OCC EXHIBIT _______

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Duke Energy Ohio, Inc. for an Increase in Electric Distribution Rates	)))	Case No. 12-1682-EL-AIR
In the Matter of the Application of Duke Energy Ohio, Inc. for Tariff Approval	))	Case No. 12-1683-EL-ATA
In the Matter of the Application of Duke Energy Ohio, Inc. for Approval to Change Accounting Methods.	)))	Case No. 12-1684-EL-AAM

DIRECT TESTIMONY OF DAVID J. EFFRON

On Behalf of
The Office of the Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
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(614) 466-8574

February 19, 2013

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SCHEDULES

ATTACHMENTS

I. INTRODUCTION

Q1. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A1. My name is David J. Effron. My address is 12 Pond Path, North Hampton, New Hampshire, 03862.

Q2. WHAT IS YOUR PRESENT OCCUPATION?

A2. I am a consultant specializing in utility regulation.

Q3. PLEASE SUMMARIZE YOUR PROFESSIONAL EXPERIENCE.

A3. My professional career includes over thirty years as a regulatory consultant, two years as a supervisor of capital investment analysis and controls at Gulf & Western Industries and two years at Touche Ross & Co. as a consultant and staff auditor. I am a Certified Public Accountant and I have served as an instructor in the business program at Western Connecticut State College.

Q4. WHAT EXPERIENCE DO YOU HAVE IN THE AREA OF UTILITY RATE SETTING PROCEEDINGS AND OTHER UTILITY MATTERS?

A4. I have analyzed numerous electric, gas, telephone, and water filings in different jurisdictions. Pursuant to those analyses, I have prepared testimony, assisted attorneys in case preparation, and provided assistance during settlement negotiations with various utility companies.

I have testified in over three hundred cases before regulatory commissions in Alabama, Colorado, Connecticut, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Maine, Maryland, Massachusetts, Missouri, Nevada, New Jersey, New York, North Dakota, Ohio, Pennsylvania, Rhode Island, South Carolina, Texas, Vermont, Virginia, and Washington.

Q5. PLEASE DESCRIBE YOUR OTHER WORK EXPERIENCE.

A5. As a supervisor of capital investment analysis at Gulf & Western Industries, I was responsible for reports and analyses concerning capital spending programs, including project analysis, formulation of capital budgets, establishment of accounting procedures, monitoring capital spending, and administration of the leasing program. At Touche Ross & Co., I was an associate consultant in management services for one year, and a staff auditor for one year.

Q6. HAVE YOU EARNED ANY DISTINCTIONS AS A CERTIFIED PUBLIC ACCOUNTANT?

A6. Yes. I received the Gold Charles Waldo Haskins Memorial Award for the highest scores in the May 1974 certified public accounting examination in New York State.

Q7. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND.

A7. I have a Bachelor's degree in Economics (with distinction) from Dartmouth College and a Masters of Business Administration Degree from Columbia University.

Q8. ***ON WHOSE BEHALF ARE YOU TESTIFYING?***

A8. I am testifying on behalf of the Office of the Ohio Consumers' Counsel ("OCC").

Q9. ***WHAT IS THE PURPOSE OF YOUR TESTIMONY?***

A9. My testimony supports certain objections OCC raised to the Staff Report of Investigation ("Staff Report") by the Staff of the Public Utilities Commission of Ohio ("Commission" or "PUCO") in this proceeding. I address certain revenue requirement issues that affect the revenue deficiency of Duke Energy Ohio, Inc. ("Duke" or "the Utility"). In particular, I address issues affecting the determination of rate base and adjusted operating income under present rates, based on the test year consisting of the twelve months ending December 31, 2012.

Q10. ***WHAT DOCUMENTS DID YOU REVIEW IN PREPARING YOUR TESTIMONY?***

A10. I reviewed the Utility's testimony, exhibits, workpapers and the Utility's responses to discovery and data requests propounded by the OCC and by the PUCO Staff. I also reviewed the Staff Report, supporting workpapers, and certain relevant Commission Opinions and Orders in other cases.

II. REVENUE REQUIREMENT ISSUES

A. Deferred Tax Debit Balances

Q11. HAVE YOU ANALYZED THE BALANCE OF ACCUMULATED DEFERRED INCOME TAXES ("ADIT") REFLECTED BY THE STAFF IN ITS DETERMINATION OF THE UTILITY'S DATE CERTAIN RATE BASE?

A11. Yes. The details of the balance of ADIT are shown on Schedule B-6 of the Staff Report. The ADIT balances consist of both credit balances that reduce the rate base and debit balances that increase rate base. These ADIT balances are components of the "Other Rate Base Items" included by both the Utility and the Staff in the determination of rate base.

Q12. ARE YOU PROPOSING ANY ADJUSTMENTS TO THE ADIT BALANCES THAT THE STAFF INCLUDES IN THE BALANCE OF "OTHER RATE BASE ITEMS"?

A12. Yes. Account 190 includes certain deferred tax debit balances that are related to accrued liabilities or reserves. One of those items is the "Tax Interest Accrual" of $2,051,000. The accrued liability for tax interest is not deducted from rate base, and to be consistent, the deferred tax debit balance related to that accrued liability should not be included in rate base.

Q13. ***WHAT IS THE EFFECT OF ELIMINATING THIS DEFERRED TAX BALANCE FROM THE UTILITY'S RATE BASE?***

A13. As noted above, the deferred tax debit balance on the Tax Interest Accrual is $2,051,000. This is partially offset by a credit balance related to the Tax Interest Accrual of $727,000 in Account 283. Thus, the net effect of removing the deferred income taxes related to the Tax Interest Accrual is to reduce the Utility's rate base by $1,324,000. (Schedule DJE-B-6a and OCC Schedule B-6 attached to OCC Witness Ibrahim Soliman's testimony.)

B. Sales and Revenue

Q14. ***HAS THE STAFF ADJUSTED THE UTILITY'S TEST YEAR SALES AND REVENUES?***

A14. Yes. The Staff's adjustments to test year sales are summarized on Schedule C-3.1 of the Staff Report. The adjustments are supported by Staff Workpapers WPC-3.1a and Staff Schedule E-4, page 2, which shows the Staff's adjusted test year sales and base rate revenues under present rates by rate class. As explained on Page 10 of the Staff Report, "Staff adjusted test year revenue according to an average consumption per customer methodology" for those rate classes "where revenue was driven by KWh usage." By far, the largest component of the Staff's adjustment relates to sales to Rate RS – Residential Service customers.

Q15. BASED ON YOUR REVIEW AND ANALYSIS, ARE YOU PROPOSING ANY FURTHER ADJUSTMENTS TO TEST YEAR SALES AND REVENUES UNDER PRESENT RATES?

A15. Yes. Test year sales to Rate Class DS – Secondary Distribution Service should be adjusted. The Utility reflects test year sales of 6,366,398 MWh to Rate DS customers and the Staff did not adjust sales or revenues for that rate class. Based on Staff workpapers, sales to DS customers ranged from 6,506,879 MWh to 6,656,712 MWh in the three years 2009 – 2011.[1]

The test year DS sales are well below the sales levels in the most recent three years. Based on Staff workpapers, the actual DS kWh sales in the months after March in 2012 (the basis for the Staff adjustments to other rate classes) was also well in excess of the Utility's forecasts for those months.[2] Evidently, the only reason that the Staff did not adjust test year sales to DS customers is that customers in that rate class are billed on kW demand rather than on kWh energy consumption. However, this does not mean that revenue is not "driven by kWh usage." To the extent that kWh sales increase, it is reasonable to expect that kW demand and revenue would also increase, unless there was some significant change in the customers' load factor.

[1] PUCO Staff file "DukeElectricTariffRevenueFinal(AvgConsumption)".

[2] PUCO Staff file "DukeElectricTariffRevenueFinal(AvgConsumption)".

In fact, the Staff also obtained data on the billed kW in recent periods. The data show that the test year kW of 19,984,780 for rate DS were well below the actual kW in any of the years 2009 – 2011, which ranged from 20,700,710 to 20,805,891. Just as with the kWh sales to DS customers, the actual DS kW demand in the months after March in 2012 (for those months for which such data were available) was also well in excess of the Utility's forecasts for those months.

Regardless of whether the test year billings to DS customers are based on kWh or kW, the billing determinants reflected by the Utility and adopted by the Staff are not reflective of the normal level of billing determinants that can reasonably be expected, although they should be. Therefore, the test year DS billing determinants and revenues should be adjusted to reflect a normal level of sales to DS customers.

Q16. ***HOW DO YOU PROPOSE TO ADJUST THE UTILITY'S TEST YEAR DS BILLING DETERMINANTS?***

A16. For the three years 2009 – 2011, the average level of kWh sales to DS customers was 3.05% above the sales reflected by the Utility for the 2012 test year; and the average level of kW demand billed to DS customers was 3.91% above the kW demand reflected by the Utility for the 2012 test year. In other words, the Utility not only reflected a lower than normal level of DS kWh sales in the 2012 test year, but also assumed that the load factor for DS customers would be higher in 2012 than it has been in recent years. To be conservative, I am incorporating the higher load factor assumed by the Utility and proposing to increase the test year kW by 3.05% (based on the higher level of kWh sales in the years 2009-2011) to recognize a more normal level of DS revenues in the calculation of adjusted operating income under present rates.

Q17. WHAT IS THE EFFECT OF YOUR PROPOSED MODIFICATION TO THE TEST YEAR KW DEMAND FOR RATE DS CUSTOMERS REFLECTED BY THE STAFF?

A17. My proposed adjustment increases adjusted test year revenues under present rates by $2,854,000 (Schedule DJE-C-3.1a). This adjustment to Rate DS billing determinants should be included in the calculations of adjusted test year operating income under present rates and in the determination of the rates necessary to produce the Utility's required revenues. The adjustment to revenues is reflected on OCC Schedule C-3.1 attached to OCC Witness Soliman's testimony.

C. Medical Costs

Q18. DID DUKE PROPOSE A PRO FORMA ADJUSTMENT TO TEST YEAR MEDICAL EXPENSES FOR ESTIMATED FUTURE INCREASES IN SUCH COSTS?

A18. Yes. The medical costs included in operation and maintenance expenses represent the current health care coverage of active employees. On its Schedule C-3.27, Duke adjusted test year expenses to reflect expected increases in medical costs. This adjustment reflects an expected increase of 8.5% to medical costs. It should be noted that this is in addition to the change in medical costs implicitly recognized in the adjustment to pensions and benefits on Duke's Schedule C-3.17.

Q19. DID THE STAFF ADOPT DUKE'S PROPOSED ADJUSTMENT TO TEST YEAR MEDICAL EXPENSES?

A19. Yes. Schedule C-3.27 of the Staff Report reflects an adjustment to test year medical costs. The Staff's adjustment differs from Duke's because the Staff's adjustment is based on a lower level of annualized electric operation and maintenance labor, but the Staff accepts the basic premise of an 8.5% escalation to medical expenses.

Q20. IS THIS ADJUSTMENT APPROPRIATE?

A20. No. It is not an adjustment for a known and measurable change. In response to OCC Interrogatory No. 03-41, Duke stated that the basis for this adjustment is that "medical inflation assumptions for the near future assume a rate greater than 8%." In other words, this adjustment is not based on actually known increases to premiums that Duke pays for medical insurance or an actually known increase in the level of medical costs. Rather, it is an estimate of the medical inflation that Duke believes it <u>may</u> experience and is the assumed effect of such estimated inflation on medical expenses subsequent to the test year. Nothing in this adjustment reflects any known change to the 2012 test year medical costs or anything specific to the medical costs actually incurred by Duke.

Q21. WHAT DO YOU RECOMMEND?

A21. I recommend that the 8.5% increase to test year medical costs be eliminated from the determination of pro forma test year operation and maintenance expenses. It is not a known and measurable change to the level of test year expenses; rather it is an estimate of increases to medical costs that the Utility expects may take place after the test year.

Q22. WHAT IS THE EFFECT OF YOUR RECOMMENDATION TO ELIMINATE THE 8.5% ESCALATION TO MEDICAL COSTS?

A22. The effect is to reduce the medical costs included in pro forma operation and maintenance expenses by $708,000 (Schedule DJE-3.27a and Schedule OCC 3.27 accompanying the testimony of OCC Witness Soliman).

D. Uncollectible Accounts Expense

Q23. HAVE YOU ANALYZED DUKE'S DETERMINATION OF ADJUSTED TEST YEAR UNCOLLECTIBLE ACCOUNTS EXPENSE?

A23. Yes. The Utility calculated the adjusted test year uncollectible accounts expense by applying an uncollectible expense factor of 0.5425% to test year revenues (as adjusted to eliminate revenues not subject to being uncollectible). The 0.5425% factor represents the collection costs and time value of money used to develop the discount rate Duke applied to its sale of receivables. Thus, the "uncollectible" expense included in test year expenses is actually the cost incurred by Duke in the process of selling its accounts receivable. The Staff accepted Duke's 0.5425% uncollectible expense factor for the purpose of calculating adjusted test year uncollectible accounts expense.

Q24. ARE YOU PROPOSING TO ADJUST THE TEST YEAR UNCOLLECTIBLE EXPENSE FACTOR?

A24. Yes. As seen on Duke workpaper WPA-2a, the 0.5425% factor is based on the average collection cost and time value of money rates for the twelve months ended March 31, 2012. The time value of money component was approximately 0.53% in the last nine months of 2011 and approximately 0.36% in the first three months of 2012. In response to OCC Interrogatory No. 03-36, Duke explained that the discount rate in January 2012 was adjusted to reflect the decline in interest rates over the last few years. As seen in the response to OCC Interrogatory No. 03-37 (Attachment DJE-1), the lower time value discount rate continued at least through August 2012. The discount rate used in the calculation of the pro forma uncollectible accounts expense should be adjusted to reflect the actual average rate in 2012, which is the latest known rate at the time of the preparation of this testimony.

Q25. WHAT IS THE EFFECT OF UPDATING THE TIME VALUE FACTOR TO REFLECT THE LATEST KNOWN DISCOUNT RATE?

A25. Through the first eight months of 2012, the actual average time value percentage was 0.3603% (Schedule DJE-C-3.16a). This compares to an average time value percentage of 0.4925% for the twelve months ended March 31, 2012. Substituting the average time value percentage of 0.3603% into the calculation of the total uncollectible expense factor, the result is a factor of 0.4103%. Applying this factor to revenues of $497,742,000, the adjusted test year uncollectible accounts expense is $2,042,000. This is $643,000 less than the annualized uncollectible accounts expense of $2,685,000 calculated by the Staff on Workpaper WPC-3.16a. I recommend that test year uncollectible accounts expense be adjusted accordingly. (See OCC Schedule 3.16 attached to the testimony of Witness Soliman.)

The uncollectible accounts expense factor also goes into the calculation of the gross revenue conversion factor. The gross revenue conversion factor should be modified to incorporate a revised uncollectible accounts expense factor of 0.4103%, which is reflected on OCC Schedule A-2 attached to the testimony of Witness Soliman.

E. Depreciation Expense

Q26. HAVE YOU REVIEWED THE PRO FORMA DEPRECIATION EXPENSE THE STAFF INCLUDED IN THE UTILITY'S REVENUE REQUIREMENT?

A26. Yes. The details of the annual test year depreciation expense by plant account are shown on Schedule B-3.2 of the Staff Report.

Q27. BASED ON YOUR REVIEW, SHOULD THE TEST YEAR DEPRECIATION EXPENSE CALCULATED BY THE STAFF BE MODIFIED?

A27. Yes. Both General Plant and Common Plant include balances of Miscellaneous Intangible Plant. The Miscellaneous Intangible Plant consists mainly of capitalized software costs being depreciated over various periods of time. The annual depreciation expense on General Miscellaneous Intangible Plant is $2,030,000, and the annual depreciation expense on Common Miscellaneous Intangible Plant is $3,133,000. Certain of the vintages of intangible plant became fully depreciated during the test year. In addition, the depreciation on certain other vintages of intangible plant is inconsistent with supporting data provided by the Utility. Therefore, I am proposing to modify the amortization of intangible plant included in pro forma test year operating expenses.

Q28. PLEASE EXPLAIN YOUR PROPOSED MODIFICATIONS TO THE AMORTIZATION OF INTANGIBLE PLANT.

A28. My proposed adjustments to the amortization of intangible plant are summarized on my Schedule DJE-C-3.5a. First, the 2001 and 2007 vintages of general intangible plant became fully amortized in the 2012 test year. Therefore, the amortization of these vintages should be eliminated on a pro forma basis. With regard to the 2010 vintage on general intangible plant, Duke's response to OCC Request for Production of Documents No. 03-19 (Attachment DJE-2) shows a cost basis of $314,000 and an allocated reserve of $1,635,000 as of the date certain in this case. Obviously, a plant balance with a cost basis of $314,000 should not have an allocated reserve of $1,635,000 (or more than five times higher than the value of the plant). In addition, Duke's response to OCC Interrogatory No. 09-130 (Attachment DJE-3) shows annual depreciation of $1,205,000 on the 2010 vintage. Again, a plant balance with a cost basis of $314,000 should not have annual depreciation of $1,205,000 (almost four times higher than the value of the plant). Unless these discrepancies can be clarified, the amortization of the 2010 vintage of general intangible plant should also be eliminated.

I am proposing to eliminate total general intangible plant amortization of $1,345,000. On a jurisdictional basis, this results in a reduction of $1,241,000 to depreciation and amortization of general plant.

With regard to common intangible plant, the 2002 and 2007 vintages of common intangible plant became fully amortized in the 2012 test year. Elimination of the amortization of these vintages reduces the pro forma amortization of common intangible plant by $1,143,000. On a jurisdictional basis, this adjustment reduces the depreciation and amortization of common plant allocable to electric distribution operations by $428,000.

Q29. PLEASE SUMMARIZE YOUR PROPOSED ADJUSTMENTS TO PRO FORMA TEST YEAR DEPRECIATION EXPENSE.

A29. I am proposing to reduce pro forma test year depreciation and amortization of general plant by $1,241,000 and pro forma test year depreciation and amortization of common plant by $428,000. My total proposed adjustment to test year depreciation and amortization expense is a reduction of $1,669,000. (Schedule DJE-3.5a.) These adjustments are reflected on OCC Schedule C-3.5 accompanying the testimony of Mr. Soliman.

Q30. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A30. Yes. However, I reserve the right to incorporate new information that may subsequently become available. I also reserve the right to supplement my testimony in the event that Duke, the PUCO Staff or other parties submit new or corrected information or if additional information is provided through discovery.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing *Direct Testimony of David J. Effron* was served electronically to the persons listed below this 19th day of February 2013.

/s/ Terry L. Etter
Terry L. Etter
Assistant Consumers' Counsel

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Duke Energy Ohio
Case No. 12-1682-EL-AIR
OCC Third Set of Interrogatories
Date Received: September 20, 2012

OCC-INT-03-37

REQUEST:

Referring to Schedule A-2, what is the time value percentage for each month since March 2012?

RESPONSE:

Apr-12	0.3629%
May-12	0.3590%
Jun-12	0.3563%
Jul-12	0.3569%
Aug-12	0.3577%

PERSON RESPONSIBLE: Michael Covington

Duke Energy Ohio
Case No. 12-1682-EL-AIR
OCC Third Set Production of Documents
Date Received: September 20, 2012

OCC-POD-03-019

REQUEST:

Referring to Schedule B-3.2, Page 3, please provide a schedule of amortization of Miscellaneous Intangible Electric Plant showing by vintage, the plant and accumulated reserve as of the date certain, and annual amortization expense.

RESPONSE:

See Attachment "OCC-POD-03-019"

For the annual amortization expense calculation see Staff-DR-43-001

PERSON RESPONSIBLE: Dan Reilly

Account	Vintage	Cost	Allocated Reserve
30300 - Miscellaneous Intangible Pl	1996	(19)	(16)
	1997	456,069	456,069
	1998	717,179	717,179
	1999	304,324	304,324
	2000	894,786	894,786
	2001	6,498,262	6,492,777
	2002	241,633	241,633
	2003	945,045	945,045
	2004	996,412	996,412
	2005	6,677,756	6,677,756
	2006	6,301,119	6,940,718
	2007	634,132	579,568
	2008	273,078	145,589
	2009	1,132,372	598,063
	2010	314,373	1,635,299
	2011	2,978,048	(500,666)
	2012	219,582	(266,893)
		29,584,151	26,857,642
Allocation Percentage		92.257%	92.257%
		27,293,450	24,778,055

Duke Energy Ohio
Case No. 12-1682-EL-AIR
OCC Ninth Set of Interrogatories
Date Received: October 24, 2012

OCC-INT-09-130

REQUEST:

Referring to the response to OCC-POD-03-019, what is the annual amortization for each of the vintages?

RESPONSE:

See attachment "OCC-INT-09-130."

PERSON RESPONSIBLE: Dan Reilly

Account	Vintage	Cost
30300 - Miscellaneous Intangible Pl	1996	(2)
	1997	-
	1998	-
	1999	-
	2000	-
	2001	13,163
	2002	-
	2003	-
	2004	-
	2005	-
	2006	(52,212)
	2007	126,826
	2008	54,616
	2009	219,276
	2010	1,205,276
	2011	589,901
	2012	43,916
		2,200,760
Allocation Percentage		92.257%
		2,030,355

DUKE ENERGY OHIO, INC.
CASE NO. 12-1682-EL-AIR
ACCUMULATED DEFERRED INCOME TAXES
($000)

Tax Interest Accrual - Account 190	$ 2,051
Tax Interest Accrual - Account 283	(727)
Net Tax Interest Accrual ADIT Debit Balance	$ 1,324
Adjustment to Rate Base	$ (1,324)

Source: Staff Report Schedule B-6

Schedule DJE-C-3.1a

DUKE ENERGY OHIO, INC.
CASE NO. 12-1682-EL-AIR
BASE RATE REVENUE
($000 Except per KW)

Average Rate DS Sales 2009 -2011	(000 kWh)		6,560,498
Rate DS Sales per Staff Report	(000 kWh)		6,366,399
Difference	(000 kWh)		194,099
Percentage Difference			3.05%
Test Year Rate DS KW Billed per Staff Report		(000 kW)	19,985
Increase to Test Year KW		(000 kW)	609
Present DS Rate per KW			$ 4.6848
Adjustment to Test Year Revenues Under Present Rates			$ 2,854

Source: Staff file "DukeElectricTariffRevenueFinal(AvgConsumption)"

Schedule DJE-C-3.27a

DUKE ENERGY OHIO, INC.
CASE NO. 12-1682-EL-AIR
MEDICAL COST ADJUSTMENT
($000)

Medical Cost Adjustment, per Staff	$ 708
Adjustment to Pro Forma O&M Expense	$ (708)

Source: Staff Report, Schedule C-3.27

Schedule DJE-C-3.16a

DUKE ENERGY OHIO, INC.
CASE NO. 12-1682-EL-AIR
UNCOLLECTIBLE ACCOUNTS EXPENSE
($000)

Revenue Subject to Uncollectible Ratio per Staff Report	(A)	$494,887
Proposed Adjustment to Base Rate Revenues	(B)	2,854
Adjusted Revenue Subject to Uncollectible Ratio		497,742
Uncollectible Expense Factor	(C)	0.4103%
Annualized Uncollectible Expense		2,042
Annualized Uncollectible Expense per Staff Report	(A)	2,685
Adjustment to Staff Uncollectible Expense		$ (643)

Sources:
(A) Staff Report Workpaper - WPC-3.16a
(B) Schedule DJE-2
(C)

	Time Value Percent	
Jan-12	0.3681%	Company Workpaper WPA-2a
Feb-12	0.3618%	"
Mar-12	0.3593%	"
Apr-12	0.3629%	Response to OCC Int. 03-07
May-12	0.3590%	"
Jun-12	0.3563%	"
Jul-12	0.3569%	"
Aug-12	0.3577%	"
Average	0.3603%	
Collection Costs	0.0500%	Company Workpaper WPA-2a
Total Discount Rate	0.4103%	

Schedule DJE-C-3.5a

DUKE ENERGY OHIO, INC.
CASE NO. 12-1682-EL-AIR
AMORTIZATION OF INTANGIBLE PLANT
($000)

Amortization of General Intangible Plant - Expiring or Discrepancy		
Vintage 2001	(A)	$ 13
Vintage 2007	(A)	127
Vintage 2010	(A)	1,205
Total		1,345
Allocation Percentage	(A)	92.257%
Jurisdictional Amortization		$ 1,241
Amortization of Common Intangible Plant - Expiring		
Vintage 2002	(B)	$ 713
Vintage 2007	(B)	430
Total		1,143
Allocation Percentage to Electric	(C)	83.50%
Electric Amortization		954
Allocation Percentage to Distribution	(B)	44.821%
Jurisdictional Amortization		$ 428
Total Adjustment to Amortization of Intangible Plant		$ (1,669)

Sources:
- (A) Responses to OCC - POD-03-19, OCC Int 09-130
- (B) Response to OCC - POD-12-043
- (C) Staff Report, Schedule B-3.2, Page 4