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**SOAH DOCKET NO. 473-21-2606
PUC DOCKET NO. 52195**

**APPLICATION OF EL PASO § BEFORE THE STATE OFFICE
ELECTRIC COMPANY TO § OF
CHANGE RATES § ADMINISTRATIVE HEARINGS**

**CITY OF EL PASO'S NOTICE OF FILING OF ERRATA TO
DIRECT TESTIMONY OF CLARENCE JOHNSON**

The City of El Paso provides this notice of the filing of Errata to the Direct Testimony of Mark E. Garrett. This Errata clarifies issues in Mr. Johnson's recommendation on page 29 of the testimony filed on October 22, 2021 and appendix B. The corrected portions of page 29 and Appendix B are attached to this filing and underlined and highlighted. Workpapers are on file in native form electronically.

Dated: January 4, 2022

Respectfully submitted,

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Certificate of Service

I certify that a true and correct copy of this document was served by e-mail and/or US mail on all parties of record in this proceeding on January 4, 2022.

Norman J. Gordon

**SOAH DOCKET NO. 473-21-2606
PUC DOCKET NO. 52195**

**APPLICATION OF EL PASO § BEFORE THE STATE OFFICE
ELECTRIC COMPANY TO § OF
CHANGE RATES § ADMINISTRATIVE HEARINGS**

**DIRECT TESTIMONY
OF
CLARENCE L. JOHNSON

ON BEHALF OF
THE CITY OF EL PASO**

OCTOBER 22, 2021

ERRATA January 4, 2022

ERRATA

1 estimates the portion of the residential increase attributable to COVID impact, which
2 is removed from residential existing revenue and added to the existing revenues of the
3 five non-residential classes. As a result, \$14.9 million is added to residential revenue
4 requirement and deducted from the five non-residential classes' revenue requirement
5 in proportion to the increase in the classes' cost of service. This adjustment to class
6 revenues does not affect the Total Texas requested revenue increase. This step is also
7 discussed in Attachment B.

8 **Q. HOW DOES THIS AFFECT YOUR RECOMMENDATION?**

9 A. The demand and energy allocation adjustments are intended to produce normalized
10 allocation factors for the affected classes. The adjusted allocation factors are included
11 in my recommended CCOS study. The CCOS result is used to evaluate and adjust the
12 Company's cap and floor proposal. The CCOS study is always an estimation process,
13 and in this case the COVID pandemic has created additional uncertainty and
14 imprecision in the CCOS result. Given that context, the CCOS study is best utilized to
15 evaluate rate moderation constraints. Class percentages are based on actual current
16 revenues. The adjustments to the CCOS study for aberrant usage pattern provide a more
17 reasonable benchmark for evaluating class revenue change limits.

18 **D. Allocation of A&G Accounts 920, 923, And 930**

19 **Q. DESCRIBE ADMINISTRATIVE & GENERAL ("A&G") ACCOUNTS 920-923?**

20 A. As a matter of accounting definition, Account 920 contains salaries and wages which
21 cannot be attributed to any particular function of the utility. Examples of typical
22 expenses include the chief executive officer, general corporate officers, the treasury
23 and finance departments, the human resources department, corporate strategic

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- A. For the six customer classes, above, the D1, D2, and E1 allocation factors were normalized based on three year 2017-2019 allocation factors as set out in Mr. Carrasco's Ex. MC-5. To reflect differences between E1 and E2 allocation factors (which is based on interruptible sales), the affected classes are adjusted based on the E1 and E2 differentials in Schedule P-7. The E1Fuel allocator is not adjusted. The three year average period is reasonable, because the term is sufficient to avoid anomalies but avoids structural changes in class composition which may occur over periods longer than three years. The Company, itself, utilizes a three year period, 2017-2019, in order to normalize other operating revenues for COVID impact.⁷ In some jurisdictions , utilities use three year averages, in the normal course of business, to develop the demand and energy factors for the CCOS study.⁸

Q. PLEASE DESCRIBE THE ADJUSTMENT FOR D-12 AND NCP ALLOCATION FACTORS.

- A. For the selected classes, the three-year average E1 allocators were utilized to develop average demand. The 2020 12 CP and NCP load factors are applied to the average demand in order to develop D-12 and NCP allocation factors.

Q. WHAT ARE THE DEMAND AND ENERGY ALLOCATION FACTORS AFTER YOU INCORPORATED THE ADJUSTMENTS INTO THE COMPANY'S REGULATORY MODEL?

- A. The allocation factors are shown on as follows:

⁷ Carrasco at 13; Table MC-7.

⁸ See, for example, Baltimore Gas & Electric Co. in Maryland.
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ADJUSTED ALLOCATION FACTORS

| | RES | SGS | R. Light | Lighting | Traffic | Pumping | E. Refin. | Irrigation | |
|----------|---------------|--------------|-----------------|-----------------|----------------|-----------------|-----------------------|-------------------|----------------|
| D8DIST | <u>63.95%</u> | <u>5.66%</u> | <u>0.27%</u> | <u>0.37%</u> | <u>0.01%</u> | <u>2.02%</u> | <u>0.00%</u> | <u>0.18%</u> | |
| D9DIST | <u>53.41%</u> | <u>5.21%</u> | <u>0.40%</u> | <u>0.54%</u> | <u>0.01%</u> | <u>2.38%</u> | <u>0.00%</u> | <u>0.14%</u> | |
| DPROD12 | <u>47.13%</u> | <u>4.95%</u> | <u>0.19%</u> | <u>0.30%</u> | <u>0.02%</u> | <u>1.49%</u> | <u>0.64%</u> | <u>0.07%</u> | |
| DTRAN12 | <u>44.21%</u> | <u>4.88%</u> | <u>0.15%</u> | <u>0.27%</u> | <u>0.02%</u> | <u>1.89%</u> | <u>0.65%</u> | <u>0.07%</u> | |
| E1ENERGY | 37.81% | 4.80% | 0.06% | 0.61% | 0.04% | 2.91% | 0.69% | 0.07% | |
| | GS | LPS | Refin. | A. Light | Furnace | Military | Cotton Gin | City/Coty | W. Heat |
| D8DIST | <u>19.82%</u> | <u>4.39%</u> | <u>0.00%</u> | <u>0.28%</u> | <u>0.00%</u> | <u>0.00%</u> | <u>0.08%</u> | <u>2.60%</u> | <u>0.37%</u> |
| D9DIST | <u>24.36%</u> | <u>7.70%</u> | <u>0.00%</u> | <u>0.41%</u> | <u>0.00%</u> | <u>0.00%</u> | <u>0.12%</u> | <u>5.08%</u> | <u>0.24%</u> |
| DPROD12 | <u>25.68%</u> | <u>7.85%</u> | <u>3.03%</u> | <u>0.22%</u> | <u>0.50%</u> | <u>3.88%</u> | <u>0.01%</u> | <u>3.99%</u> | <u>0.04%</u> |
| DTRAN12 | <u>26.50%</u> | <u>8.87%</u> | <u>3.68%</u> | <u>0.20%</u> | <u>0.45%</u> | <u>4.04%</u> | <u>0.02%</u> | <u>4.09%</u> | <u>0.04%</u> |
| E1ENERGY | 26.64% | 11.14% | 5.38% | 0.46% | 0.35% | 4.50% | 0.03% | 4.43% | 0.09% |
| | RES | SGS | R. Light | Lighting | Traffic | Pumping | E. Refin. | Irrigation | GS |
| D1PROD | 44.83% | 5.70% | 0.03% | 0.30% | 0.02% | 1.62% | 0.52% | 0.10% | 27.25% |
| D2PROD | 45.27% | 5.75% | 0.00% | 0.00% | 0.01% | 1.59% | 0.52% | 0.10% | 27.41% |
| D2TRAN | 45.27% | 5.75% | 0.00% | 0.00% | 0.01% | 1.59% | 0.52% | 0.10% | 27.41% |
| | GS | LPS | Refin. | A. Light | Furnace | Military | Cotton Gin | City/Coty | W. Heat |
| D1PROD | 27.25% | 7.88% | 2.95% | 0.23% | 0.34% | 3.51% | 0.01% | 4.67% | 0.04% |
| D2PROD | 27.41% | 7.89% | 2.93% | 0.00% | 0.34% | 3.49% | 0.00% | 4.67% | 0.03% |
| D2TRAN | 27.41% | 7.89% | 2.93% | 0.00% | 0.34% | 3.49% | 0.00% | 4.67% | 0.03% |

Q. WHY DO YOU INCLUDE A REVENUE ADJUSTMENT AMONG THE SIX CLASSES WHICH ARE SUBJECT TO ADJUSTED ALLOCATION FACTORS?

A. The allocation factor changes result in a revision to the amount of non-fuel costs assigned to the customer classes. However, theoretically the impact of COVID on allocation factors should be accompanied by shifts in revenues. In order to provide a more balanced view of class cost of service, the relationship of current revenues among classes should be adjusted. This estimation is challenging, but necessary. My approach is to estimate

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the portion of increased 2020 residential revenues which is likely due to COVID work from home impact. Residential revenue requirement will be increased by this amount, and the same amount will be deducted from the required revenues of the five non-residential classes subject to allocation factor adjustment.

Q. PLEASE DESCRIBE THE PROCEDURE FOR ADJUSTING RESIDENTIAL REVENUES FOR COVID IMPACT.

- A. The first step is quantifying the increase in residential revenues between 2019 and 2020. The adjusted residential revenues from EPE's 2019 Earnings Monitoring Report (EMR) are compared to 2020 adjusted test year residential revenues from RFP Schedule Q-1.⁹ The 2020 increase in residential revenues is \$36.56 million. The second step is to estimate the portion of this residential increase which is COVID-related as opposed to growth for any other reasons or conditions. Because residential revenues are generated primarily by kWhs, the 2019 EMR's weather adjusted monthly residential kWh is compared to the adjusted test year monthly kWh in RFP Schedule O-1.04. The residential 2020 total kWh is 11.3% higher than 2019. The COVID impact begins in the second quarter of 2020. Therefore, a comparison between the first quarters of 2020 and 2019 can provide information regarding the non-COVID level of residential sales growth. The first quarter 2020 sales growth is 6.7%, which is assumed to be non-COVID-related. If this same percentage of non-COVID kWh growth occurred during the remaining three quarters of 2020, then 40.8% of the 2020 residential growth is COVID-related.¹⁰ Based

⁹ Both the EMR revenues and the Q-1 revenues are adjusted for weather and customer annualizations.

¹⁰ 6.7% / 11.3% = 59.2%.

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on this percentage, \$14.99 million of 2020 residential revenue growth will be classified as COVID-related.¹¹

Q. WHAT IS THE NEXT STEP IN RECOGNIZING THE \$14.9 MILLION OF RESIDENTIAL REVENUE IMPACT?

- A. The \$14.9 million is excluded from residential current revenues, and credited to the five non-residential classes' current revenues in proportion to impact of the allocation adjustment on those classes. The revenue requirement adjustment is as follows: Residential \pm \$14.99 million; Small General \pm \$1.42 million; General Service \pm \$8.18 million; Large Power \pm \$2.19 million; Petroleum Refining \pm \$369 thousand; City/County \pm \$2.82 million.

¹¹ \$36.567 million X 41% = \$14.99 million.
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Adjusted CCOS Study: EPE Proposed Revenue Requirement

| | Texas Retail | Residential Service | Small General | Recreat. Lighting | Street Light | Traffic Signs | Municipal Pumping | Electric Refining | Irrigation Service | General Service |
|---------------------------|----------------|---------------------|---------------|-------------------|--------------|---------------|-------------------|-------------------|--------------------|-----------------|
| Base Rev Req | 574,531,417 | 289,315,647 | 33,303,358 | 585,050 | 2,963,950 | 96,861 | 10,236,735 | 2,252,410 | 583,269 | 137,101,368 |
| Rev Adjustment | | (14,992,000) | 1,421,743 | | | | | | | 8,184,516 |
| Current Revs | \$ 532,713,639 | \$ 273,638,830 | \$ 33,319,685 | \$ 462,980 | \$ 4,046,620 | \$ 95,204 | \$ 10,102,350 | \$ 1,830,063 | \$ 423,413 | 125,005,740 |
| Required Change | 41,817,778 | 30,668,817 | (1,438,071) | 122,070 | (1,082,670) | 1,657 | 134,385 | 422,347 | 159,856 | 3,911,112 |
| Percentage Ratio to Total | 7.8% | 11.2% | -4.3% | 26.4% | -26.8% | 1.7% | 1.3% | 23.1% | 37.8% | 3.1% |
| | 143% | | -55% | 336% | -341% | 22% | 17% | 294% | 481% | 40% |

| | Large Power | Petroleum Refinery | Area Lighting | Electric Furnace | Military Reservation | Cotton Gin | City and County | Water Heating |
|---------------------------|---------------|--------------------|---------------|------------------|----------------------|------------|-----------------|---------------|
| Base Rev Req | 41,347,541 | 13,611,077 | 2,657,838 | 1,518,215 | 14,889,630 | 172,045 | 23,070,254 | 826,169 |
| Rev Adjustment | 2,189,774 | 368,503 | | | | | 2,827,464 | |
| Current Revs | \$ 35,955,664 | \$ 10,964,770 | \$ 2,932,614 | \$ 1,191,760 | \$ 13,009,892 | \$ 132,972 | \$ 19,126,500 | \$ 474,582 |
| Required Change | 3,202,103 | 2,277,804 | (274,776) | 326,455 | 1,879,738 | 39,073 | 1,116,291 | 351,587 |
| Percentage Ratio to Total | 8.9% | 20.8% | -9.4% | 27.4% | 14.4% | 29.4% | 5.8% | 74.1% |
| | 113% | 265% | -119% | 349% | 184% | 374% | 74% | 944% |

Notes: Assumes EPE Proposed Interruptible Increase

Errata Corrections:

E1Fuel Allocator Set Equal to Company's E1Fuel Allocation Factors.

E2 Allocator Corrected for Interruptible sales.

Corrections to distribution demand and D12 allocation factors.

Rev Increase percentages based upon actual current revenues.

Adjusted CCOS Study: CEP Proposed Revenue Reduction

| | Texas Retail | Residential Service | Small General | Recreat. Lighting | Street Light | Traffic Signs | Municipal Pumping | Electric Refining | Irrigation Service |
|---------------------------|--------------------|------------------------|-----------------------|----------------------|---------------------|-------------------------|----------------------|----------------------|-----------------------|
| Total Revenue Requirement | 703,739,734 | 334,691,932 | 39,113,818 | 648,783 | 3,681,293 | 141,379 | 13,877,249 | 3,134,053 | 658,257 |
| Other Operating Revenues | (181,083,928) | (57,245,979) | (9,991,213) | (95,874) | (889,775) | (52,353) | (4,471,468) | (1,535,913) | (140,412) |
| Base Revenue Requirement | 522,655,806 | 277,445,953 | 29,122,605 | 552,909 | 2,791,517 | 89,026 | 9,405,781 | 1,598,140 | 517,844 |
| Current Revenues | \$ 532,713,639 | \$ 273,638,830 | \$ 33,319,685 | \$ 462,980 | \$ 4,046,620 | \$ 95,204 | \$ 10,102,350 | \$ 1,830,063 | \$ 423,413 |
| Indicated Revenue Change | (10,059,034) | 5,328,138 | (4,497,120) | 79,096 | (1,265,345) | (6,212) | (750,746) | 217,549 | 88,645 |
| | -1.89% | 1.95% | -13.50% | 17.08% | -31.27% | -6.52% | -7.43% | 11.89% | 20.94% |
| | General Service | Large Power | Petroleum Refinery | Area Lighting | Electric Furnace | Military Reservation | Cotton Gin | City and County | Water Heating |
| Total Revenue Requirement | 169,902,632 | 55,763,038 | 22,118,685 | 3,184,302 | 5,504,524 | 21,843,106 | 202,607 | 28,328,688 | 945,390 |
| Other Operating Revenues | (53,784,771) | (20,148,130) | (9,883,398) | (657,092) | (4,142,690) | (8,371,293) | (40,356) | (9,463,376) | (169,834) |
| Base Revenue Requirement | 116,117,861 | 35,614,908 | 12,235,287 | 2,527,210 | 1,361,833 | 13,471,812 | 162,251 | 18,865,312 | 775,556 |
| Current Revenues | \$ 125,005,740 | \$ 35,955,664 | \$ 10,964,770 | \$ 2,932,614 | \$ 1,191,760 | \$ 13,009,892 | \$ 132,972 | \$ 19,126,500 | \$ 474,582 |
| Indicated Revenue Change | (9,187,072) | (604,908) | 1,059,040 | (413,183) | 195,381 | 507,451 | 26,222 | (1,124,849) | 288,878 |
| | -7.35% | -1.68% | 9.66% | -14.09% | 16.39% | 3.90% | 19.72% | -5.88% | 60.87% |

Source: Karl Nalepa Testimony
Incorporates Rev Adjustments
Same Errata Corrections as CJ-3.

Recommended Class Revenue Increase Based On EPE Proposed Revenues

| | Texas Retail | Residential Service | Small General | Recreat. Lighting | Street Light | Traffic Signs | Municipal Pumping | Electric Refining | Irrigation Service | General Service |
|---------------------------------|---------------|---------------------|---------------|-------------------|---------------|---------------|-------------------|-------------------|--------------------|-----------------|
| CCOS Increase | \$39,296,582 | \$29,128,239 | (\$1,595,168) | \$119,088 | (\$1,099,906) | \$1,233 | \$95,265 | \$414,416 | \$157,568 | \$3,477,544 |
| Percent Increase | 7.38% | 10.64% | -4.79% | 25.72% | -27.18% | 1.29% | 0.94% | 22.64% | 37.21% | 2.78% |
| Revenue Change (Recommended) | \$ 39,296,582 | \$ 28,688,451 | \$ - | \$ 48,539 | \$ - | \$ 1,252 | \$ 96,779 | \$ - | \$ 44,391 | \$ 3,532,827 |
| | 7.38% | 10.48% | 0.00% | 10.48% | 0.00% | 1.32% | 0.96% | 0.00% | 10.48% | 2.83% |

| | Large Power | Petroleum Refinery | Area Lighting | Electric Furnace | Military Reservation | Cotton Gin | City and County | Water Heating |
|---------------------------------|--------------|--------------------|---------------|------------------|----------------------|------------|-----------------|---------------|
| CCOS Increase | \$3,064,316 | \$2,231,190 | (\$282,382) | \$321,503 | \$1,827,314 | \$38,365 | \$1,052,424 | \$345,573 |
| Percent Increase | 8.52% | 20.35% | -9.63% | 26.98% | 14.05% | 28.85% | 5.50% | 72.82% |
| Revenue Change (Recommended) | \$ 3,113,030 | \$ 1,149,553 | \$ - | \$ 124,945 | \$ 1,363,965 | \$ 13,941 | \$ 1,069,154 | \$ 49,755 |
| | 8.66% | 10.48% | 0.00% | 10.48% | 10.48% | 10.48% | 5.59% | 10.48% |

Notes: For Comparability, Company Increase Adjusted Based On Carrasco Table MC-8.

Assumes Company proposed interruptible rates.

Rate moderation procedure resulted in rounding differences.

Recommended Class Revenue Change (Revenue Reduction)

| | Texas Retail | Residential Service | Small General | Recreat. Lighting | Street Light | Traffic Signs | Municipal Pumping | Electric Refining | Irrigation Service |
|----------------------|-----------------|---------------------|--------------------|-------------------|------------------|----------------------|-------------------|-------------------|--------------------|
| Class Revenue Change | \$ (10,059,034) | | \$ (2,534,348) | \$ - | \$ (713,084) | \$ (3,501) | \$ (423,082) | | \$ - |
| Percentage Change | -1.89% | 0.00% | -7.61% | 0.00% | -17.62% | -3.68% | -4.19% | 0.00% | 0.00% |
| | General Service | Large Power | Petroleum Refinery | Area Lighting | Electric Furnace | Military Reservation | Cotton Gin | City and County | Water Heating |
| Class Revenue Change | \$ (5,177,367) | \$ (340,895) | \$ - | \$ (232,849) | \$ - | \$ - | \$ - | \$ (633,908) | \$ - |
| Percentage Change | -4.14% | -0.95% | 0.00% | -7.94% | 0.00% | 0.00% | 0.00% | -3.31% | 0.00% |

Compare to CEP CCOS, CJ-4

DN 52195 Clarence Johnson Corrected Workpapers
Allocation Adjustments CCOS-EPE Revenue Requirement
(also filed in native format)

SCHEDULE P-7
PAGE 1 OF 16

| Allocation Factor Table | | | | | | | | | | | | | | | | | | | | |
|-------------------------|---|---------------|---------------|---------------|-------------|-----------|------------|-----------|-------------|------------|-----------|-------------|---------------|-------------|------------|-------------|-------------|-----------|-------------|-----------|
| 1 | Demand Related | | | | | | | | | | | | | | | | | | | |
| 2 | AED 4CP Demand - Production | D1PROD | 1.00000 | 0.54510 | 0.04721 | 0.00031 | 0.00305 | 0.00018 | 0.01627 | 0.00521 | 0.00095 | 0.06942 | 0.21124 | 0.02828 | 0.00227 | 0.00342 | 0.03509 | 0.00014 | 0.03146 | |
| 3 | 4CP Demand - Production | D2PROD | 1,493,736 | 824,954 | 70,970 | 0 | 0 | 194 | 23,810 | 7,737 | 1,448 | 102,647 | 315,648 | 41,374 | 0 | 5,127 | 52,230 | 17 | 47,199 | |
| 4 | 12CP Demand - Production | DPROD12 | 1.00000 | 0.52936 | 0.04807 | 0.00188 | 0.00305 | 0.00018 | 0.01505 | 0.00642 | 0.00072 | 0.07025 | 0.21928 | 0.02892 | 0.00227 | 0.00499 | 0.03916 | 0.00014 | 0.02985 | |
| 5 | | | | | | | | | | | | | | | | | | | | |
| 6 | 4CP Demand - Transmission | D2TRAN | 1,493,736 | 824,954 | 70,970 | 0 | 0 | 194 | 23,810 | 7,737 | 1,448 | 102,647 | 315,648 | 41,374 | 0 | 5,127 | 52,230 | 17 | 47,199 | |
| 7 | 12CP Demand - Transmission | DTRAN12 | 1,122,008 | 560,642 | 53,480 | 1,708 | 3,022 | 194 | 21,482 | 7,392 | 784 | 89,645 | 255,422 | 39,663 | 2,262 | 5,127 | 45,958 | 182 | 34,559 | |
| 8 | | | | | | | | | | | | | | | | | | | | |
| 9 | MCD Demand Less Trans/ Direct Sub | D3DIST | 1,693,376 | 990,694 | 83,646 | 6,695 | 9,067 | 195 | 39,550 | 0 | 2,284 | 110,510 | 375,159 | 0 | 6,839 | 0 | 0 | 1,931 | 62,807 | |
| 10 | | | | | 1.7 | 1.6 | | | | | 0.83 | | 1.2 | | | | | 100.4% | | |
| 11 | MCD Demand Overhead Lines - Primary | D4DIST | 1,693,376 | 990,694 | 83,646 | 6,695 | 9,067 | 195 | 39,550 | 0 | 2,284 | 110,510 | 375,159 | 0 | 6,839 | 0 | 0 | 1,931 | 62,807 | |
| 12 | NCP Demand Overhead Lines - Secondary | D6DIST | 2,547,080 | 1,728,334 | 132,309 | 6,651 | 9,067 | 195 | 49,005 | 0 | 4,307 | 91,774 | 444,617 | 0 | 6,839 | 0 | 0 | 1,933 | 63,065 | |
| 13 | MCD Demand Underground Lines - Primary | D7DIST | 1,693,376 | 990,694 | 83,646 | 6,695 | 9,067 | 195 | 39,550 | 0 | 2,284 | 110,510 | 375,159 | 0 | 6,839 | 0 | 0 | 1,931 | 62,807 | |
| 14 | NCP Demand Underground Lines - Secondary | D8DIST | 2,547,080 | 1,728,334 | 132,309 | 6,651 | 9,067 | 195 | 49,005 | 0 | 4,307 | 91,774 | 444,617 | 0 | 6,839 | 0 | 0 | 1,933 | 63,065 | |
| 15 | Poles, Towers & Fixtures - Primary | D9DIST | 1,693,376 | 990,694 | 83,646 | 6,695 | 9,067 | 195 | 39,550 | 0 | 2,284 | 110,510 | 375,159 | 0 | 6,839 | 0 | 0 | 1,931 | 62,807 | |
| 16 | Poles, Towers & Fixtures - Secondary | D10DIST | 2,547,080 | 1,728,334 | 132,309 | 6,651 | 9,067 | 195 | 49,005 | 0 | 4,307 | 91,774 | 444,617 | 0 | 6,839 | 0 | 0 | 1,933 | 63,065 | |
| 17 | NCP Demand Transformers - Primary | D5DIST-PRIM | 1,693,376 | 990,694 | 83,646 | 6,695 | 9,067 | 195 | 39,550 | 0 | 2,284 | 110,510 | 375,159 | 0 | 6,839 | 0 | 0 | 1,933 | 62,807 | |
| 18 | NCP Demand Transformers - Secondary | D5DIST-SEC | 2,547,080 | 1,728,334 | 132,309 | 6,651 | 9,067 | 195 | 49,005 | 0 | 4,307 | 91,774 | 444,617 | 0 | 6,839 | 0 | 0 | 1,933 | 63,065 | |
| 19 | | | | | | | | | | | | | | | | | | | | |
| 20 | ENERGY RELATED | | | | | | | | | | | | | | | | | | | |
| 21 | kWh at Supply - Other | E1ENERGY | 6,346,682,094 | 2,681,376,311 | 293,679,397 | 3,964,113 | 38,885,062 | 2,238,727 | 184,560,694 | 44,081,882 | 4,141,472 | 653,816,289 | 1,563,843,457 | 323,039,506 | 28,935,421 | 22,163,145 | 285,973,306 | 1,721,696 | 208,735,770 | 5,525,846 |
| 22 | kWh at Supply - with Interruptions | E2ENERGY | 6,751,772,704 | 2,681,376,311 | 293,679,397 | 3,964,113 | 38,885,062 | 2,238,727 | 184,560,694 | 81,431,660 | 4,141,472 | 726,820,357 | 1,563,843,457 | 394,006,232 | 28,935,421 | 188,117,881 | 343,788,608 | 1,721,696 | 208,735,770 | 5,525,846 |
| 23 | kWh at Supply - Fuel | E1FUEL | 6,751,772,704 | 2,681,376,311 | 293,679,397 | 3,964,113 | 38,885,062 | 2,238,727 | 184,560,694 | 81,431,660 | 4,141,472 | 726,820,357 | 1,563,843,457 | 394,006,232 | 28,935,421 | 188,117,881 | 343,788,608 | 1,721,696 | 208,735,770 | 5,525,846 |
| 24 | | | | | | | | | | | | | | | | | | | | |
| 25 | CUSTOMER RELATED | | | | | | | | | | | | | | | | | | | |
| 26 | Total Annual Customers | CUSTOMER | 4,065,180 | 3,615,636 | 328,728 | 2,532 | 2,148 | 600 | 4,824 | 12 | 1,728 | 1,320 | 87,516 | 12 | 9,852 | 12 | 12 | 24 | 10,152 | |
| 27 | Customer Deposits | CUSTDEP | 4,065,180 | 3,615,636 | 328,728 | 2,532 | 2,148 | 600 | 4,824 | 12 | 1,728 | 1,320 | 87,516 | 12 | 9,852 | 12 | 12 | 24 | 10,152 | |
| 28 | Interest on Customer Deposits | CUSTDEPINT | 4,065,180 | 3,615,636 | 328,728 | 2,532 | 2,148 | 600 | 4,824 | 12 | 1,728 | 1,320 | 87,516 | 12 | 9,852 | 12 | 12 | 24 | 10,152 | |
| 29 | Major Account Representatives | MAJ_ACCT_REPS | 439,620 | 0 | 328,728 | 2,532 | 2,148 | 600 | 4,824 | 12 | 1,728 | 1,320 | 87,516 | 12 | 0 | 12 | 12 | 24 | 10,152 | |
| 30 | Account 369 Services | SDI | 99,801,185 | 82,201,484 | 7,473,631 | 228,290 | 0 | 14,354 | 429,142 | 0 | 41,340 | 295,776 | 7,964,920 | 0 | 235,693 | 0 | 0 | 574 | 914,259 | |
| 31 | Account 370 Meters | METER | 399,204 | 336,732 | 36,019 | 360 | 0 | 30 | 1,105 | 5 | 265 | 486 | 15,554 | 29 | 0 | 8 | 38 | 13 | 1,685 | |
| 32 | Account 371 Install. on Customer Prem. | CUST371 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| 33 | Account 373 Street Lights | CUST373 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| 34 | Account 902 Meter Reading Expense | CUST902 | 399,204 | 336,732 | 36,019 | 360 | 0 | 30 | 1,105 | 5 | 265 | 486 | 15,554 | 29 | 0 | 8 | 38 | 13 | 1,685 | |
| 35 | Account 903 Customer Records & Collect. | CUSTSVC | 4,065,180 | 3,615,636 | 328,728 | 2,532 | 2,148 | 600 | 4,824 | 12 | 1,728 | 1,320 | 87,516 | 12 | 9,852 | 12 | 24 | 10,152 | | |
| 36 | | | | | | | | | | | | | | | | | | | | |
| 37 | INTERNALLY DEVELOPED - RATE BASE | | | | | | | | | | | | | | | | | | | |
| 38 | Total 364 Poles, Towers and Fixtures | DIST364 | 129,770,578 | 80,456,986 | 6,533,804 | 447,952 | 607,794 | 13,072 | 2,831,236 | 0 | 191,630 | 7,051,093 | 26,470,993 | 0 | 458,443 | 0 | 0 | 129,480 | 4,215,096 | |
| 39 | Tot Acct OH Lines & Transf - Acct 364 & 365 | DIST3645 | 220,681,663 | 134,632,412 | 11,051,403 | 793,189 | 1,075,593 | 23,132 | 4,911,010 | 0 | 317,867 | 12,674,924 | 46,115,108 | 0 | 811,292 | 0 | 0 | 229,116 | 7,456,604 | |
| 40 | Total 365 O.H. Conductors and Devices | DIST365 | 90,911,084 | 54,175,426 | 4,517,599 | 345,236 | 467,799 | 10,061 | 2,079,774 | 0 | 126,237 | 5,623,831 | 19,644,115 | 0 | 352,848 | 0 | 0 | 99,635 | 3,241,508 | |
| 41 | Total 366 U.G. Conduits | DIST366 | 104,732,197 | 64,917,394 | 5,272,715 | 361,752 | 490,830 | 10,556 | 2,285,669 | 0 | 154,598 | 5,695,614 | 21,371,600 | 0 | 370,220 | 0 | 0 | 104,563 | 3,403,923 | |
| 42 | Tot Acct UG Lines & Transf - Acct 366 & 367 | DIST3667 | 237,059,538 | 144,035,074 | 11,855,523 | 860,511 | 1,166,723 | 25,092 | 5,301,4 | | | | | | | | | | | |

PAGE 10

| Allocation Ratio Table | | | | | | | | | | | | | | | | | | | | |
|------------------------|--|---------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|
| 1 | Demand Related | | | | | | | | | | | | | | | | | | | |
| 2 | AED 4CP Demand - Production | D1PROD | 1.000000 | 0.545099 | 0.047207 | 0.000311 | 0.003047 | 0.000175 | 0.016265 | 0.005206 | 0.000954 | 0.069417 | 0.211242 | 0.028276 | 0.002267 | 0.003415 | 0.035089 | 0.000135 | 0.031462 | 0.000433 |
| 3 | 4CP Demand - Production | D2PROD | 1.000000 | 0.552276 | 0.047512 | 0.000000 | 0.000000 | 0.000130 | 0.015940 | 0.005180 | 0.000969 | 0.068718 | 0.211314 | 0.027698 | 0.000000 | 0.003432 | 0.034966 | 0.000011 | 0.031598 | 0.000255 |
| 4 | 12CP Demand - Production | DPROD12 | 1.000000 | 0.529353 | 0.048071 | 0.001882 | 0.003047 | 0.000175 | 0.015051 | 0.006421 | 0.000716 | 0.070247 | 0.219277 | 0.028921 | 0.002267 | 0.004992 | 0.039161 | 0.000135 | 0.029851 | 0.000433 |
| 5 | | | | | | | | | | | | | | | | | | | | |
| 6 | 4CP Demand - Transmission | D2TRAN | 1.000000 | 0.552276 | 0.047512 | 0.000000 | 0.000000 | 0.000130 | 0.015940 | 0.005180 | 0.000969 | 0.068718 | 0.211314 | 0.027698 | 0.000000 | 0.003432 | 0.034966 | 0.000011 | 0.031598 | 0.000255 |
| 7 | 12CP Demand - Transmission | DTRAN12 | 1.000000 | 0.499677 | 0.047665 | 0.001522 | 0.002693 | 0.000173 | 0.019146 | 0.006588 | 0.000699 | 0.079897 | 0.227647 | 0.035350 | 0.002016 | 0.004569 | 0.040960 | 0.000162 | 0.030801 | 0.000433 |
| 8 | | | | | | | | | | | | | | | | | | | | |
| 9 | MCD Demand Less Trans/ Direct Sub | D3DIST | 1.000000 | 0.585041 | 0.049396 | 0.003954 | 0.005354 | 0.000115 | 0.023356 | 0.000000 | 0.001349 | 0.065260 | 0.221545 | 0.000000 | 0.004039 | 0.000000 | 0.000000 | 0.001140 | 0.037090 | 0.002362 |
| 10 | | | | | | | | | | | | | | | | | | | | |
| 11 | MCD Demand Overhead Lines - Primary | D4DIST | 1.000000 | 0.585041 | 0.049396 | 0.003954 | 0.005354 | 0.000115 | 0.023356 | 0.000000 | 0.001349 | 0.065260 | 0.221545 | 0.000000 | 0.004039 | 0.000000 | 0.000000 | 0.001140 | 0.037090 | 0.002362 |
| 12 | NCP Demand Overhead Lines - Secondary | D6DIST | 1.000000 | 0.678555 | 0.051945 | 0.002611 | 0.003560 | 0.000077 | 0.019240 | 0.000000 | 0.001691 | 0.036031 | 0.174559 | 0.000000 | 0.002685 | 0.000000 | 0.000000 | 0.000759 | 0.024760 | 0.003527 |
| 13 | MCD Demand Underground Lines - Primary | D7DIST | 1.000000 | 0.585041 | 0.049396 | 0.003954 | 0.005354 | 0.000115 | 0.023356 | 0.000000 | 0.001349 | 0.065260 | 0.221545 | 0.000000 | 0.004039 | 0.000000 | 0.000000 | 0.001140 | 0.037090 | 0.002362 |
| 14 | NCP Demand Underground Lines - Secondary | D8DIST | 1.000000 | 0.678555 | 0.051945 | 0.002611 | 0.003560 | 0.000077 | 0.019240 | 0.000000 | 0.001691 | 0.036031 | 0.174559 | 0.000000 | 0.002685 | 0.000000 | 0.000000 | 0.000759 | 0.024760 | 0.003527 |
| 15 | Poles, Towers & Fixtures - Primary | D9DIST | 1.000000 | 0.585041 | 0.049396 | 0.003954 | 0.005354 | 0.000115 | 0.023356 | 0.000000 | 0.001349 | 0.065260 | 0.221545 | 0.000000 | 0.004039 | 0.000000 | 0.000000 | 0.001140 | 0.037090 | 0.002362 |

| | Adjusted Allocation Factors | | |
|----------|------------------------------------|-------------------------------------|-------------------------------------|
| | Rate 01 Residential Service | Rate 02 Small General Service | Rate 07 Recreational Lighting |
| D1 | 0.449 | 0.05705 | 0.00031 |
| D2 | 676,688 | 85902 | 0 |
| D12-T | 503,265 | 55,498 | 1,708 |
| D12-P | 0.47518 | 0.04989 | 0.00188 |
| Dist-Pr | 889,304 | 86,803 | 6,695 |
| Dist-Sec | 1,551,453 | 137,302 | 6,651 |
| E1 | 2,400,382,735 | 304,763,141 | 3,964,113 |
| Avg Dem | 274,016 | 34,790 | 453 |
| E2 | 2,400,382,735 | 304,763,141 | 3,964,113 |

3 year average allocation factors from Ex. MC-5

| Res | SGS | GS |
|-----------|--------|--------|
| E1 | | |
| | 0.378 | 0.048 |
| D1 | | |
| | 0.449 | 0.057 |
| D2 | | |
| | 0.4530 | 0.0575 |
| | | 0.2743 |

| | Texas Jurisdiction | Residential Service | Small General Service |
|--------------------|--------------------|------------------------|--------------------------|
| filed | \$ 532,713,639 | \$ 273,638,830 | \$ 33,319,685 |
| | \$ 41,817,778 | \$ 52,607,044 | \$ (3,181,502) |
| | 7.8% | 19.2% | -9.5% |
| Alloc. Change | | 21,431,215 | (205,079.94) |
| Ratio for Non-Res. | | \$ 31,175,829 | \$ (2,976,422) |
| | | | 9.48% |

COVID Revenue Adjust. \$ 14,992,000 \$ 1,421,743

Adjusted CCOS Results At Company

| | Texas Jurisdiction | Residential Service | Small General Service |
|-----------------------|--------------------|---------------------|-----------------------|
| Base Rev Req | 574,531,417 | 289,315,647 | 33,303,358 |
| Rev Adjustment | | (14,992,000) | 1,421,743 |
| Current Revs | 532,713,639 | 273,638,830 | 33,319,685 |
| Required Change | 41,817,778 | 30,668,817 | (1,438,071) |
| Adjust Per Table MC-8 | \$39,296,582 | \$29,128,239 | (\$1,595,168) |
| Percentage | 7.38% | 10.64% | -4.79% |
| | Ratio to System | 144% | -65% |
| 140% System Avg. | 10.327% | | |
| Increase w/o MC-8 | 7.8% | 11.2% | -4.3% |
| | | 143% | -55% |
| | 574,531,417 | | |

| Rate 08 Street Light | Rate 09 Traffic Signs | Rate 11 TOU Municipal Pumping | Rate 15 Electric Refining | Rate 22 Irrigation Service | Rate 24 General Service |
|----------------------------|-----------------------------|-------------------------------------|---------------------------------|----------------------------------|-------------------------------|
| 0.00305 | 0.00018 | 0.01627 | 0.00521 | 0.00095 | 0.27282 |
| 0 | 194 | 23,810 | 7,737 | 1,448 | 409,711 |
| 3,022 | 194 | 21,482 | 7,392 | 784 | 301,615 |
| 0.00305 | 0.00018 | 0.01505 | 0.00642 | 0.00072 | 0.25893 |
| 9,067 | 195 | 39,550 | 0 | 2,284 | 405,657 |
| 9,067 | 195 | 49,005 | 0 | 4,307 | 480,761 |
| 38,885,062 | 2,238,727 | 184,560,694 | 44,081,882 | 4,141,472 | 1,690,972,806 |
| 4,439 | 256 | 21,069 | 5,032 | 473 | 193,033 |
| 38,885,062 | 2,238,727 | 184,560,694 | 81,431,660 | 4,141,472 | 1,690,972,806 |

| LGS | Refining | City/County |
|--------|----------|-------------|
| 0.111 | 0.054 | 0.044 |
| 0.079 | 0.030 | 0.031 |
| 0.0789 | 0.0294 | 0.0467 |

| Recreational Lighting | Street Light | Traffic Signs | TOU Municipal Pumping | Electric Refining | Irrigation Service |
|--------------------------|-----------------|------------------|--------------------------|----------------------|-----------------------|
| \$ 462,980 | \$ 4,046,620 | \$ 95,204 | \$ 10,102,350 | \$ 1,830,063 | \$ 423,413 |
| \$ 153,617 | \$ (967,831) | \$ 3,416 | \$ 95,157 | \$ 407,243 | \$ 135,518 |
| 33.2% | -23.9% | 3.6% | 0.9% | 22.3% | 32.0% |

Any Requested Revenue Requirement

| Recreational Lighting | Street Light | Traffic Signs | TOU Municipal Pumping | Electric Refining | Irrigation Service |
|--------------------------|-----------------|------------------|--------------------------|----------------------|-----------------------|
| 585,050 | 2,963,950 | 96,861 | 10,236,735 | 2,252,410 | 583,269 |
| 462,980 | 4,046,620 | 95,204 | 10,102,350 | 1,830,063 | 423,413 |
| 122,070 | (1,082,670) | 1,657 | 134,385 | 422,347 | 159,856 |
| \$119,088 | (\$1,099,906) | \$1,233 | \$95,265 | \$414,416 | \$157,568 |
| 25.72% | -27.18% | 1.29% | 0.94% | 22.64% | 37.21% |
| 349% | -368% | 18% | 13% | 307% | 504% |
| 26.4% | -26.8% | 1.7% | 1.3% | 23.1% | 37.8% |
| 336% | -341% | 22% | 17% | 294% | 481% |

| Rate 25 Large Power | Rate 26 Petroleum Refinery | Rate 28 Area Lighting | Rate 30 Electric Furnace | Rate 31 Military Reservation | Rate 34 Cotton Gin |
|---------------------------|----------------------------------|-----------------------------|--------------------------------|------------------------------------|--------------------------|
| 0.07888 | 0.02953 | 0.00227 | 0.00342 | 0.03509 | 0.00014 |
| 117,898 | 43,868 | 0 | 5,127 | 52,230 | 17 |
| 100,937 | 41,928 | 2,262 | 5,127 | 45,958 | 182 |
| 0.07909 | 0.03057 | 0.00227 | 0.00499 | 0.03916 | 0.00014 |
| 128,213 | 0 | 6,839 | 0 | 0 | 1,931 |
| 106,475 | 0 | 6,839 | 0 | 0 | 1,933 |
| 707,363,439 | 341,483,880 | 28,935,421 | 22,163,145 | 285,973,306 | 1,721,696 |
| 80,749 | 38,982 | 3,303 | 2,530 | 32,645 | 197 |
| 780,367,507 | 412,450,706 | 28,935,421 | 188,117,881 | 343,788,608 | 1,721,696 |
| 73,004,068 | 70,966,826 | | | | |

| General Service | Large Power | Petroleum Refinery | Area Lighting | Electric Furnace | Military Reservation |
|--------------------|----------------|-----------------------|------------------|---------------------|-------------------------|
| \$ 125,005,740 | \$ 35,955,664 | \$ 10,964,770 | \$ 2,932,614 | \$ 1,191,760 | \$ 13,009,892 |
| \$ (10,767,792) | \$ 1,321,031 | \$ 1,976,474 | \$ (289,539) | \$ 314,558 | \$ 1,766,040 |
| -8.6% | 3.7% | 18.0% | -9.9% | 26.4% | 13.6% |
| \$ 6,366,509 | \$ 5,905,328 | \$ 2,747,935 | | | |
| \$ (17,134,301) | \$ (4,584,297) | \$ (771,461) | | | |
| 54.59% | 14.61% | 2.46% | | | |

\$ 8,184,516 \$ 2,189,774 \$ 368,503

| General Service | Large Power | Petroleum Refinery | Area Lighting | Electric Furnace | Military Reservation |
|-----------------|-------------|--------------------|---------------|------------------|----------------------|
| 137,101,368 | 41,347,541 | 13,611,077 | 2,657,838 | 1,518,215 | 14,889,630 |
| 8,184,516 | 2,189,774 | 368,503 | | | |
| 125,005,740 | 35,955,664 | 10,964,770 | 2,932,614 | 1,191,760 | 13,009,892 |
| 3,911,112 | 3,202,103 | 2,277,804 | (274,776) | 326,455 | 1,879,738 |
| \$3,477,544 | \$3,064,316 | \$2,231,190 | (\$282,382) | \$321,503 | \$1,827,314 |
| 2.78% | 8.52% | 20.35% | -9.63% | 26.98% | 14.05% |
| 38% | 116% | 276% | -131% | 366% | 190% |
| 3.1% | 8.9% | 20.8% | -9.4% | 27.4% | 14.4% |
| 40% | 113% | 265% | -119% | 349% | 184% |

| Rate 41 City and County | WH Water Heating | | |
|-------------------------------|------------------------|---------------|-----------|
| 0.04672 | 0.00043 | 1.001 | |
| 69,794 | 381 | 1,494,805 | |
| 46,538 | 486 | 1,138,377 | 1,122,008 |
| 0.04020 | 0.00043 | 101% | |
| 84,577 | 3,999 | 1,665,114 | |
| 63,065 | 8,984 | 2,426,038 | |
| 281,088,137 | 5,525,846 | 6,348,245,502 | |
| 32,088 | 631 | | |
| 281,088,137 | 5,525,846 | 6,753,336,213 | |

| Cotton Gin | City and County | Water Heating | |
|---------------|--------------------|------------------|-----------------|
| \$ 132,972 | \$ 19,126,500 | \$ 474,582 | |
| \$ 45,212 | \$ (2,136,072) | \$ 335,205 | |
| 34.0% | -11.2% | 70.6% | |
| | | | Total |
| | | | \$ (31,385,782) |
| | | | 18.86% |
| | | | |
| | | | |

\$ 2,827,464 \$ 14,992,000

| Cotton Gin | City and County | Water Heating | |
|---------------|--------------------|------------------|-------|
| 172,045 | 23,070,254 | 826,169 | |
| | 2,827,464 | | |
| 132,972 | 19,126,500 | 474,582 | |
| 39,073 | 1,116,291 | 351,587 | |
| \$38,365 | \$1,052,424 | \$345,573 | |
| 28.85% | 5.50% | 72.82% | |
| 391% | 75% | 987% | |
| 29.4% | 5.8% | 74.1% | ##### |
| 374% | 74% | 944% | |

Adjustment to Reconcile to Table MC-8

| Texas Total | Residential Service | Small Business Service | Generations Lighting | Recreation Lighting | Street Light | Traffic Signs | CU Pumping | Municipal Signs | Electric Refining |
|--------------------------------------|------------------------|------------------------------|-------------------------|------------------------|-----------------|------------------|---------------|--------------------|----------------------|
| COVID Amortization | \$2,196,060 | \$1,341,904 | \$136,838 | \$2,598 | \$15,014 | \$370 | \$34,075 | \$6,908 | |
| | | | 61.1% | 6.2% | 0.1% | 0.7% | 0.0% | 1.6% | 0.3% |
| Interruptible Incr. (Per Company) | \$ 325,136 | \$ 198,675 | \$ 20,259 | \$ 385 | \$ 2,223 | \$ 55 | \$ 5,045 | \$ 1,023 | |
| Total Adjustment | \$2,521,196 | \$1,540,578 | \$157,097 | \$2,983 | \$17,237 | \$425 | \$39,120 | \$7,930 | |

| Irrigation Service | General Service | Large Power | Petroleum Refinery | Area Lighting | Electric Furnace | Military Reservatio | Cotton Gin | City and County | Water Heating |
|--------------------|-----------------|-------------|--------------------|---------------|------------------|---------------------|------------|-----------------|---------------|
| \$1,993 | \$377,654 | \$120,017 | \$40,602 | \$6,625 | \$4,313 | \$45,664 | \$616 | \$55,631 | \$5,239 |
| 0.1% | 17.2% | 5.5% | 1.8% | 0.3% | 0.2% | 2.1% | 0.0% | 2.5% | 0.2% |
| \$ 295 | \$ 55,913 | \$ 17,769 | \$ 6,011 | \$ 981 | \$ 639 | \$ 6,761 | \$ 91 | \$ 8,236 | \$ 776 |
| | | | | | | | | | |
| \$2,288 | \$433,567 | \$137,787 | \$46,614 | \$7,606 | \$4,952 | \$52,425 | \$707 | \$63,867 | \$6,014 |

Development of Recommended Revenue

| | Texas Total | Residential Service | Small General Service |
|---|------------------------|-------------------------|--------------------------|
| CCOS Rev Increase | \$39,296,582 | \$29,128,239 | (\$1,595,168) |
| CCOS % Increase | 7.38% | 10.64% | -4.79% |
| Ratio to Texas Avg. | | 144% | -65% |
| Moderation Adjustments | | | |
| No class revenue reduction (\$2,977,455) | | | |
| Cap Increases at 140% 10.32% | | \$ 28,239,527 | |
| \$3,177,962 Difference | | \$888,712 | |
| | Texas Total | Residential Service | Small General Service |
| Net Reallocation \$200,507 0.005102399 1.015897007 | | \$ 28,239,527 | 0 |
| Reallocated 0.015897007 | \$ 39,296,582 7.38% | \$ 28,688,451 10.48% | \$ - 0.00% |
| \$39,296,582 | | 142.1% | |

venue Increase Allocation At Company Revenue Requirement

| Recreational Lighting | Street Light | Traffic Signs | TOU Municipal Pumping | Electric Refining |
|--------------------------|-----------------|------------------|--------------------------|----------------------|
| \$119,088 | (\$1,099,906) | \$1,233 | \$95,265 | \$414,416 |

25.72% -27.18% 1.29% 0.94% 22.64%

349% -368% 18% 13% 307%

\$ 47,780

\$71,308

| Recreational Lighting | Street Light | Traffic Signs | TOU Municipal Pumping | Electric Refining |
|--------------------------|-----------------|------------------|--------------------------|----------------------|
| \$ 47,780 | 0 | \$1,233 | \$95,265 | 0 |

\$ 48,539 \$ - \$ 1,252 \$ 96,779 \$ -
10.48% 0.00% 1.32% 0.96% 0.00%

| Irrigation Service | General Service | Large Power | Petroleum Refinery | Area Lighting |
|---|-----------------|-------------|--------------------|---------------|
| \$157,568 | \$3,477,544 | \$3,064,316 | \$2,231,190 | (\$282,382) |
| 37.21% | 2.78% | 8.52% | 20.35% | -9.63% |
| 504% | 38% | 116% | 276% | -131% |
| | | | | |
| \$ 43,696 | | | \$ 1,131,564 | |
| \$113,872 | | | \$1,099,626 | |
| | | | | |
| Irrigation Service | General Service | Large Power | Petroleum Refinery | Area Lighting |
| \$ 43,696 | \$3,477,544 | \$3,064,316 | \$ 1,131,564 | 0 |
| | | | | |
| \$ 44,391 \$ 3,532,827 \$ 3,113,030 \$ 1,149,553 \$ - | | | | |
| 10.48% 2.83% 8.66% 10.48% 0.00% | | | | |

| Electric Furnace | Military Reservation | Cotton Gin | City and County | Water Heating |
|---------------------|-------------------------|---------------|--------------------|------------------|
| \$321,503 | \$1,827,314 | \$38,365 | \$1,052,424 | \$345,573 |
| 26.98% | 14.05% | 28.85% | 5.50% | 72.82% |
| 366% | 190% | 391% | 75% | 987% |
| | | | | |
| \$ 122,990 | \$ 1,342,621 | \$ 13,723 | \$ 48,977 | |
| \$198,513 | \$484,693 | \$24,643 | | \$296,596 |
| Electric Furnace | Military Reservation | Cotton Gin | City and County | Water Heating |
| \$ 122,990 | \$ 1,342,621 | \$ 13,723 | \$ 1,052,424 | \$ 48,977 |
| | | | | |
| \$ 124,945 | \$ 1,363,965 | \$ 13,941 | \$ 1,069,154 | \$ 49,755 |
| 10.48% | 10.48% | 10.48% | 5.59% | 10.48% |

DN 52195 Clarence Johnson Corrected Workpapers
Allocation Adjustments CCOS-CEP Revenue Requirement
(also filed in native format)

Revenue Requirement**Nalepa Summary With Errata**

| | Utility | Texas | R01-Residential TX |
|---------------------------|--|-----------------------------------|--------------------------------|
| Rate Base | 2,586,933,689 | 1,987,143,503 | 1,013,256,635 |
| Overall Return | 7.322% | 7.322% | 7.322% |
| Return on Rate Base | 189,421,493 | 145,503,416 | 74,193,083 |
| Operating Expense | 695,084,344 | 535,732,017 | 248,859,760 |
| Federal Income Taxes | 25,674,917 | 19,324,323 | 10,014,499 |
| State Income Taxes | 4,108,259 | 3,179,977 | 1,624,590 |
| Total Revenue Requirement | 914,289,013 | 703,739,734 | 334,691,932 |
| Other Operating Revenues | (252,316,850) | (181,083,928) | (57,245,979) |
| Base Revenue Requirement | 661,972,163 | 522,655,806 | 277,445,953 |
| Utility Impact | <i>Current Base Revs</i> (56,248,384) | 532,713,639.01 (10,059,034.20) | 273,638,830.00 5,328,137.87 |
| | | -1.89% | 1.95% |

decrease totals

(17,849,434.02)

0.563549185

| R02-Small Gen Serv | R07-Rec Light | R08-Street Light | R09-Traffic Signs | R11TOU-Muni Pump |
|---------------------------|----------------------|-------------------------|--------------------------|-------------------------|
| 115,958,115 | 2,401,895 | 9,140,562 | 280,217 | 34,898,901 |
| 7.322% | 7.322% | 7.322% | 7.322% | 7.322% |
| 8,490,731 | 175,873 | 669,294 | 20,518 | 2,555,381 |
| 29,298,349 | 444,223 | 2,902,554 | 117,720 | 10,926,405 |
| 1,139,013 | 24,844 | 94,619 | 2,693 | 339,721 |
| 185,724 | 3,844 | 14,826 | 447 | 55,741 |
| 39,113,818 | 648,783 | 3,681,293 | 141,379 | 13,877,249 |
| (9,991,213) | (95,874) | (889,775) | (52,353) | (4,471,468) |
| 29,122,605 | 552,909 | 2,791,517 | 89,026 | 9,405,781 |
| 33,319,685.00 | 462,980.00 | 4,046,620.00 | 95,204.00 | 10,102,350.00 |
| (4,497,120.06) | 79,095.81 | (1,265,345.41) | (6,211.71) | (750,745.67) |
| -13.50% | 17.08% | -31.27% | -6.52% | -7.43% |

| R15-Elec Ref | R22-Irrig Serv | R24-Gen Serv | R25-Large Power | R26-Petroleum Ref | R28-P Area Light |
|--------------|----------------|----------------|-----------------|-------------------|------------------|
| 6,848,198 | 2,259,061 | 473,278,703 | 142,626,549 | 39,086,879 | 8,258,749 |
| 7.322% | 7.322% | 7.322% | 7.322% | 7.322% | 7.322% |
| 501,442 | 165,414 | 34,654,603 | 10,443,458 | 2,862,035 | 604,725 |
| 2,558,421 | 467,127 | 129,991,885 | 43,727,684 | 18,831,203 | 2,483,361 |
| 63,271 | 22,099 | 4,500,678 | 1,364,207 | 363,154 | 82,955 |
| 10,920 | 3,617 | 755,466 | 227,688 | 62,293 | 13,261 |
| 3,134,053 | 658,257 | 169,902,632 | 55,763,038 | 22,118,685 | 3,184,302 |
| (1,535,913) | (140,412) | (53,784,771) | (20,148,130) | (9,883,398) | (657,092) |
| 1,598,140 | 517,844 | 116,117,861 | 35,614,908 | 12,235,287 | 2,527,210 |
| 1,830,063.00 | 423,413.00 | 125,005,740.00 | 35,955,664.01 | 10,964,770.00 | 2,932,614.00 |
| 217,548.52 | 88,645.34 | (9,187,072.01) | (604,907.57) | 1,059,040.33 | (413,182.83) |
| 11.89% | 20.94% | -7.35% | -1.68% | 9.66% | -14.09% |

| R30-Elec Furnace | R31-Mili Reserv | R34-Cotton Gin | R41-Cty/Cnty | RWH-Water Heating |
|-------------------------|------------------------|-----------------------|---------------------|--------------------------|
| 4,528,839 | 46,131,099 | 706,514 | 84,547,891 | 2,934,696 |
| 7.322% | 7.322% | 7.322% | 7.322% | 7.322% |
| 331,612 | 3,377,830 | 51,733 | 6,190,799 | 214,885 |
| 5,123,872 | 17,965,938 | 142,582 | 21,196,623 | 694,309 |
| 41,835 | 425,781 | 7,164 | 806,322 | 31,469 |
| 7,204 | 73,557 | 1,129 | 134,944 | 4,727 |
| 5,504,524 | 21,843,106 | 202,607 | 28,328,688 | 945,390 |
| (4,142,690) | (8,371,293) | (40,356) | (9,463,376) | (169,834) |
| 1,361,833 | 13,471,812 | 162,251 | 18,865,312 | 775,556 |
| 1,191,760.00 | 13,009,892.00 | 132,972.00 | 19,126,500.00 | 474,582.00 |
| 195,381.07 | 507,450.59 | 26,222.27 | (1,124,848.74) | 288,878.02 |
| 16.39% | 3.90% | 19.72% | -5.88% | 60.87% |

Revenue Allocations

| Texas Retail | R01-Residential TX | R02-Small Gen Serv | R07-Rec Light |
|-----------------|--------------------|--------------------|---------------|
| \$ (10,059,034) | | \$ (2,534,348) | \$ - |
| -1.89% | 0.00% | -7.61% | 0.00% |
| | No Increase | | |
| -10059034 | 8,007,948 | | |
| | 0.563549185 | | |

tion Recommendation (with errata)

| R08-Street Light | R09-Traffic Signs | R11TOU-Muni Pump | R15-Elec Ref | R22-Irrig Serv | R24-Gen Serv |
|------------------|-------------------|------------------|--------------|----------------|--------------|
| \$ (713,084) | \$ (3,501) | \$ (423,082) | \$ - | \$ (5,177,367) | |
| -17.62% | -3.68% | -4.19% | 0.00% | 0.00% | -4.14% |

R25-Large Power R26-Petroleum Ref R28-P Area Light R30-Elec Furnace R31-Mili Reserv

| | | | | | | | | | |
|----|-----------|----|---|----|-----------|-------|---|----|-------|
| \$ | (340,895) | \$ | - | \$ | (232,849) | \$ | - | \$ | - |
| | -0.95% | | | | 0.00% | | | | |
| | | | | | -7.94% | | | | |
| | | | | | | 0.00% | | | 0.00% |

R34-Cotton Gin R41-Cty/Cnty RWH-Water Heating

\$ - \$ (633,908) \$ -

0.00% -3.31% 0.00%

Revenue Requirement**Nalepa Summary With Errata**

| | Utility | Texas | R01-Residential TX |
|---------------------------|----------------|--------------------------|---------------------------|
| Rate Base | 2,586,933,689 | 1,987,143,503 | 1,013,256,635 |
| Overall Return | 7.322% | 7.322% | 7.322% |
| Return on Rate Base | 189,421,493 | 145,503,416 | 74,193,083 |
| Operating Expense | 695,084,344 | 535,732,017 | 248,859,760 |
| Federal Income Taxes | 25,674,917 | 19,324,323 | 10,014,499 |
| State Income Taxes | 4,108,259 | 3,179,977 | 1,624,590 |
| Total Revenue Requirement | 914,289,013 | 703,739,734 | 334,691,932 |
| Other Operating Revenues | (252,316,850) | (181,083,928) | (57,245,979) |
| Base Revenue Requirement | 661,972,163 | 522,655,806 | 277,445,953 |
| | | <i>Current Base Revs</i> | 273,638,830.00 |
| Utility Impact | | (10,059,034.20) | 5,328,137.87 |
| | (56,248,384) | | -1.89% 1.95% |

decrease totals

(17,849,434.02)

0.563549185

| R02-Small Gen Serv | R07-Rec Light | R08-Street Light | R09-Traffic Signs | R11TOU-Muni Pump |
|---------------------------|----------------------|-------------------------|--------------------------|-------------------------|
| 115,958,115 | 2,401,895 | 9,140,562 | 280,217 | 34,898,901 |
| 7.322% | 7.322% | 7.322% | 7.322% | 7.322% |
| 8,490,731 | 175,873 | 669,294 | 20,518 | 2,555,381 |
| 29,298,349 | 444,223 | 2,902,554 | 117,720 | 10,926,405 |
| 1,139,013 | 24,844 | 94,619 | 2,693 | 339,721 |
| 185,724 | 3,844 | 14,826 | 447 | 55,741 |
| 39,113,818 | 648,783 | 3,681,293 | 141,379 | 13,877,249 |
| (9,991,213) | (95,874) | (889,775) | (52,353) | (4,471,468) |
| 29,122,605 | 552,909 | 2,791,517 | 89,026 | 9,405,781 |
| 33,319,685.00 | 462,980.00 | 4,046,620.00 | 95,204.00 | 10,102,350.00 |
| (4,497,120.06) | 79,095.81 | (1,265,345.41) | (6,211.71) | (750,745.67) |
| -13.50% | 17.08% | -31.27% | -6.52% | -7.43% |

| R15-Elec Ref | R22-Irrig Serv | R24-Gen Serv | R25-Large Power | R26-Petroleum Ref | R28-P Area Light |
|---------------------|-----------------------|---------------------|------------------------|--------------------------|-------------------------|
| 6,848,198 | 2,259,061 | 473,278,703 | 142,626,549 | 39,086,879 | 8,258,749 |
| 7.322% | 7.322% | 7.322% | 7.322% | 7.322% | 7.322% |
| 501,442 | 165,414 | 34,654,603 | 10,443,458 | 2,862,035 | 604,725 |
| 2,558,421 | 467,127 | 129,991,885 | 43,727,684 | 18,831,203 | 2,483,361 |
| 63,271 | 22,099 | 4,500,678 | 1,364,207 | 363,154 | 82,955 |
| 10,920 | 3,617 | 755,466 | 227,688 | 62,293 | 13,261 |
| 3,134,053 | 658,257 | 169,902,632 | 55,763,038 | 22,118,685 | 3,184,302 |
| (1,535,913) | (140,412) | (53,784,771) | (20,148,130) | (9,883,398) | (657,092) |
| 1,598,140 | 517,844 | 116,117,861 | 35,614,908 | 12,235,287 | 2,527,210 |
| 1,830,063.00 | 423,413.00 | 125,005,740.00 | 35,955,664.01 | 10,964,770.00 | 2,932,614.00 |
| 217,548.52 | 88,645.34 | (9,187,072.01) | (604,907.57) | 1,059,040.33 | (413,182.83) |
| 11.89% | 20.94% | -7.35% | -1.68% | 9.66% | -14.09% |

| R30-Elec Furnace | R31-Mili Reserv | R34-Cotton Gin | R41-Cty/Cnty | RWH-Water Heating |
|-------------------------|------------------------|-----------------------|---------------------|--------------------------|
| 4,528,839 | 46,131,099 | 706,514 | 84,547,891 | 2,934,696 |
| 7.322% | 7.322% | 7.322% | 7.322% | 7.322% |
| 331,612 | 3,377,830 | 51,733 | 6,190,799 | 214,885 |
| 5,123,872 | 17,965,938 | 142,582 | 21,196,623 | 694,309 |
| 41,835 | 425,781 | 7,164 | 806,322 | 31,469 |
| 7,204 | 73,557 | 1,129 | 134,944 | 4,727 |
| 5,504,524 | 21,843,106 | 202,607 | 28,328,688 | 945,390 |
| (4,142,690) | (8,371,293) | (40,356) | (9,463,376) | (169,834) |
| 1,361,833 | 13,471,812 | 162,251 | 18,865,312 | 775,556 |
| 1,191,760.00 | 13,009,892.00 | 132,972.00 | 19,126,500.00 | 474,582.00 |
| 195,381.07 | 507,450.59 | 26,222.27 | (1,124,848.74) | 288,878.02 |
| 16.39% | 3.90% | 19.72% | -5.88% | 60.87% |

Revenue Allocations

| Texas Retail | R01-Residential TX | R02-Small Gen Serv | R07-Rec Light |
|-----------------|--------------------|--------------------|---------------|
| \$ (10,059,034) | | \$ (2,534,348) | \$ - |
| -1.89% | 0.00% | -7.61% | 0.00% |
| | No Increase | | |
| -10059034 | 8,007,948 | | |
| | 0.563549185 | | |

tion Recommendation (with errata)

| R08-Street Light | R09-Traffic Signs | R11TOU-Muni Pump | R15-Elec Ref | R22-Irrig Serv | R24-Gen Serv |
|-------------------------|--------------------------|-------------------------|---------------------|-----------------------|---------------------|
| \$ (713,084) | \$ (3,501) | \$ (423,082) | \$ - | \$ (5,177,367) | |
| -17.62% | -3.68% | -4.19% | 0.00% | 0.00% | -4.14% |

R25-Large Power R26-Petroleum Ref R28-P Area Light R30-Elec Furnace R31-Mili Reserv

| | | | | | | | | | |
|----|-----------|----|---|----|-----------|----|--------|----|-------|
| \$ | (340,895) | \$ | - | \$ | (232,849) | \$ | - | \$ | - |
| | -0.95% | | | | 0.00% | | -7.94% | | 0.00% |
| | | | | | | | | | 0.00% |

R34-Cotton Gin R41-Cty/Cnty RWH-Water Heating

\$ - \$ (633,908) \$ -

0.00% -3.31% 0.00%