inventory. Whereby, the company may have incurred a legal obligation before the in-service date of the asset. Timing of the recognition of the ARO, as discussed in paragraphs 3-10 and B32-B41 of SFAS 143, is when all the following criteria are met:

- The obligation meets the definition of a liability in paragraph 35 of Concepts Statement 6.
- A future transfer of assets associated with the obligation is probable.
- The amount of the liability can be reasonably estimated.

During construction of long-lived assets, such as a steam generating plant, legal obligations to eventually retire the plant may be incurred and measurement of those obligations may be prudent during the construction phase. It is important to remember that the obligating event has to have already happened to create a liability. In the case of a nuclear power facility, the obligation to remove the facility may not exist until the facility is operated and contamination occurs. Thus, the contamination constitutes the obligating event. Along with these two instances provided, work performed on leased property also may create a legal obligation during the construction phase. Furthermore, the amount of the liability may grow in subsequent periods as the construction of the asset continues. These changes in the amount of the original estimate may need to be recognized as an increase in the carrying amount of the liability.

Another example may be a treated pole purchased to inventory. One could argue that the obligating event has occurred at the purchase of the pole even though it is held for a time in the inventory account before moving through construction work in progress to plant in-service. The assumption presupposes that the manufacturer treated the pole before the company purchased it. The scenario would change if the company treats its poles itself. This component can add more complexity to an already multifarious process.

The definition for the obligating date needs to be fully thought out and clear as to the materiality of and the ability to recognize the obligation before the in-service date. One may likely conclude that the obligation will be flagged during construction or when in inventory only for those exceptionally large items. Otherwise, the in-service date will prevail. For any decision, either for this section or for others

throughout this document, one needs to assure that it is legally reviewed and representative of management's judgment as to the correct application of the Interpretation and SFAS 143.

### *Indefinite Life*

FIN 47 does not eliminate the recognition of an indefinite life, but rather distinguishes uncertainty from indefinite. The first sentence in paragraph B22 of the Interpretation provides specific guidance in three clauses where FASB considers an ARO is reasonably estimable, "if information is available":

1. "To estimate the settlement date or the range of potential settlement dates,"
2. "The method of settlement or potential methods of settlement," *and (emphasis added)*.
3. "The probabilities associated with potential settlement dates and methods of settlement."

The third clause would seem to imply that the **probable** service lives and estimated net salvage developed from utility depreciation studies could lead to the conclusion that an ARO is reasonably estimable. Paragraph B19 through B27 also provided more specific language than originally addressed in SFAS 143, which substantially narrowed the circumstance that would lead to a conclusion that an ARO is not estimable.

The current utility industry position, prior to the release of this Interpretation, is that a company cannot calculate an ARO for the ultimate retirement of its distribution and transmission **systems** because each system has an indefinite life. A depreciation study develops probabilities of life and net salvage for a large group of similar assets, and that many cycles of replacements occur to the group or system. An example of the distinction between a "group of similar assets" versus a "system"; a power line or gas line between two points will probably have multiple retirements and replacement additions (items in a group), particularly if a portion of the line is moved for any reason, but the line itself generally continues long afterwards (as a system). In addition, it is part of a larger group of assets when life analysis is done; all similar power lines or gas lines are considered together. In other words, the probable lives in a depreciation study are on the interim retirements and additions to the line, and not representative of the probable life of the line (or the system). Further, it has been suggested that retirement of the **system** would invoke other accounting pronouncement governing status as an ongoing entity, impairment of an asset, or accounting for discontinued operations.

Accordingly, sufficient information may not be available to reasonably estimate the ARO liability on the ultimate retirement of transmission or distribution property. The industry also does not believe that an ARO should be calculated for such interim retirements when there is not an obligation for that specific interim retirement or when a company cannot reasonable estimate when a specific interim retirement with an obligation would take place. The third characteristic of a liability is that the transaction or other event obligating the entity has already happened. One does not know what portion of a distribution or transmission system will be retired until an event such as a gas leak, storm damage, or a road widening requires work on the asset, making it difficult to estimate the costs and timing. This generally is corrected or recorded in the same accounting period so no liability would be accrued.

However, FIN 47 provides further interpretation of FAS 143 that may require a reassessment of the indefinite life concept. Example 1 specifically addresses this mass asset system versus individual asset

contrast and clearly attempts to close the loophole that a system has an infinite life, therefore no ARO can be measured. FIN 47 requires that the fair value of an ARO be recognized when it can be reasonably estimated. It also clarifies when an entity would have sufficient information to reasonably estimate the fair value of an ARO. For some utilities, data derived from their most current depreciation study possibly could be a potential source to provide information to calculate an estimated ARO for distribution and transmission assets that constitute an entire system. This data is used to recover property costs (including removal cost) for regulatory purposes and also may serve as a platform for calculating the expected ARO liability. Depreciation study data is used in the Snapshot example within the Mass Assets, Electric and Gas section of this paper.

An argument also can be made that depreciation study data does not provide sufficient information to estimate a reasonable ARO liability. Depreciation data is utilized to provide for matching of existing property cost with the customer benefiting from that property cost. It is not designed, in concept, to provide an estimated liability for the permanent removal of the entire distribution and transmission system. The assumption is the entity will continue to be a going concern. As such, depreciation study data may need to be used cautiously as it may not be an appropriate mechanism to use when calculating all ARO liabilities. Discarding the depreciation study data, no data may be available to reasonably estimate the ARO liability.

Given this quandary, the indefinite life concept currently used by most utilities may continue in effect for the ultimate retirement of the system, but the individual assets comprising the system may not have indefinite life. Again, it was very clear that a “do nothing” scenario might not be a defensible position and that material obligations should be recognized or disclosed if a legal retirement obligation applies to the interim retirement of a system and the timing and method of settlement can be reasonably estimated. Any conclusion needs to be supported with full documentation and justification for the indefinite life choice and should be disclosed.

### ***Materiality***

FIN 47 clearly states, “The provisions of this Interpretation need not be applied to immaterial items.” However, many immaterial items may constitute, in aggregate, a material item. Determination of materiality is company specific and often an issue-specific routine. It should be defined and documented for each segment of the business. Along with the materiality threshold, a company should define the way in which assets will be summed to test materiality. It is assumed that the test will be for balance sheet materiality, as most utilities will offset any income statement effect with regulatory accounting. When the ARO does impact the income statement, an income statement materiality test may be used. For example, one must decide if distribution assets will be combined with nuclear assets in determining materiality. Perhaps a company will sum all asset obligations relative to a segment of the utility business keeping the nuclear AROs separate from the distribution calculation. Defining the materiality test to a lower level than function should be a decision based on propriety and not with the intent of avoiding this Interpretation. Additional guidance on materiality can be found in the Securities and Exchange Commission’s SAB No. 99.

For those companies that have more than one legal entity, the materiality should be done at the individual legal entity and not at the consolidated level. Now, one legal entity may have an ARO and another may not for the same class of assets because of the variety in the rules and regulation as well as the difference

in size of the companies. This white paper does not advocate a consolidated materiality review of AROs where multiple legal entities exist within the corporation. The obligation is clearly the responsibility of the originating legal entity and it should be maintained at that level. However, the disclosures may be more detailed on the utility reports and summarized at the parent level.

### *Decision Tree*

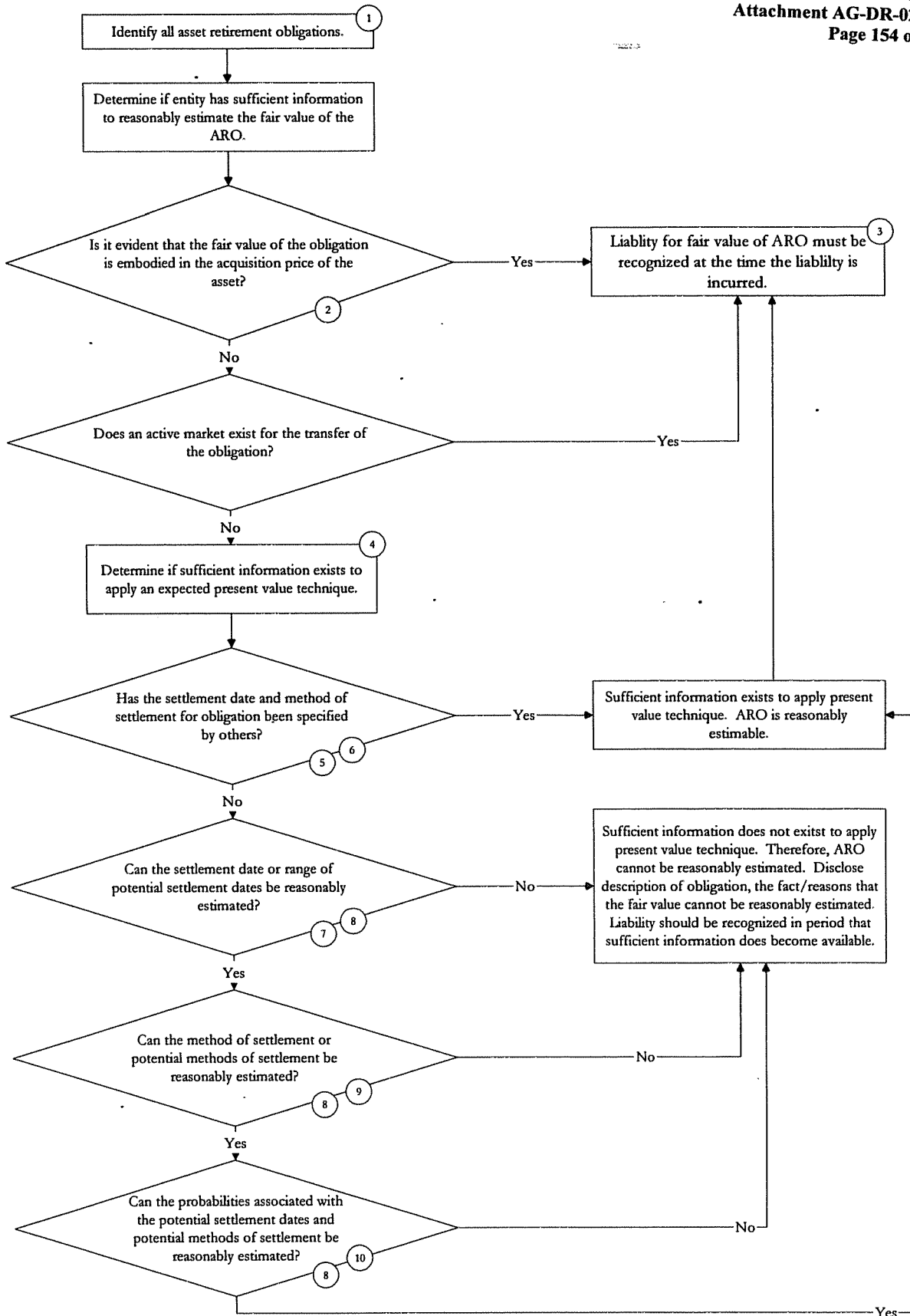
In general, a more substantive review of regulations, laws, and contract obligations will be required to assure that conditional AROs are properly recognized. Each company will need to assess its particular facts and circumstances as the same general situation may play out differently depending on the legal documents and company policies that surround it. To help facilitate this review, a decision tree for analyzing each situation is provided below.

### Decision Tree Notes

1. Paragraph 3 of FIN 47 advises to include all legal obligations to perform an asset retirement activity, even those in which the timing and (or) method of settlement are conditional on a future event that may or may not be within the control of the entity. The obligation to perform the asset retirement activity is unconditional even though uncertainty exists about the timing and (or) method of settlement.  
  
Paragraph B7 of the Interpretation states, "As used in Statement 143, a legal obligation is an obligation that a party is required to settle as a result of an existing or enacted law, statute, ordinance, or written or oral contract or by legal construction of a contract under the doctrine of promissory estoppel."
2. Paragraph 4 of the Interpretation references paragraph 17 of FASB Concepts Statement No. 7, *Using Cash Flow Information and Present Value in Accounting Measurements*, which states, "If a price for an asset or liability or an essentially similar asset or liability can be observed in the marketplace, there is no need to use present value measurements. The marketplace assessment of present value is already embodied in such prices."
3. Paragraph 3 of the Interpretation reiterates the SFAS 143 requirement that the fair value of an asset retirement obligation be recognized when the obligation is incurred—generally upon acquisition, construction, or development and (or) through the normal operation of the asset.
4. Present value techniques are discussed in paragraphs 39–54 and 75–88 of Concepts Statement 7. These techniques, which incorporate uncertainty about the timing and method of settlement into the fair value measurement, should be used when the fair value of the liability cannot be estimated based on the acquisition price or on an observable market price.
5. For example, specified in a law, regulation or contract (Paragraph 5a of the Interpretation).

**Decision Tree**

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 154 of 286





**Decision Tree Notes Continued:**

6. Paragraph 5a of the Interpretation states that uncertainty about whether performance will be required does **not** defer the recognition of an asset retirement obligation because a legal obligation to stand ready to perform the retirement activities still exists, and it does not prevent the determination of a reasonable estimate of fair value because the only uncertainty is whether performance will be required.

There are two possible outcomes in situations in which the only uncertainty is whether performance will be required—the entity will be required to perform or the entity will not be required to perform. If there is no information about which outcome is more probable, paragraph A23 of Statement 143 requires 50 percent likelihood for each outcome to be used until additional information is available.

In certain cases, determining the settlement date for the obligation that has been specified by others is a matter of judgment that depends on the relevant facts and circumstances. For example, a contract that provides the entity with an ability to extend its term through renewal should be evaluated to determine whether the settlement date should take into consideration renewal periods.

7. Paragraph 5b of the Interpretation states that the estimated economic life of the asset might indicate a potential settlement date for the asset retirement obligation. However, the original estimated economic life of the asset might not establish, in and of itself, that date because the entity may intend to make improvements to the asset that could extend the life of the asset or the entity could defer settlement of the obligation beyond the economic life of the asset. In those situations, the entity would look beyond the economic life of the asset in determining the settlement date or range of potential settlement dates to use when estimating the fair value of the asset retirement obligation.
8. Paragraph 5b gives examples of information that is expected to provide a basis for estimating the potential settlement dates, potential methods of settlement, and the associated probabilities. Examples include, but are not limited to, information that is derived from an entity's past practice, industry practice, management's intent, or the asset's estimated economic life.
9. Paragraph 5b of the Interpretation limits "potential methods of settlement" to those methods that are currently available to the entity. Therefore, uncertainty about future methods yet to be developed would not prevent the entity from estimating the fair value of the asset retirement obligation.
10. Paragraph 5b of the Interpretation states that the entity should have a reasonable basis for assigning probabilities to the potential settlement dates and potential methods of settlement to reasonably estimate the fair value of the asset retirement obligation. If the entity does not have a reasonable basis of assigning probabilities, it is expected that the entity would still be able to reasonably estimate fair value when the range of time over which the entity may settle the obligation is so narrow and (or) the cash flows associated with each potential method of settlement are so similar that assigning probabilities without having a reasonable basis for doing so would not have a material impact on the fair value of the asset retirement obligation.

***Specific Property Considerations***

Four examples were included in FIN 47. This white paper discusses those examples in the context of the Electric and Gas utility business. The examples are as follows:

1. Telecommunication poles
2. Bricks in a kiln
3. Factory with asbestos and regulations go into effect after purchase
4. Factory with asbestos and regulations are in place at acquisition

Basically, the premise put forward by the FASB in this Interpretation was that no tangible asset, except land, would last forever and accordingly, asset retirement activities will eventually be performed. In completing the retirement work, if a company is required to dispose of the asset in a specific manner or could be required to perform any one of a number of different methods of settlement, to be chosen at some later date, the company will need to evaluate the asset's retirement obligations. The four examples provided were meant to cover various situations a company may face. To bring the examples into the context of the energy industry, the list has been tailored to the potential issues for the Electric and Gas business. The following are the asset issues discussed in the remaining document:

1. Mass assets, electric and gas (*Telecommunication poles*)
2. Minor Items (*Bricks in a kiln*)
3. Asbestos, PCBs, and other contaminants (*Factory with asbestos and regulations go into effect after purchase or in place at acquisition*)
4. Rights-of-Way and franchises
5. General equipment
6. Hydro generation

***Mass Assets, Electric and Gas***

Example 1 of Appendix A, Illustrative Examples, provides specific discussion on wood pole treated with certain chemicals. However, the circumstances may be comparable to other utility property generally described as mass asset property. The following summarizes Example 1, followed by a discussion of comparability and applicability to other mass assets, and finally a discussion of various issues for utilities to consider in their implementation of FIN 47.

**Summary of Example 1 of Appendix A**

Example 1 discusses a situation in which a utility is using treated wood poles and where there is existing legislation that requires special disposal procedures in the state in which the utility operates. The example recognizes that the poles may be removed from the ground for a variety of operational reasons other than disposal, and further recognizes that the disposal obligation is not triggered by removal of the pole. Once a pole is removed from the ground, it may be disposed of, sold, or reused as part of other activities. In

this example, the disposal obligation is not triggered by removal of the pole. Based on that premise, Example 1 includes specific guidance that requires an assessment of AROs related to treated wood poles. That guidance suggests assessing the ARO and related accounting based on the following:

1. The **recognition point begins with the purchase** of the pole, rather than when the pole was placed into service (in-service date is when the pole first became a long-lived fixed asset). See obligating event and materiality above.
2. That **reuse does not change the obligation**, only defers it (common industry practice is to retire the pole at time of removal, not track it while in inventory, and considered a new addition when reused and placed in the ground again).
3. The **utility already has the information necessary to estimate** a range of settlement dates, methods of settlement, and the related probabilities **based on entity-specific practices, industry practices, management's intent, or the asset's estimated economic life**. (It is important to note that only in the example did the entity have sufficient information to estimate the fair value of the liability for the ARO. Each entity will have to make their own determination as to whether they have sufficient information.)
4. The utility is **not relieved of the obligation by selling** the pole to another party through the assertion that the exchange price reflects the estimated fair value of the obligation.

#### **Impact On Asset Retirement Obligations Accounting**

Example 1 of FIN 47 represents a utility that has a legal requirement to follow special procedures for disposal of treated wood poles. In this example, the utility is presumed to have all the information necessary to calculate an asset retirement obligation and is expected to make appropriate disclosure. Therefore, the asset retirement obligation should be recognized when the entity purchases the pole. This may result in a significant change from the requirements under FAS 143, where previous estimates and disclosures were not made because: 1) most disposal activities were performed by third parties so there were no future direct costs to be expended by the utility, 2) it was not reasonable to track the obligation (and settlement) due to reuse and different options for disposal, or 3) that the obligation was conditional due to circumstances known only at the time of removing the pole from the ground. There were no future costs because most utilities could give the poles away to third parties at no cost to the utility, but under FIN 47 even the ultimate disposal cost to a third party is to be considered (that net zero would be bifurcated into the avoided future disposal removal cost and the salvage – remember salvage is not recognizable for ARO purposes.)

Example 1 could apply to other mass asset property where a portion of the asset may be subject to special disposal procedures. Some examples might be property containing PCBs, mercury, lead, or any chemical considered hazardous. In the case of natural gas pipelines, specific activities are legally mandated for abandonment or removal and disposal. The ARO may include the cost of testing, removal, disposal or decontamination of pipeline segments and liquids. In other words, FIN 47 requires that if a utility has a special procedure requirement at ultimate disposal, then the utility either would have a measurable ARO with all the related accounting requirements, which should be recognized if the entity has sufficient information to estimate the fair value of the obligation. If the entity does not have sufficient information to reasonably estimate the obligation, the entity only has a disclosure requirement until sufficient information becomes available.

### Concerns and Issues

This raises several concerns and issues for both the individual utility and for the industry:

1. Initial determination of legal obligation – The language seems to indicate that if there is a special disposal procedure, that there will be a cost of performing that disposal activity and therefore, an asset retirement obligation. The legal obligation review may need to be expanded to other assets containing materials, which are considered hazardous with special disposal procedures required by some legal mandate.
2. Record keeping and reporting changes – Many if not most utilities track poles as assets from the date put in the ground until the next time it is removed rather than from purchase to disposal. Time in inventory (initially and upon salvage for reuse) is often not tracked – much less details on how many were treated and what happened to the treated portion at disposal. An individual utility may have to develop such tracking details.
3. Third party disposal – Example 1 states that the “ability to sell the poles prior to disposal does not relieve the entity of its ...obligation”, and states that “the assumption of the obligation affects the exchange price”. This could be a significant issue in compliance for some utilities. It implies that the utility is not relieved of the obligation; and, therefore, should attempt to measure the ARO.

The use of the pole would affect disposal requirements, as Example 1 clearly requires a company to identify future disposal costs. Therefore, unless there is a market price available, the company would need to apply present value techniques, estimating the life of the pole before disposal. Such information about that future transaction may be particularly hard to estimate when the utility purchases the pole and needs to record the obligation.

4. SEC transfer of other provisions for accrued cost of removal – Any change because of reassessing the ARO for treated wood poles also would affect any recognition of the SEC interpretation on depreciation accruals for future removal costs.

Background: SFAS 143 does not allow a provision for future removal costs to be included in depreciation reserves. FERC Order 631 provides that utilities that qualify to apply SFAS 71 and if the requirements for Order 552 are met, any provisions for future removal cost would be transferred to a regulatory liability. However, FERC Order 631 continues to allow provision for future removal costs for assets that do not have an existing legal retirement obligation. A conflict may exist because many utilities also have adopted the unofficial SEC interpretation that SFAS 143 does not allow for any accrual of future removal costs, and all provisions for future removal costs should be excluded from accumulated reserves (or transferred to a regulatory liability if eligible for SFAS 71). There is inherent contradiction for many utility assets whereby it needs to be recognized in two different ways for reporting the same activity to the two different entities.

FERC Order 631 requires that only for accounts where an ARO is recognized, then previous provisions for future removal costs should be transferred from the accumulated reserve (and carried as a regulatory obligation under SFAS 71, if the requirements for Order 552 are met). Many utilities have also adopted the unofficial SEC interpretation that SFAS 143 does not allow for any accrual of future removal costs, and all provisions for future removal costs should be excluded from accumulated reserves (or transferred to a regulatory liability if eligible for SFAS 71).

The cumulative effect adjustment for SEC reporting will be the difference between the amount previously recognized prior to FIN 47 and the amount recognized following the advice in FIN 47 (as mentioned under Transition Accounting below). FERC reporting will be governed by any new advice that FERC may issue prior to adoption of FIN 47.

### Recommendation

Since ARO compliance for this category of plant type, mass assets, may be quite onerous, a recommendation is offered for consideration to achieve the intent of the Interpretation without excess burden to the company and the accounting personnel. Each company will need to decide if the recommendation is feasible for their books and records. SFAS 143 (paragraph A22) permits the use of estimates and computational shortcuts that are consistent with the fair value measurement objective when computing an aggregate asset retirement obligation for assets that are components of a larger group of assets. This is appropriate for large transmission and distribution utilities that use group accounting. Therefore, the recommendation is to approximate the literal compliance with FIN 47 with an approximation that uses a statistical based method in order to achieve the **intent** of the statements without incurring undue burden on the accounting personnel.

1. Statistical Method – There are varying levels of information available to the individual utility from their depreciation studies from Simulated Plant Record to Equal Life Group study methods applied property data from individual accounts/sub accounts to functional categories like distribution plant. Even availability of details (such as separating net salvage into removal cost or into removal cost just for treated poles) will vary for different utilities. The following are general descriptions of possible approximation procedures that might be used:
  - a. Modified group property/modified depreciation study. Using the latest available depreciation study, the utility could develop the percentage adjustments to indicated life and negative salvage estimates to approximate the timing and the amount of the future removal cash flow. Many utilities have property records that provide the age of existing property and combined with average age, a future cash flow estimate could be prepared for each vintage of property (average age less current age result in the time to expected removal). There may be a standard length of time between removal from service until actual disposal and that could be added to remaining life.

It may be necessary to analyze the property in the pole account as not all the units may be part of the retirement obligation and to identify a percentage adjustment to approximate the proportion of obligating poles that are treated to all others and adjust the future cash flows to represent only the legally required disposal.

If dispersion curves were used in the study, the related retirement curves also could be used to approximate the period of disposal. When time estimates and future cash flows are estimated, then one can compute the various ARO elements (ARC, depreciation and accretion tables, and associated regulatory assets). For the first year, monthly entries are made based on that estimate only. In subsequent years and if vintaged retirements are available, it would be possible to go through the individual settlement calculations for each ARO vintage group plus recognize any layers if disposal cost estimates change or a new study is performed. If vintage retirement data is not available, do exactly the same calculation, but true up the components (which would eliminate all the subsequent measurements and layering).

- b. Fin 47 requires the use of current assumptions. It may be necessary to perform a new depreciation study to obtain current information on expected lives and removal costs for existing property. Negative salvage estimates that have been taken from depreciation studies reflect previous assumptions. In other words, the study reflects removal costs that have already happened and may not even reflect costs or methods of disposal under a new or recent legal requirement (or only partially reflect it). To the extent that previous assumptions are the same as current assumptions, the depreciation study may be used.

The gross removal portion of the negative net salvage amount also may contain a removal component that may or may not be part of the retirement obligation. Use of the approved rate to determine the obligation under this Interpretation could result in an inflated obligation. In either case, it should be updated to reflect current assumptions, based on management's intent, the asset's estimated economic life as well as entity and industry practices. Be sure to exclude gross salvage value from estimated removal costs and to split the removal costs into its components in order to identify only those pieces that represent the retirement obligation.

- c. Snapshot. If immaterial or one is unable to modify or perform annual studies, work with what is available at the end of each year. Then compute the ARO by taking a snapshot each year and true up for differences.
2. Detail Method – If detailed records exist or it is feasible to create detailed records and reporting just for treated wood poles (or like mass assets), and then it would be possible to fully comply with SFAS 143 and FIN 47.
3. For either method, one may want to:
- a. Re-examine the legal obligation to determine if there is a specific obligation due to the type of treatment on the poles along with other mass assets **and** that complying will result in a cost. For some locations, there are no “special” disposal tracking or fees. Examine the disposal fee for poles to determine if it is related to special facilities or just additional cost for garbage service. No cost means no accruals need to be booked.
- b. Determine if the future fee could qualify as immaterial. For example, a \$5 fee or a 50-cent information sheet to buyers could be immaterial on the surface. However, balance sheet materiality would apply and it is the fair value of the ARO items as grouped that may determine materiality.
- c. Review the additional reporting and record keeping requirements of the full application to determine if the cost of keeping records is unreasonable for the effort and that an alternative method may yield a reasonable estimate. For example, if one can match disposal to vintaged purchases, then one should be able to comply using the Detailed Method instead of developing a statistical approximation.
- d. Similar to above, review whether the depreciation studies are reasonably compatible. Remember FIN 47 “example 1” is concerned with “purchase to disposal” total life versus studies based upon “site life” and in-service time (does not recognize reuse.) Similarly, then, approximation methods might be reasonable. Paragraph 2 of SFAS 143 states that this “applies to legal obligations associated with the *retirement* of a tangible long-lived asset that results from **the acquisition, construction or development...**” This sentence has two interpretations - the first half indicates it only applies to plant in-service, while the second half adds the purchase or construction to the point of application. This review

may want to include making a determination on the reasonableness and materiality of the difference between in-service date versus the date of construction or purchase.

- e. Alternative approaches also may be justified if one qualifies as a regulated utility. As a regulated utility, the entire ARO compliance effort may result only in balance sheet adjustments with no earning impacts. The most reasonable application of managerial judgment might involve only a high-level, rough estimate of the current obligation without all the various kinds of offsetting regulatory assets and regulatory liabilities. It may be that all those offsetting line items and calculations provides only confusion and a good description of the circumstances is the most appropriate disclosure, especially if preliminary efforts indicate that full compliance results in an immaterial impact.

An example of a possible “snapshot” follows. Utilities with recent, extensive, and detailed studies may have such particulars and resources to develop a very close approximation of full ARO accounting. Many utilities will have very limited information available from latest depreciation studies and property records. This example is intended to show how to approximate an ARO calculation with the bare minimum of information.

Assuming that the utility depreciation study only provides an average service life and net salvage (no basis for a split for removal costs), has a count or estimate of treated poles in service, and vintage or estimate of age of those poles:

For Year 1 (2005) the following applies:

- Surviving plant is equal to 100,000 poles,
- Average service life is estimated to be 50 years,
- Average age of existing poles is 30 years (assume the average remaining life is 20 years even though it most likely would be closer to 25 years using Iowa Curves)
- Disposal cost is \$15 per pole fee set by law in 2000 at a local waste management facility.
- Future removal cost in 20 years would be \$1.5 million (\$15 times 100,000). Note, apply an inflation factor as well if disposal fee can increase due to inflation,
- Apply a current discount rate (credit adjusted risk free rate) back to the year that the obligation began (in this example it is the year 2000) to determine ARC,
- Set up schedules to determine ARC depreciation, accumulated reserve, accretion table, and current value of ARO in year 2005 (also determine regulatory accounting to offset any expenses or income if eligible for SFAS 71 treatment – FERC Accounts 182.3 and 407.4 for regulatory assets, FERC Accounts 254 and 407.3 for regulatory liabilities).

For Year 2 (it is now 2006) the following occurs:

- Surviving plant has been reduced to 95,000 poles (additions and retirement led to a net reduction,
- Average service life is still estimated to be 50 years,

- Average age of existing poles has changed due to the additions and retirements – and is now 29.5 years (average remaining life is now 21.5 years)
- Disposal cost is still \$15 per pole fee set by law at a local waste management facility back in year 2000 (watch for whether this should be inflated),
- Future removal cost in 21.5 years would be \$1.425 million (15 times 95,000),
- Apply a current discount rate (credit adjusted risk-free rate) back to year 2000 to determine ARC (FERC account 359.1 or 374),
- Set up schedules to determine ARC depreciation, accumulated reserve, accretion table, and current value of ARO now in year 2006 (also determine regulatory accounting to offset any expenses or income if eligible for SFAS 71 treatment – FERC Accounts 182.3 and 407.4 for regulatory assets, FERC Accounts 254 and 407.3 for regulatory liabilities).
- Compare the Year 2 (2006) results to Year 1 (2005) results:
  1. Adjust both the ARC asset, ARC accumulated reserve, and the ARO liability to the new numbers.
  2. The remaining differences (accretion, depreciation, and affect of the change upon the current) will be recognized as a gain or loss or deferred under regulatory accounting (adjust previously recorded amount – difference may change the amount from an asset to a liability which should be a reversal of the prior year entry and a new entry in order to keep the connection between 407.3 and 254 or 407.4 and 182.3 as appropriate).
  3. Layering is being ignored for both because this is only an approximation and this does recognize that the forecast future date of cash flows has changed for all assets and in the long run will achieve a more appropriate obligation at the time of disposal.

In the situation where more information is available (such as vintage data), and the effort reasonable, then the above “snapshot” approach could be applied to each vintage. If service life is estimated using dispersion curves such as Iowa Curves, another enhancement would be to use the “retirement rate” percentages from those curves to develop the estimated time for future retirements. Such an enhancement may be unreasonable (especially if being computed manually) because it would be many times more complicated with the number of vintages involved and it may result in an immaterial difference to the results. These are issues subject to that managerial judgment discussed at the beginning of this document.

**Questions for Review: Mass Assets, Electric and Gas**

1. Which mass assets are subject to this section?
2. What actuarial assumptions has the company been using with those assets identified as falling within FIN 47?
3. Are the state laws or federal ones defining the disposal restrictions related to any of these minor items?
4. Can one determine a reasonable estimate the current disposal costs and does that apply to all or most in the mass asset group?
5. Can one estimate the retirement possibilities such that the choices would meet current audit and accounting standards for supporting evidence?



6. Is the ARO associated with this mass assets material enough to spur recognition in the books and records or should its presence just be disclosed?

### ***Minor Items***

SFAS 143 applies to legal obligations associated with the retirement of a tangible long-lived asset that result from the acquisition, construction, development, or normal operations of the asset itself. In the utility business, property accountants break the huge investment in fixed assets into retirement units, whereby anything less than a retirement unit is not significant enough to be a unit of property. These items that are less than a retirement unit are often called minor items. When construction ensues to install one or more retirement units, minor items directly associated with the retirement units are often part of the construction cost. However, a minor item is not replaced with future construction dollars just because its original cost was part of fixed assets. These items are replaced using maintenance dollars or the replacement is expensed at that time. Minor items to the utility business are basically our “bricks in a kiln”.

So it can easily be seen that these minor items can be a quandary when determining a conditional ARO. In some respects, these minor items can consist of the contaminants discussed below. Replacing these in the course of normal operations may be construed as impossible to determine as not enough facts are available to measure the conditional ARO. One would need to know when in the course of operations these minor items will be replaced. However, a more routine maintenance replacement may not be as difficult to predict than an item that perchance could fail. For example, if oil is replaced after every certain number of hours of operation, then one may be able to estimate the disposal obligation. The bricks example infers that the disposal of these bricks, because it is known and routine, may constitute an ARO. A company needs to decide if any of the minor items, those that are part of the asset on installation, but are replaced on maintenance throughout the life of the asset, qualify for conditional ARO treatment. Minimally, the proper removal of oil may be a legal obligation upon retirement of the asset.

However, one keeps coming back to the idea that these items are not fixed assets in exclusion of the retirement unit. Oil sitting on the shelf (i.e. inventory) does not fall within the scope of SFAS 143. If the installation of the oil is expensed at the time it is added to the fixed asset, one could conclude that it is not part of the fixed asset cost and perhaps the only retirement obligation is the one associated with the retirement of the asset either interim or final. Assuming this conclusion, the replacement of a minor item during operation in exclusion of the retirement unit would be considered normal maintenance and not subject to ARO accounting. Whereas, the retirement of the asset including the minor item could constitute an ARO, conditional or otherwise, if the minor item causes the asset retirement to meet the rules of SFAS 143 or FIN 47.

### **Recommendation**

Before minor items are recognized as an ARO, make sure that the component is not part of an ARO established for the asset to which the minor item relates. For example, the bricks in the kiln were replaced many times over the life of the kiln's useful life. If an ARO exists for the final disposal of the kiln in its entirety, one would not want to set up an ARO for the disposal of the final set of bricks. Clearly define the minor items that should be included and test early on in this process for materiality. One may have bricks, but the bricks represent such a small component of one's balance sheet and income statement that

the inclusion of such in the ARO process may be immaterial at all times, especially if the asset (the kiln) has no ARO. Keep track of the asset to which these minor items relate in order to determine if a future ARO will be warranted by association. Lastly, document the minor items with possible AROs that are routinely replaced versus those where replacement cannot be predicted.

#### **Some Questions for Review: Minor Items**

1. Can the minor items be identified that could cause an ARO situation to occur when it is removed with the asset retirement?
2. Does the company have a definitive list of minor units of property?
3. Are the state laws or federal ones defining the disposal restrictions related to any of these minor items?
4. Can a one make a reasonable estimate of when the asset will be retired and whether the minor item will exist as part of the asset at that retirement date?
5. Does any of the guidance from AICPA Statement of Position (SOP) 96-1, "Environmental Remediation Liabilities" supersede the application of SFAS 143 or FIN 47?
6. Can one estimate the retirement possibilities such that the choices would meet current audit and accounting standards for supporting evidence?
7. Is the ARO associated with this minor item material enough to spur recognition in the books and records?

### ***Asbestos, PCBs, and Other Contaminants***

#### **Asbestos**

Assets constructed before 1980 may have used asbestos as insulation or fire retardant. Typical removal of this substance involves extensive effort to protect workers and the environment from harm along with very specific disposal rules. For that matter, any asset with asbestos may have an ARO associated with it. The determination of whether the removal is performed as a part of normal ongoing maintenance during the life of the asset or is present at the time of retirement may need to be factored into the fair value analysis.

For non-real property, the ability to determine the amount of contamination may be an issue and a costly one at that. The engineering staff generally can determine if the asset being worked on contains asbestos, but determining the amount of contamination may not be feasible. This may make the process more difficult in applying FIN 47, but it may not preclude recognition in the financial statements. At the minimum, disclosure may be necessary for specific assets that are contaminated. For instance, the amount of existing asbestos in a generating facility may not be known and the timing of the removal of it during normal maintenance may be difficult to forecast. The obligation, in this circumstance may be measurable only after the work has been defined. If the ARO is known, measurable, and satisfied all during the same accounting period, then perhaps only a disclosure is necessary for these instances.

Real estate may be easier to estimate if one knows the extent of the contamination. It may be that when the building was first constructed asbestos was throughout every floor. Many years later, some of the

asbestos may have been removed in past maintenance on various sections of the building. The engineers familiar with the building should know the relative extent of the contamination. If the building has been through a recent assessment, it may be possible to estimate the loss in market value of the building because of the asbestos. However, asbestos abatement may not be comparable to the loss in market value, and this loss should be weighed with the potential for undertaking the removal oneself.

Estimation of retirement, as with all assets falling within the scope of this Interpretation, can be quite difficult as some of the assets contaminated also are the longest living assets. Even with the loss in value due to selling the building with the contamination, one still may have a difficult time determining retirement parameters. Non-real property may be easier to estimate, as there often exists a manufacturing life on most retirement units.

### **Polychlorinated Biphenyls (PCBs)**

PCBs are man-made chemical compounds previously used in the manufacture of products to make them flexible and heat resistant. Because of these fire retardant qualities, manufacturers sometimes used it in the insulating oil of capacitors, transformers and other electrical equipment. PCBs also can be found in hydraulic fluids, lubricants, paints, sealants, carbonless paper, ink, caulking compounds, and plastics.

PCBs are very stable and do not readily break down in the environment and therefore require special care during handling and disposal. The use of PCBs is regulated under the Federal Toxic Substances Control Act (TSCA). The Environmental Protection Agency (EPA) has set strict regulations regarding the manufacture, use, storage, transportation and disposal of specific levels of PCBs. PCB concentrations below specified levels are not regulated under TSCA.

The existence of regulations related to disposal of PCBs creates a duty to dispose of PCBs in a prescribed manner. The obligation to perform this asset retirement activity is unconditional even though uncertainty may exist about the timing and (or) method of settlement.

The Interpretation states an entity shall recognize a liability for the fair value of the conditional Asset Retirement Obligation (ARO) if the fair value of the liability can be reasonably estimated. If one has assets that contain PCBs and one has sufficient information to reasonably estimate the fair value of the ARO, then the PCB ARO must be recorded. Sufficient information needed to reasonably estimate the fair value includes:

- Settlement date, or information to estimate a range of potential settlement dates
- Method of settlement or potential method of settlement, and
- The probability associated with the potential settlement dates and method of settlement.

The ability to defer settlement, such as storing PCB containing equipment, does not relieve the entity of the obligation. The PCB will eventually need to be disposed of following EPA prescribed procedures. The obligation to perform the asset retirement activity is unconditional even though uncertainty may exist about the timing or method of settlement. The PCB ARO is the cost to dispose of the PCBs as required by the EPA.

Example 1 included in Appendix A of the Interpretation indicates that the ability to sell the PCB containing equipment or facility prior to disposal does not relieve the entity of its present duty to settle the

obligation. The sale of the equipment or facility transfers the obligation to another entity. The assumption of the obligation by the buyer affects the sale price. Therefore, an ARO should be recorded once known; when the asset is sold, the ARO liability is debited and the sale price is adjusted to reflect the transfer of the ARO obligation. It is assumed that the utility has factored into the calculation of the ARO, the probability that not all of the assets may be contaminated upon sale.

An entity does not have sufficient information to estimate the fair value of the ARO if:

- The settlement date is indeterminate (the range of time over which the entity may settle the obligation is unknown or cannot be estimated),
- Method of settlement is unknown, and
- Sufficient information is not available to apply an expected present value technique

In this case, an entity will record an ARO when sufficient information exists. It currently qualifies as an ARO, albeit not measurable, and it would be subject to certain accounting and disclosure requirements related to reserves and provisions for cost of future removal. Example 3 included in Appendix A of the Interpretation illustrates this point. However, paragraph 22 of Statement 143 requires that if the liability's fair value cannot be reasonably estimated, that fact and the reasons shall be disclosed.

Electrical equipment damaged by a car, lightning or other incident, which result in a spill of insulating oil containing PCBs will be out-of-scope of this Interpretation since the spill is not considered normal operations. Paragraph 2 of the Interpretations states that "Statement 143 applies to legal obligations associated with the retirement of tangible long-lived assets that result from the acquisition, construction, or development and (or) the normal operation of a long-lived asset, except as explained in paragraph 17 of that Statement for certain obligations of lessees."

### Other Contaminants

As part of the normal operations for a utility, other contaminants may exist in fixed assets that would require "special" disposal procedures under federal and state regulations. Below are examples of these assets that may contain other contaminants:

#### *Generation*

- Groundwater contamination in *ash ponds* from metals such as nickel, chromium and arsenic
- Groundwater and soil contamination from unlined *chemical cleaning basins* (i.e. boiler cleaning waste basins)
- Soil and ground water contamination associated with *above and below ground storage tanks* (i.e. petroleum or other contamination)
- *Solid waste landfills* that require installation of a final cover system, grading the final cover, and establish vegetation on the final cover
- *Septic tanks* that must be drained and filled with sand prior to closure
- *Wastewater and sewage treatment facilities* that may contain hazardous wastewater treatment sludge or sewage

**Transmission & distribution**

- Soil contamination from arsenic at *substations*
- Soil contamination from mineral oil at *substations* from *non-PCB transformers*

**Other**

- **Equipment** containing sulfur hexafluoride (SF<sub>6</sub>) gas

This is not an exhaustive list of potential contaminants resulting from normal operations of utilities. Each company should consult with environmental experts and legal counsel to properly assess these and other contaminants for potential AROs. Care should be given to ensure that contaminants at these facilities do not fall under the scope of SOP 96-1, *Environmental Remediation Liabilities*, and that these contaminants resulted from normal operations.

**Recommendation**

EEI and AGA issued a White Paper entitled *Asset Retirement Obligation Implementation White Paper* late 2002, which recommended a team approach to identifying and estimating AROs. That approach can be used for the implementation of FIN 47. Listed below are some of the main points included in the White Paper:

- Use a team approach, ARO team members should include representatives from various company operating departments,
- Develop an inventory of potential AROs,
- Accounting and Legal departments must review and discuss these potential AROs to determine if a legal obligation exists,
- Once it is determined that the obligation falls within the scope of SFAS 143 and FIN 47, the next step is measurement of the ARO liability. The amount of the ARO liability is to be measured at fair value.

Refer to the 2002 EEI and AGA White paper section entitled "Calculation Process Overview" for suggested ARO calculation guidelines and examples. The White Paper also includes journal entry examples and record keeping suggestions.

**Questions for Review: Asbestos, PCBs, and Other Contaminants**

1. Can all the assets be identified that contain asbestos, PCBs, or other contaminants and can the amount of asbestos that is contained in the asset be determined?
2. Does the company treat these contaminants as a major or minor unit of property?
3. Are the state laws more onerous than the federal ones?
4. Can a market value of the asset be determined with and without the contaminant?
5. Does any of the guidance from AICPA Statement of Position (SOP) 96-1, "Environmental Remediation Liabilities" supersede the application of SFAS 143, Accounting for Retirement Obligations or FIN 47?
6. Can one estimate the retirement possibilities such that the choices would meet current audit and accounting standards for supporting evidence?

*Rights-of-Way and Franchises*

Land is specifically excluded from scope of SFAS 143 and FIN 47. Rights of way and easements are land related intangible assets that also are excluded from the scope of SFAS 143 and FIN 47. However, consideration should be given to whether there is a conditional obligation that can be associated to specific, existing, long-lived assets within rights-of-way and franchise areas. It should be noted that there is no asset retirement obligation associated with the franchise (or right-of-way) itself. If it is determined that there is an ARO, it only will be with the assets located within that franchise (or right-of-way).

Typically, utilities are granted franchises by each local jurisdiction in which they have distribution and transmission assets. Typically, the local jurisdiction retains the right to require the removal of the utility's assets, at the discretion of the local jurisdiction. Consequently, the wording in the franchise imposes certain requirements due to revocation of ordinances and road relocations. Just as typically, however, the intent of the utility and the local jurisdiction is for the utility to continue to provide service on a permanent basis in the service area, and the utility is required to remove its assets only when necessary to allow the local jurisdiction to perform some public work.

Generally, the wording in such franchises indicates that there is a possibility that any individual asset could be required to be moved at any time, but the wording neither identifies specific assets to be removed nor sets a specific time that the removal is required. Furthermore, the franchise wording typically indicates that the franchise is either perpetual or renewable.

Paragraph 3 of FASB Interpretation No. 47 states:

“The term *conditional asset retirement obligation* as used in paragraph A23 of Statement 143 refers to a legal obligation to perform an asset retirement activity in which the timing and (or) method of settlement are conditional on a future event that may or may not be within the control of the entity. The obligation to perform the asset retirement activity is unconditional even though uncertainty exist about the timing and (or) method of settlement.”

This definition identifies three variables: “If”, “When” and “How/How Much”.

- The “If” is satisfied if it has been determined that an asset will have to be retired at some future date, i.e. the obligating event has occurred.
- The “When” is the date or range of dates when the retirement will/must occur.
- The “How” is the method (and by extension, the cost) associated with the retirement.

In the case of franchises, the obligating event would be the determination by the local jurisdiction that an asset or group of assets must be removed. In granting a franchise, however, the presumption by both the utility and the local jurisdiction is that this event will never occur. The fact that this event does occur on occasion (road widening, for example) is not sufficient to negate this presumption.

In this situation, a conditional ARO does not exist, because the obligating event has not yet occurred. The possibility exists that the obligating event will occur, but the possibility alone is not itself an obligating event. The questions of “when” and “how/how much” do not even come into play, because it has not been established that any asset or group of assets will have to be removed. It is impossible to calculate an

asset retirement amount, so journal entries are not required. Furthermore, the possibility that an ARO could come into existence need not be disclosed in a footnote.

It should be noted that franchise language typically requires a utility to remove its assets from a given location, not retire those assets. Theoretically, the utility could satisfy the requirements of the franchise by simply moving those assets. In the case of a road widening, for example, the utility could just pick up all of its poles and wires and move them. In reality, new poles and wire are installed and the old poles and wire are removed. But, the decision to install the new and then remove the old is a management decision, to allow for continuous service while the assets are being “relocated”. And in some cases, those assets being removed could be re-used elsewhere (poles, for example). There is no asset retirement obligation, because there is no obligation to retire assets.

This situation can change for major projects, however. If a jurisdiction notifies a utility that it must remove specific assets, for any reason, and assuming the utility will retire those assets, the obligating event for those specific assets will have occurred, and an ARO would exist at that point. If the timing and method of removal can be reasonably estimated (and it probably could be), then the utility would be required to calculate and record an ARO. For example, if the utility is notified that a given section of a subway system is to be extended in five years, and that the utility will have to relocate its poles, wires, buried cable or gas mains along the route of the subway extension, all of the requirements of an ARO will have been met. At this point the utility would be required to record an asset retirement obligation for these assets.

It is not uncommon for local jurisdictions to reimburse the utility some or all of the cost of removal when that local jurisdiction requires that assets be relocated. Such reimbursements are not salvage; they are, in fact, a reduction of the cost of removal. Since the cost of removal is the basis for calculating the amount of the asset retirement obligation, any such reimbursement must be reflected (as a reduction) in the ARO calculation. This could substantially reduce the amount of the ARO (or in the case of a 100% reimbursement, totally eliminate it).

Rights-of-Way are similar to franchises, but on a smaller scale. Rights-of-Way typically are granted by individual citizens or companies, cover smaller areas of land, and may be for shorter periods than franchises. The logic in applying the criteria for establishing an ARO is the same, however. If and when an obligating event occurs, an ARO would have to be recognized if sufficient information exists to estimate the fair value of the obligation or disclosed (if sufficient information does not exist). The determination that a Right-of-Way will not be renewed would be an obligating event. Until that time, no calculations or disclosure by the utility would be required.

If it is determined that an asset retirement obligation does exist, it is important that companies do not double-count or double-record the ARO amount. For example, companies may have a program to identify and track asset retirement obligations for the disposal of treated poles. If a treated pole is in a franchise area or right-of-way and must be removed, and it is deemed that an ARO does exist, the cost of disposing of the treated pole should not be counted twice – once under the program to identify costs of disposing of treated poles, and then again as part of the cost of removing an asset from a franchise area or right-of-way. Property accounting personnel should take care to coordinate the ARO identification and measurement efforts to ensure that all ARO costs are recorded, but that those costs are recorded only once.

### **Recommendation**

The costs of franchises and rights-of-way do not themselves incur an asset retirement obligation. Generally, the assets within the franchise area or right-of-way do not incur an asset liability solely because those assets are subject to the franchise or right-of-way. Under certain circumstances, however, those assets could incur an asset retirement obligation. If it is deemed that an asset retirement obligation does exist for certain assets in a franchise area or right-of-way, care should be taken not to include costs that have been included under another ARO identification program within the company.

#### **Questions for Review: Rights-of-Way and Franchises**

1. Who maintains the file of all franchises and rights-of-way agreements?
2. What is the exact wording in the franchises and rights-of-way agreements? (Specifically, what do it require the company to do?)
3. Can one identify all of the assets in the franchise and rights-of-way areas?
4. Are the assets in the franchise and rights-of-way areas covered under some other ARO identification program within the company?
5. Do the company have procedures in place to make sure that one is not double-counting the ARO?
6. Can one reasonably estimate the amount of reimbursements the company will receive for any required cost of removal?

### ***General Property***

The possible changes in ARO accounting as indicated in the guidance and examples provided in FIN 47 also may apply to utility property classified under the General Plant function. Recently, the lead and mercury content in personal computers have been drawing attention of lawmakers, environmental agencies, and disposal sites. There are other potential issues like the mercury in fluorescent light bulbs and chemicals in common batteries. Individual utilities may want to assess ARO requirements as modified by FIN 47.

It may be possible that each of the four examples could apply depending upon the circumstances of the legal obligation and property accounting issues such as whether the obligation relates to a retirement unit, a minor item, or a smaller portion of an asset. For example the coatings or trace elements in a personal computer might be comparable to the chemicals in the treated wood poles in Example 1 in Appendix A of FIN 47. If the obligation relates to specific components of the computer, Examples 3 and 4 may be more applicable.

There may be an additional complication in applying FIN 47 to General Plant property. Many utilities have adopted amortization accounting (such as allowed under Federal Energy Regulatory Commission Accounting Release No. 15, "Vintage Year Accounting For General Plant Accounts"). A main objective of adopting amortization accounting was often to eliminate the relatively unreasonable cost of tracking the status of large volumes of low cost property. Under amortization accounting, the cost of the long-lived asset is given an assumed life and reporting of movement or disposition of the property ceases.



While there may be insufficient information in the property records, there may be alternative sources of information. In the personal computer circumstance, a utility may already have a policy of storing the PC prior to disposal – possibly to be in compliance or anticipation of compliance with disposal obligation. The assessment of application of FIN 47 might include evaluation of the existing availability of such alternative information or of possibly creating such information to facilitate compliance with both the legal obligation and the accounting requirements.

**Recommendation**

1. Review the circumstances for each account – identify the legal obligation, availability of the information to determine the estimated future removal cost, and the property accounting method (item property, group property, or amortization accounting).
2. Amortization accounting would represent a unique situation, because it was probably adopted because of a determination that it was unreasonable to maintain detailed record keeping under group or item property. There may still be a basis for recording an ARO, if alternative information is available and the effort reasonable or not considered immaterial.
  - a. For example, company using amortization accounting with a policy that requires that unused PCs be returned to a central location for disposal with a known disposal cost. If quantities are kept with the unamortized period, then it is possible to estimate a total liability (quantity unamortized plus quantity waiting for disposal multiplied by the disposal fee). All that is necessary is to estimate the timing of the disposals.
  - b. Some utilities may keep other records on such items outside of the accounting, which may provide sufficient information to calculate the exposure quantity and approximate timing of disposal.
  - c. This accounting method is designed to alleviate the record keeping burden on small value, high volume assets and one should attempt to maintain this simplicity in the ARO analysis and calculation.
3. The possible situations are numerous, but if information is available and cost is large enough, then one of the methods described above (such as used for mass assets) may be applicable for making the calculation.

**Questions for Review: General Property**

1. Can one define the legal requirements for removal for the general assets?
2. Does the company use AR-15, amortization of general property?
3. Can one estimate potential future retirements?
4. Are the obligations for this category material?
5. If immaterial, is it appropriate to group these AROs with others to determine materiality?
6. Can you estimate the retirement possibilities such that the choices would meet current audit and accounting standards for supporting evidence?

**Hydro Generation**KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 172 of 286

Hydro dams and facilities fall into conditional obligations primarily due to three factors:

1. An exceptionally long life of the total facility,
2. The large magnitude of costs and complications associated with removal, and
3. The uneven probabilities involved.

In some circumstances, however, the obligation may already provide the information to support recording an estimate. In other circumstances, there may be legitimacy in asserting that too much uncertainty exists to make a reasonable estimate.

Hydro facilities (generation equipment, dam, reservoir, and other plant) typically have an extremely long life. That life may also involve multiple steps, in that the dam may continue to provide service long after generation ceases, and may be rebuilt or repaired multiple times in order to maintain the reservoir for conservation or flood control purposes. That combined total facility life may be so long that “there are no boundaries of time or an extremely lengthy period of time, that bears on a person’s ability to make a reasonable estimate of the timing and the amount of the cash flows”<sup>1</sup> (Minutes of January 26, 2005 Board Meeting, wwwfasb.org). Estimating life may be further complicated by whether the obligation is identified (individually or overlapping) by multiple jurisdictions (a FERC license, a Corp of Engineers building permit, an act of Congress, state law, or even promissory estoppel).

The exceptionally long life expectancy will typically represent the greatest obstacle to developing a reasonable estimate of ARO. Many reservoirs can be traced to the early history of the United States, so it is reasonable for a total life of a hydro facility to be measured in hundreds of years. Another complication may be multiple legal jurisdictions involved in the obligation over different phases of that total life. Further, economics may support a truly indefinite life since the magnitude of a repair/rebuild may be the clear option of choice compared to the magnitude of the cost of removal of the facility - at any point in time when a removal consideration is being faced.

The long-life combined with the economics favoring indefinite repair over removal creates a time frame in which acts of gods (unprecedented floods, earthquake, etc.) would have to be included in setting probabilities of life. Statistical models may not be applicable when a long life would also involve such random factors – not only for the life, but also the wide range of possible methods of removal complicated by varying relationships to the cause of removal.

**Recommendation**

Understanding the nature and timing of the current legal obligation is a critical first step, but one that may be particularly difficult to determine. With Hydro licenses, the requirement to remove the dam and flowage structure, albeit purportedly required by the FERC, may not occur if the environment has adapted and become accustomed to the dam. One may have to rely more on local data that is in relation to a legal obligation to define the possible course of action.

A conditional ARO is a judgment-based process and if it results in no ARO recognition, then documentation of such conclusion must be done. If a life or range of lives can be identified, the next step is to review the extent of possible methods for meeting the obligation. If life and method of settlement

can be identified, the next step would be to identify the availability of other critical elements in estimating an ARO.

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 173 of 286

#### **Questions for Review: Hydro Generation**

1. What is the nature of the legal obligation(s) involved – does it apply to only a portion of the hydro or to the full facility?
2. Can a life or a range of lives be reasonably identified with any degree of statistical validity?
3. Can the methods of settlement be identified with reasonable estimates of probability?
4. Can a market value of the asset be determined with and without asbestos?
5. If all of the above exists, can costs and cash flows be reasonably estimable with any degree of statistical validity?
6. And, can inflation be reliably predicted from present to the time of removal?
7. Does a risk-free interest rate exist for such a period and will credit adjustments be applicable to determine the rate necessary to convert the ARO into the capitalized asset retirement cost and accretion models necessary under SFAS 143?
8. Can one estimate the retirement possibilities such that the choices would meet current audit and accounting standards for supporting evidence?

#### ***Overall Recommendation***

There will be no single way to estimate the conditional ARO on the property that was excluded in the earlier review. Several recommendations have been provided within this white paper, but as always, each company will need to decide the appropriate conditional ARO. This review includes the determination of the potential liability, the costing and probability of occurrence, the method for calculating the liability and asset, the materiality of the ARO, forward processing, and the appropriate disclosure. The basic concept throughout was to define the property and to encourage one to find a way to provide for the intent of the accounting without creating unbearable duress in doing the calculation. Also, the calculation for the first recognition at the end of this year should be one consideration, but the process used should define the ongoing revision of the conditional liability and the eventual settlement.

The whole process used should be defined and documented to support audit review and to satisfy any Sarbanes/Oxley provisions within the company. Even if one chooses to disclose and not to account, the documentation for the first and subsequent measurements must be such that it will completely support that decision. Overall, proper management and design of the process keeping a keen site on the form and intent should enable one to fully represent the conditional ARO without creating a nightmare of a process.

***Effective Date*****Effective Date**

Paragraph 8 of the Interpretation specifies the effective date and states:

The Interpretation shall be effective no later than the end of fiscal years ending after December 15, 2005 (December 31, 2005, for calendar-year enterprises). Retrospective application of interim financial information is permitted but is not required. Early adoption of the Interpretation is encouraged.

**Transition Accounting:**

Paragraphs 9 and 10 of the Interpretation provide requirements for transitional accounting and state:

“For amounts recognized upon the initial application of the Interpretation, an entity shall recognize the following items in its statement of financial position: (a) a liability for any existing AROs adjusted for cumulative accretion to the date of adoption of the Interpretation, (b) an asset retirement cost capitalized as an increase to the carrying amount of the associated long-lived asset(s), and (c) accumulated depreciation on that capitalized cost.”

“Amounts resulting from initial application of the Interpretation shall be measured using current (that is, as of the date of adoption of the Interpretation) information, current assumptions, and current interest rates. The amount recognized as an asset retirement cost shall be measured as of the date the asset retirement obligation was incurred. Cumulative accretion and accumulated depreciation shall be recorded for the time period from the date the liability would have been recognized had the provisions of the Interpretation been in effect when the liability was incurred to the date of adoption of the Interpretation.”

“An entity shall recognize the cumulative effect of initially applying the Interpretation as a change in accounting principle. The amount to be reported as a cumulative-effect adjustment in the statement of operations is the difference between the amounts, if any, recognized in the statement of financial position prior to the application of the Interpretation and the net amount that is recognized in the statement of financial position pursuant to paragraph 9 of the Interpretation.”

Thus, the recognition of new AROs due to adopting this Interpretation is similar to the first recognition done for SFAS 143. Once the full accounting is established for an ARO, the change in estimate routine from SFAS 143 is used for all subsequent layers. For mass assets and other AROs recognized in aggregate, the change in the obligation acknowledged in the second and successive years may be defined as a new layer. This would have to be discussed and agreed upon by management and your auditors as an appropriate treatment.

**Subsequent Accounting for Indeterminate AROs:**

As has occurred throughout this issue, a quandary seems to exist relating to subsequent recognition if a previously indeterminate ARO becomes measurable and material such that one must invoke the full accounting treatment, not just the disclosure part. The question that has been difficult to get a consensus on is as follows:

*Should transition accounting be used in future years to record the initial measurement of an ARO, which was previously treated as indeterminate or would the measurement of this ARO constitute a change in estimate and thus the accounting for a subsequent layer be applicable?*

There does not seem to be agreement on this point and it may be a common occurrence. A survey of 18 EEI companies (by Constellation) showed responses that were split down the middle as to whether transition accounting would apply when asset retirement costs were first being measured (previously immeasurable) in years after adoption of FIN 47.

It would seem that transition accounting would not be used in years following adoption of FIN 47. Both FAS 143's paragraph 25 and FIN 47's paragraph 9 on transitional accounting specifically refer to measuring an asset retirement cost (as of the date the obligation was incurred) and provide for accumulated depreciation "to the date of adoption of this Statement" or "Interpretation". Neither FAS 143's paragraph B19 nor Fin 47's paragraph B27 specifically provide a method for asset retirement costs when it states that obligations should be measured at the point where information becomes available.

FIN 47 paragraph 9 ends by stating: "Cumulative accretion and accumulated depreciation shall be recorded for the time period from the date the liability would have been recognized had the provisions of this Interpretation been in effect when the liability was incurred to the date of adoption of this Interpretation." (Emphasis added.) Since the date of subsequent measurement of a specific ARO is not the date of adoption of the pronouncement, it would seem that transition accounting would not be applicable. To rely on this premise, it is assumed that the following is true:

1. An asset was defined as either having an ARO or not based on the legal review at time of adoption
2. Of those assets with an ARO, the ones that were measurable and material were accounted for and disclosed in the financial statements
3. The remaining assets with an ARO were immeasurable, immaterial, or indeterminate in nature, such that only a disclosure was presented in the financial statements
4. A new legal obligation created in the current period for an asset would start the ARO accounting in the current period and no transitional or layer would apply
5. An asset with an ARO would use the cumulative-effect accounting upon adoption of FIN 47 or did use this accounting upon adoption of SFAS 143
6. Any change in estimate, a new layer is created. With an asset where only a disclosure existed, the new layer is done based on a zero layer from adoption.

FIN 47 seems to constitute new rules regarding the determination of when an ARO exists, and how (or what information can be used) to measure that ARO. When booking entries, which adopt these new rules, it explicitly directs one to discount the asset retirement cost back to the origination of the obligation. However, neither SFAS 143 nor FIN 47 requires this when new facts result in a change in the measurement of an existing ARO. In future years, if an immeasurable ARO becomes measurable, this is due to a change in facts rather than a change in the rules. Therefore, it seems more closely aligned with the prospective treatment given to a new layer. It seems likely that if the FASB wanted transition accounting for this situation, it would have explicitly required it in SFAS 143 paragraph B19 and FIN 47

paragraphs B19 and 27. This elucidation has not been tested through any audit and each company will need to decide if this accounting is appropriate for their financial statements.

**Transition Disclosures:**

Paragraph 11 of the Interpretation provides requirements for transitional disclosures and states:

In addition to disclosures required by paragraphs 19(c), 19(d), and 21 of APB Opinion No. 20, *Accounting Changes*, an entity shall compute on a pro forma basis and disclose in the footnotes to the financial statements for the beginning of the earliest year presented and at the end of all years presented the amount of the liability for AROs as if the Interpretation had been applied during all periods affected. The pro forma amounts of that liability shall be measured using the information, assumptions, and interest rates used to measure the obligation recognized upon adoption of the Interpretation.

Until the Interpretation is implemented, there is a disclosure requirement for adoption of new accounting pronouncements (SAB 74). Basically, an entity is to provide qualitative or quantitative information, when available, about the expected impact of implementation, updated quarterly.

**Welles, Sarah**

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**From:** Perrin, Rachele [Rachele.Perrin@DPLINC.com]  
**Sent:** Friday, January 13, 2006 4:05 PM  
**To:** Glenn, Erica  
**Subject:** RE: Stuart Station -Fin 47

Killen was built in after 1979 and contains no Asbestos material.

The Stuart \$\$ are 2005 dollars.

We worked with plant personnel to gain an understanding of our annual spending in asbestos clean up. They also provided information about the amount of cubic yards of asbestos remaining in the plant.

Rachele L Perrin  
Fixed Asset Accountant  
Dayton Power & Light  
259-7893 Office  
259-7293 Fax  
<mailto:rachele.perrin@dplinc.com>

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**From:** Glenn, Erica [mailto:Erica.Glenn@Cinergy.COM]  
**Sent:** Friday, January 13, 2006 3:58 PM  
**To:** Perrin, Rachele  
**Subject:** RE: Stuart Station -Fin 47

Rachele,

Thanks for the data. Are you sending the data for Killen separately? Is the amount below in 2005 dollars? Also, can you provide some detail regarding how the estimate was determined?

Thanks,  
Erica

---

**From:** Perrin, Rachele [mailto:Rachele.Perrin@DPLINC.com]  
**Sent:** Friday, January 13, 2006 3:48 PM  
**To:** Glenn, Erica; smhannis@aep.com  
**Subject:** Stuart Station -Fin 47

Here is our number.

We went back to 1990.

100% number for Asbestos at Stuart Station is \$9,949,849.

Sorry for the delay.

Rachele L Perrin  
Fixed Asset Accountant  
Dayton Power & Light  
259-7893 Office  
259-7293 Fax  
<mailto:rachele.perrin@dplinc.com>

KyPSC Case No. 2006-00172  
Attachment AG-DR-02-029  
Page 178 of 286

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\*\*\* DPL, Inc. \*\*\*



***Sargent & Lundy LLC***

55 E. Monroe  
Chicago, IL

**Richard A. Jerch**  
Project Manager  
Phone No. 312-269-6860  
Fax. No. 312-269-3871  
Email: richard.a.jerch@sargentlundy.com

February 27, 2003  
09940-003, -004  
Letter No. SLDM007

***Cinergy Corporation***

**Subject: *FAS143 Demolition Cost Estimates***

**Mr. Dale Wilson**  
Cinergy Corporation  
1000 East Main Street  
Plainfield, IN 46168-1782

**Dear Mr. Wilson:**

Pursuant to your request, Sargent & Lundy LLC has completed the preparation of demolition cost estimates for power plant river structures situated along navigable rivers for Cinergy East and West stations. The estimates are present day and were prepared to satisfy current FAS 143 requirements. The estimates include the costs for demolition and removal of power plant buildings, materials and equipment that is situated at or below the Ordinary High Water Level (OHWL) at each site. Where applicable, costs to backfill intake channels, plug intake piping, grade and re-seed the impacted areas to return them to vegetated ground cover conditions are also included.

The river structure demolition cost estimates were prepared for the following Cinergy stations:

Mr. Dale Wilson  
FAS 143 Cost Estimates

02/27/03  
Page 2

The demolition cost estimate and associated scope of work basis for each station is enclosed. Brief scope summaries and estimated associated river structure demolition costs are as follows.

**Beckjord**

Demolish and remove enclosed masonry pump house, equipment and associated substructure, river front bay of boiler building and associated materials and equipment, electrical power transformers and equipment in switchyard below OHWL, coal and fuel oil barge unloading facilities located within river and all river barge cells.

Total Demolition Cost Estimate: \$8,333,000  $\div 6$  units = 1,388,833  
S&L Estimate No. 21031B (1/31/03)

**Zimmer**

Service/circulating water pump house remains in place. Intake channel filled, associated sheet pile and concrete removed and intake piping plugged. Coal unloading, limestone unloading situated on piles with river and all river barge cells removed.

Total Demolition Cost Estimate: \$3,696,000  
S&L Estimate No. 21030A (1/21/03)

**Miami Fort**

Demolish and remove masonry crib house, equipment and associated substructure. Intake and discharge tunnels below OHWL removed, CW piping plugged and abandoned in place. Coal unloading facility and all coal barge river cells removed.

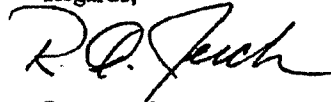
Total Demolition Cost Estimate: \$2,715,000  $\div 4$  units = 678,750  
S&L Estimate No. 21029B (1/31/03)

Mr. Dale Wilson  
FAS 143 Cost Estimates

02/27/03  
Page 4

If you have any questions concerning these estimates, please do not hesitate to call.

Regards,



R. A. Jeroh  
Project Manager

RAJ:  
Copies:  
R. Preshak 1/1  
P. Garza 1/1  
G. Komanduri 1/1  
Project File 1/1  
Sn13a\data\cinergy\demoesti\correspondence\06.doc

 Sargent & Lundy <sup>LLC</sup>

Gary M. Ault  
Senior Project Manager  
(312) 269-3656 (Phone)  
(312) 269-5937 (Fax)  
<gary.m.ault@sargentlundy.com>

January 23, 2006

Subject: Asbestos Remediation Cost Estimates  
Cinergy Coal-Fired Units  
S&L Project 09940-007

Mr. George F. Stevens  
Principal Engineer  
Cinergy Corporation  
1000 East Main Street  
Plainfield, Indiana 46168

Dear Mr. Stevens:

Attached are Sargent & Lundy's (S&L's) estimates of the costs to remove Asbestos Containing Materials (ACM) from Cinergy Corp.'s coal-fired generating stations in Indiana and Ohio. Cinergy had already estimated the quantity of ACM remaining at all plants except Beckjord and Cayuga. That data was used to develop cost estimates directly. In the case of Beckjord and Cayuga, units with similar electrical output ratings were chosen and the ACM remaining was estimated using parametric estimating techniques.

The rates used were all-inclusive, i.e., the rates include labor, asbestos disposal, material (such as vapor barriers and protective outerwear) and equipment required to ventilate the areas being remediated (such as HEPA filters and fans). The rates also include contractor profit and administrative expenses.

Many of the Cinergy units have asbestos-bearing material in the form of high-temperature gaskets. These gaskets are considered non-friable and their ultimate abatement costs are expected to be minimal. Therefore, no estimated removal costs were included for these gaskets.

S&L did not visit the various sites as part of this effort. The decision to not schedule sites visits was agreed-upon with Cinergy based on the following considerations:

1. Cinergy had already developed and/or agreed to develop ACM take-offs which include a level of detail consistent with other decommissioning cost liability estimates. S&L believes further detail would add little or no value for the level of accuracy desired.
2. The material quantity information developed by Cinergy is the best available short of a detailed sampling and inventory program.

Mr. George F. Stevens  
Asbestos Remediation Cost Estimates

January 23, 2006  
S&L Project 09940-007  
Page 2 of 4

The various generating stations are listed below along with the approach we used to derive the cost estimates for each:

W. C. Beckjord Generating Station

- Unit 6: Asbestos quantities were scaled up from Wabash River Unit 6 using the techniques of exponential costing.

East Bend Unit 2

S&L had provided an estimate of the costs to remove the remaining asbestos from this unit earlier in 2005. S&L used the earlier estimate in this report.

Mr. George F. Stevens  
Asbestos Remediation Cost Estimates

January 23, 2006  
S&L Project 09940-007  
Page 3 of 4

Miami Fort Generating Station

- Unit 7: Cinergy stated that the only asbestos-bearing material believed to be present in this unit is in high-temperature gaskets as discussed above.
- Unit 8: Cinergy stated that the only asbestos-bearing material believed to be present in this unit is in high-temperature gaskets as discussed above.

Zimmer Generating Station

Cinergy developed detailed estimates of the asbestos-bearing material remaining at the station and the costs for its removal. S&L estimated the costs of removal based on order of magnitude confirmation of Cinergy estimates with other industry sources.

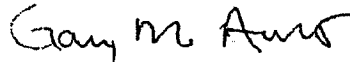
When asbestos material quantities were based on other similarly-sized units, and no definitive estimates were available regarding the quantity of asbestos material remaining; S&L estimated the percentage remaining based on the unit used as a model. All data supplied by Cinergy was converted into standardized units to correspond with S&L's cost models. For example, cubic feet of asbestos-containing boiler insulation was converted into square feet based on the insulation thickness.

Mr. George F. Stevens  
Asbestos Remediation Cost Estimates

January 23, 2006  
S&L Project 09940-007  
Page 4 of 4

A summary table of the estimated costs to remove the ACM in 2005 dollars is attached.

Yours very truly,



Gary M. Ault  
Senior Project Manager

Attachment

Distribution: Mel Baute  
Dale Wilson  
R. G. Presnak  
Project File

Sargent & Lundy LLC Chicago		CINERGY ASBESTOS REMOVAL STUDY	ESTIMATE # 21948B 01/10/06
-CONFIDENTIAL-			
<u>STATION</u>	<u>UNIT (Note 1)</u>	TOTAL	
WC BECKJORD			

WC BECKJORD	6	\$	672,877
		\$	

EAST BEND			
EAST BEND	2	\$	853,875
EAST BEND TOTAL		\$	853,875



<b>Sargent &amp; Lundy LLC</b> Chicago			<b>CINERGY</b> <b>ASBESTOS REMOVAL STUDY</b>  <b>-CONFIDENTIAL-</b>			<b>ESTIMATE # 21948B</b> 01/10/06		
<b><u>STATION</u></b>			<b><u>UNIT (Note 1)</u></b>			<b>TOTAL</b>		

<b>ZIMMER</b>			
<b>ZIMMER</b>	<b>ALL</b>	<b>\$</b>	<b>5,039,793</b>
<b>ZIMMER TOTAL</b>		<b>\$</b>	<b>5,039,793</b>
		<b>\$</b>	

Note (1): "ALL" indicates that the costs presented apply to all units. In most cases, these data represent facilities which are common to all units; In the case of Noblesville, individual unit data were not available for cost development.

**Welles, Sarah**

---

**From:** smhannis@aep.com  
**Sent:** Monday, December 19, 2005 9:09 AM  
**To:** Glenn, Erica  
**Subject:** RE: Conesville Unit 4 Asbestos Estimate

Erica,  
The \$406,682 was in 2005 dollars. However, we just revised the estimate to \$324,480 (2005 dollars) and updated the estimated settlement date to 2045.

Thanks,  
Susannah  
(614) 716-1172

"Glenn, Erica" <Erica.Glenn@Cinergy.COM>

To <smhannis@aep.com>

cc

12/16/2005 02:11 PM

Subject RE: Conesville Unit 4 Asbestos Estimate

Susannah,

Is the \$406,682 in 2005 dollars?

Thanks,  
Erica

---

**From:** smhannis@aep.com [mailto:smhannis@aep.com]  
**Sent:** Friday, December 09, 2005 6:06 PM  
**To:** Glenn, Erica  
**Cc:** temitchell@aep.com; jehenderson@aep.com; dadavis@aep.com  
**Subject:** Conesville Unit 4 Asbestos Estimate

Erica,  
Our estimate of asbestos removal/disposal costs at Conesville Unit 4 is \$406,682. This is 100% of the estimated cost, before an ownership percent is applied. We're using an estimated settlement date of 2041. Let me know if you have any questions.

Thanks,  
Susannah  
(614) 716-1172

8/17/2006

**Sargent & Lundy** LLC

Gary M. Ault  
Senior Project Manager  
(312) 269-3656 (Phone)  
(312) 269-5937 (Fax)  
<gary.m.ault@sargentlundy.com>

January 23, 2006

**Subject: Asbestos Remediation Cost Estimates  
Cinergy Coal-Fired Units  
S&L Project 09940-007**

Mr. George F. Stevens  
Principal Engineer  
Cinergy Corporation  
1000 East Main Street  
Plainfield, Indiana 46168

Dear Mr. Stevens:

Attached are Sargent & Lundy's (S&L's) estimates of the costs to remove Asbestos Containing Materials (ACM) from Cinergy Corp.'s coal-fired generating stations in Indiana and Ohio. Cinergy had already estimated the quantity of ACM remaining at all plants except Beckjord and Cayuga. That data was used to develop cost estimates directly. In the case of Beckjord and Cayuga, units with similar electrical output ratings were chosen and the ACM remaining was estimated using parametric estimating techniques.

The rates used were all-inclusive, i.e., the rates include labor, asbestos disposal, material (such as vapor barriers and protective outerwear) and equipment required to ventilate the areas being remediated (such as HEPA filters and fans). The rates also include contractor profit and administrative expenses.

Many of the Cinergy units have asbestos-bearing material in the form of high-temperature gaskets. These gaskets are considered non-friable and their ultimate abatement costs are expected to be minimal. Therefore, no estimated removal costs were included for these gaskets.

S&L did not visit the various sites as part of this effort. The decision to not schedule sites visits was agreed-upon with Cinergy based on the following considerations:

1. Cinergy had already developed and/or agreed to develop ACM take-offs which include a level of detail consistent with other decommissioning cost liability estimates. S&L believes further detail would add little or no value for the level of accuracy desired.
2. The material quantity information developed by Cinergy is the best available short of a detailed sampling and inventory program.

Mr. George F. Stevens  
Asbestos Remediation Cost Estimates

January 23, 2006  
S&L Project 09940-007  
Page 2 of 4

The various generating stations are listed below along with the approach we used to derive the cost estimates for each:

W. C. Beckjord Generating Station

- Unit 1: Asbestos quantities were scaled from Wabash River Unit 2 (a similarly-sized unit).
- Unit 2: Asbestos quantities were scaled from Wabash River Unit 2 (a similarly-sized unit).
- Unit 3: Asbestos quantities were scaled from Wabash River Unit 5 (the same size unit).
- Unit 4: Asbestos quantities were scaled from Miami Fort 6 (a similarly-sized unit).
- Unit 5: Asbestos quantities were scaled down from the previous S&L removal estimate for Wabash River Unit 6.
- Unit 6: Asbestos quantities were scaled up from Wabash River Unit 6 using the techniques of exponential costing.

Cayuga Generating Station

- Unit 1: Asbestos quantities were scaled up from Wabash River Unit 6 using techniques of exponential costing.
- Unit 2: Asbestos quantities were scaled up from Wabash River Unit 6 using techniques of exponential costing.

East Bend Unit 2

S&L had provided an estimate of the costs to remove the remaining asbestos from this unit earlier in 2005. S&L used the earlier estimate in this report.

Edwardsport Generating Station

- Units 6-8: Asbestos-containing material take-offs developed by Great Barrier, Inc. The S&L estimate was based on GBI's take-offs.

R. A. Gallagher Generating Station

- Units 1-4: Cinergy developed estimates of the quantities of asbestos-bearing material that remain at each of the four units. S&L estimated the costs of removal based on Cinergy's quantity estimates.

Gibson Generating Station

- Units 1-5: Cinergy developed an estimate of the asbestos-bearing material which remains at the station. S&L estimated the costs of removal based on Cinergy's quantity estimates.

Mr. George F. Stevens  
Asbestos Remediation Cost Estimates

January 23, 2006  
S&L Project 09940-007  
Page 3 of 4

#### Miami Fort Generating Station

- Unit 3: Cinergy developed estimates of the quantities of asbestos-bearing material that remain. S&L used the Cinergy quantity estimates to develop the costs of removal.
- Unit 4: Cinergy developed estimates of the quantities of asbestos-bearing material that remain. S&L used the Cinergy quantity estimates to develop the costs of removal.
- Unit 5: Cinergy developed estimates of the quantities of asbestos-bearing material that remain. S&L used the Cinergy quantity estimates to develop the costs of removal.
- Unit 6: S&L had provided an estimate of the costs to remove the remaining asbestos from this unit earlier in 2005. S&L used the earlier estimate in this report.
- Unit 7: Cinergy stated that the only asbestos-bearing material believed to be present in this unit is in high-temperature gaskets as discussed above.
- Unit 8: Cinergy stated that the only asbestos-bearing material believed to be present in this unit is in high-temperature gaskets as discussed above.

#### Noblesville Generating Station

- Units 1-2: Cinergy developed estimates of the quantities of asbestos-bearing material that remain at each of the units. S&L estimated the costs of removal based on Cinergy's quantity estimates.
- Units 3-5: Cinergy stated that the only asbestos-bearing material believed to be present in this unit is in high-temperature gaskets as discussed above.

#### Wabash River Generating Station

- Units 1-6: Cinergy has developed detailed estimates of the asbestos-bearing material remaining in all six units; Removal costs were based on these take-offs.

#### Zimmer Generating Station

Cinergy developed detailed estimates of the asbestos-bearing material remaining at the station and the costs for its removal. S&L estimated the costs of removal based on order of magnitude confirmation of Cinergy estimates with other industry sources.

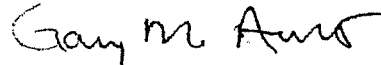
When asbestos material quantities were based on other similarly-sized units, and no definitive estimates were available regarding the quantity of asbestos material remaining; S&L estimated the percentage remaining based on the unit used as a model. All data supplied by Cinergy was converted into standardized units to correspond with S&L's cost models. For example, cubic feet of asbestos-containing boiler insulation was converted into square feet based on the insulation thickness.

Mr. George F. Stevens  
Asbestos Remediation Cost Estimates

January 23, 2006  
S&L Project 09940-0Q7  
Page 4 of 4

A summary table of the estimated costs to remove the ACM in 2005 dollars is attached.

Yours very truly,



Gary M. Ault  
Senior Project Manager

**Attachment**

Distribution: Mel Baute  
Dale Wilson  
R. G. Presnak  
Project File

<b>Sargent &amp; Lundy LLC Chicago</b>		<b>CINERGY ASBESTOS REMOVAL STUDY</b>		<b>ESTIMATE # 21948B 01/10/06</b>
<b>-CONFIDENTIAL-</b>				
<u>STATION</u>	<u>UNIT (Note 1)</u>	<u>TOTAL</u>		
<b>WC BECKJORD</b>				
WC BECKJORD	1	\$	503,936	
WC BECKJORD	2	\$	544,876	
WC BECKJORD	3	\$	480,213	
WC BECKJORD	4	\$	1,238,322	
WC BECKJORD	5	\$	477,465	
WC BECKJORD	6	\$	672,877	
<b>WC BECKJORD TOTAL</b>		<b>\$</b>	<b>3,917,688</b>	
<b>CAYUGA</b>				
CAYUGA	1	\$	759,449	
CAYUGA	2	\$	759,449	
<b>CAYUGA TOTAL</b>		<b>\$</b>	<b>1,518,897</b>	
<b>EAST BEND</b>				
EAST BEND	2	\$	853,875	
<b>EAST BEND TOTAL</b>		<b>\$</b>	<b>853,875</b>	
<b>EDWARDSPORT</b>				
EDWARDSPORT	6	\$	861,990	
EDWARDSPORT	7 & 8	\$	848,592	
EDWARDSPORT	ALL	\$	405,080	
<b>EDWARDSPORT TOTAL</b>		<b>\$</b>	<b>2,115,661</b>	
<b>RA GALLAGHER</b>				
RA GALLAGHER	1	\$	1,922,131	
RA GALLAGHER	2	\$	1,922,131	
RA GALLAGHER	3	\$	1,922,131	
RA GALLAGHER	4	\$	1,922,131	
RA GALLAGHER	ALL	\$	361,598	
<b>RA GALLAGHER TOTAL</b>		<b>\$</b>	<b>8,050,122</b>	

<b>Sargent &amp; Lundy LLC Chicago</b>		<b>CINERGY ASBESTOS REMOVAL STUDY</b>		<b>ESTIMATE # 21948B 01/10/06</b>
<b>-CONFIDENTIAL-</b>				
<u>STATION</u>	<u>UNIT (Note 1)</u>	<u>TOTAL</u>		
<b>GIBSON</b>				
GIBSON	1	\$	1,617,370	
GIBSON	2	\$	1,617,370	
GIBSON	3	\$	1,575,175	
GIBSON	4	\$	1,575,175	
GIBSON	5	\$	1,575,175	
GIBSON	ALL	\$	4,004,212	
<b>GIBSON TOTAL</b>		\$	<b>11,964,475</b>	
<b>MIAMI FORT</b>				
MIAMI FORT	3	\$	385,029	
MIAMI FORT	4	\$	385,029	
MIAMI FORT	5	\$	1,893,169	
MIAMI FORT	6	\$	2,176,075	
<b>MIAMI FORT TOTAL</b>		\$	<b>4,839,302</b>	
<b>NOBLESVILLE</b>				
NOBLESVILLE	ALL	\$	706,720	
<b>NOBLESVILLE TOTAL</b>		\$	<b>706,720</b>	
<b>WABASH RIVER</b>				
WABASH RIVER	1	\$	542,278	
WABASH RIVER	2	\$	586,333	
WABASH RIVER	3	\$	700,206	
WABASH RIVER	4	\$	586,333	
WABASH RIVER	5	\$	480,213	
WABASH RIVER	6	\$	628,157	
<b>WABASH RIVER TOTAL</b>		\$	<b>3,523,521</b>	
<b>ZIMMER</b>				
ZIMMER	ALL	\$	5,039,793	
<b>ZIMMER TOTAL</b>		\$	<b>5,039,793</b>	
<b>TOTAL</b>		\$	<b>42,530,055</b>	

Note (1): "ALL" indicates that the costs presented apply to all units. In most cases, these data represent facilities which are common to all units; In the case of Noblesville, individual unit data were not available for cost development.



Sargent & Lundy LLC Chicago		CINERGY ASBESTOS REMOVAL STUDY		ESTIMATE # 21948B 01/10/06
-CONFIDENTIAL-				
<u>STATION</u>	<u>UNIT</u> (Note 1)	<u>TOTAL</u>		
<b>WC BECKJORD</b>				
WC BECKJORD	1	\$	503,936	
WC BECKJORD	2	\$	544,876	
WC BECKJORD	3	\$	480,213	
WC BECKJORD	4	\$	1,238,322	
WC BECKJORD	5	\$	477,465	
WC BECKJORD	6	\$	672,877	
<b>WC BECKJORD TOTAL</b>		\$	<b>3,917,688</b>	
<b>CAYUGA</b>				
CAYUGA	1	\$	759,449	
CAYUGA	2	\$	759,449	
<b>CAYUGA TOTAL</b>		\$	<b>1,518,897</b>	
<b>EAST BEND</b>				
EAST BEND	2	\$	853,875	
<b>EAST BEND TOTAL</b>		\$	<b>853,875</b>	
<b>EDWARDSPORT</b>				
EDWARDSPORT	6	\$	861,990	
EDWARDSPORT	7 & 8	\$	848,592	
EDWARDSPORT	ALL	\$	405,080	
<b>EDWARDSPORT TOTAL</b>		\$	<b>2,115,661</b>	
<b>RA GALLAGHER</b>				
RA GALLAGHER	1	\$	1,922,131	
RA GALLAGHER	2	\$	1,922,131	
RA GALLAGHER	3	\$	1,922,131	
RA GALLAGHER	4	\$	1,922,131	
RA GALLAGHER	ALL	\$	361,598	
<b>RA GALLAGHER TOTAL</b>		\$	<b>8,050,122</b>	

<b>Sargent &amp; Lundy LLC</b> <b>Chicago</b>			<b>CINERGY</b> <b>ASBESTOS REMOVAL STUDY</b>			<b>ESTIMATE # 21948B</b> <b>01/10/06</b>		
<b>-CONFIDENTIAL-</b>								
<b><u>STATION</u></b>			<b><u>UNIT (Note 1)</u></b>			<b>TOTAL</b>		
<b>GIBSON</b>								
GIBSON			1			\$ 1,617,370		
GIBSON			2			\$ 1,617,370		
GIBSON			3			\$ 1,575,175		
GIBSON			4			\$ 1,575,175		
GIBSON			5			\$ 1,575,175		
GIBSON			ALL			\$ 4,004,212		
<b>GIBSON TOTAL</b>						<b>\$ 11,964,475</b>		
<b>MIAMI FORT</b>								
MIAMI FORT			3			\$ 385,029		
MIAMI FORT			4			\$ 385,029		
MIAMI FORT			5			\$ 1,893,169		
MIAMI FORT			6			\$ 2,176,075		
<b>MIAMI FORT TOTAL</b>						<b>\$ 4,839,302</b>		
<b>NOBLESVILLE</b>								
NOBLESVILLE			ALL			\$ 706,720		
<b>NOBLESVILLE TOTAL</b>						<b>\$ 706,720</b>		
<b>WABASH RIVER</b>								
WABASH RIVER			1			\$ 542,278		
WABASH RIVER			2			\$ 586,333		
WABASH RIVER			3			\$ 700,206		
WABASH RIVER			4			\$ 586,333		
WABASH RIVER			5			\$ 480,213		
WABASH RIVER			6			\$ 628,157		
<b>WABASH RIVER TOTAL</b>						<b>\$ 3,523,521</b>		
<b>ZIMMER</b>								
ZIMMER			ALL			\$ 5,039,793		
<b>ZIMMER TOTAL</b>						<b>\$ 5,039,793</b>		
<b>TOTAL</b>						<b>\$ 42,530,055</b>		

Note (1): "ALL" indicates that the costs presented apply to all units. In most cases, these data represent facilities which are common to all units; In the case of Noblesville, individual unit data were not available for cost development.

Sargent & Lundy LLC  
 Chicago

CINERGY  
 ASBESTOS STUDY

Project No.: 9940-007  
 Date: 9DEC05  
 Revision No.: 1  
 Revision Date:  
 Run Date:

-CONFIDENTIAL-

STATION	UNIT	DESCRIPTION	Quantity	Unit of Measure	Unit Cost	Total Equipment or Material Cost	Unit Man-hours (Base)	Total Man-hours (Base)	Crew Code	Crew Wage Rate	Total Construction & Erection Cost	Total Projected Cost
WC BECKJORD												
WC BECKJORD	1	PIPE	1,303	LF	0.00	\$ -	0.45	587	ASBT	100	58,654	\$ 58,654
WC BECKJORD	1	TOTAL EQUIP AND BOILER CASING	9,329	SF	0.00	\$ -	0.33	3,078	ASBT	100	307,844	\$ 307,844
WC BECKJORD	2	PIPE	1,965	LF	0.00	\$ -	0.45	884	ASBT	100	88,429	\$ 88,429
WC BECKJORD	2	TOTAL EQUIP AND BOILER CASING	9,329	SF	0.00	\$ -	0.33	3,078	ASBT	100	307,844	\$ 307,844
WC BECKJORD	3	PIPE	2,035	LF	0.00	\$ -	0.45	916	ASBT	100	91,582	\$ 91,582
WC BECKJORD	3	TOTAL EQUIP AND BOILER CASING	7,808	SF	0.00	\$ -	0.33	2,577	ASBT	100	257,664	\$ 257,664
WC BECKJORD	4	PIPE	5,493	LF	0.00	\$ -	0.45	2,472	ASBT	100	247,198	\$ 247,198
WC BECKJORD	4	TOTAL EQUIP AND BOILER CASING	19,800	SF	0.00	\$ -	0.33	6,534	ASBT	100	653,400	\$ 653,400
WC BECKJORD	5	PIPE	939	LF	0.00	\$ -	0.45	422	ASBT	100	42,233	\$ 42,233
WC BECKJORD	5	TOTAL EQUIP AND BOILER CASING	9,243	SF	0.00	\$ -	0.33	3,050	ASBT	100	305,015	\$ 305,015
WC BECKJORD	6	PIPE	1,323	LF	0.00	\$ -	0.45	595	ASBT	100	59,517	\$ 59,517
WC BECKJORD	6	TOTAL EQUIP AND BOILER CASING	13,026	SF	0.00	\$ -	0.33	4,298	ASBT	100	429,848	\$ 429,848
<b>WC BECKJORD TOTAL</b>								<b>28,492</b>			<b>2,849,228</b>	<b>\$ 2,849,228</b>
<b>ESTIMATED INDIRECTS</b>		<b>10% OF DIRECT COST</b>										<b>\$ 284,923</b>
<b>RISK PREMIUM</b>		<b>25% OF LABOR AND INDIRECTS</b>										<b>\$ 783,538</b>
<b>WC BECKJORD TOTAL</b>												<b>\$ 3,917,688</b>
CAYUGA												
CAYUGA	1	PIPE	1,493	LF	0.00	\$ -	0.45	672	ASBT	100	67,174	\$ 67,174
CAYUGA	1	TOTAL EQUIP AND BOILER CASING	14,702	SF	0.00	\$ -	0.33	4,852	ASBT	100	485,152	\$ 485,152
CAYUGA	2	PIPE	1,493	LF	0.00	\$ -	0.45	672	ASBT	100	67,174	\$ 67,174
CAYUGA	2	TOTAL EQUIP AND BOILER CASING	14,702	SF	0.00	\$ -	0.33	4,852	ASBT	100	485,152	\$ 485,152
<b>CAYUGA TOTAL</b>								<b>11,047</b>			<b>1,104,652</b>	<b>\$ 1,104,652</b>

Sargent & Lundy <sup>LLC</sup> Chicago		CINERGY ASBESTOS STUDY					Project No.: 9940-007 Date: 9DEC05 Revision No.: 1 Revision Date: Run Date:					
-CONFIDENTIAL-												
STATION	UNIT	DESCRIPTION	Quantity	Unit of Measure	Unit Cost	Total Equipment or Material Cost	Unit Man-hours (Base)	Total Man-hours (Base)	Crew Code	Crew Wage Rate	Total Construction & Erection Cost	Total Projected Cost
ESTIMATED INDIRECTS		10% OF DIRECT COST										\$ 110,465
RISK PREMIUM		25% OF LABOR AND INDIRECTS										\$ 303,779
CAYUGA TOTAL												\$ 1,518,897
EAST BEND												
EAST BEND	2	TRANSITE PIPE	13,800	LF	0.00	\$ -	0.45	6,210	ASBT	100	621,000	\$ 621,000
EAST BEND TOTAL								6,210			621,000	\$ 621,000
ESTIMATED INDIRECTS		10% OF DIRECT COST										\$ 62,100
RISK PREMIUM		25% OF LABOR AND INDIRECTS										\$ 170,775
EAST BEND TOTAL												\$ 853,875
EDWARDSPORT	6	PIPE	3,150	LF	0.00	\$ -	0.45	1,418	ASBT	100	141,750	\$ 141,750
EDWARDSPORT	6	TOTAL EQUIP AND BOILER CASING	14,702	SF	0.00	\$ -	0.33	4,852	ASBT	100	485,152	\$ 485,152
EDWARDSPORT	7 & 8	PIPE	4,726	LF	0.00	\$ -	0.45	2,127	ASBT	100	212,670	\$ 212,670
EDWARDSPORT	7 & 8	TOTAL EQUIP AND BOILER CASING	12,257	SF	0.00	\$ -	0.33	4,045	ASBT	100	404,488	\$ 404,488
EDWARDSPORT	ALL	TRANSITE SIDING	17,105	SF	0.00	\$ -	0.07	1,146	ASBT	100	114,604	\$ 114,604
EDWARDSPORT	ALL	FLOOR TILE	7,500	SF	0.00	\$ -	0.08	600	ASBT	100	60,000	\$ 60,000
EDWARDSPORT	ALL	CEILING TILE	7,500	SF	0.00	\$ -	0.16	1,200	ASBT	100	120,000	\$ 120,000
EDWARDSPORT TOTAL								21,597			2,159,663	\$ 3,246,413
ESTIMATED INDIRECTS		10% OF DIRECT COST										\$ 324,641
RISK PREMIUM		25% OF LABOR AND INDIRECTS										\$ 892,764
EDWARDSPORT TOTAL												\$ 4,463,818
RA GALLAGHER												
RA GALLAGHER	1	PIPE	3,503	LF	0.00	\$ -	0.45	1,576	ASBT	100	157,635	\$ 157,635
RA GALLAGHER	1	TOTAL EQUIP AND BOILER CASING	37,584	SF	0.00	\$ -	0.33	12,403	ASBT	100	1,240,279	\$ 1,240,279
RA GALLAGHER	2	PIPE	3,503	LF	0.00	\$ -	0.45	1,576	ASBT	100	157,635	\$ 157,635
RA GALLAGHER	2	TOTAL EQUIP AND BOILER CASING	37,584	SF	0.00	\$ -	0.33	12,403	ASBT	100	1,240,279	\$ 1,240,279

Sargent & Lundy LLC  
Chicago

CINERGY  
ASBESTOS STUDY

Project No.: 9940-007  
Date: 9DEC05  
Revision No.: 1  
Revision Date:  
Run Date:

-CONFIDENTIAL-

STATION	UNIT	DESCRIPTION	Quantity	Unit of Measure	Unit Cost	Total Equipment or Material Cost	Unit Man-hours (Base)	Total Man-hours (Base)	Crew Code	Crew Wage Rate	Total Construction & Erection Cost	Total Projected Cost
RA GALLAGHER	3	PIPE	3,503	LF	0.00	\$ -	0.45	1,576	ASBT	100	157,635	\$ 157,635
RA GALLAGHER	3	TOTAL EQUIP AND BOILER CASING	37,584	SF	0.00	\$ -	0.33	12,403	ASBT	100	1,240,279	\$ 1,240,279
RA GALLAGHER	4	PIPE	3,503	LF	0.00	\$ -	0.45	1,576	ASBT	100	157,635	\$ 157,635
RA GALLAGHER	4	TOTAL EQUIP AND BOILER CASING	37,584	SF	0.00	\$ -	0.33	12,403	ASBT	100	1,240,279	\$ 1,240,279
RA GALLAGHER	ALL	FLOOR TILE	10,800	SF	0.00	\$ -	0.08	902	ASBT	100	90,180	\$ 90,180
RA GALLAGHER	ALL	CEILING TILE	10,800	SF	0.00	\$ -	0.16	1,728	ASBT	100	172,800	\$ 172,800
<b>RA GALLAGHER TOTAL</b>								<b>58,546</b>			<b>5,854,634</b>	<b>\$ 5,854,634</b>
<b>ESTIMATED INDIRECTS</b>		<b>10% OF DIRECT COST</b>										<b>\$ 585,463</b>
<b>RISK PREMIUM</b>		<b>25% OF LABOR AND INDIRECTS</b>										<b>\$ 1,610,024</b>
<b>RA GALLAGHER TOTAL</b>												<b>\$ 8,050,122</b>
<b>GIBSON</b>												
GIBSON	1	TRANSITE SIDING	175,563	SF	0.00	\$ -	0.07	11,763	ASBT	100	1,176,269	\$ 1,176,269
GIBSON	2	TRANSITE SIDING	175,563	SF	0.00	\$ -	0.07	11,763	ASBT	100	1,176,269	\$ 1,176,269
GIBSON	3	TRANSITE SIDING	170,982	SF	0.00	\$ -	0.07	11,456	ASBT	100	1,145,582	\$ 1,145,582
GIBSON	4	TRANSITE SIDING	170,982	SF	0.00	\$ -	0.07	11,456	ASBT	100	1,145,582	\$ 1,145,582
GIBSON	5	TRANSITE SIDING	170,982	SF	0.00	\$ -	0.07	11,456	ASBT	100	1,145,582	\$ 1,145,582
GIBSON	ALL	TRANSITE SIDING	351,980	SF	0.00	\$ -	0.07	23,583	ASBT	100	2,358,266	\$ 2,358,266
GIBSON	ALL	FLOOR TILE	69,236	SF	0.00	\$ -	0.08	5,539	ASBT	100	553,888	\$ 553,888
<b>GIBSON TOTAL</b>								<b>87,014</b>			<b>8,701,436</b>	<b>\$ 8,701,436</b>
<b>ESTIMATED INDIRECTS</b>		<b>10% OF DIRECT COST</b>										<b>\$ 870,144</b>
<b>RISK PREMIUM</b>		<b>25% OF LABOR AND INDIRECTS</b>										<b>\$ 2,392,895</b>
<b>GIBSON TOTAL</b>												<b>\$ 11,964,475</b>
<b>MIAMI FORT</b>												
MIAMI FORT	3	PIPE	3,417	LF	0.00	\$ -	0.45	1,538	ASBT	100	153,765	\$ 153,765
MIAMI FORT	3	TOTAL EQUIP AND BOILER CASING	3,696	SF	0.00	\$ -	0.33	1,220	ASBT	100	121,968	\$ 121,968
MIAMI FORT	3	TRANSITE SIDING	640	SF	0.00	\$ -	0.07	43	ASBT	100	4,288	\$ 4,288
MIAMI FORT	4	PIPE	3,417	LF	0.00	\$ -	0.45	1,538	ASBT	100	153,765	\$ 153,765

Sargent & Lundy LLC  
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CINERGY  
 ASBESTOS STUDY

Project No.: 9940-007  
 Date: 9DEC05  
 Revision No.: 1  
 Revision Date:  
 Run Date:

-CONFIDENTIAL-

STATION	UNIT	DESCRIPTION	Quantity	Unit of Measure	Unit Cost	Total Equipment or Material Cost	Unit Man-hours (Base)	Total Man-hours (Base)	Crew Code	Crew Wage Rate	Total Construction & Erection Cost	Total Projected Cost
MIAMI FORT	4	TOTAL EQUIP AND BOILER CASING	3,696	SF	0.00	\$ -	0.33	1,220	ASBT	100	121,968	\$ 121,968
MIAMI FORT	4	TRANSITE SIDING	640	SF	0.00	\$ -	0.07	43	ASBT	100	4,288	\$ 4,288
MIAMI FORT	5	PIPE	5,553	LF	0.00	\$ -	0.45	2,499	ASBT	100	249,885	\$ 249,885
MIAMI FORT	5	TOTAL EQUIP AND BOILER CASING	33,115	SF	0.00	\$ -	0.33	10,928	ASBT	100	1,092,795	\$ 1,092,795
MIAMI FORT	5	TRANSITE SIDING	5,100	SF	0.00	\$ -	0.07	342	ASBT	100	34,170	\$ 34,170
MIAMI FORT	6	PIPE	13,800	LF	0.00	\$ -	0.45	6,210	ASBT	100	621,000	\$ 621,000
MIAMI FORT	6	TOTAL EQUIP AND BOILER CASING	19,800	SF	0.00	\$ -	0.33	6,534	ASBT	100	653,400	\$ 653,400
MIAMI FORT	6	TRANSITE SIDING	46,000	SF	0.00	\$ -	0.07	3,082	ASBT	100	308,200	\$ 308,200
<b>MIAMI FORT TOTAL</b>								<b>35,195</b>			<b>3,519,492</b>	<b>\$ 3,519,492</b>
<b>ESTIMATED INDIRECTS</b>		<b>10% OF DIRECT COST</b>										<b>\$ 351,949</b>
<b>RISK PREMIUM</b>		<b>25% OF LABOR AND INDIRECTS</b>										<b>\$ 967,860</b>
<b>MIAMI FORT TOTAL</b>												<b>\$ 4,839,302</b>
<b>NOBLESVILLE</b>												
NOBLESVILLE Unit 1&2	ALL	PIPE	5,682	LF	0.00	\$ -	0.45	2,557	ASBT	100	255,690	\$ 255,690
NOBLESVILLE Unit 1&2	ALL	TOTAL EQUIP AND BOILER CASING	6,506	SF	0.00	\$ -	0.33	2,147	ASBT	100	214,698	\$ 214,698
NOBLESVILLE Unit 1&2	ALL	TRANSITE SIDING	6,506	SF	0.00	\$ -	0.07	436	ASBT	100	43,590	\$ 43,590
<b>NOBLESVILLE TOTAL</b>								<b>5,140</b>			<b>513,978</b>	<b>\$ 513,978</b>
<b>ESTIMATED INDIRECTS</b>		<b>10% OF DIRECT COST</b>										<b>\$ 51,398</b>
<b>RISK PREMIUM</b>		<b>25% OF LABOR AND INDIRECTS</b>										<b>\$ 141,344</b>
<b>NOBLESVILLE TOTAL</b>												<b>\$ 706,720</b>
<b>WABASH RIVER</b>												
WABASH RIVER	1	PIPE	1,403	LF	0.00	\$ -	0.45	631	ASBT	100	63,117	\$ 63,117
WABASH RIVER	1	TOTAL EQUIP AND BOILER CASING	10,038	SF	0.00	\$ -	0.33	3,313	ASBT	100	331,267	\$ 331,267
WABASH RIVER	2	PIPE	2,115	LF	0.00	\$ -	0.45	952	ASBT	100	95,157	\$ 95,157
WABASH RIVER	2	TOTAL EQUIP AND BOILER CASING	10,038	SF	0.00	\$ -	0.33	3,313	ASBT	100	331,267	\$ 331,267



Sargent & Lundy <sup>LLC</sup> Chicago		CINERGY ASBESTOS REMOVAL STUDY		Estimate No.: 21948B Project No.: 9940-007 Date: 10JAN06 Revision No.: 2 Revision Date: Run Date:	
-CONFIDENTIAL-					
<u>STATION</u>	<u>UNIT</u>	<u>Total Projected Cost Labor and Materials PER UNIT</u>	<u>ESTIMATED INDIRECTS @ 10%</u>	<u>RISK PREMIUM @ 25%</u>	<u>TOTAL</u>
<b>WC BECKJORD</b>					
WC BECKJORD	1	\$ 366,499	\$ 36,650	\$ 100,787.14	\$ 503,936
WC BECKJORD	2	\$ 396,273	\$ 39,627	\$ 108,975	\$ 544,876
WC BECKJORD	3	\$ 349,246	\$ 34,925	\$ 96,043	\$ 480,213
WC BECKJORD	4	\$ 900,598	\$ 90,060	\$ 247,664	\$ 1,238,322
WC BECKJORD	5	\$ 347,247	\$ 34,725	\$ 95,493	\$ 477,465
WC BECKJORD	6	\$ 489,365	\$ 48,936	\$ 134,575	\$ 672,877
<b>WC BECKJORD TOTAL</b>		<b>\$ 2,849,228</b>	<b>\$ 284,923</b>	<b>\$ 783,538</b>	<b>\$ 3,917,688</b>
<b>CAYUGA</b>					
CAYUGA	1	\$ 552,326	\$ 55,233	\$ 151,890	\$ 759,449
CAYUGA	2	\$ 552,326	\$ 55,233	\$ 151,890	\$ 759,449
<b>CAYUGA TOTAL</b>		<b>\$ 1,104,652</b>	<b>\$ 110,465</b>	<b>\$ 303,779</b>	<b>\$ 1,518,897</b>
<b>EAST BEND</b>					
EAST BEND	2	\$ 621,000	\$ 62,100	\$ 170,775	\$ 853,875
<b>EAST BEND TOTAL</b>		<b>\$ 621,000</b>	<b>\$ 62,100</b>	<b>\$ 170,775</b>	<b>\$ 853,875</b>
<b>EDWARDSPORT</b>					
EDWARDSPORT	6	\$ 626,902	\$ 62,690	\$ 172,398	\$ 861,990
EDWARDSPORT	7 & 8	\$ 617,158	\$ 61,716	\$ 169,718	\$ 848,592
EDWARDSPORT	ALL	\$ 294,604	\$ 29,460	\$ 81,016	\$ 405,080
<b>EDWARDSPORT TOTAL</b>		<b>\$ 1,538,663</b>	<b>\$ 153,866</b>	<b>\$ 423,132</b>	<b>\$ 2,115,661</b>
<b>RA GALLAGHER</b>					
RA GALLAGHER	1	\$ 1,397,914	\$ 139,791	\$ 384,426	\$ 1,922,131
RA GALLAGHER	2	\$ 1,397,914	\$ 139,791	\$ 384,426	\$ 1,922,131
RA GALLAGHER	3	\$ 1,397,914	\$ 139,791	\$ 384,426	\$ 1,922,131
RA GALLAGHER	4	\$ 1,397,914	\$ 139,791	\$ 384,426	\$ 1,922,131
RA GALLAGHER	ALL	\$ 262,980	\$ 26,298	\$ 72,320	\$ 361,598
<b>RA GALLAGHER TOTAL</b>		<b>\$ 5,854,634</b>	<b>\$ 585,463</b>	<b>\$ 1,610,024</b>	<b>\$ 8,050,122</b>



Sargent & Lundy LLC Chicago		CINERGY ASBESTOS REMOVAL STUDY		Estimate No.: 21948B Project No.: 9940-007 Date: 10JAN06 Revision No.: 2 Revision Date: Run Date:	
-CONFIDENTIAL-					
STATION	UNIT	Total Projected Cost Labor and Materials PER UNIT	ESTIMATED INDIRECTS @ 10%	RISK PREMIUM @ 25%	TOTAL
<b>GIBSON</b>					
GIBSON	1	\$ 1,176,269	\$ 117,627	\$ 323,474	\$ 1,617,370
GIBSON	2	\$ 1,176,269	\$ 117,627	\$ 323,474	\$ 1,617,370
GIBSON	3	\$ 1,145,582	\$ 114,558	\$ 315,035	\$ 1,575,175
GIBSON	4	\$ 1,145,582	\$ 114,558	\$ 315,035	\$ 1,575,175
GIBSON	5	\$ 1,145,582	\$ 114,558	\$ 315,035	\$ 1,575,175
GIBSON	ALL	\$ 2,912,154	\$ 291,215	\$ 800,842	\$ 4,004,212
<b>GIBSON TOTAL</b>		<b>\$ 8,701,436</b>	<b>\$ 870,144</b>	<b>\$ 2,392,895</b>	<b>\$ 11,964,475</b>
<b>MIAMI FORT</b>					
MIAMI FORT	3	\$ 280,021	\$ 28,002	\$ 77,006	\$ 385,029
MIAMI FORT	4	\$ 280,021	\$ 28,002	\$ 77,006	\$ 385,029
MIAMI FORT	5	\$ 1,376,850	\$ 137,685	\$ 378,634	\$ 1,893,169
MIAMI FORT	6	\$ 1,582,600	\$ 158,260	\$ 435,215	\$ 2,176,075
<b>MIAMI FORT TOTAL</b>		<b>\$ 3,519,492</b>	<b>\$ 351,949</b>	<b>\$ 967,860</b>	<b>\$ 4,839,302</b>
<b>NOBLESVILLE</b>					
NOBLESVILLE Unit 1&2	ALL	\$ 513,978	\$ 51,398	\$ 141,344	\$ 706,720
<b>NOBLESVILLE TOTAL</b>		<b>\$ 513,978</b>	<b>\$ 51,398</b>	<b>\$ 141,344</b>	<b>\$ 706,720</b>
<b>WABASH RIVER</b>					
WABASH RIVER	1	\$ 394,384	\$ 39,438	\$ 108,456	\$ 542,278
WABASH RIVER	2	\$ 426,424	\$ 42,642	\$ 117,267	\$ 586,333
WABASH RIVER	3	\$ 509,241	\$ 50,924	\$ 140,041	\$ 700,206
WABASH RIVER	4	\$ 426,424	\$ 42,642	\$ 117,267	\$ 586,333
WABASH RIVER	5	\$ 349,246	\$ 34,925	\$ 96,043	\$ 480,213
WABASH RIVER	6	\$ 456,842	\$ 45,684	\$ 125,631	\$ 628,157
<b>WABASH RIVER TOTAL</b>		<b>\$ 2,562,561</b>	<b>\$ 256,256</b>	<b>\$ 704,704</b>	<b>\$ 3,523,521</b>
<b>ZIMMER</b>					
ZIMMER	ALL	\$ 3,665,304	\$ 366,530	\$ 1,007,959	\$ 5,039,793
<b>ZIMMER TOTAL</b>		<b>\$ 3,665,304</b>	<b>\$ 366,530</b>	<b>\$ 1,007,959</b>	<b>\$ 5,039,793</b>
<b>TOTAL</b>		<b>\$ 30,930,949</b>	<b>\$ 3,093,095</b>	<b>\$ 8,506,011</b>	<b>\$ 42,530,055</b>

CINERGY  
 ASBESTOS STUDY

Estimate No.: 21948B  
 Project No.: 9940-007  
 Date: 10JAN06  
 Revision No.: 2  
 Revision Date:  
 Run Date:

-CONFIDENTIAL-

UNIT	<u>Total Projected Cost Labor and Materials PER UNIT</u>	ESTIMATED INDIRECTSS @ 10%	RISK PREMIUM @ 25%	TOTAL
1	\$ 366,499	\$ 36,650	\$ 100,787.14	\$ 503,936
2	\$ 396,273	\$ 39,627	\$ 108,975	\$ 544,876
3	\$ 349,246	\$ 34,925	\$ 96,043	\$ 480,213
4	\$ 900,598	\$ 90,060	\$ 247,664	\$ 1,238,322
5	\$ 347,247	\$ 34,725	\$ 95,493	\$ 477,465
6	\$ 489,365	\$ 48,936	\$ 134,575	\$ 672,877
	<b>\$ 2,849,228</b>	<b>\$ 284,923</b>	<b>\$ 783,538</b>	<b>\$ 3,917,688</b>
1	\$ 552,326	\$ 55,233	\$ 151,890	\$ 759,449
2	\$ 552,326	\$ 55,233	\$ 151,890	\$ 759,449

<b>CINERGY ASBESTOS STUDY</b>		<b>Estimate No.: 21948B Project No.: 9940-007 Date: 10JAN06 Revision No.: 2 Revision Date: Run Date:</b>		
<b>-CONFIDENTIAL-</b>				
<b>UNIT</b>	<b>Total Projected Cost Labor and Materials PER UNIT</b>	<b>ESTIMATED INDIRECTSS @ 10%</b>	<b>RISK PREMIUM @ 25%</b>	<b>TOTAL</b>
	\$ 1,104,652	\$ 110,465	\$ 303,779	\$ 1,518,897
2	\$ 621,000	\$ 62,100	\$ 170,775	\$ 853,875
	\$ 621,000	\$ 62,100	\$ 170,775	\$ 853,875
6	\$ 626,902	\$ 62,690	\$ 172,398	\$ 861,990
7 & 8	\$ 617,158	\$ 61,716	\$ 169,718	\$ 848,592
ALL	\$ 294,604	\$ 29,460	\$ 81,016	\$ 405,080
	\$ 1,538,663	\$ 153,866	\$ 423,132	\$ 2,115,661
1	\$ 1,397,914	\$ 139,791	\$ 384,426	\$ 1,922,131

**CINERGY  
 ASBESTOS STUDY**

**Estimate No.: 21948B  
 Project No.: 9940-007  
 Date: 10JAN06  
 Revision No.: 2  
 Revision Date:  
 Run Date:**

**-CONFIDENTIAL-**

<u>UNIT</u>	<u>Total Projected Cost Labor and Materials PER UNIT</u>	<u>ESTIMATED INDIRECTSS @ 10%</u>	<u>RISK PREMIUM @ 25%</u>	<u>TOTAL</u>
2	\$ 1,397,914	\$ 139,791	\$ 384,426	\$ 1,922,131
3	\$ 1,397,914	\$ 139,791	\$ 384,426	\$ 1,922,131
4	\$ 1,397,914	\$ 139,791	\$ 384,426	\$ 1,922,131
ALL	\$ 262,980	\$ 26,298	\$ 72,320	\$ 361,598
	<b>\$ 5,854,634</b>	<b>\$ 585,463</b>	<b>\$ 1,610,024</b>	<b>\$ 8,050,122</b>
1	\$ 1,176,269	\$ 117,627	\$ 323,474	\$ 1,617,370
2	\$ 1,176,269	\$ 117,627	\$ 323,474	\$ 1,617,370
3	\$ 1,145,582	\$ 114,558	\$ 315,035	\$ 1,575,175
4	\$ 1,145,582	\$ 114,558	\$ 315,035	\$ 1,575,175
5	\$ 1,145,582	\$ 114,558	\$ 315,035	\$ 1,575,175
ALL	\$ 2,912,154	\$ 291,215	\$ 800,842	\$ 4,004,212
	<b>\$ 8,701,436</b>	<b>\$ 870,144</b>	<b>\$ 2,392,895</b>	<b>\$ 11,964,475</b>

CINERGY  
 ASBESTOS STUDY

Estimate No.: 21948B  
 Project No.: 9940-007  
 Date: 10JAN06  
 Revision No.: 2  
 Revision Date:  
 Run Date:

-CONFIDENTIAL-

<u>UNIT</u>	<u>Total Projected Cost Labor and Materials PER UNIT</u>	<u>ESTIMATED INDIRECTSS @ 10%</u>	<u>RISK PREMIUM @ 25%</u>	<u>TOTAL</u>
3	\$ 280,021	\$ 28,002	\$ 77,006	\$ 385,029
4	\$ 280,021	\$ 28,002	\$ 77,006	\$ 385,029
5	\$ 1,376,850	\$ 137,685	\$ 378,634	\$ 1,893,169
6	\$ 1,582,600	\$ 158,260	\$ 435,215	\$ 2,176,075
	<b>\$ 3,519,492</b>	<b>\$ 351,949</b>	<b>\$ 967,860</b>	<b>\$ 4,839,302</b>
ALL	\$ 513,978	\$ 51,398	\$ 141,344	\$ 706,720
	<b>\$ 513,978</b>	<b>\$ 51,398</b>	<b>\$ 141,344</b>	<b>\$ 706,720</b>
1	\$ 394,384	\$ 39,438	\$ 108,456	\$ 542,278

**CINERGY  
 ASBESTOS STUDY**

Estimate No.: 21948B  
 Project No.: 9940-007  
 Date: 10JAN06  
 Revision No.: 2  
 Revision Date:  
 Run Date:

**-CONFIDENTIAL-**

<u>UNIT</u>	<u>Total Projected Cost Labor and Materials PER UNIT</u>	<u>ESTIMATED INDIRECTSS @ 10%</u>	<u>RISK PREMIUM @ 25%</u>	<u>TOTAL</u>
2	\$ 426,424	\$ 42,642	\$ 117,267	\$ 586,333
3	\$ 509,241	\$ 50,924	\$ 140,041	\$ 700,206
4	\$ 426,424	\$ 42,642	\$ 117,267	\$ 586,333
5	\$ 349,246	\$ 34,925	\$ 96,043	\$ 480,213
6	\$ 456,842	\$ 45,684	\$ 125,631	\$ 628,157
	<b>\$ 2,562,561</b>	<b>\$ 256,256</b>	<b>\$ 704,704</b>	<b>\$ 3,523,521</b>
ALL	\$ 3,665,304	\$ 366,530	\$ 1,007,959	\$ 5,039,793
	<b>\$ 3,665,304</b>	<b>\$ 366,530</b>	<b>\$ 1,007,959</b>	<b>\$ 5,039,793</b>
	<b>\$ 30,930,949</b>	<b>\$ 3,093,095</b>	<b>\$ 8,506,011</b>	<b>\$ 42,530,055</b>



Sargent & Lundy LLC  
 Chicago

CINERGY  
 ASBESTOS STUDY

Estimate No.: 21948B  
 Project No.: 9940-007  
 Date: 10JAN06  
 Revision No.: 2  
 Revision Date: 01/10/06  
 Run Date:

-CONFIDENTIAL-

STATION	UNIT	DESCRIPTION	Quantity	Unit of Measure	Unit Cost	Total Equipment or Material Cost	Cost Development	Unit Man-hours (Base)	Total Man-hours (Base)	Crew Code	Crew Wage Rate	Total Construction & Erection Cost	Total Projected Cost
<b>EAST BEND</b>													
EAST BEND	2	TRANSITE PIPE	13,800	LF	0.00	\$ -		0.45	6,210	ASBT	100	621,000	\$ 621,000
<b>EAST BEND TOTAL</b>												\$ 621,000	
<b>ESTIMATED INDIRECTS</b>		10% OF DIRECT COST										\$ 62,100	
<b>RISK PREMIUM</b>		25% OF LABOR AND INDIRECTS										\$ 170,775	
<b>EAST BEND TOTAL</b>												\$ 853,875	
<b>EDWARDSPORT</b>													
EDWARDSPORT	6	PIPE	3,150	LF	0.00	\$ -	Takeoffs by Great Barrier	0.45	1,418	ASBT	100	141,750	\$ 141,750
EDWARDSPORT	7 & 8	PIPE	4,726	LF	0.00	\$ -	Takeoffs by Great Barrier	0.45	2,127	ASBT	100	212,670	\$ 212,670
EDWARDSPORT	6	TOTAL EQUIP AND BOILER CASING	14,702	SF	0.00	\$ -	Takeoffs by Great Barrier	0.33	4,852	ASBT	100	485,152	\$ 485,152
EDWARDSPORT	7 & 8	TOTAL EQUIP AND BOILER CASING	12,257	SF	0.00	\$ -	Takeoffs by Great Barrier	0.33	4,045	ASBT	100	404,488	\$ 404,488
EDWARDSPORT	ALL	TRANSITE SIDING	17,105	SF	0.00	\$ -	Takeoffs by Great Barrier	0.07	1,146	ASBT	100	114,604	\$ 114,604
EDWARDSPORT	ALL	FLOOR TILE	7,500	SF	0.00	\$ -	Takeoffs by Great Barrier	0.08	600	ASBT	100	60,000	\$ 60,000
EDWARDSPORT	ALL	CEILING TILE	7,500	SF	0.00	\$ -	Takeoffs by Great Barrier	0.16	1,200	ASBT	100	120,000	\$ 120,000
<b>EDWARDSPORT TOTAL</b>												\$ 1,538,663	
<b>ESTIMATED INDIRECTS</b>		10% OF DIRECT COST										\$ 153,866	
<b>RISK PREMIUM</b>		25% OF LABOR AND INDIRECTS										\$ 423,132	
<b>EDWARDSPORT TOTAL</b>												\$ 2,115,661	
<b>RA GALLAGHER</b>													
RA GALLAGHER	1	PIPE	3,503	LF	0.00	\$ -		0.45	1,576	ASBT	100	157,635	\$ 157,635
RA GALLAGHER	2	PIPE	3,503	LF	0.00	\$ -		0.45	1,576	ASBT	100	157,635	\$ 157,635
RA GALLAGHER	3	PIPE	3,503	LF	0.00	\$ -		0.45	1,576	ASBT	100	157,635	\$ 157,635
RA GALLAGHER	4	PIPE	3,503	LF	0.00	\$ -		0.45	1,576	ASBT	100	157,635	\$ 157,635
RA GALLAGHER	1	TOTAL EQUIP AND BOILER CASING	37,584	SF	0.00	\$ -		0.33	12,403	ASBT	100	1,240,279	\$ 1,240,279
RA GALLAGHER	2	TOTAL EQUIP AND BOILER CASING	37,584	SF	0.00	\$ -		0.33	12,403	ASBT	100	1,240,279	\$ 1,240,279
RA GALLAGHER	3	TOTAL EQUIP AND BOILER CASING	37,584	SF	0.00	\$ -		0.33	12,403	ASBT	100	1,240,279	\$ 1,240,279



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STATION	UNIT	DESCRIPTION	Quantity	Unit of Measure	Unit Cost	Total Equipment or Material Cost	Cost Development	Unit Man-hours (Base)	Total Man-hours (Base)	Crew Code	Crew Wage Rate	Total Construction & Erection Cost	Total Projected Cost
RA GALLAGHER	4	TOTAL EQUIP AND BOILER CASING	37,584	SF	0.00	\$ -		0.33	12,403	ASBT	100	1,240,279	\$ 1,240,279
RA GALLAGHER	ALL	FLOOR TILE	10,800	SF	0.00	\$ -		0.08	902	ASBT	100	90,180	\$ 90,180
RA GALLAGHER	ALL	CEILING TILE	10,800	SF	0.00	\$ -		0.16	1,728	ASBT	100	172,800	\$ 172,800
<b>RA GALLAGHER TOTAL</b>									<b>58,546</b>			<b>5,854,634</b>	<b>\$ 5,854,634</b>
<b>ESTIMATED INDIRECTS</b>		<b>10% OF DIRECT COST</b>											<b>\$ 585,463</b>
<b>RISK PREMIUM</b>		<b>25% OF LABOR AND INDIRECTS</b>											<b>\$ 1,610,024</b>
<b>RA GALLAGHER TOTAL</b>													<b>\$ 8,050,122</b>
<b>GIBSON</b>													
GIBSON	1	TRANSITE SIDING	175,563	SF	0.00	\$ -		0.07	11,763	ASBT	100	1,176,269	\$ 1,176,269
GIBSON	2	TRANSITE SIDING	175,563	SF	0.00	\$ -		0.07	11,763	ASBT	100	1,176,269	\$ 1,176,269
GIBSON	3	TRANSITE SIDING	170,982	SF	0.00	\$ -		0.07	11,456	ASBT	100	1,145,582	\$ 1,145,582
GIBSON	4	TRANSITE SIDING	170,982	SF	0.00	\$ -		0.07	11,456	ASBT	100	1,145,582	\$ 1,145,582
GIBSON	5	TRANSITE SIDING	170,982	SF	0.00	\$ -		0.07	11,456	ASBT	100	1,145,582	\$ 1,145,582
GIBSON	ALL	TRANSITE SIDING	351,980	SF	0.00	\$ -		0.07	23,583	ASBT	100	2,358,266	\$ 2,358,266
GIBSON	ALL	FLOOR TILE	69,236	SF	0.00	\$ -		0.08	5,539	ASBT	100	553,888	\$ 553,888
<b>GIBSON TOTAL</b>									<b>87,014</b>			<b>8,701,436</b>	<b>\$ 8,701,436</b>
<b>ESTIMATED INDIRECTS</b>		<b>10% OF DIRECT COST</b>											<b>\$ 870,144</b>
<b>RISK PREMIUM</b>		<b>25% OF LABOR AND INDIRECTS</b>											<b>\$ 2,392,895</b>
<b>GIBSON TOTAL</b>													<b>\$ 11,964,475</b>
<b>MIAMI FORT</b>													
MIAMI FORT	3	PIPE	3,417	LF	0.00	\$ -		0.45	1,538	ASBT	100	153,765	\$ 153,765
MIAMI FORT	4	PIPE	3,417	LF	0.00	\$ -		0.45	1,538	ASBT	100	153,765	\$ 153,765
MIAMI FORT	5	PIPE	5,553	LF	0.00	\$ -		0.45	2,499	ASBT	100	249,885	\$ 249,885
MIAMI FORT	6	PIPE	13,800	LF	0.00	\$ -		0.45	6,210	ASBT	100	621,000	\$ 621,000
MIAMI FORT	3	TOTAL EQUIP AND BOILER CASING	3,696	SF	0.00	\$ -		0.33	1,220	ASBT	100	121,968	\$ 121,968
MIAMI FORT	4	TOTAL EQUIP AND BOILER CASING	3,696	SF	0.00	\$ -		0.33	1,220	ASBT	100	121,968	\$ 121,968
MIAMI FORT	5	TOTAL EQUIP AND BOILER CASING	33,115	SF	0.00	\$ -		0.33	10,928	ASBT	100	1,092,795	\$ 1,092,795
MIAMI FORT	6	TOTAL EQUIP AND BOILER CASING	19,800	SF	0.00	\$ -		0.33	6,534	ASBT	100	653,400	\$ 653,400

Sargent & Lundy LLC Chicago		CINERGY ASBESTOS STUDY										Estimate No.: 21948B Project No.: 9940-007 Date: 10JAN06 Revision No.: 2 Revision Date: 01/10/06 Run Date:	
-CONFIDENTIAL-													
STATION	UNIT	DESCRIPTION	Quantity	Unit of Measure	Unit Cost	Total Equipment or Material Cost	Cost Development	Unit Man-hours (Base)	Total Man-hours (Base)	Crew Code	Crew Wage Rate	Total Construction & Erection Cost	Total Projected Cost
MIAMI FORT	3	TRANSITE SIDING	640	SF	0.00	\$ -		0.07	43	ASBT	100	4,288	\$ 4,288
MIAMI FORT	4	TRANSITE SIDING	640	SF	0.00	\$ -		0.07	43	ASBT	100	4,288	\$ 4,288
MIAMI FORT	5	TRANSITE SIDING	5,100	SF	0.00	\$ -		0.07	342	ASBT	100	34,170	\$ 34,170
MIAMI FORT	6	TRANSITE SIDING	46,000	SF	0.00	\$ -		0.07	3,082	ASBT	100	308,200	\$ 308,200
<b>MIAMI FORT TOTAL</b>									<b>35,195</b>			<b>3,519,492</b>	<b>\$ 3,519,492</b>
<b>ESTIMATED INDIRECTS</b>		<b>10% OF DIRECT COST</b>											
<b>RISK PREMIUM</b>		<b>25% OF LABOR AND INDIRECTS</b>											
<b>MIAMI FORT TOTAL</b>													<b>\$ 4,839,302</b>
<b>NOBLESVILLE</b>													
NOBLESVILLE Unit 1&2	ALL	PIPE	5,682	LF	0.00	\$ -		0.45	2,557	ASBT	100	255,690	\$ 255,690
NOBLESVILLE Unit 1&2	ALL	TOTAL EQUIP AND BOILER CASING	6,506	SF	0.00	\$ -		0.33	2,147	ASBT	100	214,698	\$ 214,698
NOBLESVILLE Unit 1&2	ALL	TRANSITE SIDING	6,506	SF	0.00	\$ -		0.07	436	ASBT	100	43,590	\$ 43,590
<b>NOBLESVILLE TOTAL</b>									<b>5,140</b>			<b>513,978</b>	<b>\$ 513,978</b>
<b>ESTIMATED INDIRECTS</b>		<b>10% OF DIRECT COST</b>											
<b>RISK PREMIUM</b>		<b>25% OF LABOR AND INDIRECTS</b>											
<b>NOBLESVILLE TOTAL</b>													<b>\$ 706,720</b>
<b>WABASH RIVER</b>													
WABASH RIVER	1	PIPE	1,403	LF	0.00	\$ -		0.45	631	ASBT	100	63,117	\$ 63,117
WABASH RIVER	2	PIPE	2,115	LF	0.00	\$ -		0.45	952	ASBT	100	95,157	\$ 95,157
WABASH RIVER	3	PIPE	2,115	LF	0.00	\$ -		0.45	952	ASBT	100	95,157	\$ 95,157
WABASH RIVER	4	PIPE	2,115	LF	0.00	\$ -		0.45	952	ASBT	100	95,157	\$ 95,157
WABASH RIVER	5	PIPE	2,035	LF	0.00	\$ -		0.45	916	ASBT	100	91,582	\$ 91,582
WABASH RIVER	6	PIPE	1,235	LF	0.00	\$ -		0.45	556	ASBT	100	55,562	\$ 55,562
WABASH RIVER	1	TOTAL EQUIP AND BOILER CASING	10,038	SF	0.00	\$ -		0.33	3,313	ASBT	100	331,267	\$ 331,267
WABASH RIVER	2	TOTAL EQUIP AND BOILER CASING	10,038	SF	0.00	\$ -		0.33	3,313	ASBT	100	331,267	\$ 331,267
WABASH RIVER	3	TOTAL EQUIP AND BOILER CASING	12,548	SF	0.00	\$ -		0.33	4,141	ASBT	100	414,084	\$ 414,084
WABASH RIVER	4	TOTAL EQUIP AND BOILER CASING	10,038	SF	0.00	\$ -		0.33	3,313	ASBT	100	331,267	\$ 331,267



Bargent & Lundy, LLC Chicago Cost Tower FeEstimate		CINERGY ASBESTOS ESTIMATE Conceptual Cost Estimate  CONFIDENTIAL																								Estimate No.: 218488 Project No.: 08940-007 Date: 1/10/2008 Revision No.: 2 Revision Date: Run Date: 1/10/2008												
STATION	Reference Unit	UNIT #	MVE	BOILER PIPING LF	BOILER PIPING IN PLACE LF	TURBINE PIPING LF	TURBINE PIPING IN PLACE LF	TURBINE PIPING IN PLACE LF	TOTAL PIPING LF	PIPE CF	BOILER CASING SF	BOILER CASING IN PLACE SF	BOILER REMAINING SF	TANKS AND EQUIPMENT IN PLACE SF	TANKS AND EQUIPMENT IN PLACE SF	AIR HTRS AND DUCTWORK SF	AIR HTRS AND DUCTWORK IN PLACE SF	AIR HTRS AND DUCTWORK IN PLACE SF	TOTAL EQUIP AND BOILER CASING	COOLING TOWER TOWER FILL TONS	COOLING TOWER FILL IN PLACE %	COOLING TOWER FILL IN PLACE TONS	RATE (\$/LB)	RATE	TRANSIT E SIDING SF	TRANSIT E SIDING IN PLACE %	TRANSIT E SIDING IN PLACE SF	FLOOR TILE SF	CEILING TILE SF	COMMON AREA TRANSIT E SIDING	COOLING TOWER PIPING LF	COOLING TOWER PIPING IN PLACE %	COOLING TOWER PIPING IN PLACE TONS					
WC BECKJORD	COMMON	ALL																																				
	Wabash River Unit 1	1	100	3061.09	40.00%	1224.44	1,579.80	5%	79	1303.4	23321.8	40.00%	9328.62						9,329																			
	Wabash River Unit 2	2	100	4715.24	40.00%	1886.09	1,579.80	5%	79	1865.1	23321.8	40.00%	9328.62						9,329																			
	Wabash River Unit 5	3	125	4835	40.00%	1974	1223	5%	81.15	2035.2	18520	40.00%	7608						7,608																			
	Miami Fort Unit #	4	185								5493.3		19500	100.00%	19500				19,500																			
	Wabash River Unit 6	5	245	2219.5	40%	887.802	1013.579	5%	50.89694	938.5	25107.2	40.00%	9242.67						9,243																			
	Wabash River Unit 6	6	434	3127.86	40%	1251.15	1428.97	5%	71.4485	1322.8	32584.2	40.00%	13025.7						13,026																			
CAYUGA	COMMON	ALL																																				
	Wabash River Unit 6	1	531	3530.31	40%	1412.12	1812.82	5%	80.84101	1482.8	36753.9	40.00%	14701.8						14,702																			
	Wabash River Unit 6	2	531	3530.31	40%	1412.12	1812.82	5%	80.84101	1482.8	36753.9	40.00%	14701.8						14,702																			
EAST BEND	COMMON	ALL																																				
	Takoffs by Great Barrier	9	38							3150	2417	7800	80.00%	6340	17.2	100.00%	17.2	5400	100.00%	8400	12,257	0				17105	100%	17105	7500	7500			13800	100%	13800			
	Takoffs by Great Barrier	7 & 8	40							4728	2006	7800	50.00%	3800	8680	100.00%	8680	900	100.00%	1800	15,280	0																
	Takoffs by Great Barrier	6	69									7800	50.00%	3800	0	100.00%	0	1800	100.00%	3600	7,400	0																
RA GALLAGHER	COMMON	ALL																																				
	Cinergy Takoffs	1	150							3503	1642	32474	80.00%	25979.2	1929	100.00%	1929	9678	100.00%	9678	37,584	0						10000	10600									
	Cinergy Takoffs	2	150							3503	1642	32474	80.00%	25979.2	1929	100.00%	1929	9678	100.00%	9678	37,584	0						0	0									
	Cinergy Takoffs	3	150							3503	1642	32474	80.00%	25979.2	1929	100.00%	1929	9678	100.00%	9678	37,584	0						0	0									
	Cinergy Takoffs	4	150							3503	1642	32474	80.00%	25979.2	1929	100.00%	1929	9678	100.00%	9678	37,584	0						0	0									
GIBSON	COMMON	ALL																																				
	Cinergy Takoffs	1	668							0																175,563	100%	175,563	0			351,960						
	Cinergy Takoffs	2	668							0																175,563	100%	175,563	0									
	Cinergy Takoffs	3	668							0																170,882	100%	170,882	0									
	Cinergy Takoffs	4	668							0																170,882	100%	170,882	0									
	Cinergy Takoffs	5	668							0																170,882	100%	170,882	0									
MIAMI FORT	COMMON	ALL																																				
	Cinergy Takoffs	3	65							3417	2290	575	100.00%	575	2381	100.00%	2381	740	100.00%	740	3,698								640	100%	640							
	Cinergy Takoffs	4	65							3417	2290	575	100.00%	575	2381	100.00%	2381	740	100.00%	740	3,698								640	100%	640							
	Cinergy Takoffs	5	100							5533	2242	18750	100.00%	18750	10770	100.00%	10770	3598	100.00%	3598	33,115	0						5100	100%	5100								
	S&L Takoffs	6	169							13800		18800	100.00%	18800							19,900							46000	100%	46000								
	n/a	7	558							0	0									0								0										
	n/a	8	558							0	0									0								0										
NOBLEVILLE	COMMON	ALL																																				
	Takoffs by Great Barrier	1	50							5882	898				8508	100.00%	8508			6,506						1508	100%	1508										
	Takoffs by Great Barrier	2	50							0					0					0																		
	Takoffs by Great Barrier	3								0					0					0																		
	n/a	4								0					0					0																		
	n/a	5								0					0					0																		
WABASH RIVER	COMMON	ALL																																				
	Cinergy Takoffs	1	113	3294	40%	1317.6	1700	5%	85	1402.8	25098	40.00%	10038.4						10,038																			
	Cinergy Takoffs	2	113	5074	40%	2029.8	1700	5%	85	2114.8	25098	40.00%	10038.4						10,038																			
	Cinergy Takoffs	3	113	3074	40%	2029.8	1700	5%	85	2114.8	25098	50.00%	12548						12,548																			
	Cinergy Takoffs	4	113	5074	40%	2029.8	1700	5%	85	2114.8	25098	40.00%	10038.4						10,038																			
	Cinergy Takoffs	5	125	4835	40%	1974	1223	5%	81.15	2035.2	18520	40.00%	7608						7,608																			
	Cinergy Takoffs	6	387	2820	40%	1188	1334	5%	68.7	1234.7	30400	40.00%	12180						12,180																			
ZIMMER	COMMON	ALL																																				
	Cinergy Takoffs	1	1300																																			

Many of the Cinergy units have asbestos bearing material in the form of high temperature brackets. These brackets are considered non-ferrous and present minimal costs related to asbestos abatement. This minimal cost is not considered in liability estimates.

Ref.	Location	Nominal Pipe Size	Pipe OD (in.)	Insulation Thickness (in.)	Pipe + Ins. OD (in.)	Insulation Cross Sectional Area (sq. in.)	Pipe Length (feet)	Insulation Volume (cu. in.)	Subtotal Insulation Volume (cu. ft.)	Multiplier	Total Insulation Volume (cu. ft.)	TOTAL LENGTH OF PIPE
P-Q	Unit 6	6	6.63	4.00	14.63	133.57	30	48,085.71	27.83	1	27.83	30
P-R	Unit 6	4	4.50	4.00	12.50	106.86	20	25,645.71	14.84	1	14.84	20
P-S	Unit 6	12	12.75	4.00	20.75	210.57	20	50,537.14	29.25	1	29.25	20
P-T	Unit 6	4	4.50	2.00	8.50	40.86	100	49,028.57	28.37	1	28.37	100
P-P	Unit 6	2	2.38	2.00	6.38	27.50	300	99,000.00	57.29	1	57.29	300
P-Y	Unit 6	4	4.50	1.00	6.50	17.29	55	11,408.57	6.60	3	19.81	165
P-AE	Unit 6	26	26.00	4.00	34.00	377.14	120	543,085.71	314.29	2	628.57	240
P-AF	Unit 6	8	8.63	4.00	16.63	158.71	25	47,614.29	27.55	1	27.55	25
P-AG	Unit 6	6	6.63	2.00	10.63	54.21	20	13,011.43	7.53	1	7.53	20
P-AH	Unit 6	4	4.50	4.00	12.50	106.86	20	25,645.71	14.84	1	14.84	20
P-AI	Unit 6	12	12.75	4.00	20.75	210.57	100	252,685.71	146.23	1	146.23	100
P-AJ	Unit 6	6	6.63	4.00	14.63	133.57	80	128,228.57	74.21	1	74.21	80
P-AK	Unit 6	4	4.50	4.00	12.50	106.86	30	38,468.57	22.26	2	44.52	60
P-AL	Unit 6	6	6.63	4.00	14.63	133.57	30	48,085.71	27.83	1	27.83	30
P-AM	Unit 6	10	10.75	4.00	18.75	185.43	30	66,754.29	38.63	2	77.26	60
P-AN	Unit 6	4	4.50	4.00	12.50	106.86	30	38,468.57	22.26	1	22.26	30
P-AO	Unit 6	8	8.63	2.00	12.63	66.79	30	24,042.86	13.91	1	13.91	30
P-AP	Unit 6	4	4.50	2.00	8.50	40.86	60	29,417.14	17.02	1	17.02	60
P-AQ	Unit 6	26	26.00	4.00	34.00	377.14	45	203,657.14	117.86	1	117.86	45
P-AR	Unit 6	10	10.75	4.00	18.75	185.43	150	333,771.43	193.15	1	193.15	150
P-AS	Unit 6	12	12.75	4.00	20.75	210.57	150	379,028.57	219.35	1	219.35	150
P-AT	Unit 6	8	8.63	4.00	16.63	158.71	150	285,685.71	165.33	1	165.33	150
P-AU	Unit 6	6	6.63	2.00	10.63	54.21	100	65,057.14	37.65	1	37.65	100
P-AV	Unit 6	2	2.38	2.00	6.38	27.50	450	148,500.00	85.94	1	85.94	450
P-AW	Unit 6	6	6.63	4.00	14.63	133.57	80	128,228.57	74.21	1	74.21	80
P-AX	Unit 6	8	8.63	2.00	12.63	66.79	15	12,021.43	6.96	1	6.96	15
P-AY	Unit 6	10	10.75	2.00	14.75	80.14	90	86,554.29	50.09	2	100.18	180
P-AZ	Unit 6	12	12.75	2.00	16.75	92.71	100	111,257.14	64.38	1	64.38	100
P-BA	Unit 6	8	8.63	2.00	12.63	66.79	100	80,142.86	46.38	1	46.38	100
P-BB	Unit 6	6	6.63	2.00	10.63	54.21	40	26,022.86	15.06	1	15.06	40
<b>TOTAL</b>							2570				2,406	<b>2950</b>

**Welles, Sarah**

---

**From:** Glenn, Erica  
**Sent:** Monday, December 19, 2005 9:26 AM  
**To:** Stevens, George; Wilson, Dale  
**Cc:** Sheppard, Amy; Reynolds, Jaime  
**Subject:** FW: Conesville Unit 4 Asbestos Estimate

FYI - AEP has made an adjustment to their Conesville cost estimate.

Thank you,  
Erica

---

**From:** smhannis@aep.com [mailto:smhannis@aep.com]  
**Sent:** Monday, December 19, 2005 9:09 AM  
**To:** Glenn, Erica  
**Subject:** RE: Conesville Unit 4 Asbestos Estimate

Erica,  
The \$406,682 was in 2005 dollars. However, we just revised the estimate to \$324,480 (2005 dollars) and updated the estimated settlement date to 2045.

Thanks,  
Susannah  
(614) 716-1172

"Glenn, Erica" <Erica.Glenn@Cinergy.COM>

To <smhannis@aep.com>

cc

12/16/2005 02:11 PM

Subject RE: Conesville Unit 4 Asbestos Estimate

Susannah,

Is the \$406,682 in 2005 dollars?

Thanks,  
Erica

---

**From:** smhannis@aep.com [mailto:smhannis@aep.com]  
**Sent:** Friday, December 09, 2005 6:06 PM  
**To:** Glenn, Erica  
**Cc:** temitchell@aep.com; jehenderson@aep.com; dadavis@aep.com  
**Subject:** Conesville Unit 4 Asbestos Estimate

8/18/2006

Erica,

Our estimate of asbestos removal/disposal costs at Conesville Unit 4 is \$406,682. This is 100% of the estimated cost, before an ownership percent is applied. We're using an estimated settlement date of 2041. Let me know if you have any questions.

Thanks,

Susannah

(614) 716-1172

**Welles, Sarah**

---

**From:** Glenn, Erica  
**Sent:** Thursday, December 15, 2005 2:16 PM  
**To:** Reynolds, Jaime  
**Subject:** FW: FAS 143

**Attachments:** FAS143 Demo Est 1.pdf



FAS143 Demo Est  
1.pdf

-----Original Message-----

From: Wilson, Dale  
Sent: Tuesday, March 04, 2003 3:25 PM  
To: Barnhart, Christa  
Subject: FW: FAS 143

-----Original Message-----

From: RICHARD.A.JERCH@sargentlundy.com  
[mailto:RICHARD.A.JERCH@sargentlundy.com]  
Sent: Thursday, February 27, 2003 3:16 PM  
To: Wilson, Dale  
Subject: FAS 143

Dale,

I am resending the estiamte files for your reference. Multiple files to be sent to pass your fire wall.

Regards,

Rick

(See attached file: FAS143 Demo Est 1.pdf)



DEMOLITION OF "RIVER STRUCTURES "

CONCEPTUAL COST ESTIMATE

PREPARED FOR  
CINERGY  
MIAMI FORT STATION

SARGENT & LUNDY

ESTIMATE NO. 21029B  
PROJECT NO. 9940-003  
January 31, 2003

REVIEWED BY: 

APPROVED BY: 

Estimate No: 21029B

TABLE OF CONTENTS

Report	Page
Basis of Estimate.....	1
Summary.....	3
Work Sheet Details.....	4

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**B A S I S o f E S T I M A T E**  
CINERGY  
MIAMI FORT STATION  
CONCEPTUAL COST ESTIMATE  
DEMOLITION OF "RIVER STRUCTURES "

Page: 1  
Estimate No: 210298  
Project No: 9940-003  
Prepared by: PAG/BJD/

Estimate Date: 31JAN03

Price level: 2002

Scope

DISMANTLING AND REMOVAL OF ALL EQUIPMENT AND PIPING, DEMOLITION AND REMOVAL OF COAL UNLOADING STRUCTURE AND CELLS , CRIB HOUSE AND ACCESSORIES AND UNDERWATER CONCRETE INTAKE AND DISCHARGE STRUCTURES.

Technical Basis

SEE ASSUMPTIONS BELOW

Assumptions

- PLANT GRADE ELEV. VARIES 495FT. TO 506FT. OHWL 473FT.
- ALL ABOVE GRADE ITEMS AT THE SITE ARE DEMOLISHED AND DISPOSED OF ON SITE, AND HAVE NO SCRAP VALUE UNLESS INDICATED OTHERWISE IN THE ESTIMATE
- TRANSPORTATION OF SCRAP MATERIAL TO A PROCESSOR IS NOT INCLUDED
- ALL SOIL BORROW MATERIAL IS FROM ON SITE
- BASED ON 40 HOUR WORKWEEK

Commercial Basis

1. Equipment/Material Cost

THE QUOTED PRICES FOR METAL SCRAP VALUES ARE:

- COPPER \$1400.00 PER TON
- STEEL \$85.00 PER TON

2. Labor Wage Rates

THE FOLLOWING VALUES INCLUDE WAGES, DEMOLITION EQUIPMENT, ON-SITE TRANSPORTATION, DISPOSAL, INSURANCE COSTS, AND OVERHEAD & PROFIT:

- |                       |             |
|-----------------------|-------------|
| - WRECKING CREW       | \$ 58.10/hr |
| - ASBESTOS & PCB WORK | \$ 90.00/hr |
| - EARTHWORK           | \$115.10/hr |
| - SEEDING & MULCHING  | \$ 34.90/hr |
| - ELECTRICIAN         | \$ 41.90/hr |
| - CARPENTER           | \$ 34.30/hr |

3. Labor Crews

S & L STANDARD FOR THIS TYPE OF WORK

4. Productivity

AS THOSE APPLIED TO OHIO

5. Quantity Sources

BASED ON S & L GENERAL ARRANGEMENT DRAWINGS , RIVER STRUCTURE DRAWINGS AND PLANT PHOTOGRAPHS.

6. Project Schedule

6 MONTHS DURATION

7. Indirect Expenses

CINERGY INDIRECT EXPENSES - PERMITTING FEE ALLOWANCE OF \$ 50,000 AND PROJECT ADMINISTRATION ALLOWANCE BASED ON 10% OF TOTAL DIRECT CONSTRUCTION COST.

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B A S I S o f E S T I M A T E

Page: 2  
Estimate No: 21029B

Commercial Basis continued

8. Escalation Rates (See Cost Summary for rates)

NOT INCLUDED, ESCALATION RATE EXPECTED TO BE 3% P.A.

9. Sales/Use Taxes (See Cost Summary for rates)

NOT INCLUDED

10. Contingency (See Cost Summary for rates)

SEE COST SUMMARY FOR RATES

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**C O S T   S U M M A R Y   R E P O R T**  
 C I N E R G Y  
 M I A M I   F O R T   S T A T I O N  
 C O N C E P T U A L   C O S T   E S T I M A T E  
 D E M O L I T I O N   O F   " R I V E R   S T R U C T U R E S "   "

Page: 3  
 Estimate No: 210298  
 Project No: 9940-003  
 Prepared by: PAG/BJD/  
 Estimate Date: 31JAN03

Price level: 2002

ACCT.NO.	DESCRIPTION	TOTAL EQUIPMENT COST	TOTAL MATERIAL COST	TOTAL LABOR COST	TOTAL COST
311	STRUCTURES AND IMPROVEMENTS - DEMOLITION AND MODIFICATIONS		85,000	1,883,000	1,968,000
315	ELECTRICAL PLANT			25,000	25,000
317	SCRAP VALUE (SEE BASIS)				
TOTAL CONSTRUCTION COSTS			85,000	1,908,000	1,993,000
INDIRECT EXPENSES					275,000
ESCALATION					
SALES/USE TAX					
CONTINGENCY					567,000
TOTAL PROJECT COST					2,835,000
SALVAGE VALUE					-120,000
GRAND TOTAL COST					2,715,000

FINANCIAL ASSUMPTIONS:

ESCALATION RATES: Equipment 0.000%  
 Material 3.000%  
 Labor 3.000%  
 Indirects 3.000%

SALES/USE TAX RATES: Equipment: 0.000% Material 0.000%

CONTINGENCY RATES: Equipment 0.0% Material 25.0% Labor 25.0% Indirects 25.0%

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**ESTIMATE WORKSHEET**  
 CINERGY  
 MIAMI FORT STATION  
 CONCEPTUAL COST ESTIMATE  
 DEMOLITION OF "RIVER STRUCTURES "

Page: 4  
 Estimate No: 21029B  
 Project No: 9940-003  
 Prepared by: PAG/BJD/  
 Estimate Date: 31JAN03

Price level: 2002

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***			*** LABOR ***			TOTAL COST	
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	MNHR	WAGE RATE		LABOR COST
311		STRUCTURES AND IMPROVEMENTS - DEMOLITION AND MODIFICATIONS										
311.1		SITE STRUCTURES DEMOLITION										
311.14		FILL SITE AREAS WHERE REQUIRED	20000	CY				0.025	500	115.10	58,000	58,000
311.15		PLUG SERVICE WATER INTAKE AND DISCHARGE TUNNELS	600	CY	100.00		60,000	2.500	1500	58.10	87,000	147,000
311.17		SEED & MULCH SITE INCLUDING TOPSOIL	4	AC				30.000	120	34.90	4,000	4,000
311.18		RIP RAP	700	SY	35.00		25,000	1.000	700	34.90	24,000	49,000
		SUB TOTAL 311.1					85,000		2,820		173,000	258,000
311.21		COAL UNLOADING FACILITY CONCRETE	600	CY				1.200	720	58.10	42,000	42,000
4		COAL UNLOADING FACILITIES CELLS 16FT DIA X 60FT	8	EA				180.000	1440	150.00	216,000	216,000
311.25		COAL UNLOADING FACILITIES CELLS 16FT DIA X 100FT	8	EA				240.000	1920	150.00	288,000	288,000
311.28		DEADMEN PARTIAL REMOVAL	13	EA				85.000	1105	58.10	64,000	64,000
		SUB TOTAL 311.2							5,185		610,000	610,000
311.31		CRIB HOUSE SUPERSTRUCTURE ARCHITECTURAL CONSTR	150000	CF				0.006	900	58.10	52,000	52,000
311.32		CRIB HOUSE SUBSTRUCTURE CONCRETE CONSTR	2660	CY				0.800	2128	58.10	124,000	124,000
311.33		UNDERWATER INTAKE AND DISCHARGE STRUCTURE CONCRETE CONSTRUCTION	2100	CY				1.600	3360	58.10	195,000	195,000
311.38		OFFSHORE STRUCTURE DEBRIS TRANSPORT TO HOLDING AREA	1	LT				5160.000	5160	58.10	300,000	300,000
311.39		BARGE RENTAL, 6 MO. DURATION	1	LT							300,000	300,000
		SUB TOTAL 311.3							11,548		971,000	971,000
311.53		BARGE UNLOADING STEEL STRUCTURE	100	TN				12.000	1200	58.10	70,000	70,000
311.54		BARGE UNLOADING EQUIPMENT	50	TN				2.700	135	58.10	8,000	8,000

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**E S T I M A T E   W O R K S H E E T**

Page: 5  
 Estimate No: 21029B

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***		*** LABOR ***		TOTAL COST			
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE		MNHR	WAGE RATE	LABOR COST
11.55		MATERIAL HANDLING CRANE	50	TN				12.000	600	58.10	35,000	35,000
		SUB TOTAL 311.5							1,935		113,000	113,000
11.61		BALANCE OF PLANT EQUIPMENT	100	TN				2.700	270	58.10	16,000	16,000
		TOTAL 311							21,758		1,883,000	1,968,000

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 Chicago

**E S T I M A T E   W O R K S H E E T**

Page: 6  
 Estimate No: 21029B

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***		*** LABOR ***		TOTAL COST			
					RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE		MNHR	WAGE RATE	LABOR COST
315		ELECTRICAL PLANT										
315.26		TRANSFORMERS, SWITCHGEAR, WIRING, CONDUIT, LIGHTING	1	LT				600.000	600	41.90	25,000	25,000
		TOTAL 315							600		25,000	25,000



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**E S T I M A T E   W O R K S H E E T**

Page: 7  
 Estimate No: 21029B

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***			*** LABOR ***		TOTAL COST
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	MNHR WAGE RATE	
317		SCRAP VALUE (SEE BASIS)								
317.11		SCRAP VALUE OF STEEL	1300	TN						
317.12		SCRAP VALUE OF COPPER	10	TN						
		SUB TOTAL 317.1								
		TOTAL 317								

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**E S T I M A T E   W O R K S H E E T**

Page: 8  
 Estimate No: 21029B

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***		*** LABOR ***		TOTAL COST
					RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	
900		INDIRECT EXPENSES							
900.1		CINERGY INDIRECT EXPENSES							
900.11		PERMITS							50,000
900.12		ADMINISTRATIVE EXPENSES							225,000
		SUB TOTAL 900.1							275,000
		TOTAL 900							275,000
		TOTAL DIRECT & INDIRECT COSTS					85,000	22,358	2,183,000

**CINERGY**  
**MIAMI FORT STATION, OHIO**  
**PERMITTING AND DEMOLITION FOR RIVER STRUCTURES**

	STRUCTURES AFFECTED BY HIGH WATER LEVEL ( OHWL ) :	463 FT	
	PLANT GRADE ELEVATION	491 FT	
	CRIB HOUSE		REMOVE ENCLOSED MASONRY PUMPHOUSE AND CONCRETE SUBSTRUCTURE ONSHORE
	INTAKE AND DISCHARGE TUNNELS		REMOVE UNDERWATER STRUCTURES FROM CRIBHOUSE TO RIVER
	INTAKE AND DISCHARGE TUNNELS		BELOW GRADE STRUCTURES FROM CRIBHOUSE TO PLANT - PLUG AND ABANDON IN PLACE
	COAL UNLOADING FACILITY		REMOVE CELL MOUNTED STRUCTURE
	LIMESTONE UNLOADING FACILITY		NOT APPLICABLE
	CELLS		REMOVE CELLS (COAL HANDLING, 16 x 16' DIA.)
	DEADMEN		PARTIAL REMOVAL
	MATERIAL HANDLING CRANE		REMOVE CELL MOUNTED STRUCTURE
1	REMOVAL OF PLANT PRIOR TO DEMOLITION		
	ELECTRICAL BULKS		CABLES
	MECHANICAL BULKS		A/G PIPING, VALVES
	MECHANICAL EQUIPMENT		PUMPS, STRAINERS
	ELECTRICAL EQUIPMENT		TRANSFORMERS, DISTRIB EQPT
	WATER TUNNEL TO PLANT		PLUG WITH CONCRETE AT BOTH ENDS AND ABANDON IN PLACE
	WATER TUNNEL TO RIVER		REMOVE UP TO CRIB HOUSE
2	DEMOLITION METHOD		
	EXPLOSIVES		CELL DEMOLITION IN SECTIONS
	HAMMER WITH LONG BOOM		REQD FOR UNDERWATER TUNNELS
	CONVENTIONAL HAMMER		DEMOLISH SERV WATER PUMPHOUSE SUPERSTRUCTURE AND SUBSTRUCTURE TO BEDROCK
	PULL PILES		NOT REQD
	PULL CELLS		80FT LONG CELLS PULLED IN SECTIONS
3	COLLECTION		
	STEEL		REQD
	CONCRETE		REQD
	COPPER		CABLE
4	RECYCLING		
	STEEL		REQD
	CONCRETE		REQD
	COPPER		REQD
5	DISPOSAL		
	RUBISH		REQD
	HAZMATL		NONE
6	OTHER		
	LAND EQUIPMENT REQD ( CRANES, TRUCKS, ETC. )		REQD
	BARGE EQUIPMENT REQD ( CRANES, TRUCKS, ETC. )		REQD
	TEMPORARY CONSTRUCTION ( SHEET PILING, COFFERDAM )		REQD
	DIVERS		REQD
	DEWATERING		REQD
7	SAFETY PRECAUTION REQUIREMENTS		
	NORMAL		REQD
	ABNORMAL		TUNNEL WORK AND UNDERWATER WORK
8	PERMITTING REQUIREMENTS		
			PER US COAST GUARD REQMTS
			PER US ARMY COE REQMTS
			PER LOCAL AND STATE REQMTS
9	SITWORK		
			CRIB HOUSE FILL, RESTORE SHORELINE TO ORIGINAL CONDITION

## ***Sargent & Lundy LLC***

55 E. Monroe  
Chicago, IL

**Richard A. Jerch**  
Project Manager  
Phone No. 312-269-6860  
Fax. No. 312-269-3871  
Email: richard.a.jerch@sargentlundy.com

February 27, 2003  
09940-003, -004  
Letter No. SLDM007

### ***Cinergy Corporation***

Subject: *FAS143 Demolition Cost Estimates*

Mr. Dale Wilson  
Cinergy Corporation  
1000 East Main Street  
Plainfield, IN 46168-1782

Dear Mr. Wilson:

Pursuant to your request, Sargent & Lundy LLC has completed the preparation of demolition cost estimates for power plant river structures situated along navigable rivers for Cinergy East and West stations. The estimates are present day and were prepared to satisfy current FAS 143 requirements. The estimates include the costs for demolition and removal of power plant buildings, materials and equipment that is situated at or below the Ordinary High Water Level (OHWL) at each site. Where applicable, costs to backfill intake channels, plug intake piping, grade and re-seed the impacted areas to return them to vegetated ground cover conditions are also included.

The river structure demolition cost estimates were prepared for the following Cinergy stations:

#### **Cinergy East**

Beckjord  
Zimmer  
Miami Fort  
East Bend

**Cinergy West**

Cayuga  
Gibson  
Gallagher  
Wabash River  
Dresser

In addition, S&L completed the total plant demolition cost estimate for structures and equipment associated with the Henry County peaking plant.

The demolition cost estimate and associated scope of work basis for each station is enclosed. Brief scope summaries and estimated associated river structure demolition costs are as follows.

***Beckjord***

Demolish and remove enclosed masonry pump house, equipment and associated substructure, river front bay of boiler building and associated materials and equipment, electrical power transformers and equipment in switchyard below OHWL, coal and fuel oil barge unloading facilities located within river and all river barge cells.

Total Demolition Cost Estimate: \$8,333,000  
S&L Estimate No. 21031B (1/31/03)

***Zimmer***

Service/circulating water pump house remains in place. Intake channel filled, associated sheet pile and concrete removed and intake piping plugged. Coal unloading, limestone unloading situated on piles with river and all river barge cells removed.

Total Demolition Cost Estimate: \$3,696,000  
S&L Estimate No. 21030A (1/21/03)

***Miami Fort***

Demolish and remove masonry crib house, equipment and associated substructure. Intake and discharge tunnels below OHWL removed, CW piping plugged and abandoned in place. Coal unloading facility and all coal barge river cells removed.

Total Demolition Cost Estimate: \$2,715,000  
S&L Estimate No. 21029B (1/31/03)

Mr. Dale Wilson  
FAS 143 Cost Estimates

**East Bend**

Intake structure/pump house remains in place. Intake piping plugged and abandoned. Channel area back-filled. Coal and limestone unloading facility, including foundations, removed. All river barge cells removed.

Total Demolition Cost Estimate: \$2,465,000  
S&L Estimate No. 21022B (1/31/03)

**Cayuga**

Demolish and remove masonry pump house, equipment and associated substructure. Intake piping and channel area filled and or plugged.

Total Demolition Cost Estimate: \$1,509,000  
S&L Estimate No. 13240-9R (1/31/03)

**Gibson**

SW intake piping plugged and abandoned. Intake area back-filled and restored.

Total Demolition Cost Estimate: \$461,000  
S&L Estimate No. 14242-8R (1/10/03)

**Gallagher**

Screen house remains in place. Intake channel area back-filled and CW piping plugged. Chimneys remain in place. Coal unloading facility in river and barge cells removed.

Total Demolition Cost Estimate: \$1,373,000  
S&L Estimate No. 13347-8R (1/10/03)

**Wabash River**

Demolish and remove CW plume structure, pump house fore bay and substructure. Circulating water piping plugged and abandoned.

Total Demolition Cost Estimate: \$2,401,000  
S&L Estimate No. 13348-10 (1/31/03)

**Dresser**

Remove remaining riverside structures. Plug and abandon CW piping.

Total Demolition Cost Estimate: \$391,000  
S&L Estimate No. 21033B (1/31/03)

Mr. Dale Wilson  
FAS 143 Cost Estimates

02/27/03  
Page 4

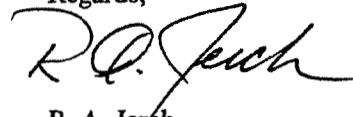
**Henry County**

Demolish and remove three combustion turbine units, fuel system, tanks, switchyard, foundations and all ancillary equipment.

Total Demolition Cost Estimate: \$1,826,000  
S&L Estimate No. 21034B (2/10/03)

If you have any questions concerning these estimates, please do not hesitate to call.

Regards,



R. A. Jerch  
Project Manager

RAJ:  
Copies:  
R. Presnak 1/1  
P. Garza 1/1  
G. Komanduri 1/1  
Project File 1/1  
Sn13a\data\cinergy\demoesti\correspondence\06.doc

DEMOLITION OF "RIVER STRUCTURES "

CONCEPTUAL COST ESTIMATE

PREPARED FOR  
CINERGY  
BECKJORD STATION

SARGENT & LUNDY

ESTIMATE NO. 21031B  
PROJECT NO. 9940-003  
January 31, 2003

REVIEWED BY: 

APPROVED BY: 



Estimate No: 21031B

TABLE OF CONTENTS

Report	Page
Basis of Estimate.....	1
Summary.....	3
Work Sheet Details.....	4

Sargent & Lundy  
Chicago

**B A S I S   o f   E S T I M A T E**  
CINERGY  
BECKJORD STATION  
CONCEPTUAL COST ESTIMATE  
DEMOLITION OF "RIVER STRUCTURES "

Page: 1  
Estimate No: 21031B  
Project No: 9940-003  
Prepared by: PAG/BJD/

Price level: 2002

Estimate Date: 31JAN03

Scope

DISMANTLING AND REMOVAL OF ALL EQUIPMENT AND PIPING, DEMOLITION AND REMOVAL OF COAL AND FUEL OIL UNLOADING STRUCTURES AND CELLS , (3) CRIB HOUSES , DISCHARGE FLUME, (1) CONCRETE CHIMNEY AND ( 1 BAY ) RIVERSIDE PORTION OF BOILER BUILDING.

Technical Basis

SEE ASSUMPTIONS BELOW

Assumptions

- PLANT GRADE ELEV. VARIES 490FT TO 515FT. OHWL 473FT.
- PARTIAL BOILER BUILDING DEMOLITION FOR ACCESS TO THE DISCHARGE FLUME DEMOLITION
- ALL ABOVE GRADE ITEMS AT THE SITE ARE DEMOLISHED AND DISPOSED OF ON SITE, AND HAVE NO SCRAP VALUE UNLESS INDICATED OTHERWISE IN THE ESTIMATE
- TRANSPORTATION OF SCRAP MATERIAL TO A PROCESSOR IS NOT INCLUDED
- ALL SOIL BORROW MATERIAL IS FROM ON SITE
- BASED ON 40 HOUR WORKWEEK

Commercial Basis

1. Equipment/Material Cost

THE QUOTED PRICES FOR METAL SCRAP VALUES ARE:

- COPPER \$1400.00 PER TON
- STEEL \$85.00 PER TON

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THE FOLLOWING VALUES INCLUDE WAGES, DEMOLITION EQUIPMENT, ON-SITE TRANSPORTATION, DISPOSAL, INSURANCE COSTS, AND OVERHEAD & PROFIT:

- |                       |             |
|-----------------------|-------------|
| - WRECKING CREW       | \$ 58.10/hr |
| - ASBESTOS & PCB WORK | \$ 90.00/hr |
| - EARTHWORK           | \$115.10/hr |
| - SEEDING & MULCHING  | \$ 34.90/hr |
| - ELECTRICIAN         | \$ 41.90/hr |
| - CARPENTER           | \$ 34.30/hr |

3. Labor Crews

S & L STANDARD FOR THIS TYPE OF WORK

4. Productivity

AS THOSE APPLIED TO OHIO

5. Quantity Sources

BASED ON S & L GENERAL ARRANGEMENT DRAWINGS , RIVER STRUCTURE DRAWINGS AND PLANT PHOTOGRAPHS.

6. Project Schedule

9 MONTHS DURATION

7. Indirect Expenses

CINERGY INDIRECT EXPENSES - PERMITTING FEE ALLOWANCE OF \$ 50,000 AND PROJECT ADMINISTRATION ALLOWANCE BASED ON 10% OF TOTAL DIRECT CONSTRUCTION COST.

nt & Lundy  
Chicago

B A S I S o f E S T I M A T E

Page: 2  
Estimate No: 21031B

Commercial Basis continued

8. Escalation Rates (See Cost Summary for rates)

NOT INCLUDED, ESCALATION RATE EXPECTED TO BE 3% P.A.

9. Sales/Use Taxes (See Cost Summary for rates)

NOT INCLUDED

10. Contingency (See Cost Summary for rates)

SEE COST SUMMARY FOR RATES

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**C O S T S U M M A R Y R E P O R T**

CINERGY  
 BECKJORD STATION  
 CONCEPTUAL COST ESTIMATE  
 DEMOLITION OF "RIVER STRUCTURES "

Page: 3  
 Estimate No: 21031B  
 Project No: 9940-003  
 Prepared by: PAG/BJD/  
 Estimate Date: 31JAN03

Price level: 2002

ACCT.NO.	DESCRIPTION	TOTAL EQUIPMENT COST	TOTAL MATERIAL COST	TOTAL LABOR COST	TOTAL COST
311	STRUCTURES AND IMPROVEMENTS - DEMOLITION AND MODIFICATIONS		70,000	5,999,000	6,069,000
315	ELECTRICAL PLANT			75,000	75,000
317	SCRAP VALUE (SEE BASIS)				
<b>TOTAL CONSTRUCTION COSTS</b>			<b>70,000</b>	<b>6,074,000</b>	<b>6,144,000</b>
INDIRECT EXPENSES					666,000
ESCALATION					
SALES/USE TAX					
CONTINGENCY					1,703,000
<b>TOTAL PROJECT COST</b>					<b>8,513,000</b>
SALVAGE VALUE					-180,000
<b>GRAND TOTAL COST</b>					<b>8,333,000</b>

FINANCIAL ASSUMPTIONS:

ESCALATION RATES: Equipment 0.000%  
 Material 3.000%  
 Labor 3.000%  
 Indirects 3.000%

SALES/USE TAX RATES: Equipment 0.000% Material 0.000%

CONTINGENCY RATES: Equipment 0.0% Material 25.0% Labor 25.0% Indirects 25.0%

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**ESTIMATE WORKSHEET**

CINERGY  
BECKJORD STATION  
CONCEPTUAL COST ESTIMATE  
DEMOLITION OF "RIVER STRUCTURES "

Page: 4  
Estimate No: 21031B  
Project No: 9940-003  
Prepared by: PAG/BJD/

Price level: 2002

Estimate Date: 31JAN03

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***			*** LABOR ***			TOTAL COST		
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	MNHR	WAGE RATE		LABOR COST	
311		STRUCTURES AND IMPROVEMENTS - DEMOLITION AND MODIFICATIONS											
311.1		SITE STRUCTURES DEMOLITION											
311.14		FILL SITE AREAS WHERE REQUIRED	35000	CY				0.025	875	115.10	101,000	101,000	
311.15		PLUG SERVICE WATER INTAKE AND DISCHARGE TUNNELS								NOT REQUIRED			
311.17		SEED & MULCH SITE INCLUDING TOPSOIL	4	AC				30.000	120	34.90	4,000	4,000	
311.18		RIP RAP	2000	SY	35.00		70,000	1.000	2000	34.90	70,000	140,000	
		SUB TOTAL 311.1						70,000		2,995		175,000	245,000
11.21		COAL UNLOADING FACILITY CONCRETE (PIERS & FDN.)	600	CY				1.200	720	58.10	42,000	42,000	
11.22		COAL UNLOADING FACILITIES CELLS 40FT DIA X 100FT	3	EA				660.000	1980	150.00	297,000	297,000	
11.23		FUEL OIL UNLOADING FACILITY CONCRETE	30	CY				1.200	36	58.10	2,000	2,000	
11.24		FUEL OIL UNLOADING FACILITIES CELLS 40FT DIA X 100FT	1	EA				660.000	660	150.00	99,000	99,000	
11.25		FUEL OIL UNLOADING FACILITIES CELLS 20FT DIA X 100FT	2	EA				460.000	920	150.00	138,000	138,000	
11.28		DEADMEN PARTIAL REMOVAL	4	EA				70.000	280	58.10	16,000	16,000	
		SUB TOTAL 311.2								4,596		594,000	594,000
11.31		BOILER BUILDING ( 1 BAY ) SUPERSTRUCTURE ARCHITECTURAL CONSTRUCTION	2920E3	CF				0.006	17520	58.10	1,018,000	1,018,000	
1.32		BOILER BUILDING ( 1 BAY ) SUBSTRUCTURE CONCRETE CONSTRUCTION	650000	CF				0.010	6500	58.10	378,000	378,000	
1.33		(2) CRIB HOUSE SUPERSTRUCTURE ARCHITECTURAL CONSTRUCTION	320000	CF				0.006	1920	58.10	112,000	112,000	

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**ESTIMATE WORKSHEET**

Page: 5  
Estimate No: 210318

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY UM	*** MATERIAL ***			*** LABOR ***			TOTAL COST	
				MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	MNHR	WAGE RATE		LABOR COST
311.34		(3) CRIB HOUSE SUBSTRUCTURE CONCRETE CONSTRUCTION	12700				1.000	12700	58.10	738,000	738,000
311.35		DISCHARGE FLUME CONCRETE	890				1.000	890	58.10	52,000	52,000
311.36		DISCHARGE FLUME SHEET PILING	260				8.000	2080	58.10	121,000	121,000
311.37		(1) CHIMNEY CONCRETE CONSTRUCTION	1				23000	23000	58.10	1,336,000	1,336,000
311.38		OFFSHORE STRUCTURE DEBRIS TRANSPORT TO HOLDING AREA	1				7745.000	7745	58.10	450,000	450,000
311.39		BARGE RENTAL, 9 MO. DURATION	1							450,000	450,000
SUB TOTAL 311.3								72,355		4,655,000	4,655,000
311.53		COAL UNLOADING STEEL STRUCTURES	200				12.000	2400	150.00	360,000	360,000
311.54		COAL UNLOADING EQUIPMENT	50				2.700	135	58.10	8,000	8,000
311.55		FUEL OIL UNLOADING STEEL STRUCTURES	100				12.000	1200	150.00	180,000	180,000
311.56		FUEL OIL UNLOADING EQUIPMENT	50				2.700	135	58.10	8,000	8,000
SUB TOTAL 311.5								3,870		556,000	556,000
11.61		BALANCE OF PLANT EQUIPMENT	120				2.700	324	58.10	19,000	19,000
TOTAL 311						70,000		84,140		5,999,000	6,069,000

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**E S T I M A T E   W O R K S H E E T**

Page: 6  
 Estimate No: 21031B

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***		*** LABOR ***		TOTAL COST		
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE		MNHR	WAGE RATE
315		ELECTRICAL PLANT									
315.26		TRANSFORMERS, SWITCHGEAR, WIRING, CONDUIT, LIGHTING	1	LT			600.000	600	41.90	25,000	25,000
315.27		POWER BLOCK ELECTRICAL EQUIPMENT REMOVAL	1	LT			1200.000	1200	41.90	50,000	50,000
		SUB TOTAL 315.2						1,800		75,000	75,000
		TOTAL 315						1,800		75,000	75,000

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**E S T I M A T E   W O R K S H E E T**

Page: 7  
 Estimate No: 21031B

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***			*** LABOR ***			TOTAL COST
					RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	MNHR	WAGE RATE	
317		SCRAP VALUE (SEE BASIS)									
317.11		SCRAP VALUE OF STEEL	2000	TN							
317.12		SCRAP VALUE OF COPPER	30	TN							
		SUB TOTAL 317.1									
		TOTAL 317									



**E S T I M A T E   W O R K S H E E T**

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Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***		*** LABOR ***		TOTAL COST
					RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	
900		INDIRECT EXPENSES							
900.1		CINERGY INDIRECT EXPENSES							
900.11		PERMITS							50,000
900.12		ADMINISTRATIVE EXPENSES							616,000
		<b>SUB TOTAL 900.1</b>							<b>666,000</b>
		<b>TOTAL 900</b>							<b>666,000</b>
					<b>TOTAL DIRECT &amp; INDIRECT COSTS</b>	<b>70,000</b>	<b>85,940</b>	<b>6,740,000</b>	<b>6,810,000</b>

**CINERGY  
BECKJORD STATION, OHIO  
PERMITTING AND DEMOLITION FOR RIVER STRUCTURES**

STRUCTURES AFFECTED BY HIGH WATER LEVEL ( OHWL ):		473 FT		
PLANT GRADE ELEVATION		490 TO 515 FT		
	CRIB HOUSE ( 2 )		REMOVE ENCLOSED MASONRY PUMPHOUSE AND CONCRETE SUBSTRUCTURE OFF-SHORE	
	BOILER BUILDING		REMOVE RIVER FRONT BAY OF BOILER BLDG ONLY	
	DISCHARGE TUNNEL		REMOVE DISCHARGE TUNNEL	
	COAL UNLOADING FACILITY		REMOVE CELL MOUNTED STRUCTURE	
	FUEL OIL UNLOADING FACILITY		REMOVE CELL MOUNTED STRUCTURE	
	CELLS		REMOVE CELLS COAL UNL 3 X 40FT CELLS,	
	DEADMEN		FUEL OIL UNL 1 40FT AND 2 20FT CELLS	
	CHIMNEY		PARTIAL REMOVAL	
	SHORELINE SHEETPIILING		REMOVE CONCRETE CHIMNEY	
	TRANSMISSION LINE TOWERS		SHEETPIILING REMAINS IN PLACE	
			TOWERS REMAIN IN PLACE	
1	REMOVAL OF PLANT PRIOR TO DEMOLITION			
	ELECTRICAL BULKS		CABLES	
	MECHANICAL BULKS		A/G PIPING, VALVES	
	MECHANICAL EQUIPMENT		PUMPS, STRAINERS	
	ELECTRICAL EQUIPMENT		TRANSFORMERS, DISTRIB EQPT. FOR RIVER STRUCTURES	
	ELECTRICAL EQUIPMENT		TRANSFORMERS, DISTRIB EQPT. FOR POWER BLOCK	
2	DEMOLITION METHOD			
	EXPLOSIVES		CELL DEMOLITION IN SECTIONS	
	HAMMER WITH LONG BOOM		DEMOLISH UNDERWATER TUNNELS	
			DEMOLISH SERV WATER PUMPHOUSE	
			SUPERSTRUCTURE AND SUBSTRUCTURE	
	CONVENTIONAL HAMMER		TO BEDROCK .	
	PULL PILES		NOT REQD	
	PULL CELLS		100FT LONG CELLS PULLED IN SECTIONS	
	SHEET PILING		REMOVE DISCHARGE TUNNEL SHEET PILE	
3	COLLECTION			
	STEEL		REQD	
	CONCRETE		REQD	
	COPPER		CABLE	
4	RECYCLING			
	STEEL		REQD	
	CONCRETE		REQD	
	COPPER		REQD	
5	DISPOSAL			
	RUBISH		REQD	
	HAZMATL		NONE	
6	OTHER			
	LAND EQUIPMENT REQD ( CRANES, TRUCKS, ETC. )		REQD	
	BARGE EQUIPMENT REQD ( CRANES, TRUCKS, ETC )		REQD	
	TEMPORARY CONSTRUCTION ( SHEET PILING, COFFERDAM )		NOT REQD	
	DIVERS		REQD	
	DEWATERING		REQD	
7	SAFETY PRECAUTION REQUIREMENTS			
	NORMAL		REQD	
	ABNORMAL		NOT REQD	
8	PERMITTING REQUIREMENTS			
			PER US COAST GUARD REQMTS	
			PER US ARMY COE REQMTS	
			PER LOCAL AND STATE REQMTS	
9	SITWORK			
			CRIB HOUSE FILL, RESTORE SHORELINE TO ORIGINAL CONDITION	

DEMOLITION OF "RIVER STRUCTURES "

CONCEPTUAL COST ESTIMATE

PREPARED FOR  
CINERGY  
ZIMMER STATION

SARGENT & LUNDY

ESTIMATE NO. 21030A  
PROJECT NO. 9940-003  
January 21, 2003

REVIEWED BY: *[Signature]*

APPROVED BY: *[Signature]*  
*G.D. Ruckas*

Estimate No: 21030A

TABLE OF CONTENTS

Report	Page
Basis of Estimate.....	1
Summary.....	3
Work Sheet Details.....	4

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**B A S I S   o f   E S T I M A T E**  
CINERGY  
ZIMMER STATION  
CONCEPTUAL COST ESTIMATE  
DEMOLITION OF "RIVER STRUCTURES "

Page: 1  
Estimate No: 21030A  
Project No: 9940-003  
Prepared by: PAG/BJD/  
Estimate Date: 21JAN03

rice level: 2002

Scope

DISMANTLING AND REMOVAL OF ALL EQUIPMENT AND PIPING, DEMOLITION AND REMOVAL OF COAL AND LIME UNLOADING STRUCTURES AND CELLS , INTAKE AND DISCHARGE STRUCTURES.

Technical Basis

SEE ASSUMPTIONS BELOW

Assumptions

- PLANT GRADE ELEV. 520FT. OHWL 475FT.
- SERVICE WATER PUMPHOUSE AND EQUIPMENT REMAIN IN PLACE.
- ALL ABOVE GRADE ITEMS AT THE SITE ARE DEMOLISHED AND DISPOSED OF ON SITE, AND HAVE NO SCRAP VALUE UNLESS INDICATED OTHERWISE IN THE ESTIMATE
- TRANSPORTATION OF SCRAP MATERIAL TO A PROCESSOR IS NOT INCLUDED
- ALL SOIL BORROW MATERIAL IS FROM ON SITE
- BASED ON 40 HOUR WORKWEEK

Commercial Basis

1. Equipment/Material Cost

THE QUOTED PRICES FOR METAL SCRAP VALUES ARE:

- COPPER \$1400.00 PER TON
- STEEL \$85.00 PER TON

2. Labor Wage Rates

THE FOLLOWING VALUES INCLUDE WAGES, DEMOLITION EQUIPMENT, ON-SITE TRANSPORTATION, DISPOSAL, INSURANCE COSTS, AND OVERHEAD & PROFIT:

- |                       |             |
|-----------------------|-------------|
| - WRECKING CREW       | \$ 58.10/hr |
| - ASBESTOS & PCB WORK | \$ 90.00/hr |
| - EARTHWORK           | \$115.10/hr |
| - SEEDING & MULCHING  | \$ 34.90/hr |
| - ELECTRICIAN         | \$ 41.90/hr |
| - CARPENTER           | \$ 34.30/hr |

3. Labor Crews

S & L STANDARD FOR THIS TYPE OF WORK

4. Productivity

AS THOSE APPLIED TO OHIO

5. Quantity Sources

BASED ON S & L GENERAL ARRANGEMENT DRAWINGS , RIVER STRUCTURE DRAWINGS AND PLANT PHOTOGRAPHS.

6. Project Schedule

6 MONTHS DURATION

7. Indirect Expenses

CINERGY INDIRECT EXPENSES - PERMITTING FEE ALLOWANCE OF \$ 50,000 AND PROJECT ADMINISTRATION ALLOWANCE BASED ON 10% OF TOTAL DIRECT CONSTRUCTION COST.

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**B A S I S   O F   E S T I M A T E**

Page: 2  
Estimate No: 21030A

Commercial Basis continued

8. Escalation Rates (See Cost Summary for rates)

NOT INCLUDED, ESCALATION RATE EXPECTED TO BE 3% P.A.

9. Sales/Use Taxes (See Cost Summary for rates)

NOT INCLUDED

10. Contingency (See Cost Summary for rates)

SEE COST SUMMARY FOR RATES

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**C O S T S U M M A R Y R E P O R T**

CINERGY  
 ZIMMER STATION  
CONCEPTUAL COST ESTIMATE  
 DEMOLITION OF "RIVER STRUCTURES "

Page: 3  
 Estimate No: 21030A  
 Project No: 9940-003  
 Prepared by: PAG/BJD/  
 Estimate Date: 21JAN03

Price level: 2002

ACCT.NO.	DESCRIPTION	TOTAL EQUIPMENT COST	TOTAL MATERIAL COST	TOTAL LABOR COST	TOTAL COST
311	STRUCTURES AND IMPROVEMENTS - DEMOLITION AND MODIFICATIONS			2,778,000	2,778,000
315	ELECTRICAL PLANT			25,000	25,000
317	SCRAP VALUE (SEE BASIS)				
<b>TOTAL CONSTRUCTION COSTS</b>				<b>2,803,000</b>	<b>2,803,000</b>
INDIRECT EXPENSES					330,000
ESCALATION					
SALES/USE TAX					
CONTINGENCY					783,000
<b>TOTAL PROJECT COST</b>					<b>3,916,000</b>
- SALVAGE VALUE					-220,000
<b>GRAND TOTAL COST</b>					<b>3,696,000</b>

**FINANCIAL ASSUMPTIONS:**

ESCALATION RATES: Equipment 0.000%  
 Material 3.000%  
 Labor 3.000%  
 Indirects 3.000%

SALES/USE TAX RATES: Equipment 0.000% Material 0.000%

CONTINGENCY RATES: Equipment 0.0% Material 25.0% Labor 25.0% Indirects 25.0%

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**ESTIMATE WORKSHEET**

CINERGY  
ZIMMER STATION  
CONCEPTUAL COST ESTIMATE  
DEMOLITION OF "RIVER STRUCTURES "

Page: 4  
Estimate No: 21030A  
Project No: 9940-003  
Prepared by: PAG/BJD/

Estimate Date: 21JAN03

Price level: 2002

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***		*** LABOR ***			TOTAL COST		
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	MNRS		WAGE RATE	LABOR COST
511		STRUCTURES AND IMPROVEMENTS - DEMOLITION AND MODIFICATIONS										
511.1		SITE STRUCTURES DEMOLITION										
511.14		FILL SITE AREAS WHERE REQUIRED	17000	CY				0.025	425	115.10	49,000	49,000
511.15		PLUG SERVICE WATER INTAKE AND DISCHARGE TUNNELS								NOT REQUIRED		
511.17		SEED & MULCH SITE INCLUDING TOPSOIL	4	AC				30.000	120	34.90	4,000	4,000
		SUB TOTAL 311.1							545		53,000	53,000
511.21		COAL AND LIME UNLOADING FACILITY CONCRETE	600	CY				1.200	720	58.10	42,000	42,000
511.22		COAL UNLOADING FACILITIES CELLS 40FT DIA X 100FT	2	EA				660.000	1320	150.00	198,000	198,000
511.23		COAL UNLOADING FACILITIES CELLS 30FT DIA X 100FT	2	EA				450.000	900	150.00	135,000	135,000
511.24		COAL UNLOADING FACILITIES CELLS 10FT DIA X 100FT	16	EA				150.000	2400	150.00	360,000	360,000
511.25		LIME UNLOADING FACILITIES CELLS 40FT DIA X 100FT	1	EA				660.000	660	150.00	99,000	99,000
511.26		LIME UNLOADING FACILITIES CELLS 20FT DIA X 100FT	6	EA				460.000	2760	150.00	414,000	414,000
511.27		LIME UNLOADING FACILITIES CELLS 10FT DIA X 100FT	14	EA				150.000	2100	150.00	315,000	315,000
511.28		DEADMEN PARTIAL REMOVAL	10	EA				70.000	700	58.10	41,000	41,000
		SUB TOTAL 311.2							11,560		1,604,000	1,604,000
511.33		INTAKE STRUCTURE SHEET PILING ( 150FT LONG X 100FT LONG SHEET PILES 3000SF )	330	TN				4.000	1320	58.10	77,000	77,000
511.34		INTAKE STRUCTURE STRUCTURAL STEEL	75	TN				12.000	900	58.10	52,000	52,000
511.38		OFFSHORE STRUCTURE DEBRIS TRANSPORT TO HOLDING AREA	1	LT				5160.000	5160	58.10	300,000	300,000
511.39		BARGE RENTAL, 6 MO. DURATION	1	LT							300,000	300,000



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**ESTIMATE WORKSHEET**

Page: 5  
 Estimate No: 21030A

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***		*** LABOR ***			TOTAL COST		
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	MNHR		WAGE RATE	LABOR COST
		SUB TOTAL 311.3						7,380		729,000	729,000	
11.53		COAL UNLOADING STEEL STRUCTURES	100	TN				12.000	1200	150.00	180,000	180,000
11.54		COAL UNLOADING EQUIPMENT	50	TN				2.700	135	58.10	8,000	8,000
11.55		LIME UNLOADING STEEL STRUCTURES	100	TN				12.000	1200	150.00	180,000	180,000
11.56		LIME UNLOADING EQUIPMENT	50	TN				2.700	135	58.10	8,000	8,000
		SUB TOTAL 311.5						2,670			376,000	376,000
11.61		BALANCE OF PLANT EQUIPMENT	100	TN				2.700	270	58.10	16,000	16,000
		<b>TOTAL 311</b>						<b>22,425</b>			<b>2,778,000</b>	<b>2,778,000</b>

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**ESTIMATE WORKSHEET**

Page: 6  
 Estimate No: 21030A

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***			*** LABOR ***			TOTAL COST	
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	MNHR	WAGE RATE		LABOR COST
15		ELECTRICAL PLANT										
15.26		TRANSFORMERS, SWITCHGEAR, WIRING, CONDUIT, LIGHTING	1	LT				600.000	600	41.90	25,000	25,000
		<b>TOTAL 315</b>							<b>600</b>		<b>25,000</b>	<b>25,000</b>

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**ESTIMATE WORKSHEET**

Page: 7  
 Estimate No: 21030A

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***		*** LABOR ***		TOTAL COST	
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE		MNHR
17		SCRAP VALUE (SEE BASIS)								
17.11		SCRAP VALUE OF STEEL	2600	TN						
17.12		SCRAP VALUE OF COPPER	10	TN						
		SUB TOTAL	317.1							
		TOTAL	317							

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**ESTIMATE WORKSHEET**

Page: 8  
 Estimate No: 21030A

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***		*** LABOR ***		TOTAL COST
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	
00		INDIRECT EXPENSES							
00.1		CINERGY INDIRECT EXPENSES							
00.11		PERMITS							50,000
00.12		ADMINISTRATIVE EXPENSES							280,000
		SUB TOTAL 900.1							330,000
		TOTAL 900							330,000
		TOTAL DIRECT & INDIRECT COSTS					23,025		3,133,000

**CINERGY  
ZIMMER STATION, OHIO  
PERMITTING AND DEMOLITION FOR RIVER STRUCTURES**

	STRUCTURES AFFECTED BY HIGH WATER LEVEL ( OHWL):	475 FT	
	PLANT GRADE ELEVATION	520 FT	
	SERVICE WATER PUMPHOUSE		ENCLOSED PUMPHOUSE AND CONCRETE SUBSTRUCTURE - REMAINS IN PLACE
	SERVICE WATER INTAKE STRUCTURE		REMOVE STRUCTURE SHEETPILE AND CONCRETE
	COAL UNLOADING FACILITY		REMOVE CELL MOUNTED STRUCTURE
	LIMESTONE UNLOADING FACILITY		REMOVE CELL MOUNTED STRUCTURE
	CELLS		REMOVE COAL UNLG ; 2 X 40FT DIA CELLS, 2 X 30FT DIA CELLS, 16 X 10FT DIA CELLS.
	DEADMEN		LIME UNLG; 1 X 40FT CELL, 6 X 20FT DIA CELLS, 14 X 10FT DIA CELLS.
	UNLOADING FACILITY		PARTIAL REMOVAL
			ABANDON IN PLACE
1	REMOVAL OF PLANT PRIOR TO DEMOLITION		
	ELECTRICAL BULKS		NOT REQD
	MECHANICAL BULKS		NOT REQD
	MECHANICAL EQUIPMENT		NOT REQD
	ELECTRICAL EQUIPMENT		NOT REQD
	SERVICE WATER LINE TO PLANT		PLUG WITH CONCRETE AT BOTH ENDS AND ABANDON IN PLACE
2	DEMOLITION METHOD		
	EXPLOSIVES		NOT REQD
	HAMMER WITH LONG BOOM		NOT REQD
	CONVENTIONAL HAMMER		DEMOLISH SERV WATER INTAKE STRUCTURE
	PULL PILES		100FT LONG SHEET PILING PULLED
	PULL CELLS		100FT LONG SHEET PILING PULLED
3	COLLECTION		
	STEEL		REQD
	CONCRETE		REQD
	COPPER		REQD
4	RECYCLING		
	STEEL		REQD
	CONCRETE		REQD
	COPPER		REQD
5	DISPOSAL		
	RUBISH		REQD
	HAZMATL		NONE
6	OTHER		
	LAND EQUIPMENT REQD ( CRANES, TRUCKS, ETC. )		REQD
	BARGE EQUIPMENT REQD ( CRANES, TRUCKS, ETC )		REQD
	TEMPORARY CONSTRUCTION ( SHEET PILING, COFFERDAM )		NOT REQD
	DIVERS		NOT REQD
	DEWATERING		NOT REQD
7	SAFETY PRECAUTION REQUIREMENTS		
	NORMAL		REQD
	ABNORMAL		
8	PERMITTING REQUIREMENTS		
			PER US ARMY COE REQMTS
			PER LOCAL AND STATE REQMTS
9	SITWORK		
			RESTORE SHORELINE TO ORIGINAL CONDITION

**Welles, Sarah**

---

**From:** Glenn, Erica  
**Sent:** Thursday, December 15, 2005 2:16 PM  
**To:** Reynolds, Jaime  
**Subject:** FW: fas 143/3

**Attachments:** FAS143 Demo Est 3.pdf



FAS143 Demo Est  
3.pdf

-----Original Message-----

**From:** Wilson, Dale  
**Sent:** Tuesday, March 04, 2003 3:26 PM  
**To:** Barnhart, Christa  
**Subject:** FW: fas 143/3

-----Original Message-----

**From:** RICHARD.A.JERCH@sargentlundy.com  
[mailto:RICHARD.A.JERCH@sargentlundy.com]  
**Sent:** Thursday, February 27, 2003 3:17 PM  
**To:** Wilson, Dale  
**Subject:** fas 143/3

(See attached file: FAS143 Demo Est 3.pdf)

DEMOLITION OF "RIVER STRUCTURES "

CONCEPTUAL COST ESTIMATE

PREPARED FOR

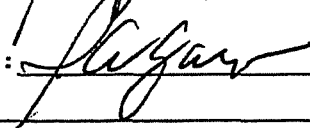
CINERGY  
EAST BEND UNIT 2

SARGENT & LUNDY

ESTIMATE NO. 21022B  
PROJECT NO. 9940-003  
January 31, 2003

REVIEWED BY: \_\_\_\_\_

APPROVED BY: \_\_\_\_\_



Estimate No: 21022B

TABLE OF CONTENTS

Report	Page
Basis of Estimate.....	1
Summary.....	3
Work Sheet Details.....	4



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**B A S I S   o f   E S T I M A T E**  
CINERGY  
EAST BEND UNIT 2  
CONCEPTUAL COST ESTIMATE  
DEMOLITION OF "RIVER STRUCTURES "

Page: 1  
Estimate No: 21022B  
Project No: 9940-003  
Prepared by: PAG/BJD/

Estimate Date: 31JAN03

Price level: 2002

Scope

DISMANTLING AND REMOVAL OF ALL EQUIPMENT AND PIPING, DEMOLITION AND REMOVAL OF COAL AND LIME UNLOADING STRUCTURES AND CELLS AND UNDERWATER SERVICE WATER INTAKE PIPES.

Technical Basis

SEE ASSUMPTIONS BELOW

Assumptions

- PLANT GRADE ELEV. 500FT. OHWL 458FT.
- ALL ABOVE GRADE ITEMS AT THE SITE ARE DEMOLISHED AND DISPOSED OF ON SITE, AND HAVE NO SCRAP VALUE UNLESS INDICATED OTHERWISE IN THE ESTIMATE
- TRANSPORTATION OF SCRAP MATERIAL TO A PROCESSOR IS NOT INCLUDED
- ALL SOIL BORROW MATERIAL IS FROM ON SITE
- BASED ON 40 HOUR WORKWEEK

Commercial Basis

1. Equipment/Material Cost

THE QUOTED PRICES FOR METAL SCRAP VALUES ARE:

- COPPER \$1400.00 PER TON
- STEEL \$85.00 PER TON

2. Labor Wage Rates

THE FOLLOWING VALUES INCLUDE WAGES, DEMOLITION EQUIPMENT, ON-SITE TRANSPORTATION, DISPOSAL, INSURANCE COSTS, AND OVERHEAD & PROFIT:

- |                       |             |
|-----------------------|-------------|
| - WRECKING CREW       | \$ 58.10/hr |
| - ASBESTOS & PCB WORK | \$ 90.00/hr |
| - EARTHWORK           | \$115.10/hr |
| - SEEDING & MULCHING  | \$ 34.90/hr |
| - ELECTRICIAN         | \$ 41.90/hr |
| - CARPENTER           | \$ 34.30/hr |

3. Labor Crews

S & L STANDARD FOR THIS TYPE OF WORK

4. Productivity

AS THOSE APPLIED TO OHIO

5. Quantity Sources

BASED ON S & L GENERAL ARRANGEMENT DRAWINGS , RIVER STRUCTURE DRAWINGS AND PLANT PHOTOGRAPHS.

6. Project Schedule

6 MONTHS DURATION

7. Indirect Expenses

CINERGY INDIRECT EXPENSES - PERMITTING FEE ALLOWANCE OF \$ 50,000 AND PROJECT ADMINISTRATION ALLOWANCE BASED ON 10% OF TOTAL DIRECT CONSTRUCTION COST.

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B A S I S o f E S T I M A T E

Page: 2  
Estimate No: 21022B

Commercial Basis continued

8. Escalation Rates (See Cost Summary for rates)

NOT INCLUDED, ESCALATION RATE EXPECTED TO BE 3% P.A.

9. Sales/Use Taxes (See Cost Summary for rates)

NOT INCLUDED

10. Contingency (See Cost Summary for rates)

SEE COST SUMMARY FOR RATES

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**C O S T S U M M A R Y R E P O R T**

CINERGY  
 EAST BEND UNIT 2  
CONCEPTUAL COST ESTIMATE  
 DEMOLITION OF "RIVER STRUCTURES "

Page: 3  
 Estimate No: 21022B  
 Project No: 9940-003  
 Prepared by: PAG/BJD/

Estimate Date: 31JAN03

Price level: 2002

ACCT.NO.	DESCRIPTION	TOTAL EQUIPMENT COST	TOTAL MATERIAL COST	TOTAL LABOR COST	TOTAL COST
311	STRUCTURES AND IMPROVEMENTS - DEMOLITION AND MODIFICATIONS		40,000	1,765,000	1,805,000
315	ELECTRICAL PLANT			25,000	25,000
317	SCRAP VALUE (SEE BASIS)				
TOTAL CONSTRUCTION COSTS			40,000	1,790,000	1,830,000
INDIRECT EXPENSES					230,000
ESCALATION					
SALES/USE TAX					
CONTINGENCY					515,000
TOTAL PROJECT COST					2,575,000
SALVAGE VALUE					-110,000
GRAND TOTAL COST					2,465,000

FINANCIAL ASSUMPTIONS:

ESCALATION RATES: Equipment 0.000%  
 Material 3.000%  
 Labor 3.000%  
 Indirects 3.000%

SALES/USE TAX RATES: Equipment 0.000% Material 0.000%

CONTINGENCY RATES: Equipment 0.0% Material 25.0% Labor 25.0% Indirects 25.0%

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**ESTIMATE WORKSHEET**  
CINERGY  
EAST BEND UNIT 2  
CONCEPTUAL COST ESTIMATE  
DEMOLITION OF "RIVER STRUCTURES "

Page: 4  
Estimate No: 21022B  
Project No: 9940-003  
Prepared by: PAG/BJD/

Estimate Date: 31JAN03

Price level: 2002

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***			*** LABOR ***			TOTAL COST	
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	MNHR	WAGE RATE		LABOR COST
311		STRUCTURES AND IMPROVEMENTS - DEMOLITION AND MODIFICATIONS										
311.1		SITE STRUCTURES DEMOLITION										
311.14		FILL SITE AREAS WHERE REQUIRED	1000	CY				0.025	25	115.10	3,000	3,000
311.15		PLUG SERVICE WATER PIPE WITH SLURRY & PLACE CONCRETE AT ENDS ( 3 36IN LINES )	1	LS	15000		15,000	300.000	300	58.10	17,000	32,000
311.17		SEED & MULCH SITE INCLUDING TOPSOIL	2	AC				30.000	60	34.90	2,000	2,000
311.18		RIP RAP	700	SY	35.00		25,000	1.000	700	34.90	24,000	49,000
		<b>SUB TOTAL 311.1</b>					<b>40,000</b>		<b>1,085</b>		<b>46,000</b>	<b>86,000</b>
311.21		COAL UNLOADING FACILITY CONCRETE	440	CY				1.200	528	58.10	31,000	31,000
311.23		LIME UNLOADING FACILITIES CONCRETE	440	CY				1.200	528	58.10	31,000	31,000
311.24		COAL UNLOADING FACILITIES CELLS 40FT DIA	2	EA				500.000	1000	150.00	150,000	150,000
311.25		COAL UNLOADING FACILITIES CELLS 20FT DIA	12	EA				175.000	2100	150.00	315,000	315,000
311.26		LIME UNLOADING FACILITIES CELLS 40FT DIA	1	EA				500.000	500	150.00	75,000	75,000
311.27		LIME UNLOADING FACILITIES CELLS 20FT DIA	4	EA				175.000	700	150.00	105,000	105,000
311.28		COAL & LIME UNLOADING CELLS 10FT DIA	13	EA				100.000	1300	150.00	195,000	195,000
311.29		DEADMEN PARTIAL REMOVAL	13	EA				70.000	910	58.10	53,000	53,000
		<b>SUB TOTAL 311.2</b>							<b>7,566</b>		<b>955,000</b>	<b>955,000</b>
311.38		OFFSHORE STRUCTURE DEBRIS TRANSPORT TO HOLDING AREA	1	LT				5160.000	5160	58.10	300,000	300,000
311.39		BARGE RENTAL, 6 MO. DURATION	1	LT							300,000	300,000
		<b>SUB TOTAL 311.3</b>							<b>5,160</b>		<b>600,000</b>	<b>600,000</b>

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**E S T I M A T E   W O R K S H E E T**

Page: 5  
 Estimate No: 21022B

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***		*** LABOR ***			TOTAL COST		
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	MNHR		WAGE RATE	LABOR COST
311.53		SERVICE WATER INTAKE PIPE ( UNDERWATER PORTION INCLUDING AIR LINES )	60	TN				12.000	720	150.00	108,000	108,000
311.54		COAL UNLOADING STRUCTURE	100	TN				2.700	270	58.10	16,000	16,000
311.55		COAL UNLOADING EQUIPMENT	50	TN				2.700	135	58.10	8,000	8,000
311.56		LIME UNLOADING STRUCTURE	100	TN				2.700	270	58.10	16,000	16,000
311.57		LIME UNLOADING EQUIPMENT	50	TN				2.700	135	58.10	8,000	8,000
		<b>SUB TOTAL 311.5</b>							<b>1,530</b>		<b>156,000</b>	<b>156,000</b>
311.61		BALANCE OF PLANT EQUIPMENT	50	TN				2.700	135	58.10	8,000	8,000
		<b>TOTAL 311</b>							<b>15,476</b>		<b>1,765,000</b>	<b>1,805,000</b>

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**ESTIMATE WORKSHEET**

Page: 6  
 Estimate No: 210228

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***			*** LABOR ***			TOTAL COST	
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	MNHR	WAGE RATE		LABOR COST
315		ELECTRICAL PLANT										
315.26		TRANSFORMERS, SWITCHGEAR, WIRING, CONDUIT, LIGHTING	1	LT				600.000	600	41.90	25,000	25,000
		<b>TOTAL 315</b>							<b>600</b>		<b>25,000</b>	<b>25,000</b>



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**E S T I M A T E   W O R K S H E E T**

Page: 8  
 Estimate No: 21022B

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***		*** LABOR ***		TOTAL COST	
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE		MNHR
900		INDIRECT EXPENSES								
900.1		CINERGY INDIRECT EXPENSES								
900.11		PERMITS							50,000	
900.12		ADMINISTRATIVE EXPENSES							180,000	
		SUB TOTAL 900.1							230,000	
		TOTAL 900							230,000	
TOTAL DIRECT & INDIRECT COSTS							40,000	16,076	2,020,000	2,060,000



**CINERGY  
EAST BEND STATION, OHIO  
PERMITTING AND DEMOLITION FOR RIVER STRUCTURES**

	STRUCTURES AFFECTED BY HIGH WATER LEVEL ( OHWL ):	458 FT	
	PLANT GRADE ELEVATION	500 FT	
	SERVICE WATER PUMPHOUSE		ARCHITECTURALLY ENCLOSED PUMPHOUSE AND CONCRETE SUBSTRUCTURE ONSHORE - REMAINS IN PLACE
	COAL UNLOADING FACILITY		REMOVE CELL MOUNTED STRUCTURE
	LIMESTONE UNLOADING FACILITY		REMOVE CELL MOUNTED STRUCTURE
	CELLS		REMOVE COAL UNLG ; 2 X 40FT DIA CELLS, 12 X 20FT DIA CELLS, 11 X 10FT DIA CELLS. LIME UNLG; 1 X 40FT CELL, 4 X 20FT DIA CELLS, 2 X 10FT DIA CELLS.
	DEADMEN		PARTIAL REMOVAL
	SERVICE WATER (3) 36IN LINES		REMOVE UNDERWATER PORTION OF SERVICE WATER LINES AND PLUG AT BOTH ENDS
1	REMOVAL OF PLANT PRIOR TO DEMOLITION		
	ELECTRICAL BULKS		CABLES
	MECHANICAL BULKS		A/G PIPING, VALVES
	MECHANICAL EQUIPMENT		PUMPS, STRAINERS
	ELECTRICAL EQUIPMENT		TRANSFORMERS, DISTRIB EQPT
	SERVICE WATER LINE TO PLANT		PLUG WITH CONCRETE AT BOTH ENDS AND ABANDON IN PLACE
	SERVICE WATER LINE TO RIVER		PLUG WITH CONCRETE AT LAND END AND ABANDON IN PLACE 150FT
2	DEMOLITION METHOD		
	EXPLOSIVES		CELL DEMOLITION IN SECTIONS
	HAMMER WITH LONG BOOM		NOT REQD
	CONVENTIONAL HAMMER		PARTIAL REMOVAL OF DEADMEN
	PULL PILES		NOT REQD
	PULL CELLS		70FT LONG CELLS PULLED IN SECTIONS
	SERVICE WATER LINE		REMOVE UNDERWATER PORTION OF LINE IN SECTIONS
3	COLLECTION		
	STEEL		REQD
	CONCRETE		REQD
	COPPER		CABLE
4	RECYCLING		
	STEEL		REQD
	CONCRETE		REQD
	COPPER		REQD
5	DISPOSAL		
	RUBISH		REQD
	HAZMATL		NONE
6	OTHER		
	LAND EQUIPMENT REQD ( CRANES, TRUCKS, ETC. )		REQD
	BARGE EQUIPMENT REQD ( CRANES, TRUCKS, ETC )		REQD
	TEMPORARY CONSTRUCTION ( SHEET PILING, COFFERDAM )		NOT REQD
	DIVERS		REQD FOR UNDERWATER PIPE REMOVAL
	DEWATERING		NOT REQD
7	SAFETY PRECAUTION REQUIREMENTS		
	NORMAL		REQD
	ABNORMAL		
8	PERMITTING REQUIREMENTS		
			PER US COAST GUARD REQMTS
			PER US ARMY COE REQMTS
			PER LOCAL AND STATE REQMTS
9	SITWORK		
			RESTORE SHORELINE TO ORIGINAL CONDITION

DEMOLITION OF "RIVER STRUCTURES "

CONCEPTUAL COST ESTIMATE

PREPARED FOR

CINERGY  
CAYUGA - UNITS 1 & 2

SARGENT & LUNDY

ESTIMATE NO. 13240-9R  
PROJECT NO. 9940-003  
January 31, 2003

REVIEWED BY:

APPROVED BY:

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*[Handwritten signature]*

TABLE OF CONTENTS

Report	Page
Basis of Estimate.....	1
Summary.....	3
Work Sheet Details.....	4

**B A S I S o f E S T I M A T E**  
CINERGY  
CAYUGA - UNITS 1 & 2  
CONCEPTUAL COST ESTIMATE  
DEMOLITION OF "RIVER STRUCTURES "

t & Lundy  
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Price Level: 2002

Scope

DISMANTLING AND REMOVAL OF ALL EQUIPMENT AND PIPING IN SCREEN HOUSE, PLUGGING OF CW PIPING, DEICING PIPE & DISCHARGE CHANNEL, DEMOLITION AND REMOVAL OF THE SCREEN HOUSE STRUCTURE, AND DEMOLITION AND REMOVAL OF UNDERWATER CONCRETE IN FOREBAY.

Technical Basis

SEE ASSUMPTIONS BELOW

Assumptions

- PLANT GRADE EL. 505FT. OHWL EL. 474FT.
- ALL ABOVE GRADE ITEMS AT THE SITE ARE DEMOLISHED AND DISPOSED OF ON SITE, AND HAVE NO SCRAP VALUE UNLESS INDICATED OTHERWISE IN THE ESTIMATE
- TRANSPORTATION OF SCRAP MATERIAL TO A PROCESSOR IS NOT INCLUDED
- ALL SOIL BORROW MATERIAL IS FROM ON SITE
- BASED ON 40 HOUR WORKWEEK

Commercial Basis

1. Equipment/Material Cost

THE QUOTED PRICES FOR METAL SCRAP VALUES ARE:

- COPPER \$1400.00 PER TON
- STEEL \$85.00 PER TON

2. Labor Wage Rates

THE FOLLOWING VALUES INCLUDE WAGES, DEMOLITION EQUIPMENT, ON-SITE TRANSPORTATION, DISPOSAL, INSURANCE COSTS, AND OVERHEAD & PROFIT:

- |                       |             |
|-----------------------|-------------|
| - WRECKING CREW       | \$ 70.30/hr |
| - ASBESTOS & PCB WORK | \$100.40/hr |
| - EARTHWORK           | \$139.27/hr |
| - SEEDING & MULCHING  | \$ 42.23/hr |
| - ELECTRICIAN         | \$ 50.70/hr |
| - CARPENTER           | \$ 41.50/hr |

3. Labor Crews

S & L STANDARD FOR THIS TYPE OF WORK

4. Productivity

AS THOSE APPLIED TO INDIANA

5. Quantity Sources

BASED ON S & L GENERAL ARRANGEMENT DRAWINGS, RIVER STRUCTURE DRAWINGS AND PHOTOGRAPHS.

6. Project Schedule

3 MONTHS DURATION

7. Indirect Expenses

CINERGY INDIRECT EXPENSES - 10% OF TOTAL DIRECT CONSTRUCTION COST

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**B A S I S   o f   E S T I M A T E**

Commercial Basis continued

8. Escalation Rates (See Cost Summary for rates)

NOT INCLUDED, ESCALATION RATE EXPECTED TO BE 3% P.A.

9. Sales/Use Taxes (See Cost Summary for rates)

NOT INCLUDED

10. Contingency (See Cost Summary for rates)

SEE COST SUMMARY FOR RATES

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**C O S T S U M M A R Y R E P O R T**  
 C I N E R G Y  
 CAYUGA - UNITS 1 & 2  
CONCEPTUAL COST ESTIMATE  
 DEMOLITION OF "RIVER STRUCTURES "

Page: 3  
 Estimate No: 13240-9R  
 Project No: 9940-003  
 Prepared by: PAG/BJD/  
 Estimate Date: 31JAN03

price level: 2002

ACCT.NO.	DESCRIPTION	TOTAL EQUIPMENT COST	TOTAL MATERIAL COST	TOTAL LABOR COST	TOTAL COST
311	STRUCTURES AND IMPROVEMENTS - DEMOLITION AND MODIFICATIONS		180,000	760,000	940,000
314	TURBINE PLANT			102,000	102,000
315	ELECTRICAL PLANT			32,000	32,000
317	SCRAP VALUE (SEE BASIS)				
TOTAL CONSTRUCTION COSTS			180,000	894,000	1,074,000
INDIRECT EXPENSES					157,000
ESCALATION					
SALES/USE TAX					
CONTINGENCY					308,000
TOTAL PROJECT COST					1,539,000
SALVAGE VALUE					-30,000
GRAND TOTAL COST					1,509,000

FINANCIAL ASSUMPTIONS:

ESCALATION RATES: Equipment 0.000%  
 Material 3.000%  
 Labor 3.000%  
 Indirects 3.000%

SALES/USE TAX RATES: Equipment 0.000% Material 0.000%

CONTINGENCY RATES: Equipment 0.0% Material 25.0% Labor 25.0% Indirects 25.0%

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**ESTIMATE WORKSHEET**

CINERGY  
 CAYUGA - UNITS 1 & 2  
CONCEPTUAL COST ESTIMATE  
 DEMOLITION OF "RIVER STRUCTURES "

Page: 4  
 Estimate No: 13240-9R  
 Project No: 9940-003  
 Prepared by: PAG/BJD/

Estimate Date: 31JAN03

Price level: 2002

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***			*** LABOR ***			TOTAL COST	
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	MNHR	WAGE RATE		LABOR COST
311		STRUCTURES AND IMPROVEMENTS - DEMOLITION AND MODIFICATIONS										
311.1		SITE STRUCTURES DEMOLITION										
311.14		FILL SITE AREAS WHERE REQUIRED	25000	CY				0.025	625	139.27	87,000	87,000
311.15		PLUG CIRCULATING WATER PIPES WITH SLURRY & PLACE CONCRETE AT ENDS (TWO 120" LINES, 100LF EACH, 580 CY)	1	LS	29000		29,000	425.000	425	70.30	30,000	59,000
311.16		SEED & MULCH SITE INCLUDING TOPSOIL	2	AC	1100.00		2,000	30.000	60	42.23	3,000	5,000
311.17		PLUG DEICING & COOLING PIPE WITH SLURRY & PLACE CONCRETE AT ENDS (120" LINE, 300LF, 900 CY)	1	LS	33000		33,000	400.000	400	70.30	28,000	61,000
311.18		RIP RAP (AT INTAKE & DISCHARGE)	800	SY	35.00		28,000	1.000	800	42.23	34,000	62,000
		SUB TOTAL 311.1					92,000		2,310		182,000	274,000
311.2		OUTLYING BUILDINGS DEMOLITION										
311.21		CRIB HOUSE SUPERSTRUCTURE	245000	CF				0.006	1470	70.30	103,000	103,000
311.22		CRIB HOUSE SUBSTRUCTURE	3700	CY				0.800	2960	70.30	208,000	208,000
311.23		CRIB HOUSE FOREBAY AND TUNNELS	1100	CY				2.400	2640	70.30	186,000	186,000
311.24		CRIB HOUSE FOREBAY SHEET PILING										
												REMAINS IN PLACE
311.25		CRIB HOUSE MISC. STRUCTURES	20	TN				3.000	60	70.30	4,000	4,000
		SUB TOTAL 311.2							7,130		501,000	501,000
311.3		OUTLYING STRUCTURES CONSTRUCTION										
311.31		DISCHARGE FLUME CONCRETE PLUG	1100	CY	80.00		88,000	1.000	1100	70.30	77,000	165,000
		SUB TOTAL 311.3					88,000		1,100		77,000	165,000
		TOTAL 311					180,000		10,540		760,000	940,000

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**E S T I M A T E   W O R K S H E E T**

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***		*** LABOR ***		TOTAL COST		
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE		MNHR	WAGE RATE
314		TURBINE PLANT									
314.21		CIRCULATING WATER PUMPS	283	TN			3.000	849	70.30	60,000	60,000
314.22		SERVICE WATER PUMPS	30	TN			3.000	90	70.30	6,000	6,000
314.23		SCREENS AND SCREENWASH EQUIPMENT	50	TN			3.000	150	70.30	11,000	11,000
314.24		ABOVE GROUND PIPING	60	TN			6.000	360	70.30	25,000	25,000
		SUB TOTAL 314.2						1,449		102,000	102,000
		TOTAL 314						1,449		102,000	102,000



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E S T I M A T E   W O R K S H E E T

Page: 6  
 Estimate No: 13240-9R

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***			*** LABOR ***			TOTAL COST	
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	MNHR	WAGE RATE		LABOR COST
15		ELECTRICAL PLANT										
15.21		TRANSFORMERS, SWITCHGEAR, WIRING, CONDUIT, LIGHTING	1	LT				640.000	640	50.70	32,000	32,000
		TOTAL 315							640		32,000	32,000

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E S T I M A T E   W O R K S H E E T

Page: 7  
 Estimate No: 13240-9R

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***			*** LABOR ***			TOTAL COST
					RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	MNHR	WAGE RATE	
317		SCRAP VALUE (SEE BASIS)									
317.11		SCRAP VALUE OF STEEL	165	TN							
317.12		SCRAP VALUE OF COPPER	10	TN							
		SUB TOTAL 317.1									
		TOTAL 317									

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**ESTIMATE WORKSHEET**

Page: 8  
 Estimate No: 13240-9R

Note: Extended costs are rounded up to next thousand dollars

ACCOUNT NO.	WORK PACKAGE	DESCRIPTION	QTY	UM	*** MATERIAL ***			*** LABOR ***		TOTAL COST
					MATERIAL RATE	EQUIPMENT COST	MATERIAL COST	MNHR RATE	MNHR	
900		INDIRECT EXPENSES								
900.1		CINERGY INDIRECT EXPENSES								
900.11		PERMITTING	1	LS						50,000
900.12		PROJECT ADMINISTRATION	1	LS						107,000
		<b>SUB TOTAL 900.1</b>								<b>157,000</b>
		<b>TOTAL 900</b>								<b>157,000</b>
		<b>TOTAL DIRECT &amp; INDIRECT COSTS</b>					<b>180,000</b>	<b>12,629</b>	<b>1,051,000</b>	<b>1,231,000</b>

**CINERGY**  
**CAYUGA STATION, INDIANA**  
**PERMITTING AND DEMOLITION FOR RIVER STRUCTURES**

	STRUCTURES AFFECTED BY HIGH WATER LEVEL ( OHWL ):	474 FT	
	PLANT GRADE ELEVATION	505 FT	
	SCREEN (PUMP) HOUSE		REMOVE ENCLOSED PUMPHOUSE WITH CONCRETE SUBSTRUCTURE ON SHORE
	SCREEN HOUSE FOREBAY AND TUNNELS		REMOVE UNDERWATER CONCRETE STRUCTURE
	FOREBAY SHEET PILING		REMAINS IN PLACE
	DEICING AND COOLING PIPE		10FT DIA PIPE - PLUG AT BOTH ENDS AND ABANDON IN PLACE
	F.P. PUMPHOUSE		REMAINS IN PLACE
	DISCHARGE CHANNEL		CONCRETE STRUCTURE - FILL 100LF WITH CONCRETE
1	REMOVAL OF PLANT PRIOR TO DEMOLITION		
	ELECTRICAL BULKS		CABLES
	MECHANICAL BULKS		A/G PIPING, VALVES
	MECHANICAL EQUIPMENT		SCREENS, PUMPS, STRAINERS
	ELECTRICAL EQUIPMENT		TRANSFORMERS, DISTRIB EQPT
	CIRC WATER LINE		PLUG & FILL 100LF
2	DEMOLITION METHOD		
	EXPLOSIVES		NOT REQD
	HAMMER WITH LONG BOOM		NOT REQD
	CONVENTIONAL HAMMER		DEMOLISH SCREEN HOUSE SUPERSTRUCTURE AND SUBSTRUCTURE TO RIVER BED
	PULL PILES		NOT REQD
	PULL CELLS		NOT REQD
3	COLLECTION		
	STEEL		REQD
	CONCRETE		REQD
	COPPER		CABLE
4	RECYCLING		
	STEEL		REQD
	CONCRETE		REQD
	COPPER		REQD
5	DISPOSAL		
	RUBISH		REQD
	HAZMATL		NONE
6	OTHER		
	LAND EQUIPMENT REQD ( CRANES, TRUCKS, ETC. )		REQD
	BARGE EQUIPMENT REQD ( CRANES, TRUCKS, ETC )		REQD
	TEMPORARY CONSTRUCTION ( SHEET PILING, COFFERDAM )		NOT REQD
	DIVERS		REQD
	DEWATERING		NOT REQD
7	SAFETY PRECAUTION REQUIREMENTS		
	NORMAL		REQD
	ABNORMAL		
8	PERMITTING REQUIREMENTS		
			PER US COAST GUARD REQMTS
			PER US ARMY COE REQMTS
			PER LOCAL AND STATE REQMTS
9	SITWORK		
			50FT LONG CONCRETE PLUG AT DISCHARGE FLUME RIVER END

**Welles, Sarah**

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**From:** Glenn, Erica  
**Sent:** Thursday, December 15, 2005 2:17 PM  
**To:** Reynolds, Jaime  
**Subject:** FW: fas 143/4

**Attachments:** FAS143 Demo Est 4.pdf



FAS143 Demo Est  
4.pdf

-----Original Message-----

**From:** Wilson, Dale  
**Sent:** Tuesday, March 04, 2003 3:26 PM  
**To:** Barnhart, Christa  
**Subject:** FW: fas 143/4

-----Original Message-----

**From:** RICHARD.A.JERCH@sargentlundy.com  
[mailto:RICHARD.A.JERCH@sargentlundy.com]  
**Sent:** Thursday, February 27, 2003 3:17 PM  
**To:** Wilson, Dale  
**Subject:** fas 143/4

(See attached file: FAS143 Demo Est 4.pdf)

**Welles, Sarah**

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**From:** Glenn, Erica  
**Int:** Thursday, December 15, 2005 2:17 PM  
**To:** Reynolds, Jaime  
**Subject:** FW: fas 143/5

**Attachments:** FAS143 Demo Est 5.pdf



FAS143 Demo Est  
5.pdf

-----Original Message-----

**From:** Wilson, Dale  
**Sent:** Tuesday, March 04, 2003 3:27 PM  
**To:** Barnhart, Christa  
**Subject:** FW: fas 143/5

-----Original Message-----

**From:** RICHARD.A.JERCH@sargentlundy.com  
[mailto:RICHARD.A.JERCH@sargentlundy.com]  
**Sent:** Thursday, February 27, 2003 3:18 PM  
**To:** Wilson, Dale  
**Subject:** fas 143/5

(See attached file: FAS143 Demo Est 5.pdf)

**Welles, Sarah**

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**From:** Glenn, Erica  
**Sent:** Monday, February 20, 2006 3:56 PM  
**To:** 'Perrin, Rachele'  
**Subject:** RE: Fin 47 Conditional ARO - Jt Owner Communication  
**Attachments:** Reports for DPL.pdf

Rachelle,

Attached are the S&L reports for both the river structures and asbestos for your files. Information related to plants where DP&L is not a joint owner have been excluded. The report assumes the remediation is at the settlement date. Our assumption is that intermediate remediation is immaterial based on discussions with our internal engineers.

I will call you on your other question.

Thanks,  
Erica

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**From:** Perrin, Rachele [mailto:Rachele.Perrin@DPLINC.com]  
**Sent:** Monday, February 20, 2006 1:38 PM  
**To:** Glenn, Erica; smhannis@aep.com  
**Cc:** Thobe, Dan; Collis, Kevin  
**Subject:** FW: Fin 47 Conditional ARO - Jt Owner Communication  
**Importance:** High

Erica could you forward a copy of the third party study for our records?

Erica and Susannah, our auditors have ask a question about intermediate remediation for asbestos. Did your study assume that all asbestos remediation would occur at settlement date, without intermediate remediation occuring? Could you forward amortization schedules for the asbestos ARO's? I would like to include a copy in my ARO supporting binder. Thanks for your help.

Rachele L Perrin  
Fixed Asset Accountant  
Dayton Power & Light  
259-7893 Office  
259-7293 Fax  
<mailto:rachele.perrin@dplinc.com>

8/17/2006

**Welles, Sarah**

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**From:** smhannis@aep.com  
**Sent:** Friday, January 13, 2006 1:42 PM  
**To:** Glenn, Erica  
**Cc:** temitchell@aep.com  
**Subject:** RE: Fin 47 - question and request

Erica,

Our asbestos estimate was an internal calculation. The cubic yards of asbestos remaining per unit was estimated by plant personnel based on plant records and gross MW output. Then an estimated market price per cubic yard was applied for asbestos removal and disposal. The \$324,480 is the estimated cubic yards (270.4) times the estimated price per cubic yard (\$1,200).

- Susannah  
(614) 716-1172

"Glenn, Erica" <Erica.Glenn@Cinergy.COM>

To <smhannis@aep.com>

cc

01/11/2006 08:44 AM

Subject RE: Fin 47 - question and request

Susannah,

Thanks for the data. Could you send me some additional language regarding the calculation below for our files. I believe this is an internal estimate but could you confirm? Also, how do I get to the \$324,480 using the data given below?

Please feel free to call me at 317-838-2280 if you prefer to discuss.

Thanks again,  
Erica

---

**From:** smhannis@aep.com [mailto:smhannis@aep.com]  
**Sent:** Tuesday, January 10, 2006 5:48 PM  
**To:** Glenn, Erica  
**Cc:** temitchell@aep.com  
**Subject:** Re: Fin 47 - question and request

Erica,

Sorry we didn't get back to you sooner. We have also tentatively concluded that the FIN 47 entries don't need to be filed with the FERC, but we are still discussing with our Legal department.

8/17/2006



Below is our calculation of the Conesville unit 4 estimate. Let me know if you need anything else.

Plant	Unit	Size	Fuel	In Service Date	O/S Date	Percent Asbestos	Cubic yards	Dollars for Removal & Disposal
Conesville	CV-4	800	C	1973	2045	5	270.4	\$324,480

Thanks,  
Susannah  
(614) 716-1172

"Glenn, Erica" <Erica.Glenn@Cinergy.COM>

01/03/2006 02:07 PM

To <temitchell@aep.com>, <smhannis@aep.com>

cc

Subject: Fin 47 - question and request

Tom and Susannah,

We spoke previously regarding whether the Fin 47 entries would need to be filed with the FERC under Order 631. We have tentatively concluded that the Fin 47 entries do not need to be filed. Is this AEP's conclusion also?

Secondly, could you provide me support for the Conesville asbestos ARO estimate for our files?

Thank you,

**Erica Glenn**

Cinergy Corp.

Accounting Research

(317) 838-2280

8/17/2006

**Welles, Sarah**

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**From:** Stevens, George  
**Sent:** Tuesday, January 24, 2006 8:49 AM  
**To:** Glenn, Erica; Sheppard, Amy  
**Cc:** Wilson, Dale; Baute, Melvin; Bloemer, John; Moreland, Bob  
**Subject:** FW: Asbestos Abatement Cost Report  
**Attachments:** Asbestos Costs Report.pdf; 21948B2 Asbestos Study.xls

Erica and Amy:

Attached is the final report from Sargent and Lundy for the FASB FIN 47 Asbestos ARO work. The pdf file prints out with Gary Ault's signature, so this file should be suitable for any hard copies you need to produce. Later this week, I will also transmit this report to John Roebel and Barry Pulskamp with a note covering the following:

- 1 - The asbestos Asset Retirement Obligation (ARO) work is complete and the ARO is "booked";
- 2 - The S&L study is ready to transmit to the plants and that I would be glad to discuss the specifics of their estimates with any of the stations; and
- 3 - Some discussion of the need for future tracking, possibly through the Investment Engineers, as asbestos is removed either on capital or O&M projects.

It was a pleasure working with all of you on this project.

George

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**From:** Gary Ault - smtp  
**Sent:** Monday, January 23, 2006 5:38 PM  
**To:** Stevens, George  
**Cc:** ROBERT.G.PRESNAK@sargentlundy.com; ROBERT.C.KINSINGER@sargentlundy.com  
**Subject:** Asbestos Abatement Cost Report

George,

Attached is the subject report and the cost analysis Excel spreadsheet. We incorporated Cinergy's comments conveyed in Ms. Glenn's January 18 E-mail. Per our discussion this date, S&L is not planning to send paper copies of this work.

Please let me know if you have further questions, or if there are any other issues which need to be addressed. If not, it was a pleasure working with you and Dale and John on this assignment. I hope I'll have other opportunities to support you in the future.

Gary

Welles, Sarah

**From:** Glenn, Erica  
**Sent:** Tuesday, November 29, 2005 10:12 PM  
**To:** Melendez, Brenda; Sheppard, Amy  
**Cc:** Reynolds, Jaime  
**Subject:** RE: SOS - Asbestos - Date of Legal Obligation

**Attachments:** RE: Date Asbestos Regulations enacted question



RE: Date Asbestos  
Regulations ...

This does affect us as it will determine our vintage date for these AROs. However, our environmental folks gave me a different date than either of the two mentioned below (see attached email). I will follow up with them regarding the discrepancy.

Also, as an FYI, Fin 47 was discussed today at the D&T conference. D&T (Bill Graf was presenter) has taken the position that all companies with asbestos issues should be recording a related ARO with the adoption of Fin 47 (i.e. no indeterminate life argument).

Thanks,  
Erica

-----Original Message-----

**From:** Melendez, Brenda  
**Sent:** Tuesday, November 29, 2005 9:31 AM  
**To:** Glenn, Erica; Sheppard, Amy  
**Cc:** Reynolds, Jaime  
**Subject:** FW: SOS - Asbestos - Date of Legal Obligation

Erica/Amy,

Fyi - this is a question posed about asbestos removal. They're questioning whether to use the 1973 date or a 1990 date. I don't know if this affects us.

-----Original Message-----

**From:** Martin, Joe [mailto:JMartin@aga.org]  
**Sent:** Monday, November 28, 2005 8:41 AM  
**To:** AGA Members  
**Subject:** SOS - Asbestos - Date of Legal Obligation

Good morning,

Greg Vanderwerff, Wisconsin Public Service Corporation has the following question about asbestos removal. Please respond directly to him and copy me on your responses. Findings will be summarized and sent to those responding. If you want your company listed as anonymous, please indicate so.

Thanks

Joe Martin  
jmartin@aga.org

-----  
Subject - Asbestos - date of legal obligation

Based upon this information obtained from our outside legal counsel we plan to use 1990 as the date our legal obligation to remove asbestos was created as this is the law under which our current removal costs are calculated - this does not appear to be in agreement with the 1973 date I've seen floating around (but the information below does describe the difference between the 1973 regs and the 1990 regs) - I would like to know what dates other companies are using??

Regards,

Craig Vanderwerff  
WPS Resources  
VANDER@wpsr.com

ASBESTOS

With respect to asbestos. The federal government first promulgated standards for asbestos in 1973. The 1973 regulations applied only to the demolition of buildings containing friable asbestos. The rules required that before the building was demolished, that the friable asbestos be wetted and kept wet and not dropped and removed. See 38 Fed. Reg v. 38, No. 66, p. 8819 (1973) creating 40 CFR section 61, see specifically 40 CFR 61.22(d)(2).

The 1990 version (still current) regulates friable and non-friable asbestos and asbestos containing materials (ACM). The regulations specify bagging, wetting, venting, etc. requirements, that are much more detailed than the "wet it and don't drop it" 1973 standard.

An asset retirement obligation for asbestos in 1973, then, would be premised on the notion that you knew which buildings contained friable asbestos and the cost of wetting and not dropping the asbestos is a material cost.

An asset retirement obligation for asbestos beginning in 1990 would be premised on the notion that you knew which buildings contained friable asbestos or non-friable asbestos containing materials (ACM) in sufficient quantities to trigger the federal handling requirements and the cost of properly handling and disposing of the asbestos is a material cost.