

THE PUBLIC UTILITIES COMMISSION OF OHIO

IN THE MATTER OF THE COMMISSION'S
REVIEW OF THE STANDARD FILING
REQUIREMENTS FOR RATE INCREASES IN
OHIO ADM.CODE CHAPTER 4901-7.

CASE No. 19-2103-AU-ORD

FINDING AND ORDER

Entered in the Journal on October 20, 2021

I. SUMMARY

{¶ 1} The Commission adopts the proposed amendments to Ohio Adm.Code Chapter 4901-7 on the standard filing requirements for rate increases.

II. APPLICABLE LAW

{¶ 2} R.C. 111.15(B) requires all state agencies to conduct a review, every five years, of their rules and to determine whether to continue their rules without change, amend their rules, or rescind their rules.

{¶ 3} On January 10, 2011, the Governor of Ohio issued Executive Order 2011-01K, entitled "Establishing the Common Sense Initiative," which sets forth several factors to be considered in the promulgation of rules and the review of existing rules. Among other things, the Commission must review its rules to determine the impact that a rule has on small businesses; attempt to balance properly the critical objectives of regulation and the cost of compliance by the regulated parties; and amend or rescind rules that are unnecessary, ineffective, contradictory, redundant, inefficient, or needlessly burdensome, or that have had negative unintended consequences, or unnecessarily impede business growth.

{¶ 4} In addition, in accordance with R.C. 121.82, in the course of developing draft rules, the Commission must conduct a business impact analysis (BIA) regarding the rules. If there will be an adverse impact on business, as defined in R.C. 107.52, the agency is to incorporate features into the draft rules to eliminate or adequately reduce any adverse

impact. Further, the Commission is required, pursuant to R.C. 121.82, to provide the Common Sense Initiative office the draft rules and the BIA.

{¶ 5} Furthermore, Amended Sub.H.B. 166 of the 133rd General Assembly, which became effective on October 17, 2019, adopted a new provision, codified at R.C. 121.95, which states that a state agency, including the Commission, cannot adopt a new regulatory restriction unless it simultaneously removes two or more existing regulatory restrictions. In accordance with R.C. 121.95, and prior to January 1, 2020, the Commission identified rules having one or more regulatory restrictions that require or prohibit an action, prepared a base inventory of these restrictions in the existing rules, and submitted this base inventory to the Joint Committee on Agency Rule Review as well as posted this inventory on the Commission's website at <https://www.puco.ohio.gov/rules/inventory-of-regulatory-restrictions/>. With regard to the amendments discussed in this Order for Ohio Adm.Code 4901-7, we have satisfied the "2-for-1" threshold required by R.C. 121.95. The existing rule restriction inventory for Ohio Adm.Code Chapter 4901-7 identified 548 restrictions, mostly located in the associated appendix, and, after these amendments, this now consists of 524 restrictions, adding 18 restrictions while removing 42 restrictions.

III. PROCEDURAL HISTORY

{¶ 6} Staff evaluated the rules contained in Ohio Adm.Code Chapter 4901-7 and, following Staff's review, proposed amendments to the Appendix, including both substantive and non-substantive changes. Non-substantive changes are intended to improve clarity, streamline language, or correct typographical errors. Substantive changes for certain standard filing requirements for large utilities include, but are not limited to, removing unnecessary or redundant language, specifying supplemental information to be provided to Staff, updating certain components, such as tax, detailed within the required schedules, and detailing operating income schedules. With respect to the standard filing requirements for an abbreviated filing, substantive recommendations include, but are not limited to, clarifying the purpose of an abbreviated filing and certain instructions for completing the application as well as updating the contact information for the Commission's

Docketing Division. The remaining rules in the chapter were, under Staff's proposal, to remain unchanged.

{¶ 7} By Entry issued on December 16, 2020, the Commission requested comments and reply comments on Staff's proposed revisions to Ohio Adm.Code Chapter 4901-7, and ordered that comments and reply comments be filed by January 15, 2021, and January 29, 2021, respectively.

{¶ 8} Consistent with the Entry issued on December 16, 2020, written comments were timely filed by Columbia Gas of Ohio (Columbia), Retail Energy Supply Association (RESA), Duke Energy Ohio, Inc. (Duke), the Ohio Power Company (AEP Ohio), Ohio Consumers' Counsel (OCC), and collectively by The East Ohio Gas Company d/b/a Dominion Energy Ohio (DEO) and Vectren Energy Delivery of Ohio, Inc. (VEDO), in response to Staff's proposed revision. Reply comments were then timely filed by RESA, The Ohio Gas Association (OGA), AEP Ohio, Duke, and OCC.¹

{¶ 9} Lastly, before addressing the proposed changes in the Appendix, we would like to thank all participants for their contributions toward the development of these rules and the insightful comments and reply comments submitted in this proceeding. In some instances, we will be making changes to the structure and content of the Appendix proposed by Staff, often at the suggestion of the comments that we have received. However, due to the volume of materials and time constraints, we will not attempt to address every issue or suggestion raised. In certain instances, we may have incorporated suggested changes or addressed concerns without expressly acknowledging the source of the suggestion in this Finding and Order. To the extent that a comment is not specifically addressed in this Finding and Order, it has been rejected.

¹ On January 29, 2021, DEO/VEDO filed correspondence in this case indicating that they would not be filing reply comments in this proceeding and, instead, endorsed the reply comments submitted by OGA.

IV. COMMENTS AND DISCUSSION ON OHIO ADM.CODE CHAPTER 4901-7

{¶ 10} We again note that Staff proposed no changes to the actual rule language contained in Ohio Adm.Code 4901-7-01; rather, all proposed changes were made in the Appendix of that rule. Similarly, no interested stakeholder proposed additional changes to the rule language. The proposed changes to the Appendix are discussed below.

A. *Chapter I of the Appendix²- General Instructions*

{¶ 11} Staff did not suggest any changes to Chapter I of the appendix, which provides instructions affected entities must follow to properly provide notice of intent to file an application for an increase in rates. Similarly, no filed comments discussed this chapter of the Appendix. As such, the Commission finds no changes to be necessary.

B. *Chapter II of the Appendix³ – Standard Filing Requirements (Large Utilities)*

{¶ 12} As an initial threshold matter, OCC argues that it is imperative for consumer protection that OCC, and in some instances the other parties involved in the proceeding, be provided with copies of all schedules, work papers, and any other supplemental information that the utilities file with their applications in order to fully, as well as expeditiously, evaluate the impact of the utility's filing on consumers. In making its overarching request, OCC cites to R.C. 4911.09, which states that the Commission "shall supply [OCC], without cost to counsel, with all books, maps, charts, and such other items as may be necessary for carrying out the purposes of Chapters 4909 and 4911 of the Revised Code." As such, OCC recommends that the Commission amend the Appendix to specifically prescribe that the standard filing requirements are "designed to assist the Commission *and parties* in performing a thorough and expeditious review of applications for rate increases," while requiring that the requisite information be provided to Commission Staff and other interested parties concurrently. Similarly, OCC suggests, as to Division (A)(3), to add language requiring the utility to provide any supplemental information requested by the

² Chapter I begins on Page 7 of the Appendix attached to this Finding and Order.

³ Chapter II begins on Page 8 of the Appendix attached to this Finding and Order.

Commission during the course of the investigation to all involved parties or require it to be filed in the docket for review. OCC suggests similar language revisions regarding Divisions (A)(4)(d), (A)(5)(d), (A)(7), (A)(8), and (A)(9) to likewise recognize that any information provided to the Commission or its staff by the utility during a rate case proceeding should likewise be provided to OCC and other parties. Also, in respect to Division (A)(9), OCC further requests that the Commission reject Staff's recommendation to eliminate the standard filing requirement for Staff's ability to use the information provided to determine if "specific areas of a company's management and/or operations should be the subject of further investigation." (OCC Initial Comments at 3-9.)

{¶ 13} In response to OCC's request to amend certain portions of the Appendix in order to require the utility to provide OCC, as well as other parties, copies of all documentation provided to Staff for its review of an application, OGA first contends that the existing discovery process and regulatory framework has worked effectively for many years and OCC fails to demonstrate how it is has been harmed by the existing process, relying instead on vague assertions that utilities have not been forthcoming with this information to OCC or other parties during rate case proceedings. OGA also argues that OCC's proposal would result in considerable administrative burden. Thus, OGA claims OCC has not provided any justification for changing the existing rules, which strike an appropriate balance toward the provision of information and transparency during rate case proceedings. (OGA Reply Comments at 1-2.) AEP Ohio and Duke similarly find OCC's request to be meritless, agreeing with OGA that the purpose of the standard filing requirements are to assist the Commission, and not OCC, in performing a thorough and expeditious review of applications for rate increases. Again, AEP Ohio notes that OCC may request any information it deems necessary to review an application during the discovery process, upon being granted intervention. (AEP Ohio Reply Comments at 3-4; Duke Reply Comments at 1.)

{¶ 14} The Commission agrees with the comments submitted on behalf of OGA, AEP Ohio, and Duke and find that OCC has failed to demonstrate how the existing

discovery paradigm has harmed its efforts to obtain the relevant information during a rate case proceeding. Moreover, if the General Assembly had intended OCC to be treated equivalent to Staff in proceedings pursuant to R.C. 4909.15, it would have specifically stated so. Instead, as noted by several commenters, the Commission is charged with making the determinations referenced in the statute. OCC is provided the opportunity for full and fair discovery upon intervention in these proceedings. Despite its allegations to the contrary, we find that OCC, as well as any other interested party historically involved in these types of proceedings, have had ample opportunity to participate in these cases, most notably during discovery. As such, we find no reason to adopt OCC's recommendation to modify the process for filing an application pursuant to R.C. 4909.15.

{¶ 15} **Division (A)(6)** - AEP Ohio recommends that the Commission modify Staff's proposed amendment to subsection (A)(6)(a) to make clear that the proposed adjustments made to operating income items refers to the adjustments included in Schedule C-3, which is the Summary of Jurisdiction Adjustments for Operating Income. However, in the event Staff believes this proposed language refers to other adjustments, AEP Ohio requests clarification as to which proposed adjustments Staff is referring to in the proposed language. (AEP Ohio Initial Comments at 2.) Further, Duke proposes to include the phrase "test period or during the" before the reference to the 12-month period, in order to more closely align the rule's language with the statutory language set forth in R.C. 4909.15(D) (Duke Initial Comments at 1).

{¶ 16} We find that AEP Ohio's recommendation does not reflect the intent of the proposed language, recognizing that, if Staff wanted to limit the enumerated adjustments to those contained on Schedule C-3, Staff would have specifically noted so. Rather, this language intends to capture *any* adjustments made to operating income items that fall within the stated conditions and, thus, could possibly include adjustments falling outside of Schedule C-3. Moreover, this newly proposed directive is consistent with the level of detail in the remaining portions of Division (A)(6)(a) that speak to base and operating income items. We believe the rule provides sufficient clarity for the companies' continued

compliance. Contrarily, the Commission finds Duke's suggestion to be well founded and, as such, has amended the Appendix accordingly.

{¶ 17} Division (A)(9)(d) - As discussed further below, Staff proposes to delete certain portions of Division (B)(9); however, if these proposals are adopted, DEO/VEDO assert the first sentence in Division (A)(9)(d) appears unnecessary and could ultimately be deleted or, alternatively, be revised (DEO/VEDO Initial Comments at 2).

{¶ 18} The Commission agrees with the comments submitted by DEO/VEDO and has modified the language accordingly.

{¶ 19} Division (B)(8) - OCC suggests that the Commission should modify this rule to include requiring the utility to provide information about the utility's corporate governance and lobbying efforts, in response to the events leading up to, as well as the consequences resulting from the passage of, Am.Sub. H.B. No. 6. OCC adds this revision is necessary to protect consumers from inappropriate and excessive lobbying efforts and to improve transparency in this arena. (OCC Initial Comments at 9-10.)

{¶ 20} OGA and Duke take issue with OCC's suggestion to modify Division (B)(8), noting the proposed change is unnecessary and, if adopted, would raise serious jurisdictional concerns. OGA first notes that if the regulatory-related activities are relevant to the cost of service, the associated costs would be subject to review and the discovery process; however, if found to be irrelevant to the cost of service, there would be no basis for requiring the information as part of every rate case. Additionally, OGA adds that the Commission has several tools at its disposal if it believes a more thorough review of this information is necessary. Lastly, OGA asserts that OCC's recommendation suggests that the Commission collect information over non-regulated affiliates of natural gas distribution utility companies, which the Commission lacks jurisdictional authority to do so. Duke adds that utilities do not seek recovery of any lobbying or regulatory relations expenses in their base rate filings. (OGA Reply Comments at 2-3; Duke Reply Comments at 2.)

{¶ 21} The Commission finds that OCC's proposed modification to Division (B)(8) is unnecessary at this time. Duke aptly raises the fact that, as a matter of law, political and charitable contributions have long been excluded from test year expenses. See e.g. *In re the Application of The Cleveland Elec. Illum. Co.*, Case No. 79-537-EL-AIR, Order on Rehearing (Jan. 21, 1981); *In re the Application of The Cleveland Elec. Illum. Co.*, Case No. 88-170-EL-AIR, Opinion and Order (Jan. 31, 1989). Although, as OGA raises, the Commission is, nonetheless, armed with several methods to investigate and review such expenses if determined to be necessary and within the scope of discovery during a rate case proceeding. However, that is a determination that should be made on a case-by-case basis. As such, we find it unnecessary to adopt OCC's recommendation.

{¶ 22} **Division (B)(9)** – Although AEP Ohio does not object to Staff's proposed amendment to Division (B)(9) to allow Staff to file a letter in the docket setting forth any functional areas a utility must discuss, as opposed to the three functional areas that are currently permitted under the rules, AEP Ohio stresses the importance that the Staff letter be filed within ten business days after the company files its notice of intent to afford the company a fair opportunity to address each of the functional areas Staff includes in its letter (AEP Ohio Initial Comments at 2).

{¶ 23} Duke posits a different argument, noting that the work required to provide Staff the requisite information on three functional areas was considerable, adding that to provide that same amount of information for an unlimited number of functional areas would be unduly burdensome and add very little value to Staff's inquiry. Thus, Duke suggests maintaining the current three functional areas in the existing rule. Duke also requests clarification as to whether Divisions (B)(9)(a)(i) and (ii) should have been deleted. (Duke Initial Comments at 1-2; Duke Reply Comments at 2.) Columbia also argues that, as proposed, the new requirement creates the potentially burdensome mandate that a company address a limitless number of subjects while, at the same time, it strives to finalize its rate application. Further, elimination of the clause explaining the list of functional areas

at the end of the first paragraph in Division (B)(9) creates confusion in the rule. (Columbia Initial Comments at 1-2.)

{¶ 24} Recognizing the equitable balance struck during a prior rulemaking over the standard filing requirements, which limited the initial provision of information to three functional areas identified by Staff without restricting its overall investigatory authority, DEO/VEDO at the very least question the intent behind certain recommendations of Staff and oppose any changes intended to expand the existing filing requirements. See *In re the Commission's Review of the Standard Filing Requirements for Rate Increases in Ohio Adm.Code Chapter 4901-7*, Case No. 08-558-AU-ORD, Finding and Order (May 13, 2010) at ¶ 21. Initially, DEO/VEDO note that the sentence proposed to be added to Division (B)(9) that requires a utility to discuss “all pertinent elements of the applicant’s management practices described in Division (B)(8) of this appendix as well as any other areas identified by the staff,” appears to be duplicative of a similar sentence and recommends that one of the sentences be deleted. DEO/VEDO also take issue with Staff’s proposal relating to the provision of information as to “any” functional areas identified by Staff to be discussed, as they argue that amendment would run contrary to the rationale adopting the limitation of three functional areas in the prior rulemaking. DEO/VEDO suggest either modifying the language to indicate “up to” three functional areas or, if the intent is to provide Staff with the discretion to identify more than three functional areas, simply rejecting the proposal. DEO/VEDO oppose the additional language referencing “any other areas identified by staff” for the same reasons, if this language is meant to expand the prior limitations set forth in this rule. Finally, DEO/VEDO request clarification as to whether the enumerated list of possible functional areas was meant to be deleted in its entirety, as only two remain in the list. (DEO/VEDO Initial Comments at 2-4.)

{¶ 25} As to the comments regarding the functional areas, it is not our intent to unduly burden an applicant with an unlimited number of functional areas to be discussed in the application. The entire purpose of that discussion remains to facilitate a more focused review of the issues pertinent to each individual applicant. Staff will continue to proceed

under the rules with that understanding in mind, which it has successfully achieved in its decades of conducting such reviews. However, in the event Staff determines additional functional areas are required to be discussed, we find it is essential to provide them the discretion to make that request. The Commission is statutorily charged with the duty to conduct thorough reviews in base distribution rate cases that come before us. This must be the first, and foremost, consideration as we deliberate the comments filed in this proceeding. Moreover, as noted in the prior rulemaking cited by DEO/VEDO, nothing prevents a utility that intends to file an application to increase rates from requesting Staff to identify the functional areas of concern prior to filing its notice of intent. Finally, we agree with DEO/VEDO and Duke that the enumerated list of functional areas set forth in Division (B)(9)(a) was meant to be deleted in its entirety and have modified the Appendix, accordingly.

{¶ 26} **Division (C)** – Columbia supports Staff’s proposed changes to Division (C), noting that the documents removed from the list of required disclosures are all publicly available on the internet from a variety of sources (Columbia Comments at 2). AEP Ohio does not oppose Staff’s proposed amendments to this section; however, AEP Ohio notes that the subsection numbering does not currently reflect the deletions proposed by Staff and requests that the subsections be renumbered accordingly (AEP Ohio Initial Comments at 2).

{¶ 27} Duke suggests including subsection (i) in Division (C)(13) to indicate the amortization of excess deferred income tax (EDIT) in the federal income tax information to be submitted. Additionally, as to Division (C)(15), Duke recommends including language to clarify that only advertising expenses that are being requested for recovery by the utility included in the test period are required to be provided. Finally, given utilities’ increasing reliance on service company employees, Duke also recommends eliminating the requirement to provide “[t]est year and two most recent calendar years’ employee levels by month.” (Duke Initial Comments at 2-3.)

{¶ 28} Similar to its earlier requests regarding the provision of information to OCC and other parties involved in the rate case, OCC suggests that the Commission should modify Division (C)(1)-(4) to require providing all utility supplemental information to OCC and other parties, in addition to Staff of the Commission's Rates and Analysis Department. Additionally, OCC recommends that the Commission reject Staff's proposal to remove from the rule the first four documents currently required as part of the supplemental information, which includes securities and exchange forms, annual reports, FERC report, and stock and bond prospectuses. (OCC Initial Comments at 10-11.)

{¶ 29} OCC's suggestion to modify Division (C)(1)-(4) should be denied for the same reasons illustrated earlier in this Finding and Order. As to OCC's opposition to the elimination of certain supplemental information to be provided at filing, we agree with Columbia that this information is publicly available and, thus, easily accessible for parties to obtain during the course of a rate case proceeding. Similarly, we find it necessary to maintain the language set forth in Division (C)(22) regarding employee levels and, thus, reject Duke's recommendation to eliminate that requirement. Similar to our findings in the prior rulemaking considering the standard filing requirements, the jurisdictional labor allocation methodology and cost recovery is an essential step in the Staff's investigation. See *In re the Commission's Review of Ohio Adm.Code Chapter 4901-7*, Case No. 12-2338-AU-ORD (2012 Rules Proceeding), Finding and Order (Apr. 2, 2014) at ¶¶ 9-10. That analysis includes evaluating the companies' employee levels and changes thereto over the three-year period. We do not see, nor has Duke persuaded us that there is, a burden in continuing to require the employee levels by month. However, the Commission does find merit in Duke's suggestions to require the amortization of EDIT and clarify that utilities will only be required to provide those advertising expenses included in the test year. Furthermore, we have corrected the paragraph numbering issues identified by AEP Ohio.

{¶ 30} **Division (D)** - While Staff proposed to delete the phrase "provided at audit" from the heading, Duke, AEP Ohio, Columbia, and DEO/VEDO request that language be added to clarify when the information listed in the section will now be required or indicate

that it will be available upon Staff's request. DEO/VEDO notes that the timing required by this rule was helpful to spread out the filing burden associated with rate cases and, to their knowledge, did not hinder the review process in any way. Regardless, DEO/VEDO also requests that the Commission permit utilities to make certain information, if voluminous or not readily available for electronic production, available on site for Staff's review, as has been the practice in past rate proceedings. (Duke Initial Comments at 3; DEO/VEDO Initial Comments at 4-5; Columbia Initial Comments at 2-3; AEP Ohio Reply Comments at 1.)

{¶ 31} After reviewing the comments, the Commission agrees that more clarity is required as to the timing of the provision of the supplemental information identified in Division (D). As such, we believe the most appropriate time to provide such information to Staff, if applicable, is at the time the application is filed. The Appendix has been amended accordingly. Furthermore, in response to DEO/VEDO's request to permit utilities to make certain information available for onsite review, we find such an allowance to be unnecessary. Utilities have been able to produce the required information listed in Division (D) to Staff in the past without issue. Moreover, if the utility does anticipate difficulties with the production of certain information, it retains the opportunity to file a request for waiver of the rule near the time it files its application, if necessary.

{¶ 32} Division (D)(3) - Additionally, Duke contends the newly proposed Division (D)(3) is unnecessary, given there are no utilities in Ohio currently providing both competitive and noncompetitive services. Alternatively, if Staff was instead referring to those utilities that have affiliates who provide competitive services, Duke notes that the proposed language remains unnecessary as utilities and their affiliates are required to keep assets and accounting separate pursuant to corporate separation rules, further adding that this information should already be provided or made available by utilities under those same corporate separation rules.

{¶ 33} In response to Duke's comments, RESA notes that there is a general prohibition that an electric distribution utility may not provide competitive service;

however, R.C. 4928.17 expressly carves out an exception which allows an electric distribution utility to provide its standard service offer, or default service, for those customers who either decide not to choose a different electric supplier or whose supplier terminates service. Despite the existing bar on the Commission from setting rates for competitive service, RESA claims current electric distribution rates often include the recovery of costs incurred by the utility to provide the standard service offer, thus, misleading customers as to the relative cost of the standard service offer and resulting in less efficient and fair competitive markets. According to RESA, the Commission will promote improved economic outcomes by rejecting Duke's recommendation, while also requiring the identification and removal of revenues, expenses, and plant used to provide the standard service offer from the calculation of base distribution rates. (RESA Reply Comments at 3-5.)

{¶ 34} Although the proposed change in proposed Division (D)(3) will consider the identification and separation of competitive and non-competitive services in its review of an application to increase rates, RESA suggests that the proposed changes to the standard filing requirements end with the change to the supplemental filing requirement recommended for this limited aspect of the Appendix. Specifically, RESA notes that, to the extent that revenues, expenses, or plant in service are identified, there is no provision to adjust plant accounts, revenues and expenses, or the cost of service study to remove them from the calculation of base distribution rates. (RESA Initial Comments at 3-5.) RESA contends that the Commission should allow modifications to the various schedules used to calculate the revenue requirement that would be affected by removing revenue, expenses, and plant in service used to support the standard service offer, noting further that the cost of service study should only include that revenue and those expenses that are properly assignable to base distribution service, consistent with Ohio law. RESA recommended that this requirement be revised to include specific accounts that must be addressed, as well as explanations if those accounts were not assigned or allocated to competitive services.

However, RESA makes no specific reference to what changes it believes would be necessary to effectuate its comments. (RESA Initial Comments at 10-11.)

{¶ 35} In response to RESA's general policy suggestions, OGA and Duke contend this is not the appropriate forum to raise these arguments, noting that the standard filing requirements establish the uniform means by which an application for an increase in rates is to be presented to the Commission for review. Instead, OGA argues that RESA's suggestions should be raised in the rate cases themselves, as RESA has done in several recent rate cases, which, according to OGA, the Commission ultimately rejected. (OGA Reply comments at 3-4; Duke Reply Comments at 2.) AEP Ohio concurs with OGA and argues that the Commission, as well as intervening parties, would have the ability to review and engage in discovery to ensure that the utilities' costs and rates are unbundled on a case-by-case basis (AEP Ohio Reply Comments at 4-5). OCC likewise finds RESA's recommendations to be unnecessary, as it claims the standard filing requirements schedules already accommodate RESA's requested calculations. For instance, according to OCC, the plant schedules already show additions, retirements, and transfers since the date certain in the last rate case. (OCC Reply Comments at 3.)

{¶ 36} Upon review of the comments, the Commission agrees that the newly proposed Division (D)(3) is unnecessary and, therefore, we have eliminated the relevant language from the attached Appendix. To the extent additional information is required during Staff's review of the application, it can be requested through the discovery process, to the extent necessary. Along those same lines, we find RESA's recommendations to be more appropriate to raise in the actual rate case proceedings, rather than this general rulemaking, as argued by OGA and Duke.

{¶ 37} Division (D)(3)(d) - Duke also takes issue with Staff's proposal to require utilities to file their current CAM under existing Division (D)(3)(d). Duke notes that the CAM is already available for audit by Staff at any time under the current rules and would be burdensome to file, given its large size. However, if the Commission adopts the proposed

addition, Duke requests that the language be modified in order to allow utilities to file the CAM under seal so that it may remain confidential. AEP Ohio supports Duke's comments as to this issue. (Duke Initial Comments at 3-4; AEP Ohio Reply Comments at 2.) DEO/VEDO and Columbia suggest defining CAM as the "cost allocation manual" to avoid any ambiguity in the rule. Further, as written, DEO/VEDO argue the rule could be interpreted as requiring Commission approval to implement a change in an internal cost allocation factor, which, according to the utilities, the Commission lacks the specific statutory authority to impose. In order to avoid the existing ambiguity issues with a default measure as proposed by Staff, DEO/VEDO suggest that the rule, instead, require the most recent CAM, "including the actual allocation factors where applicable." DEO/VEDO add that if a specific case warrants further review of the CAM, that can be resolved during the discovery process. (DEO/VEDO Initial Comments at 5-6.)

{¶ 38} Columbia notes that, as applicable to natural gas utilities, the statutory support for Division (D)(3)(d) as a whole is unclear and requests that, if Staff intends this new subpart to apply only to electric utilities required to maintain CAMs under Ohio Adm.Code Chapter 4901:1-37, the language should be revised to reflect that intent. Further, Columbia asserts Staff's request for companies to provide details of the "specific change requested" and to "provide a detailed rationale" for changes to its CAM appears to be duplicative of other requirements, specifically noting that a description of each basis of allocation, which are approved by the Securities and Exchange Commission (SEC) and filed annually with the Federal Energy Regulatory Commission (FERC), is provided in a contract that is submitted in compliance with subpart (a). Subpart (d)'s requirement to quantify the impact of each change in the CAM would require substantial work and would add to the costs of the rate case. Columbia questions whether this additional cost is necessary given the fact that the bases of allocation were reviewed and approved by the SEC and are filed annually with the FERC. (Columbia Initial Comments at 2-3.)

{¶ 39} Initially, we agree that CAM should be defined as the "cost allocation manual" to avoid any ambiguity and have, thus, adopted the change proposed by

DEO/VEDO and Columbia. Furthermore, we find DEO/VEDO's comments to be persuasive regarding the actual allocation factors and have amended the Appendix accordingly. Recognizing several utilities concerns related to the filing of the CAM, the Commission finds that, while we believe the CAM is a necessary component of Staff's review of rate case applications and should remain a provision of the standard filing requirements, we believe the rule language can be adjusted to make this requirement less burdensome for the subject utilities. As such, we will no longer require the CAM to be filed; rather, the current CAM of each utility filing a rate case application will be required, if applicable, to be provided to Staff at the time the application is filed. As noted above, the utility always has the opportunity to file for a waiver of the rule requirement near the time it files an application. In addition to being more amenable to the subject utilities, we find this change to be consistent with the provision of other supplemental information required by Division (D)(3).

{¶ 40} Divisions (D)(11)-(D)(13) - AEP Ohio recommends that the Commission modify Staff's proposed changes to Divisions (D)(11) and (12) to account for instances in which an applicant files its case prior to a budget approval for a portion of the test period, to ensure consistency between the two subsections and provide flexibility to allow AEP Ohio's current budget approval process to meet the requirements of the rule. AEP Ohio adds that the proposed prohibition on filing a rate case until a budget for forecasted data is approved serves no purpose, and creates an unnecessary and unreasonable barrier for a utility preparing to file such a case. Moreover, AEP Ohio argues that this requirement would be inconsistent with the rules permitting the use of forecasted data and, more specifically, Division (D)(12), which permits an applicant to submit forecasted data that is different than budgeted data provided the applicant provides a reconciliation of the corporate budget and the forecasted data. As such, AEP Ohio suggests allowing an applicant to provide the corporate budget at the time of filing, if available, or within 30 days of the budget completion for forecasted data included in the filing if the approved budget is not available at the time of filing. (AEP Ohio Initial Comments at 3-4.)

{¶ 41} Additionally, AEP Ohio recommends that the Commission reject the requirement that the applicant's president attest to the fact that the budget used to prepare the test year information is the actual budget that was approved by the president and the board of directors, given that AEP Ohio's board of directors do not approve its corporate budget. By striking "that was approved by the President and the Board of Directors" from the proposed amendment, AEP Ohio claims the amendment will still serve Staff's purpose of requiring the president to attest to the validity of the budget while also providing flexibility with company internal processes. (AEP Ohio Initial Comments at 4.) Noting many of the same concerns as AEP Ohio, DEO/VEDO also suggests several recommendations to the language set forth in (D)(11), noting that much of the proposed additional language conflicts with internal business practices, is unnecessary or duplicative, or could be determined through the discovery process (DEO/VEDO Initial Comments at 7). Columbia also asserts that Staff's proposed language added to new Divisions (D)(11) through (13) would require extensive information related to company budgets, relying on implicit assumptions that could render compliance impossible. Further, Columbia contends the language falsely assumes that every utility's corporate budget is approved by these two parties, resulting in utilities utilizing different methods of approving budgets to seek waivers of this rule with every filing. The more appropriate avenue to avoid numerous waiver requests, according to Columbia, would be to simply have Staff obtain the information through data requests. Further, Columbia questions whether so much information is necessary for staff's review given that the budget is later trued up with actual information. (Columbia Initial Comments at 2.)

{¶ 42} AEP Ohio also recommends that the Commission modify Staff's proposed language in Division (D)(12) to clarify that an applicant is to provide, where applicable, a reconciliation of forecasted data used in the test year and the corporate budget. Finally, AEP Ohio adds that subsections (D)(3)-(22) need to be renumbered to reflect the inclusion of Staff's proposed (D)(3). (AEP Ohio Initial Comments at 5.) DEO/VEDO note that if the Commission accepts their proposal to make the supplementary information specified in

Division (D) available at Staff's request, as opposed to the time of the filing, the requirement that a witness be identified and testimony be provided to support the budget reconciliation would not be necessary (DEO/VEDO Initial Comments at 8).

{¶ 43} Although they do not oppose to making the data referenced in proposed (D)(13) available to Staff upon request, DEO/VEDO first note that the word "complete" is ambiguous and unnecessary, adding that Staff will be able to address any deficiencies in the utility's provision of information during its review. Additionally, and similar to their other suggestions, DEO/VEDO propose to delete the second sentence regarding the identification of a witness. (DEO/VEDO Initial Comments at 8-9.)

{¶ 44} In response to the comments submitted, we have made extensive revisions to this portion of the Appendix which reflect the reality of utilities employing varying internal processes related to their budget approval process. As amended, we believe this strikes the necessary flexibility in the language for utilities to comply with these requirements, as well as provide Staff with the information it requires to conduct its review. As we have declined to adopt DEO/VEDO's recommendation as to the timing that this information is to be provided to Staff, we note that utilities will still be required to identify a witness supporting the budget. We have also replaced the reference of a "complete" description in (D)(13) to, instead, a "detailed" description, in response to DEO/VEDO's comments. The attached Appendix is also renumbered correctly based on these revisions.

1. Section A: Revenue Requirement (Large Utilities):

{¶ 45} In response to Staff's proposed additional language "[u]ncollectible expenses recovered in its entirety in a separate rider shall also be omitted," Columbia requests clarification on the purpose of the clause "in its entirety," noting that it recovers its uncollectible expense for Large General Service customers in base rates, albeit not through the gross revenue conversion factor (Columbia Initial Comments at 3).

{¶ 46} AEP Ohio and Duke recommend that the Commission reject Staff's proposed amendment language to Section A (C), which would require the utility to exclude the Commission and OCC assessment fees from the gross revenue conversion factor. Noting that these fees are allocated to all utilities based on revenue, AEP Ohio argues that omitting them would ignore the direct relationship between the revenues collected by a utility and the assessment fees incurred. Thus, AEP Ohio and Duke argue that utilities should continue to be allowed to properly account for increases in these assessment fees for additional revenue reflected in base rates, as provided in the existing rules. (AEP Ohio Initial Comments at 5-6; AEP Ohio Reply Comments at 2-3; Duke Initial Comments at 4-5.)

{¶ 47} OCC disagrees with the arguments presented by AEP Ohio and Duke, contending that the assessment fees do not belong in the gross revenue conversion factor as this factor only considers the increase in taxes and uncollectibles on the additional revenue being authorized (OCC Reply Comments at 5).

{¶ 48} Duke also suggests revising the proposed addition of the number "329%" on Schedule A-2 to 1.329 or, as a percentage, 132.9 percent (Duke Initial Comments at 5). DEO/VEDO suggest that "conversation" should be changed to "conversion" and "expenses" should be changed to "expense" in Paragraph (C) in the instructions. Furthermore, in Schedule A-2, DEO/VEDO recommend that additional language be added to the footnotes. (DEO/VEDO Initial Comments at 9-10.)

{¶ 49} We agree with Columbia's initial comments regarding its concern with the phrase "in its entirety." We have amended the rule to reflect that utilities should not include uncollectible expenses if they are recovered in a separate rider. Additionally, despite AEP Ohio and Duke's arguments to the contrary, we concur with Staff and find it appropriate to exclude Commission and OCC assessment fees from the gross revenue conversion factor. As recognized by OCC, Schedule A-2 is fundamentally designed to determine the effect of any increase in taxes and uncollectibles on the additional revenue being authorized that are not otherwise collected in separate riders, as bolstered by the footnotes contained in that

schedule. We have also made several minor revisions to Paragraph (C) of the instructions, as well as Schedule A-2, in response to the comments received.

2. Section B: Rate Base (Large Utilities):

{¶ 50} Duke opposed the proposed addition of the phrase “by year, by month” to this section, arguing that monthly data would be very burdensome using its existing systems and placing such data into Schedule B-2.3 would generate a very confusing document to read. Similar to its opposition to other proposed language, Duke suggests this modification is unnecessary given that Staff can pursue these additional details during the discovery process if it so chooses. (Duke Initial Comments at 5.) DEO/VEDO agree with Duke’s suggestions, noting that they are not aware of any purpose to be served by requiring all utilities in every case to provide plant activity from the last rate case date certain to the new date certain by month and would, therefore, recommend the Commission deny this proposed revision (DEO/VEDO Initial Comments at 10).

{¶ 51} Moving to Staff’s suggestions for the Section B instructions regarding working capital, Duke recommends inserting the words “cash” and “other” to specify the type of information required to be inserted in Schedules B-5 and B-5.1, as well as making any requisite changes to the actual schedule to reflect these more detailed instructions. (Duke Initial Comments at 5-6.) AEP Ohio supports Duke’s proposed modification to clarify that (E)(1) applies to allowances for cash working capital (AEP Ohio Reply Comments at 3).

{¶ 52} AEP Ohio also recommends that the Commission adopt an addition to Staff’s proposed amendment to Section B (F)(1) to include “unamortized deficit deferred income taxes,” to reflect a situation where a utility has recovered its federal income tax taxes and there is an increase in the corporate tax rate, thereby creating deficit deferred income taxes (AEP Ohio Initial Comments at 6).

{¶ 53} Duke requests that the reference to “Pollution Control Projects” be deleted from Schedule B-4, as it is obsolete. Duke also suggests replacing the phrase “purchasing

power” with “inflation” in Schedule B-4.2, which, according to Duke, would be a more accurate representation of the requested information. (Duke Initial Comments at 6.)

{¶ 54} While we agree having the aforementioned plant property account information delineated by year and month may be beneficial to Staff’s review, we are persuaded by Duke’s comments to amend the requirement so that such information is included in a separate workpaper to be provided by the utility, rather than Schedule B-2.3. The Commission is required, pursuant to R.C. 4909.15, to determine the valuation as of the date certain of the property of a utility. In order to make this valuation, the Commission must compare the property used and useful during the last rate case to the property used and useful in the current case. This additional information contained in a separate workpapers will assist Staff with its review of the ultimate valuation, especially if numerous years have passed since the last rate case. Turning to Duke’s recommendations regarding the Section B instructions related to working capital, the Commission has previously addressed Duke’s similar comments in the *2012 Rules Proceeding*, in which we determined Duke’s suggestion was unnecessary, as the affected schedules are clear and require no further exposition. See *2012 Rules Proceeding*, Finding and Order (Apr. 2, 2014) at ¶ 20. Additionally, we continue to find that the more appropriate mechanism for resolving the treatment of working capital would be determined in an actual rate case, rather than a rule proceeding such as this. The Commission does, however, find AEP Ohio’s suggestion to subsection (F)(1) to be reasonable and have made the requisite changes to the attached Appendix. We find no other modifications to this section, or its associated schedules, are necessary.

3. Section C: Operating Income (Large Utilities)

{¶ 55} In order to align with the newly added Section C instruction (B)(4), DEO/VEDO suggest that Schedule C-2 and C-3 formats should reflect separate line items for rider revenues and expenses (DEO/VEDO Initial Comments at 11). Further, for clarification purposes, Columbia further requests that the qualifying sentence “that are not

being proposed to be incorporated in base rates” be added to the end of new Division (B)(4) (Columbia Initial Comments at 3).

{¶ 56} In the Section C Instructions, Part D, Account analyses, Duke opposes the entirety of the proposed addition to Section (D)(7), which provides “[t]he data should reflect the data provided in the C-9 and should clearly identify total labor for the regulated entity seeking a rate case.” Duke asserts it would be impossible to isolate labor hours on Schedule C-9.1 and to reconcile the data with Schedule C-9 when small amounts of time are allocated to the utility from any service company employees and, thus, suggests that the Commission reject this proposal. (Duke Initial Comments at 7.)

{¶ 57} Specific to Schedule C-11.3, Duke suggests that the entire “Average Revenue per Customer” section be deleted. Recognizing the implementation of customer choice in Ohio, Duke argues this section no longer conveys meaningful information since many of Duke’s customers obtain generation service from suppliers rather than Duke’s standard service offer. (Duke Initial Comments at 8.)

{¶ 58} The Commission finds DEO/VEDO and Columbia’s recommendations reasonable and, thus, has modified the Appendix accordingly. As to Duke’s comments regarding Part D, and consistent with our findings in the *2012 Rules Proceeding*, the jurisdictional labor allocation methodology and cost recovery is an essential step in the Staff’s investigation of labor expenses. As such, we continue to find that total company payroll information constitutes an important component of the rate case application evaluation. Therefore, Duke’s arguments are misplaced and the language should be adopted, as proposed by Staff. Similarly, we do not find Duke’s suggestion regarding Schedule C-11.3 to be necessary at this time.

4. Section E: Rates and Tariffs

{¶ 59} Similar to its recommendations for Schedule C-11.3, in Section E Instructions (A), General, Duke suggests that existing Divisions (A)(1), (A)(2), (A)(3), (A)(4), and (A)(6)

be deleted as obsolete as they no longer provide any meaningful information, given that many of Duke's customers obtain generation service from electric suppliers. In Divisions (C)(2)(b) and (c), regarding the Section Instructions for Revenue, Duke recommends inserting the word "jurisdictional" in the section headings for clarity, as well making complementary changes in Schedules E-4, E-4.1, and E-4.3. Finally, as to Schedule E-5, Duke suggests adding a footnote to the column titles "Current Bill" and "Proposed Bill" to acknowledge that the total bill for non-switching customers will be calculated at current transmission and distribution rates. (Duke Initial Comments at 8-9.)

{¶ 60} Upon review, there does not appear to be any reason to make the modifications requested by Duke. Thus, these recommendations will be rejected.

C. Chapter IV of the Appendix - Standard Filing Requirements (Abbreviated Filing)

{¶ 61} Division (A)(1) – Columbia notes that Staff proposes that applicants have "supplemental schedules" on file for the most recent calendar year and at least two prior years. As "supplemental schedules" is not defined, Columbia requests that a definition or clarifying language be added to specifically identify what schedules are being referenced here. (Columbia Initial Comments at 3.)

{¶ 62} We find Columbia's suggestion to be reasonable and have amended the Appendix accordingly.

V. CONCLUSION

{¶ 63} In making its rules, an agency is required to consider the continued need for the rules, the nature of any complaints or comments received concerning the rules, and any factors that have changed in the subject matter area affected by the rules. The Commission has evaluated Ohio Adm.Code 4901-7-01, as well as the associated appendix, and recommends amending the rule as demonstrated in the attachment to this Finding and Order.

{¶ 64} An agency must also demonstrate that it has included stakeholders in the development of the rule, that it has evaluated the impact of the rule on businesses, and that the purpose of the rule is important enough to justify the impact. The agency must seek to eliminate excessive or duplicative rules that stand in the way of job creation. Moreover, the agency must remove two or more existing regulatory restrictions for every new regulatory restriction added. The Commission has included stakeholders in the development of these rules, has sought to eliminate excessive or duplicative rules that stand in the way of job creation, and has adhered to the requirement regarding the removal of regulatory restrictions. Furthermore, to the extent interested stakeholders have identified numbering deficiencies resulting from the deletion or addition of language in the Appendix, the Commission has remedied those inconsistencies in the attachment.

{¶ 65} Accordingly, at this time, the Commission finds that amendments to Ohio Adm.Code 4901-7-01, including the Appendix, should be filed with the Joint Committee on Agency Rule Review (JCARR), the Secretary of State, and the Legislative Service Commission (LSC). In order to avoid needless production of paper copies, the Commission will serve a paper copy of this Order only and will make the rule, as well as the business impact analysis, available online at the Commission's website: www.puco.ohio.gov/puco/rules. All interested persons may download the rule and the business impact analysis from the above website, or contact the Commission's Docketing Division to be sent a paper copy.

VI. ORDER

{¶ 66} It is, therefore,

{¶ 67} ORDERED, That amended Ohio Adm.Code 4901-7-01, including the Appendix, be adopted. It is, further,

{¶ 68} ORDERED, That the amended rule and Appendix be filed with JCARR, the Secretary of State, and LSC, in accordance with Divisions (D) and (E) of R.C. 111.15. It is, further,

{¶ 69} ORDERED, That the final rule be effective on the earliest date permitted. Unless otherwise ordered, the five-year review date for Ohio Adm. Code 4901-7-01 shall be in compliance with R.C. 119.032. It is, further,

{¶ 70} ORDERED, That a copy of this Finding and Order, with the rules and BIA, be served upon the Common Sense Initiative at CSIPublicComments@governor.ohio.gov. It is, further,

{¶ 71} ORDERED, That a copy of this Finding and Order be sent to the electric-energy, gas-pipeline, and water list-servs. It is, further,

{¶ 72} ORDERED, That a copy of this Finding and Order be served upon all rate-regulated electric distribution companies, gas and natural gas companies, heating and cooling companies, waterworks and/or sewage disposal system companies, OCC, all commenters in this matter, and all parties of record in Case No. 12-2338-AU-ORD.

COMMISSIONERS:

Approving:

Jenifer French, Chair
M. Beth Trombold
Lawrence K. Friedeman
Daniel R. Conway
Dennis P. Deters

MJA/mef

*****DRAFT - NOT FOR FILING*****

4901-7-01 Standard filing requirements.

All applications for an increase in rates filed under section 4909.18 of the Revised Code, all complaints filed under section 4909.34 of the Revised Code, and all petitions filed by a public utility under section 4909.35 of the Revised Code shall conform to the standard filing requirements, set forth in appendix A to this rule. The commission may, upon timely motion, waive specific provisions of the standard filing requirements, but such waivers must be obtained prior to the time that application, complaint, or petition is filed with the commission. In the absence of such a waiver, the commission may reject any filing which fails to comply with the requirements of this rule.

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Chapter I
Notice of Intent to File an
Application for Increase in Rates

General instructions.

(A) Municipalities

Section 4909.43 (B) of the Revised Code provides as follows:

Not later than thirty days prior to the filing of application pursuant to section 4909.18 or 4909.35 of the Revised Code, a public utility shall notify, in writing, the mayor and legislative authority of each municipality included in such application of the intent of the public utility to file an application and of the proposed rates to be contained therein.

(B) Public Utilities Commission (PUC)

(1) Public utilities must provide the following information to the PUC with its prefiling notice (PFN). Except in the case of an appeal from municipal ordinance, this information must be submitted to the PUC at least thirty days prior to the date of filing:

(a) PFN Exhibit 1

- (i) Statement of notice of intent to file for an increase in rates.
- (ii) The service area to be included in the application for an increase in rates.
- (iii) Dates of proposed test year and proposed date certain.

(b) PFN Exhibit 2

A listing of municipalities included in the application along with the addresses of the mayors and legislative authorities to whom notices of intent to file were sent.

(c) PFN Exhibit 3 (applicable to only large utilities)

The proposed tariff schedules that are intended to replace or add to current tariff schedules. Identify each page with PFN Exhibit 3 Page ____ of ____ in the upper right hand corner of the schedule. In lieu of sending paper copies or a compact disc of the proposed tariff schedules, a utility may provide, in the notice of intent, a website where the same information would be available. The utility must provide in the notice of intent a method whereby a municipality can contact the utility to request a hard copy or compact disc of the proposed tariff sheets and typical bill comparison to be provided at the utility's expense.

(d) PFN Exhibit 4

Schedule E-5, "Typical Bill Comparison"

(2) Public utilities which qualify as small utilities under the guidelines of Chapter IV of the "Standard Filing Requirements" shall notify the municipalities and the commission as specified in Chapter IV, "General Instructions" in paragraph (B)(1)(e) of this appendix.

Chapter II
Standard Filing Requirements
Large Utilities

Electric Utilities All

Gas Utilities 30,000 or more customers

Waterworks Utilities 30,000 or more customers
Sewage Disposal System
Utilities

For the purpose of determining the size of the utility (small or large), each utility company shall include in its customer count all customers over which the public utilities commission of Ohio has jurisdiction without regard to the number of customers proposed to be affected by the application.

(A) General instructions

(1) Purpose

The standard filing requirements are designed to assist the commission in performing a thorough and expeditious review of applications for rate increases. Schedules contained in the filing requirements may be designed to provide support for the applicant utility's position or to provide supplemental information to facilitate the commission staff's review of the rate application.

(2) Applicability

The schedules contained in these standard filing requirements are applicable to all utilities under the jurisdiction of the public utilities commission of Ohio with customers within the limits stated. The standard filing requirement schedules are also generally applicable to all types of utilities, i.e., electric, gas, waterworks, etc.; however, certain unique aspects of a utility's business may require some schedules to be tailored to a specific type of utility. Schedules which are unique to a specific type of utility are identified in the instructions at the beginning of each section. In completing the schedules, each utility must follow the account classification as provided in the "Uniform System of Accounts" prescribed for each utility.

(3) Minimum requirements

The standard filing requirements contain the minimum information which utilities are required to submit with their application for an increase in rates. The schedules contained in the filing requirements provide the basic information normally required to support a utility's rate request. If the applicant utility believes that additional information is necessary to support its case or is proposing a position which requires a departure from the basic schedules (e.g., a special revenue adjustment proposal), the utility should supplement the standard filing requirements as required to support its position. In addition, the commission may require utilities to supply information to supplement these requirements during the course of the staff investigation of a specific case.

(4) Waiver of information requirements and determination of filing date

(a) The commission may, upon an application or a motion filed by a party, waive any requirement of these standard filing requirements, other than a requirement mandated by statute, for good cause shown.

(b) All information required by these standard filing requirements, unless waived, must be included with the application at the time of the original docketing of the application with the public utilities commission of Ohio. The commission may reject any filing not complying with these requirements or request the public utility to refile the items found noncomplying. An application filed during the pendency of waiver requests which are subsequently denied in whole or in part will be considered as failing to comply with the standard filing requirements and be treated in accordance with paragraphs (A)(4)(c)(ii) and (iv) of Chapter II of this appendix without specific notice by the staff.

- (c) Within sixty days from the date of the original docketing of the application with the commission, the commission will issue an entry indicating whether the application has complied with the standard filing requirements. The commission shall consider supplemental information filed by the utility in determining the completeness of the filing.
- (i) If, in the opinion of the staff of the public utilities commission, an application fails to substantially comply with the standard filing requirements, the staff shall inform the applicant within thirty days of the original filing date by letter from the director of utilities or his appointed representative of any defects or deficiencies. Upon the filing of such supplemental information rendering the application in technical compliance with the standard filing requirements, unless waived, the application will be deemed as having been filed as of the date upon which supplemental information rendering the application in technical compliance with the standard filing requirements was received for the purposes of calculating the time periods provided in section 4909.42 of the Revised Code.
 - (ii) If, in the opinion of the staff of the public utilities commission, the application as originally docketed substantially complies with the standard filing requirements, the staff shall so inform the applicant and indicate any defects or deficiencies within thirty days of the date of the original filing by letter from the director of utilities, or his appointed representative. Upon the filing of the supplemental information rendering the application in technical compliance with the standard filing requirements, the application will be deemed as having been filed as of the date upon which the original application was received for purposes of calculating the time periods.
 - (iii) If, in the opinion of the staff of the public utilities commission, the application as originally filed is in technical compliance with the standard filing requirements, the staff shall so notify the applicant within thirty days of the date of the original filing by letter from the director of utilities, or his appointed representative.
 - (iv) Applicant shall file its response to the staff letter within fifteen days of the date of such letter as referred to in paragraph (A)(4)(c)(ii) above.

Provided that the applicant has complied with paragraph (A)(4)(c)(iv) of Chapter II of this appendix, if the commission issues no entry within sixty days from the date of the original docketing of the application with the commission, the application shall be considered in compliance with the standard filing requirements and as having been filed as of the date of the original docketing of the application for purposes of calculating the time periods provided in section 4909.42 of the Revised Code.

If an applicant fails to comply with paragraph (A)(4)(c)(iv) of Chapter II of this appendix, the application will not be considered in compliance with the standard filing requirements, unless otherwise ordered. The application will not be considered as having been filed, unless otherwise

ordered by the commission, for purposes of calculating the time periods provided in section 4909.42 of the Revised Code.

- (d) A request for waiver of any of the provisions of the standard filing requirements must set forth the specific reasons in support of the request. The commission shall grant the request for a waiver upon good cause shown by the utility. In determining whether good cause has been shown, the commission shall give due regard, among other things to:
 - (i) Whether other information, which the utility would provide if the waiver is granted, is sufficient so that the commission staff can effectively and efficiently review the rate application.
 - (ii) Whether the information, which is the subject of the waiver request, is normally maintained by the utility or reasonably available to it from the information which it maintains.
 - (iii) The expense to the utility in providing the information, which is the subject of the waiver request.
 - (e) Except for good cause shown, all waiver requests must be filed thirty days or more before the docketing of the application with the commission. If, by complying with this requirement, the waiver requests are received before the filing of the notice of intent to file an application for an increase in rates, a docket number of the rate case series will be assigned to the waiver request. This same docket number shall then be used for the notice of intent to file an application and the application for an increase in rates.
- (5) Definition of terms
- (a) "Test year" and "Date certain" - In accordance with the requirements of the Ohio Revised Code, the test period, unless otherwise ordered by this commission, shall be the twelve-month period beginning six months prior to the date the application is filed and ending six months subsequent to the application filing date. In no event shall the test period end more than nine months subsequent to the date the application is filed. The date certain shall be not- later than the date of filing, except that it shall be, for a natural gas, waterworks, or sewage disposal system company, not later than the end of the test period.
 - (b) "Witness responsible" - each schedule contains an area specified as "Witness responsible". The utility must fill in the name of the individual who is anticipated to testify at the hearing as to the material contained in the schedule.
 - (c) "Calendar year data" - some schedules throughout these filing requirements contain provisions for financial data for both a test year and the most recent calendar years. As used in these filing requirements, "most recent calendar years" are the latest calendar years for which actual historic information is available at the date of filing.
 - (d) "Projected test year data" - to comply with the statutory requirements regarding the test year, the utility may use estimated valuation data and up to twelve months of estimated operating income data in its application. However, if estimated valuation data and/or more than nine months of estimated operating income data is provided in the application, the utility must provide, within two

months of the date of filing, actual valuation data and operating income statements which include no less than three months of actual data. The utility must also explain any material differences between the estimated and actual data.

Notwithstanding the above provisions, any natural gas, waterworks, or sewage disposal system company that elects to use a date certain that is beyond the application filing date need not provide, within two months of the date of filing, actual valuation data. Instead, such natural gas, waterworks, or sewage disposal system company must provide the data required within 30 days after the date certain.

The utility must file a comparison of the twelve-month actual income statement versus the partially forecasted income statement and any variances within three months after the end of the test year. The utility must also explain any material differences between estimated and actual data.

- (e) "Average data" - some schedules throughout these filing requirements require that "average" data be provided. The term average refers to a thirteen-month average. The test year thirteen-month average calculation shall be based on the same timeframe as the test year. Where actual month end balances are not available, utilities shall use estimated data for those months of the test year. The test year thirteen-month average calculation shall be updated to reflect no less than four actual month end balances.
- (f) "Jurisdictional data" - the term "jurisdictional" refers to the portion of a utility's service area for which the requested rate increase is applicable.
- (g) "Data" - most schedules contain an area specified as "Data". Indicate in the area provided the number of actual and estimated months of information reflected on the schedule or whether the valuation data represents actual or estimated information.
- (h) "Type of filing" - the utility should indicate whether the schedule was filed with the application for an increase in rates (original), with an update, or represents a revision to a previously filed schedule. If the schedule is a revision, the utility also should indicate whether it represents a revision to the original or to the updated filing.
- (i) "Work paper reference no(s)." - some schedules contain an area specified as "Work Paper Reference No(s)." This area should be filled in to indicate all the reference numbers for work papers, as defined in paragraph (A)(8) of Chapter II of this appendix, which relate to the schedule.
- (j) "Executive summary" - the term as used herein refers to a summary statement of the essential components of the applicant utility's management process that will succinctly explain the manner in which the organization operates at the top corporate level and/or in a specific functional area. It should be to the point but sufficiently developed to assist the commission in performing a thorough and expeditious review of the applicant utility's management policies, practices, and organization. The executive summary may be supported by an explanatory booklet, publication, or other material which addresses the applicant utility's management process.

- (k) "Mirrored CWIP allowance" and "mirrored CWIP revenue" - section 4909.15(A)(1) of the Revised Code provides in part that:

Where the commission permits an allowance for construction work in progress, the dollar value of the project or portion thereof included in the valuation as construction work in progress shall not be included in the valuation as plant in service until such time as the total revenue effect of the construction work in progress allowance is offset by the total revenue effect of the plant in service exclusion... . In no event shall the total revenue effect of any offset or offsets provided [herein] exceed the total revenue effect of any construction work in progress allowance.

(6) Submission of written testimony

- (a) Utilities shall file the prepared direct testimony of utility personnel or other expert witnesses in support of the utility's proposal within fourteen days of the filing of the application for increase in rates. Prepared direct testimony should be in question and answer format and should, in all other particulars, conform to the requirements of rule 4901-1-29 of the Administrative Code. Prepared direct testimony shall fully and completely address and support all schedules and significant issues identified by the utility as well as all adjustments made to rate base and operating income items. Individually identify, quantify, and justify as just and reasonable any proposed adjustment(s) made to operating income items, and included in the company's application pursuant to R.C. 4909.15(D), that the company believes is reasonably expected to occur during the test period or during the 12-month period following the test period. Any new schedules or adjustments or revisions to previously filed schedules or adjustments proposed by the utility shall be accompanied by prepared direct testimony which fully supports the utility's proposal.

- (b) The following legend shall be included on the cover page of each witness' testimony with the appropriate general subject area(s) sponsored by that witness checked:

- Management policies, practices, and organization
- Operating income
- Rate base
- Allocations
- Rate of return
- Rates and tariffs
- Other

Utilities shall provide as a separate exhibit an index identifying the location of major issues covered by each witness.

- (c) The testimony as described in paragraph (A)(6)(a) of Chapter II of this appendix shall be the utility's case in chief. Any utility that files a rate increase shall be prepared to go forward at hearing time on the data and prepared direct testimony filed in support of the application, the two-month update, and any

revisions or new schedules to sustain the burden of proof that the rate increase is just and reasonable. Supplemental testimony filed with objections to the staff report and testimony filed with the two-month update and any revisions shall be limited to matters which the applicant could not reasonably expect to be raised in the case, such as:

- (i) Matters raised for the first time in the staff report.
- (ii) Matters caused by changes in the law and/or in financial conditions.
- (iii) Matters resulting from unforeseen changes in the utility's operations.
- (iv) Matters raised by the staff during its investigation or by intervenors during discovery.

(7) Schedule format

Schedules shown are for illustrative purposes only and can be modified to fit the individual company, as long as the data intent is complied with. Utilities are not required to submit data on reproduced copies of the schedules, but should submit the data in substantially the same format as contained in the schedules. All schedules submitted to the commission should be typed. Additional schedules should be submitted as required to support the company's application; such schedules should be identified by the next assigned schedule in the appropriate section.

All schedules submitted must also be provided to the staff in an electronic format. The electronic format must use links to retrieve data from related schedules and, if applicable, relevant working papers. Absent a showing of good cause by the applicant, schedules and work papers containing numerical data shall be submitted on spreadsheets that contain active formulas and calculations, and must be linked so that changes propagate through the schedules and work papers.

(8) Working papers

All working papers supporting the standard filing requirements schedules and the required cost-of-service study, as well as any company-sponsored cost studies, shall be delivered to the commission staff as specified in paragraph (C)(7) of Chapter II in this appendix. The utility shall provide a comprehensive explanation of the bases for all schedules contained in the application. The working papers that are to be delivered to the staff shall include any and all pertinent data used by the utility to prepare its application and other such information that may be requested by the commission to be filed as a work paper as specified in other sections of the filing requirements. Pertinent data shall be interpreted as including, but not limited to, all supporting work papers prepared by the utility for the application, and a narrative or other support of assumptions made of working paper schedule amounts. Work papers and documents containing additional explanatory material shall be cut, folded, or reduced to letter size and shall be marked, organized, and indexed according to the standard filing schedules to which they relate and the witness. Working papers must contain the date prepared and should be cross-indexed and cross-referenced wherever possible. Data contained on the work paper should be footnoted so as to identify the source document. Working papers shall also be provided for the two-month update filing. To the extent that work papers duplicate information required to be submitted in testimonies, work papers may incorporate such information by referencing the specific testimonies containing this data.

The following working paper referencing system based on a minimum of a four position code shall be used for all working papers; when positions 5 and 6 are not required, they shall be left blank. Work papers shall indicate whether the work paper pertains to the original filing, the two-month update filing, or to a revision made to either the original or update filing.

Position	1 & 2	3	4	5	6
	Note: "WP" always denotes work paper				
Example:	WP	B	- 2	.1	a

Position Description

1 & 2 First and second characters will always be "WP" which denotes working papers.

3 Position 3 will always represent the section of standard filing schedules to which the work papers are related.

The sections are:

- A - Revenue requirements
- B - Rate base
- C - Operating income
- D - Rate of return
- E - Rates and tariffs

4 Position 4 will always represent the schedule number within a section. The first schedule within a section will always be "1", the second "2", etc. Several standard schedule numbers have been assigned. If the applicant wants to supply additional schedules in any section, the next available (unassigned) schedule number in the appropriate section shall be used.

5 Position 5 shall be used for supporting schedules which feed a specific schedule number identified by the fourth position. The first supporting schedule shall have positions 3 and 4 coded with the section and schedule number which the supporting schedules feed and it shall be numbered "1", the second "2", etc.

For example:

The standard number assigned to the operating income adjustment summary schedule is C-3. The first adjustment shall be supported by a separate schedule numbered C-3.1. The second adjustment supporting schedule shall be C-3.2. The working papers would be indexed WPC-3.1 and WPC-3.2, respectively.

6 Position 6 shall only be used (as required) when data is required for supporting a supporting schedule identified by the position 5 digit. The first additional supporting schedule shall be identified with the lower case letter "a", the second "b", etc. In all cases where the sixth position is used, the third, fourth, and fifth position characters shall be coded with

the section, schedule, and supporting schedule which the additional data supports.

For example:

Information provided as additional support for adjustment C-3.1 or for the working papers WPC-3.1 would be coded in the working paper as:

WPC-3.1a, b, c...etc

Work papers are not to be referenced in total to one schedule and labeled as page 1 of, page 2 of, etc. Each individual work paper which supports either a schedule or another work paper shall be assigned a separate work paper reference number.

- (9) Management policies, practices, and organization of utility companies
- (a) Information to be filed under paragraphs (B)(8), and (9) of Chapter II of this appendix is required for the purposes of the commission's consideration of the applicant utility's management policies, practices, and organization in fixing rates. These filing requirements are designed for the applicant utility to present pertinent information, in a succinct manner, that would provide the commission with sufficient knowledge of the applicant utility's management process or system. ~~The commission's review could be used to determine if specific areas of a company's management and/or operations should be the subject of further investigation.~~
 - (b) If the applicant utility is a subsidiary of a holding company or is affiliated with other companies, then the applicant utility is required to explain the level of participation of the parent company/affiliate company in the applicant utility's management process.
 - (c) If certain information specified in paragraphs (B)(8) and (9) in Chapter II of this appendix, is considered to be proprietary in nature or confidential by the applicant utility, then applicant utility should request a waiver from filing such information pursuant to paragraph (A)(4) of Chapter II of this appendix, indicating reasons why this is so. At the same time, the applicant utility should also file a motion for a protective order with a memorandum in support describing in general the subject material, indicating and specifically explaining why the subject material is proprietary or confidential, and addressing or offering alternatives as to how the subject material can be reviewed by the staff and at the same time be protected, should the commission agree that the subject material does require protection.
 - (d) If the activities and the functional areas specified in accordance with paragraph (B)(9) of Chapter II of this appendix do not correspond directly with the applicant utility's organization structure, the applicant should also include those functional areas and activities not specifically set forth. The applicant utility may explain its management process in a manner that is most suitable to its particular organization, provided that specific references indicate where the information on specific activities can be found in its filing. ~~If the applicant utility believes that information required to be filed herein has been previously submitted to the commission or its staff, in whole or in part, then a photocopy of such information shall be provided with this filing.~~ If a particular activity is believed by the

applicant utility to be not applicable, this should be so stated along with an explanation why it is not applicable.

- (e) The applicant utility shall satisfy all standard filing requirements relating to management policies, practices, and organization (paragraphs (B)(8), and (9) of Chapter II of this appendix) in its first rate filing after their adoption. Thereafter, the applicant utility shall submit a complete filing if it has been purchased by another regulated utility, purchased another regulated utility, or merged with another company. ~~In addition, If any~~ changes, enhancements, and modifications have occurred to the applicant utility's management process since the last rate filing, applicant shall provide an explanation of the changes~~are required in subsequent rate filings. If no changes have occurred, indicate so and provide specific references to prior rate case filings where such information has been provided (by chapter and paragraph number).~~ In the event it has been more than ten years since the previous complete filing, the applicant utility shall submit an updated complete filing as outlined in paragraphs (B)(8) and (9) of Chapter II of this appendix.

(B) Supplemental filing requirements

The following information, if applicable, should be included as part of the application filing:

- (1) Most recent five-year capital expenditures budget (three-year budget for waterworks and sewage disposal system companies) to be identified as Schedule S-1. Provide the following information for each major construction project (all projects over \$500,000 for gas, waterworks, and sewage disposal system companies and all projects which constitute five percent or more of the annual construction budget for electric utilities):
- (a) Date project started.
 - (b) Estimated completion date.
 - (c) Total estimated cost of construction by year exclusive and inclusive of AFUDC.
 - (d) AFUDC by group.
 - (e) Accumulated costs incurred as of the end of the most recent calendar year exclusive and inclusive of AFUDC.
 - (f) Current estimate of total cost to completion exclusive and inclusive of AFUDC.
- For all other construction projects, simply aggregate and show total by year.
- (2) Most recent five-year financial forecast (three-year forecast for waterworks and sewage disposal system companies) identified as Schedule S-2, providing for each forecast year:
- (a) Income statement.
 - (b) Balance sheet.
 - (c) Statement of changes in financial position (source and application of funds statement).
- (3) The financial forecast should be supported by the underlying assumptions made in projecting the results of operations, such as:
- (a) Load forecasts (electric).

- (b) Employee growth.
 - (c) Known labor cost changes.
 - (d) Capital structure requirements/assumptions.
- (4) If the applicant utility does not release financial forecasts to any outside party, it may elect to provide the following in lieu of Schedule S-2:
- A five-year projection (a three-year projection for waterworks and sewage disposal system companies) of revenue requirements necessary to support the requested rate of return on common equity (identified as Schedule S-2.1).
- This projection of revenue requirements shall be in the form of an income statement and shall be supported by an explanation of the assumptions made in projecting the revenue requirements, such as:
- (a) Load forecasts (electric).
 - (b) Employee growth.
 - (c) Known labor cost changes.
 - (d) Capital structure requirements/assumptions.
- (5) The projection of revenue requirements shall be accompanied by the following balance sheet items for each forecast year (identified as Schedule S-2.2):
- (a) Gross plant in service.
 - (b) Accumulated depreciation.
 - (c) Construction work in progress.
 - (d) Long-term debt.
 - (e) Preferred stock.
 - (f) Common equity.
 - (g) Deferred income taxes.
 - (h) Deferred investment tax credits.
- (6) In addition, the following elements of a statement of changes in financial position (sources and uses) should be provided (identified as Schedule S-2.3):
- (a) Change in cash balances.
 - (b) Retained earnings.
 - (c) Depreciation accruals.
 - (d) External funding.
 - (i) Long-term debt.
 - (ii) Preferred stock.
 - (iii) Common equity.
 - (e) Deferred income taxes.

- (f) Deferred investment tax credit.
- (7) A proposed notice for newspaper publication fully disclosing the substance of the application for increase in rates (identified as Schedule S-3).

The proposed notice for newspaper publication shall include the following information and/or similar language:

- (a) Recommendations which differ from the application may be made by the staff of the public utilities commission or by intervening parties and may be adopted by the commission.
 - (b) Any person, firm, corporation, or association may file, pursuant to section 4909.19 of the Revised Code, an objection to such proposed increased rates by alleging that such proposals are unjust and discriminatory or unreasonable.
 - (c) A copy of the application is available for inspection at the office of the (company) located at (address, city), Ohio, and at the offices of the "Public Utilities Commission, 180 East Broad Street, Columbus, Ohio 43215-3793."
 - (d) The percentage increase in operating revenue requested by the utility on a class of service or rate schedules basis.
- (8) An executive summary of applicant utility's corporate process utilized by the board of directors and corporate officers. This would include a discussion of all pertinent elements of the applicant utility's management process encompassing such areas as policy and goal setting, strategic and long-range planning, organization structure, decision-making, ring fencing (plans and methods for protecting the regulated distribution company that limit the exposure of the operating company from the action of its parent company and/or subsidiary), controlling process, internal and external communications (identified as Schedule S-4.1).
- (9) An executive summary of applicant utility's management policies, practices, and organization employed to meet the corporate goals determined by the board of directors and corporate officers. This would also include a discussion of all pertinent elements of the applicant utility's management process described in paragraph (B)(8) of Chapter II of this appendix ~~as they relate to any three of the following functional areas identified and requested by staff (identified as Schedule S-4.2).~~ Within ten business days after an applicant files its notice of intent, the staff will file a letter in the docket setting forth ~~the three~~any functional areas a utility must discuss. Such discussion will include a review of all pertinent elements of the applicant's management practices described in (B)(8) of this appendix as well as any other areas identified by staff.

Pertinent elements to incorporate for each functional area should include organization chart, diagrams, and flow charts, performance indicators, standards of performance, and prepared testimony of applicant utility personnel or other expert witnesses.

- ~~(a) Plant operations and construction.~~
- ~~(i) Plant/facilities planning process.~~
- ~~(ii) Operations and maintenance policies and procedures.~~
- ~~(iii) Plant productivity and performance evaluation.~~
- ~~(iv) Customer and usage growth forecasting.~~

- ~~(v) Demand and capacity load forecasting.~~
 - ~~(vi) Construction project management and control.~~
 - ~~(vii) Research and development.~~
 - ~~(viii) Environmental management.~~
- ~~(b) Finance and accounting:~~
 - ~~(i) Cash management.~~
 - ~~(ii) Accounting systems and financial reporting.~~
 - ~~(iii) Budgeting and forecasting.~~
 - ~~(iv) Financial planning process and objectives.~~
 - ~~(v) Materials and inventory management and control.~~
 - ~~(vi) Internal auditing.~~
 - ~~(vii) Risk management.~~
- ~~(c) Rates and tariffs:~~
 - ~~(i) Identify the system or program for managing rate related operations and rate reform projects.~~
 - ~~(a) Specify objectives of the rate program.~~
 - ~~(b) Describe the process and procedures for achieving the stated objectives.~~
 - ~~(c) Describe the organizational structure and available resources.~~
 - ~~(ii) Rate program analytical process:~~

~~Describe performance of the following activities and describe how they contribute to the adequacy of the rate program and specific projects:~~

 - ~~(a) Planning.~~
 - ~~(b) Operating impact evaluation.~~
 - ~~(c) Cost analysis.~~
 - ~~(d) Benefit analysis.~~
 - ~~(e) Data collection.~~
 - ~~(f) Risk assessment.~~
 - ~~(g) Revenue and earnings stability.~~
 - ~~(iii) Implementation management:~~
 - ~~(a) Describe the implementation management process for rate reform projects.~~
 - ~~(b) Describe the significant projects in progress and the corresponding implementation timeframes.~~

- ~~(c) Describe how the projects are intended to meet the stated program objectives.~~
- ~~(iv) Customer involvement:
Describe the process and significant vehicles in the process for introducing customer interests in rate operations.~~
- ~~(v) Commission and staff reporting:
Describe the process for reporting operations and rate reform programs to the staff and commission.~~
- ~~(d) Communications and public affairs:
 - ~~(i) Customer service and information.~~
 - ~~(ii) Credit and collections.~~
 - ~~(iii) Customer conservation programs.~~
 - ~~(iv) Marketing.~~
 - ~~(v) External relations.~~~~
- ~~(e) Administrative and corporate support services:
 - ~~(i) Legal.~~
 - ~~(ii) Insurance.~~
 - ~~(iii) Land management.~~
 - ~~(iv) Records management.~~~~
- ~~(f) Information technology:
 - ~~(i) Description of major systems and platforms utilized by the company including capital and human resources allocated to each system/platform.~~
 - ~~(ii) Corporate plans for major systems, (development, integration, and retirement.~~
 - ~~(iii) Policies for protecting company and customer information/data.~~~~
- ~~(g) Transportation
 - ~~(i) Fleet management.~~
 - ~~(ii) Garages/fleet maintenance.~~~~
- ~~(h) Human Resources:
 - ~~(i) Salary and benefits administration.~~
 - ~~(ii) Recruiting and selection.~~
 - ~~(iii) Training and career development.~~
 - ~~(iv) Performance evaluation and appraisal.~~
 - ~~(v) Work force productivity.~~~~

- ~~(i) Conservation/demand side management/integrated resource planning:~~
 - ~~(i) Conservation/demand side management integrated resource planning process and objectives, including the criteria utilized by the company to measure its progress with respect to the attainment of its objectives.~~
 - ~~(ii) Conservation program policies and procedures.~~
 - ~~(iii) Demand side management program policies and procedures (i.e., cost benefit tested programs) (e.g., green energy, diversity in supply sourcing).~~
 - ~~(iv) Rate and bill impact evaluation process.~~
 - ~~(v) Customer involvement.~~
 - ~~(vi) Financing requirements generated by demand side management and integrated resource planning.~~
 - ~~(vii) Innovative rate and tariff processes, including analysis, design, implementation, and evaluation.~~

(C) Supplemental information provided at filing

The applicant utility must deliver four copies of the following information, if applicable, to the utilities department, office of the rate case manager, at the time of the filing of the application. A document provided in a prior case may be incorporated by reference to the prior case:

- ~~(1) The most recent federal regulatory agency's (FERC,) audit report.~~
- ~~(2) Prospectuses of current stock and/or bond offering of the applicant, and/or of parent company if applicant is a wholly owned subsidiary. In the event there are no current offerings, then provide the most recent offerings.~~
- ~~(3) Annual reports to shareholders of the applicant, and/or parent company, if applicant is wholly owned subsidiary, for the most recent five years and the most recent statistical supplement.~~
- ~~(4) The most recent SEC Form 10 K, 10 Q, and 8 K of the applicant, and/or parent company, if applicant is wholly owned subsidiary. In addition, upon filing with the SEC, provide all subsequent 10 K, 10 Q, and 8 K SEC reports to the staff through the date of the hearing.~~
- (15) Working papers supporting the schedules and/or as requested in the schedule instructions, as specified in paragraph (A)(8) in Chapter II of this appendix.
- (26) Worksheet showing, by FERCNARUC, or PUCO account, monthly test year data and totals which shall agree with Schedule C-2.1, Column 1. Rider revenues should be identified separately from base distribution revenues. Taxes other than income taxes should be itemized and totaled. A worksheet shall be provided for both the original and the two-month update filing.
- (37) For CWIP included in the authorized rate base of prior case, incorporate by reference that data which is already provided on Schedule B-9:
 - (a) List the project number and dollars.

- (b) Completion date or in service date (whichever was first) for projects listed in paragraph (C)(9)(a) in Chapter II of this appendix.
- (c) Date the authorized rates in prior case went into effect.
- (d) AFUDC calculations for CWIP for projects listed in paragraph (C)(9)(a) in Chapter II of this appendix, and the date the utility stopped accruing AFUDC.
- (e) List for each project listed in paragraph (C)(9)(a) in Chapter II of this appendix, its estimated completion date and budget estimate as provided on Schedules B-4.1 and B-4.2 of the prior case's updated filing. In addition, list the actual completion date and the actual cost for each project. If actual cost is not available, provide the most recent cost estimate. If not yet completed, list the most recent completion date and budget estimates. Briefly explain the causes for any differences between the prior estimates and the actual data or the most recent estimate.
- (f) If mirroring of a CWIP project begun in a prior case was completed since the date certain of the company's last rate case, provide for each project the calculation of mirrored CWIP carrying charges. Supporting documentation shall include the project number, start and end dates for accrual, the carrying charge rate(s) used, and the mirrored CWIP amount.
- (g) If mirroring of a CWIP project begun in a prior case is not completed as of the first day of the test year in this case, provide for each project the following:
 - (1) Mirrored revenue offset amount from (effective date of sur-credit rider) to (first day of test year).
 - (2) Estimated test year mirrored revenue offset.
 - (3) Estimated mirrored revenue offset from (last day of test year) to (estimated completion date).

(48) Copy of latest certificate of valuation from department of taxation. A copy of any updated certificates on valuation shall be provided to the staff when available.

(59) Copy of monthly sales (kwh, ccf) for the test year by rate schedule classification and/or customer classes. Data provided shall be consistent with the information contained in the operating income schedule, Schedule C-2.1, under both the original and the two-month update filings.

(610) Copy of a written summary explaining the forecasting method used by the utility as related to test year data.

(711) For the materials and supplies component listed on Schedule B-5.1 provide the following:

- (a) Explanation of computation for percentage of materials and supplies used for construction, additions, and extensions.
- (b) Electric and gas utilities shall list the monthly balances.
- (c) Electric, gas, waterworks, and sewer utilities shall list the monthly withdrawals.

(812) Where depreciation expense related to specific plant accounts or subaccounts is charged to clearing accounts or allocated and charged to other accounts, provide the following:

- (a) Related plant accounts and/or subaccounts.

- (b) Test year ratios.
 - (c) The clearing accounts used, a description of the methodology (including the basis of the calculation) used to allocate costs out of the clearing accounts and the accounts these costs are ultimately charged to.
 - (d) If clearing accounts are not used, a description of the methodology (including the basis of the calculation) used to allocate the costs and the accounts these costs are charged to.
- (~~943~~) The following federal income tax information:
- (a) If the taxes included in test year operating income were not calculated in a manner consistent with Schedule C-4, provide an additional schedule showing the methodology used.
 - (b) A description of and detailed information on each individual "other reconciling item."
 - (c) Calculation of "other tax deferrals." These calculations should also show the normalization of excess deferred income taxes included in the tax deferrals.
 - (d) Case numbers in which the commission granted the utility authorization to normalize any of the tax deferrals reflected in Schedule C-4 (i.e., depreciation, investment tax credit, etc.).
 - (e) Calculation of tax straight line depreciation at date certain.
 - (f) Calculation of tax accelerated depreciation at date certain.
 - (g) Amortization period for investment tax credit.
 - (h) The ITC option elected in 1971 and 1975 under section 46(f) of the 1954 internal revenue code.
 - (i) Amortization of EDIT.
- (~~1044~~) For other rate base items listed on Schedule B-6, provide the following:
- (a) A description of and detailed information on each individual item.
 - (b) Case numbers in which the commission granted the utility authorization to defer each individual item reflected on Schedule B-6.
- (~~1145~~) At the time of filing of the two-month update a copy of all advertisements whose costs were charged to advertising expense in the actual months of test year. Indicate on the copy of the ad the cost of the ad and the account charged. In addition, the utility shall provide the best estimate of the cost of those ads that may be included in the budgeted portion of the test year. Information regarding advertising expenses that have been eliminated from the test year need not be provided.
- (~~1246~~) The utility shall provide a breakdown in the same general format as Schedule B-2.3 which shows plant in service data from the last date certain to the end of that year, annually thereafter up to the most recent annual report, and from the most recent annual report to the date certain in the current case.
- (~~17~~)(13) If the depreciation reserve on Schedule B-3 was allocated to accounts based on a theoretical reserve study, the utility shall provide a copy of such study. If the study is the

same as that contained in applicant's latest depreciation study, reference to such study is sufficient.

~~(18)~~(14) If the utility is proposing to revise its depreciation accrual rates and if such study has not already been filed with the commission or provided to the staff, the utility shall provide the depreciation study supporting such revisions.

~~(19)~~(15) The utility shall provide a breakdown in the same general format as Schedule B-3.3 which shows depreciation reserve data from the last date certain to the end of that year, annually thereafter up to the most recent annual report, and from the most recent annual report to the date certain in the current case.

~~(20)~~(16) For each construction project which is seventy-five percent complete as shown in Schedules B-4, B-4.1, and B-4.2, the utility shall provide a copy of the following:

- (a) Document providing project approval.
- (b) Initial project budget and estimated timetable for completion.
- (c) Most recent revised budget and timetables and dates of the revisions.
- (d) Document showing the date initial construction work began.
- (e) Schedule showing the distribution of construction expenditures as of the date certain (e.g., material, labor, allowance for funds used during construction, construction management, insurance, etc.).
- (f) Statement from the construction management attesting to the data on Schedules B-4.1 and B-4.2.
- (g) Details of computation of trended figures on Schedule B-4.2, including trending factors, source of trending factors, and rationale for their selection.

~~(1721)~~ Surviving dollars by vintage year of placement (original cost data as of date certain for each individual plant account).

~~(1822)~~ Test year and two most recent calendar years' employee levels by month.

(D) Supplemental information ~~provided at audit~~

The following information, if applicable, must be ~~provided-made available~~ to the commission staff ~~at the time the application is filed, unless otherwise directed below on the first day of the field audit:~~

- (1) General system layout maps for the service territory.
- (2) For those utilities who operate both regulated and nonregulated businesses, provide a narrative description of each nonregulated diversified operation of the applicant utility which includes, but is not limited to the following:
 - (a) Brief description of the nature of the nonregulated business, including the nature of the revenues and expenses involved.
 - (b) Date when utility began operating the nonregulated segment of business.
 - (c) Brief description of procedures used to separate revenues, expenses, plant in service, and other balance sheet items between regulated and nonregulated. If specific allocation factors are used, provide the allocation factors and the related computation.

- (d) A listing of the accounts and their location on the income statement and balance sheet, if separate accounts are maintained.
- (3) Utilities having transactions with affiliated (associated) companies (affiliated companies are defined as those companies or persons that directly or indirectly through one or more intermediaries, control or are controlled by, or are under common control with the utility) shall provide the following for those transactions which affect the operating income statement, plant in service accounts, and inventories:
 - (a) All contracts between the utility and any affiliated company. A description of the general nature of transaction between utility and the affiliated company.
 - (b) A statement showing all affiliated transactions by account. Any month during the twelve months preceding the test year, where actual month end balances are not available, utilities shall use estimated data for those years.
 - (c) Explanation of the method(s) used to allocate common and overhead costs.
 - ~~(e)(d) Its current cost allocation manual, including the actual allocation factors, where applicable. If the applicant seeks any changes to its current cost allocation manual, or allocation factors, it shall provide the specific change requested and provide a detailed rationale for the requested change. The applicant shall also quantify the impact of each proposed change.~~
- (4) A copy of the computation of gross maximum AFUDC rates for each annual period that includes any part of the test year. If the utility uses a net of tax AFUDC rate, provide the computation of the net of tax rate also. If the book allowance amounts of AFUDC do not reflect the maximum rates for AFUDC, also provide the derivation for the actual AFUDC rates utilized, including derivation of any net of tax rate, if applicable.
- (5) For all leased properties and improvements to leased properties shown on Schedule B-2.4, the utility shall provide the following information for each lease:
 - (a) Effective date of the lease.
 - (b) Term of the lease.
 - (c) Plant accounts and subaccounts involved.
 - (d) Dollar amounts included in each account and subaccount as of the date certain.
 - (e) Identification of whether dollars represent improvements to lease properties or other than improvements to lease properties.
- (6) Chart of accounts which contains descriptions of all accounts and subaccounts.
- (7) Monthly managerial reports providing results of operations and comparison of actual to forecast for the test year and the twelve months immediately preceding the test year. Reports covering the test period should be provided as they become available.
- (8) Latest depreciation study performed for or by the utility.
- ~~(9) Independent auditor's report and letter of recommendation.~~
- ~~(10) Quarterly reports to stockholders of applicant and/or parent company, if applicant is wholly-owned subsidiary, for the most recent five quarters.~~
- ~~(11)~~(9) Current labor contract(s).

- ~~(12)~~(10) Current federal income tax returns or the utility company's portions of the consolidated returns.
- ~~(13)~~(11) Corporate budget, approved by upper management and utilized to operate the company, by month for each fiscal year that is included in any part of the test year will be provided at the time of filing or within 30 days of its completion. If the budget is not provided at the time of filing, then the company must provide a statement explaining the source of the forecasted data in the application and an estimated date that the actual budget will be provided. A description of this budget's approval process should be included along with a statement on company letterhead signed by the president attesting to the fact that the budget(s) used to prepare test year information is (are) the corporate budget. It should also include a description of how the data in the budget was allocated to the test year expenses and should be in such detail as to allow the staff to interview individual department managers about their use and input into the budgeted data. A witness to support the budget should be identified.
- ~~(12)~~ If data used in the forecasted portion of the test year ~~budgeted data~~ is different from that reflected in the corporate budget provided above, the annual ~~budget forecast data~~ which was ~~used in the basis of~~ the test year ~~forecasted data~~ should be provided by month for each fiscal year that is included in any part of the test year. A reconciliation of the corporate budget and the forecast data used in the test year should be provided and a witness to support the reconciliation should be identified. The testimony should provide support for the differences.
- ~~(14)~~(13) A detailed description of the process to forecast the sales used in the forecasted portion of the test year should be available. A witness should be identified to support the description of the forecasted sales.
- ~~(15)~~(14) A copy of a trial balance of assets and liabilities as of the date certain and a trial balance income for the twelve months ending at the date certain.
- ~~(16)~~(15) Standard journal entries with description of entries.
- ~~(17)~~(16) If completed construction not classified balances have been tentatively classified to plant accounts and reflected in the plant account dollars on Schedule B-2.1, the utility shall provide a work paper showing a breakdown, using the same accounts and subaccounts classifications as on Schedule B-2.1, of the plant in service dollars and the completed construction not classified dollars, totaling to the dollars shown on Schedule B-2.1. If the utility provides only the total balance of completed construction not classified on Schedule B-2.1, the utility shall provide a tentative classification of such balance by plant account.
- ~~(18)~~(17) A copy of computation of most recent known property tax rates. Revised computations of known property tax rates shall be provided to the staff when changes occur.
- ~~(19)~~(18) Copy of state income tax returns (if the tax is included in jurisdictional operating expenses).
- ~~(20)~~(19) A copy of a detailed itemization of the general advertising in account 930.1 and the miscellaneous general expenses in account 930.2. If account 930 data is not projected on a detailed basis, the utility shall provide its best estimate of the account 930.1 expense items and a descriptive list of expense items anticipated as miscellaneous general expenses in account 930.2. Data provided shall be consistent with the information

contained in the operating income schedule, Schedule C-2.1, under both the original and the two-month update filings.

~~(21)~~(20) The following data on rate case expense:

- (a) The reasons for retaining outside counsel, where such is retained, as opposed to the use of in-house counsel. Such statement shall include a statement of the impact of the decision to go outside for representation on the overall expenses incurred.
 - (b) The estimated hourly rate of each outside counsel employed, as well as an estimated hourly rate for all in-house legal personnel utilized, and the basis thereof.
 - (c) The number of hours estimated to be expended by all counsel both outside and in-house, delineated by specific tasks (e.g., hearing time, time spent reviewing data requests, witness preparation time, drafting pleadings, meetings with client, etc.) and the approximate date such are to be performed.
 - (d) A full explanation of the management controls utilized to contain legal expenses (including not only fees but all expenses associated therewith).
 - (e) If outside counsel is retained on other than an hourly rate basis, a full explanation of, and rationale for, that basis.
 - (f) A revised estimate of the data provided in paragraphs (C)(46)(b) and (c) of Chapter II of this appendix shall be provided with the revised estimate of rate case expense filed as a late filed exhibit within ten days of the close of the hearings.
- (21) Explanation of the company's accounting treatment for rate case expense.

Form
(Sample Cover Sheet of Application)
(Large Utilities)

General Application for Change in Utility) Case No.: _____
Rates Before the Public Utilities Commission)
of Ohio.) Date: _____

Exact Company Name: _____

Mailing Address: _____

Company Official To Be Contacted Pertaining To Rate Case Matters: _____

Telephone Number (Including Area Code): _____

E-mail address: _____

Attorney For Applicant: _____

Address: _____

Attorney's Telephone Number (Including Area Code): _____

E-mail address: _____

Approved Test Year: _____

Approved Date Certain: _____

Section A
Revenue Requirements
(Large Utilities)

Company:_____

Case No.:_____

Test Year:_____

Date Certain:_____

- A-1 Overall financial summary
- A-2 Revenue conversion factor
- A-3 Calculation of mirrored CWIP revenue sur-credit rider

Section A Instructions
Revenue Requirements

(A) General

Schedule A-1 contains provisions for financial data for the utility's proposed test year and date certain.

(B) Overall financial summary (Schedule A-1)

Provide a jurisdictional financial summary schedule showing the proposed rate base, operating income, earned rate of return, calculation of income requirements, income deficiency, and revenue requirements for the test year on Schedule A-1.

(C) Revenue conversion factor (Schedule A-2)

Computation of gross revenue conversion factor (A-Z)

Provide a detailed calculation of the gross revenue conversion factor used in Schedule A-1. Calculation should be based on actual applicable tax rates. Do not include tax components that are separately collected through riders, such as the gross receipts tax or kWh tax in the gross revenue conversion factor. Do not include uncollectible expenses if they are recovered in a separate rider. Do not include Public Utilities Commission and Ohio Consumers' Counsel assessments.

(D) Calculation of mirrored CWIP revenue sur-credit ~~rider~~ (Schedule A-3)

Provide the calculation of mirrored CWIP revenue sur-credit rider requested on Schedule A-3. The mirrored CWIP allowance on line 1 shall represent those amounts included as CWIP in rates effective after April 10, 1985, and which were placed into service between the date certain of the last rate case and the date certain on this case. In addition, line 1 shall include those CWIP amounts placed into service prior to the date certain in the last rate case for which mirroring was begun in a prior case but is not expected to be completed by the effective date of rates authorized as a result of this case.

(Company)
Case No.: _____
Overall Financial Summary
For the Twelve Months Ended: _____

Data: _____ Months Actual & _____ Months Estimated Schedule A-1

Type of Filing: ___ Original ___ Updated ___ Revised Page 1 of 3

Work Paper Reference No(s): _____ Witness Responsible: _____

Line No. Description	Reference	Supporting Schedule Test Year	Jurisdiction Proposed
1	Rate Base as of Date Certain	B-1	\$
2	Current Operating Income	C-1	
3	Earned Rate of Return ($2 \div 1$)		
4	Requested Rate of Return	D-1	
5	Required Operating Income (1×4)		
6	Operating Income Deficiency ($5 - 2$)		
7	Gross Revenue Conversion Factor	A-2	
8	Revenue Deficiency (6×7)		
9	Revenue Increase Requested Before Mirror Revenue Offset	E-4	
10	Adjusted Operating Revenues	C-1	
11	Revenue Requirements ($9 + 10$)		

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Computation of Gross Revenue Conversion Factor

For the Twelve Months Ended: _____

Data: _____ Months Actual & _____ Months Estimated

Schedule A-2

Type of Filing: ___ Original ___ Updated ___ Revised

Page ___ of ___

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Description	% of Incremental Gross Revenue
	Operating Revenues	(100.00%)
	Less Taxes: (State, Local, CAT Tax) (If Applicable)	
	Income Before Federal Income Tax (Percent)	(95.25%)
	Federal Income Tax	(95.25% x <u>21.34</u> % = <u>(20.0032.38)</u>)
	Income After Federal <u>(75.25%62.87)</u> Income Tax (Percent)	
	Other Taxes Which Vary with Revenue	
	Operating Income Percentage <u>(75.25%62.87)</u>	
	Gross Revenue Conversion Factor	(100.00 % = <u>132.9%-590584</u>)
	(100%: Operating Income Percentage)	(<u>62.8775.25%</u>)

Notes:

(1) All tax percentages shall include the effect of other taxes upon the incremental rate.

Note: When completing forms, either portrait or landscape formatting is acceptable

- | (2) Effective state excise tax rate, if applicable, and the actual applicable statutory income tax rate should be used.
- | (3) Experienced rate of uncollectible accounts not recovered through a rider may be used in the calculation.

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Calculation of Mirrored CWIP Revenue Sur-Credit ~~Rider~~

Data: _____Months Actual & _____Months Estimated

Schedule A-3

Type of Filing: ___Original ___Updated ___Revised

Page ___ of ___

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Description	Schedule Reference	Test Year Jurisdiction
1	Mirrored CWIP Allowance	B-9	\$
2	Requested Rate of Return	D-1	
3	Income Deficiency (1 x 2)		
4	Gross Revenue Conversion Factor	C-11	
5	Mirrored CWIP Revenue Requirements (3 x 4)		
6	Proforma Base Revenues	E-4	
7	Mirrored CWIP Sur-Credit Rate (5 ÷ 6)		%

Note: When completing forms, either portrait or landscape formatting is acceptable

Section B
Rate Base
(Large Utilities)

Company: _____
Case No.: _____
Test Year: _____
Date Certain: _____

- B-1 Jurisdictional rate base summary
- B-2 Plant in service summary by major property groupings (electric & gas)
- B-2 Plant in service summary by major property groupings (waterworks)
- B-2 Plant in service summary by major property groupings (sewage disposal system)
- B-2.1 Plant in service by accounts and subaccounts
- B-2.2 Adjustments in plant in service
- B-2.3 Gross additions, retirements and transfers
- B-2.4 Lease property
- B-2.5 Property excluded from rate base
- B-3 Reserve for accumulated depreciation (electric and gas)
- B-3 Reserve for accumulated depreciation (waterworks)
- B-3 Reserve for accumulated depreciation (sewage disposal system)
- B-3.1 Adjustments to the reserve for accumulated depreciation
- B-3.2 Depreciation accrual rates and jurisdictional reserve balances by accounts
- B-3.3 Depreciation reserve, accruals, retirements, and transfers
- B-3.4 Depreciation reserve and expense for lease property
- B-4.1 Construction work in progress
- B-4.2 Construction work in progress – percent complete (time)
- B-5 Construction work in progress – percent complete (dollars)
- B-5.1 Allowance for working capital
- B-5.2 Miscellaneous working capital items
- B-6 Other rate base items summary
- B-6.1 Adjustments to other rate base items
- B-6.2 Contributions in aid of construction by accounts and subaccounts
- B-7 Jurisdictional allocation factors
- B-7.1 Jurisdictional allocation statistics
- B-7.2 Explanation of changes in allocation procedures
- B-8 Generation data (electric)
- B-8.1 Generation reserve margin (electric)
- B-8.2 Reserve capacity discussion
- B-8 Water data
- B-8 Stream heating data
- B-8 Gas data
- B-9 Mirrored CWIP allowances

Note: There must be filed at least one page for each of the above listed schedules applicable to the type of utility even if the schedules do not apply to the utility's case. Note such schedules "not applicable" or "waived."

Section B Instructions

Rate Base

(A) General

Property classification

The schedules included in Section B - Rate Base are designed to be applicable to more than one type of utility. Utilities shall use account classifications as provided in the uniform system of accounts relative to the type of utility.

(B) Plant in service schedules

(1) Jurisdictional rate base summary (Schedule B-1)

Summary rate base information shall be presented in Schedule B-1. The information requested on Schedule B-1 is supported by the schedules which follow, i.e., plant in service information is supported by Schedule B-2; reserve for accumulated depreciation is supported by Schedule B-3; construction work in progress is supported by Schedule B-4; working capital is supported by Schedule B-5; other rate base items are supported by Schedule B-6. Other rate base items (i.e., certain deferred credits, accumulated deferred income taxes, etc.) shall be fully supported by schedules and/or work papers. Schedules shall contain at a minimum a description of items, dollars involved by account, and reason for additions or deletions to the rate base. Note: If contributions in aid of construction are already netted against gross plant, indicate this by footnote and indicate -0- for this amount on Schedule B-1, line 6, and on Schedule B-6. Jurisdictional allocation factors are supported by Schedule B-7.

(2) Plant in service summary by major property groupings (Schedule B-2)

Provide in schedule B-2, a breakdown of the dollars of plant in service by each major property grouping. All information shall be provided in the format indicated on the schedule applicable to that utility.

(3) Plant in service by accounts and subaccounts (Schedule B-2.1)

All utilities shall list the information as requested on Schedule B-2.1. Total company plant in service for any account at the date certain shall be traceable directly to the general ledger and/or continuing property records. One form shall be completed for each major property grouping listed on Schedule B-2.

Subaccounts and/or functions shall be provided if necessary for the determination of allocation factors and/or depreciation expense.

(4) Adjustments to plant in service (Schedule B-2.2)

Each adjustment made to plant in service on Schedule B-2.1 shall be fully explained in Schedule B-2.2. A B-2.2 schedule shall be completed for each plant adjustment and shall identify each account and subaccount to which adjustments were made. All information shall be provided on this schedule or referenced to a specific working paper.

(5) Gross additions, retirements, and transfers (Schedule B-2.3)

Provide for each plant property account, the total company plant balances, gross additions, retirements and transfers in the format indicated on Schedule B-2.3 which occurred in the interim period from the date certain of the last rate case filed with this

commission to the date certain in this case. If, in a particular account, transfers are a normal course of events, only a general description (under the column "Explanation of Transfers") of the nature of the transfers is required.

In a separate workpaper, provide for each plant property account for the above information by year and by month.

(6) Lease property (Schedule B-2.4)

Provide a list of all leased properties that are treated as a capital lease for book purposes and improvements to leased properties. Include those leases treated as a capital lease for book purposes but as an operating lease for ratemaking purposes and reflect such leases on Schedule B-2.2 as an adjustment to plant in service. The list should include all information indicated in Schedule B-2.4 and shall be in the format specified.

(7) Property excluded from rate base (Schedule B-2.5)

For the rate area under consideration, identify all company-owned property, other than property held for future use, included in the total company plant in service but excluded from the total plant in service rate base for reasons other than rate area allocation. Identify those excluded properties that produce income or for which expenses other than depreciation expense, property taxes, or federal income taxes are included in the income statement. Show for each case the income and/or expense account number along with the test year income and/or expense realized.

(C) Depreciation

(1) Reserve for accumulated depreciation (Schedule B-3)

All utilities shall provide the information as requested on the Schedule B-3 applicable to that utility showing a breakdown by account for each major property grouping. Companies that do not maintain reserve balances by account may use theoretical reserve studies to allocate actual reserve balances among the accounts. Schedule B-3 shall indicate that the reserve was allocated using a theoretical reserve study.

(2) Adjustments to the reserve for accumulated depreciation (Schedule B-3.1)

Each adjustment made to depreciation reserve on Schedule B-3 shall be fully explained on Schedule B-3.1. A B-3.1 schedule shall be completed for each depreciation reserve adjustment and shall identify each account and subaccount to which adjustments were made. All information shall be provided on this schedule or referenced to a specific working paper.

(3) Depreciation accrual rates and jurisdictional reserve balances by accounts (Schedule B-3.2)

Provide all information as requested on Schedule B-3.2. Plant investment shall be provided by individual account and/or subaccount as required to compute depreciation expense. Current book accrual rates and related data shall be provided in the format as specified in columns (F) through (J).

If the utility proposes to revise its accrual rates for book purposes, the utility shall expand Schedule B-3.2 to include columns (K) through (O) and shall provide on a proposed basis, the same type of data as specified in columns (F) through (J).

- (4) Depreciation reserve accruals, retirements, and transfers (Schedule B-3.3)
- Provide in the level of detail maintained by the utility, the total company balances, depreciation/amortization expense accruals, salvage, cost of removal, and transfers in the format indicated on Schedule B-3.3 which occurred in the interim period from the date certain of the last rate case to the date certain in the current case. If transfers are a normal course of events in a particular account, only a general description (under the column "explanation of transfers") of the nature of the transfer is required.
- (5) Depreciation reserve and expense for lease property (Schedule B-3.4)
- For each leased property and improvements to leased properties that are shown on Schedule B-2.4, provide the information requested on Schedule B-3.4.
- (D) Construction work in progress
- (1) Construction work in progress (Schedule B-4)
- Provide a list of all construction projects in progress at the date certain which have been included in the proposed rate base. Construction work in progress shall be consistent with the definition given in the Uniform System of Accounts (either FERC or NARUC as appropriate). The utility shall also identify those projects which when completed will replace existing plant in service.
- (2) Construction work in progress - percent complete (time) (Schedule B-4.1)
- Provide a list of construction projects in progress at the date certain which are included in Schedule B-4. The list shall include all information specified in Schedule B-4.1 and shall be in the format indicated.
- (3) Construction work in progress - percent complete (dollars) (Schedule B-4.2)
- For the same construction projects listed on Schedule B-4.1, provide the information specified on Schedule B-4.2 in the format indicated.
- (E) Working capital
- (1) Allowance for working capital (Schedule B-5)
- Provide a summary schedule showing the calculation of working capital included in the proposed rate base. Show each individual component and describe the methodology used to calculate each component. An allowance for cash working capital shall be supported by a recent lead-lag study. The recent lead-lag study must accurately represent conditions during the test period. A lead-lag study is defined as a procedure for determining the weighted average of the days for which investors or customers supply cash working capital to operate the utility.
- (2) Miscellaneous working capital items (Schedule B-5.1)
- Provide, the test year average (thirteen months), and the date certain balances of items specified on Schedule B-5.1, if applicable, and reflected in the computation shown on Schedule B-5. Allocate the average and date certain balances to the jurisdiction using appropriate allocation factors.

The information to be provided on this schedule for each item may be in a summary form, provided that the detail and calculation be included in working papers. These working papers shall be keyed to the appropriate item on the schedule and made available to the commission staff as specified in the "General Instructions," paragraphs (A)(8), and (C)(7) in Chapter II of this appendix.

(F) Other rate base items

(1) Other rate base items summary (Schedule B-6)

In column (1) of Schedule B-6, provide the total company date certain balances for customers' advances for construction, customer deposits, contributions in aid of construction (CIAC) (if not already netted against gross plant in Schedule B-2.1), unamortized investment tax credit, all accumulated deferred income taxes, unamortized excess deferred income taxes, customer deposits, and any other rate base items. The unamortized investment tax credit and all accumulated deferred income taxes, including unamortized excess deferred income taxes, ~~balances~~ shall be provided in the detail and format as specified on Schedule B-6. Total company data contained in column (1) shall be traceable directly to the general ledgers and/or subsidiary ledgers. Any adjustments to the date certain balances, including eliminating investment tax credit and deferred income tax balances not used as rate base deductions, shall be made in column (4) and supported on Schedule B-6.1.

(2) Adjustments to other rate base items (Schedule B-6.1)

Each adjustment made to other rate base items on Schedule B-6 shall be fully explained in Schedule B-6.1. A B-6.1 schedule shall be completed for each adjustment made on Schedule B-6 and shall identify each account and subaccount to which adjustments were made. All information shall be provided on this schedule or referenced to a specific working paper.

(3) Contributions in aid of construction by accounts and subaccounts (Schedule B-6.2)

Provide the information required on Schedule B-6.2 for the CIAC balances shown on Schedule B-6.

(G) Allocation factors

(1) Jurisdictional allocation factors (Schedule B-7)

This schedule applies to both rate base and operating income related allocations.

Identify by each account, subaccount or component the factor(s) used in allocating total utility rate base and operating income to the jurisdiction. The allocation factors used should be based on the statistical measures shown in Schedule B-7.1.

For example, if it was determined that the account "Office Structures and Improvements" should be allocated to the jurisdiction based on the ratio of jurisdictional sales to total sales, the appropriate jurisdictional sales allocation factor would be developed in Schedule B-7.1 and applied to the office structure and improvements account on Schedule B-7.

(2) Jurisdictional allocation statistics (Schedule B-7.1)

Provide, for each allocation factor to be used on Schedule B-7, the statistics used in determining the jurisdictional percentage.

(3) Explanation of changes in allocation procedures (Schedule B-7.2)

This schedule shall be completed only if the allocation procedures described in the prior schedules are not consistent with the last commission order for the company. For each account, subaccount and/or component with a change, identify the allocation procedure used in the prior order and the rationale for using the proposed procedure in this application.

(H) Steam heating, water, and gas data (Schedule B-8)

Provide the information requested on the Schedule B-8 applicable to the type of utility.

(I) Mirrored CWIP allowances (Schedule B-9)

Provide the data requested on Schedule B-9 for each CWIP project which was included in rates effective after April 10, 1985, and which was placed in service between the date certain of the last rate case and the date certain of this case. If mirroring of a project was begun in a prior case and will not be completed by the expected effective date of rates in this case, include it on the schedule. If a project was allowed in more than one case, list it for each case.

(Company)

Case No.: _____

Jurisdictional Rate Base Summary

As of _____

Data: _____Actual _____Estimated

Schedule B-1

Type of Filing: ___Original ___Updated ___Revised

Page ___ of ___

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Rate Base Component	Supporting Schedule Reference	Company Proposed Amount
1	Plant In Service	B-2	\$
2	Reserve for Accumulated Depreciation	B-3	(_____)
3	Net Plant In Service (1 + 2)		
4	Construction Work In Progress 75% Complete	B-4	()
5	Working Capital Allowance	B-5	
6	Contributions in Aid of Construction	B-6	()
7	Other Rate Base Items	B-6	(_____)
8	Jurisdictional Rate Base (3) Thru (7)		\$

.

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Plant In Service Summary by Major Property Groupings*

As of _____

Data: _____Actual _____Estimated

Schedule B-2

Type of Filing: ____Original ____Updated ____Revised

Page ____ of ____

Work Paper Reference No(s).: _____

Witness Responsible: _____

Line No.	Major Property Groupings	Total Company	Allocation %	Allocated Total	Adjustments	Adjusted Jurisdiction
1	Production	\$	%	\$	\$	
2	Transmission					
3	Distribution					
4	General					
5	Common					
6	Completed Construction Not Classified					
7	Other (Specify)					
8	TOTAL	\$	%	\$	\$	\$

*This schedule applies to electric and gas companies only.

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Plant In Service Summary by Major Property Groupings*

As of _____

Data: ____Actual ____Estimated

Schedule B-2

Type of Filing: ____Original ____Updated ____Revised

Page ____ of ____

Work Paper Reference No(s).: _____

Witness Responsible: _____

Line No.	Major Property Groupings	Total Company	Allocation %	Allocated Total	Adjustments	Adjusted Jurisdiction
1	Intangible	\$	%	\$	\$	\$
2	Source of Supply					
3	Pumping Plant					
4	Water Treatment					
5	Transmission and Distribution					
6	General					
7	TOTAL	\$	%	\$	\$	\$

*This schedule applies to waterworks companies only.

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Plant in Service Summary by Major Property Groupings*

As of _____

Data: ____Actual ____Estimated

Schedule B-2

Type of Filing: ____Original ____Updated ____Revised

Page ____ of ____

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Major Property Groupings	Total Company	Allocation %	Allocated Total	Adjustments	Adjusted Jurisdiction
1	Intangible	\$	%	\$	\$	\$
2	Land and Structures					
3	Collection					
4	Pumping					
5	Treatment and Disposal					
6	General					
7	TOTAL	\$	%	\$	\$	\$

*This schedule applies to sewage disposal system companies only.

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Plant in Service by Accounts and Subaccounts
As of _____

Data: ____Actual ____Estimated

Schedule B-2.1

Type of Filing: ____Original ____Updated ____Revised

Page ____ of ____

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Acct. No.	Account Title	Total Company	Allocation %	Allocated Total	Adjustments	Adjusted Jurisdiction
-------------	--------------	------------------	------------------	-----------------	--------------------	-------------	--------------------------

			\$	%	\$	\$	\$
--	--	--	----	---	----	----	----

TOTAL			\$	%	\$	\$	\$
-------	--	--	----	---	----	----	----

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Adjustments to Plant in Service

As of _____

Data: ____Actual ____Estimated

Schedule B-2.2

Type of Filing: ____Original ____Updated ____Revised

Page ____ of ____

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Acct. No.	Account Title	Total Company Adjustment	Allocation %	Jurisdictional Adjustment
-------------	--------------	------------------	--------------------------------	-----------------	------------------------------

Adjustment Title

(Plant Accounts and Subaccounts Affected by Adjustment)

Total Plant Adjustment

Description And Purpose Of Adjustment

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Gross Additions, Retirements, and Transfers

From _____ To _____

Data: _____Actual _____Estimated

Schedule B-2.3

Type of Filing: ___Original ___Updated ___Revised

Page ___ of ___

Work Paper Reference No(s).: _____

Witness Responsible: _____

Line No.	Acct. No.	Acct. Title	Beginning Balance	Additions	Retirements	<u>Transfers/Reclassifications</u>		Explanation of Transfers	Other Accts. Involved	Ending Balance
						Amount				
			\$	\$	\$	\$				\$

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Lease Property

(Total Company)

As of _____

Data: _____Actual _____Estimated

Schedule B-2.4

Type of Filing: _____Original _____Updated _____Revised

Page _____of _____

Work Paper Reference No(s): _____

Witness Responsible: _____

Identification or Reference Number	Description of Type and Use of Property	Name of Leasee	Frequency of Payment	Amount of Lease Payment	Dollar Value of Property Involved	Explain Method of Capitalization	Included in Rate Base (Yes/No)
---	--	----------------------	----------------------------	-------------------------------	--	--	---

* If not available, an estimate shall be furnished.

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Property Excluded from Rate Base

(For Reasons Other than Rate Area Allocation)

As of _____

Data: ____Actual ____Estimated

Schedule B-2.5

Type of Filing: ____Original ____Updated ____Revised

Page ____ of ____

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Acct. No.	Description of Excluded Property	In- Service Date	Original Cost	Accum. Depre.	Net Original Cost	Test Year			Reasons for Exclusion
							<u>Revenue & Expense</u>			
							Acct.			
							Amount	No.	Descrip.	

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Reserve for Accumulated Depreciation*

As of _____

Data: _____Actual _____Estimated

Schedule B-3

Type of Filing: _____Original _____Updated _____Revised

Page _____ of _____

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Acct. No.	Major Property Groupings & Account Titles	Total Company Plant Investment	Reserve Balances		Allocated Total	Adjusted Jurisdiction
				Total Company	Allocation %	Adjustments	
		Production	\$	\$		\$	\$
		Total Production					
		Transmission					
		Total Transmission					
		Distribution					
		Total Distribution					
		General					
		Total General					
		Common					
		Total Common					
		Other (Specify)					
		Total Other					
		TOTAL	\$	\$		\$	\$

*This schedule applies to gas & electric companies only.

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)
Case No.: _____

Reserve for Accumulated Depreciation*

As of _____

Data: _____Actual _____Estimated

Schedule B-3

Type of Filing: ____Original ____Updated ____Revised

Page ____ of ____

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Acct. No.	Major Property Groupings & Account Titles	Total Company Plant Investment			Reserve Balances		Adjusted Jurisdiction
				Total Company	Allocation %	Allocated Total	Adjustments	
		Intangible	\$	\$		\$	\$	\$
		Total Intangible						
		Source of Supply						
		Total Source of Supply						
		Pumping						
		Total Pumping						
		Water Treatment						
		Total Water Treatment						
		Trans. & Dist.						
		Total Trans. & Dist.						
		General						
		Total General						
		TOTAL	\$	\$		\$	\$	\$

*This schedule applies to waterworks companies only.

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Reserve for Accumulated Depreciation*

As of _____

Data: _____Actual _____Estimated

Schedule B-3

Type of Filing: _____Original _____Updated _____Revised

Page _____ of _____

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Acct. No.	Major Property Groupings & Account Titles	Total Company Plant Investment			Reserve Balances		Adjusted Jurisdiction
				Total Company	Allocation %	Allocated Total	Adjustments	
		Intangible	\$	\$		\$	\$	\$
		Total Intangible						
		Land & Buildings						
		Total Land & Bldgs.						
		Collection						
		Total Collection						
		Pumping						
		Total Pumping						
		Treatment & Disposal						
		Total Treatment & Disposal						
		General						
		Total General						
		TOTAL	\$	\$		\$	\$	\$

*This schedule applies to sewage disposal system companies only.

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)
Case No.: _____
Adjustments to the Reserve for
Accumulated Depreciation
As of _____

Data: ____Actual ____Estimated Schedule B-3.1

Type of Filing: ____Original ____Updated ____Revised Page ____ of ____

Work Paper Reference No(s): _____ Witness Responsible: _____

Line No.	Account No.	Account Title	Total Company Adjustment	Allocation %	Jurisdictional Adjustment
-------------	----------------	------------------	--------------------------------	-----------------	------------------------------

Adjustment Title

(Reserve Accounts and Subaccounts Affected by Adjustment)

Total Reserve Adjustment

Description And Purpose Of Adjustment

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)
Case No.: _____
Depreciation Accrual Rates and
Jurisdictional Reserve Balances by Accounts
As of _____

Data: ____Actual ____Estimated Schedule B-3.2

Type of Filing: ____Original ____Updated ____Revised Page ____ of ____

Work Paper Reference No(s): _____ Witness Responsible: _____

Line No. (A)	Acct. No. (B)	Acct. Title (C)	<u>Adjusted Jurisdiction</u>		Current Accrual Rate* (F)	Calculated Depr. Expense (G=DxF)	%Net Salvage* (H)	Average Service Life* (I)	Curve Form* (J)
			Plant Investment (D)	Reserve Balance (E)					
			\$	\$		\$			

*Columns (F), and (H) through (J) small represent depreciation values as prescribed by this commission for booking purposes. If such values have not been prescribed by this commission, the utility shall so indicate on schedule by footnote.

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Depreciation Reserve Accruals, Retirements, and Transfers

As of _____

Data: ____Actual ____Estimated

Schedule B-3.3

Type of Filing: ____Original ____Updated ____Revised

Page ____ of ____

Work Paper Reference No(s).: _____

Witness Responsible: _____

Line No.	Description	Beginning Balance	Accruals	Salvage	Retirements	Cost of Removal	<u>Transfers/Reclassifications</u>		Ending Balance
							Amount	Explanation of Transfers	Other Accts. Involved
		\$	\$	\$	\$	\$	\$		\$

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Depreciation Reserve and Expense for Lease Property

(Total Company)

As of _____

Data: _____Actual _____Estimated

Schedule B-3.4

Type of Filing: ____Original ____Updated ____Revised

Page____of ____

Work Paper Reference No(s): _____

Witness Responsible:_____

Identifi- cation or Reference Number	Acct. No.	Acct. Title	Dollar* Value of Plant Investment	Accumulated Depreciation/ Amortization Reserve	Accrual Rate/ Amortization Period	Depreciation Expense/ Amortization Expense	Explain Method of Depreciation/ Amortization	Included in Rate Base (Yes/No)
---	--------------	----------------	--	---	--	---	--	---

*If not available, an estimate shall be furnished

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Construction Work in Progress

As of _____

Data: _____Actual _____Estimated

Schedule B-4

Type of Filing: ____Original ____Updated ____Revised

Page ____ of ____

Work Paper Reference No(s).: _____

Witness Responsible: _____

Line No. (A)	Project No. (B)	Descp. of Project (C)	Accumulated Costs			Allocation % (G)	Total Jurisdictional Cost at Date Certain (H)	Estimated Physical Percent Completion (I)
			Construc. Dollars (D)	AFUDC Capitalized (E)	Total Cost (F=D+E)			
			\$	\$	\$		\$	

Pollution Control Projects

Other Projects

Total Other Projects

Total CWIP Projects

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Construction Work in Progress – Percent Complete (Time)

As of _____

Data: _____Actual _____Estimated

Schedule B-4.1

Type of Filing: ____Original ____Updated ____Revised

Page ____ of ____

Work Paper Reference No(s).: _____

Witness Responsible: _____

Line No. Completion (A)	Project No. (B)	Date Construction Work Began (C)	Estimated Project Completion Dollars (D)	Elapsed Days: Beginning to Date Certain (E)	Elapsed Days: Beginning to Estimated Completion (F)	Date Certain % (G)=(E)÷(F)
		\$	\$	\$	\$	

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Construction Work in Progress – Percent Complete (Dollars)

As of _____

Data: _____Actual _____Estimated

Schedule B-4.2

Type of Filing: ____Original ____Updated ____Revised

Page ____ of ____

Work Paper Reference No(s).: _____

Witness Responsible: _____

		<u>Most Recent Budget Estimate</u>				<u>Project Expenditures As of Date Certain*</u>		<u>Date Certain % Completion</u>	
Line	Project	Constr.		Total	Constr.	Constr.		Constr.	Const.
No.	No.	Dollars	AFUDC	(E) =	Dollars	Dollars		Dollars	Dollars
(A)	(B)	(C)	(D)	(C)+(D)	Trended**	Trended**		(I) =	(J) =
								(G)÷(C)	(H) ÷(F)

* All figures except (D) and (E) shall exclude AFUDC.

** Trended to reflect purchasing power as of date certain.

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Allowance for Working Capital

As of _____

Data: _____Actual _____Estimated

Schedule B-5

Type of Filing: _____Original _____Updated _____Revised

Page _____ of _____

Work Paper Reference No(s).: _____

Witness Responsible: _____

Line No.	Working Capital Component	Description of Methodology Used to Determine Jurisdictional Requirement	Working Paper Reference No.	Total Company	Allocation \$	Jurisdiction
				\$		\$

TOTAL

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Miscellaneous Working Capital Items

As of _____

Data: _____Actual _____Estimated

Schedule B-5.1

Type of Filing: ____Original ____Updated ____Revised

Page ____ of ____

Work Paper Reference No(s).: _____

Witness Responsible: _____

Line No.	Description	<u>13 Month Average for Test Year</u>			<u>Date Certain Balance</u>		
		Total Company	Allocation %	Jurisdiction	Total Company	Allocation %	Jurisdiction
		(1)	(2)	(3)	(4)	(5)	(6)
(1)	Revenue Lag						
(2)	Expense Lag						
(3)	Plant Materials & Operating Supplies - Total						
(4)	M & S Held for Construction, Additions, and Extensions						
(5)	M & S Held for Normal Operations (4) - (5)						
(6)	Gas Stored - Current						
(7)	Prepayments for Gas - Undelivered						
(8)	PIPP Uncollectibles - Balance (By Account)						
a.	Other (Specify & List)						

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Other Rate Base Items Summary

As of _____

Data: _____Actual _____Estimated

Schedule B-6

Type of Filing: ____Original ____Updated ____Revised

Page ____ of ____

Work Paper Reference No(s).: _____

Witness Responsible: _____

Line No.	Account No.	Description	Total Company (1)	Allocation % (2)	Allocated Total (3)	Adjustments (4)	Adjusted Jurisdiction (5)
-------------	----------------	-------------	-------------------------	------------------------	---------------------------	--------------------	---------------------------------

Customers' Advances For Construction
Customers' Deposits
Contributions in Aid of Construction

Investment Tax Credits:¹

Pre-1971 3% Credit
1971 4% Credit
1975 6% Add'l Credit
1981 10% Credit on Recovery Property
~~ITC Tax Benefits Sold~~
Other (Specify and List Separately)

TOTAL Investment Tax Credits

Deferred Income Taxes:

Accelerated Amortization
Liberalized Depreciation
~~ACRS Tax Benefits Sold~~
Unamortized Excess Deferred
Other (Specify and List Separately)

TOTAL Deferred Income Taxes

Other (Specify and List Separately)

¹ Steam Utilities shall list separately and show 7% credit, and 10% credit.

Note: When completing forms, either portrait or landscape formatting is acceptable

TOTAL (Other Rate Base Items)

(Company)

Case No.: _____

Adjustments to Other Rate Base Items

As of _____

Data: _____Actual _____Estimated

Schedule B-6.1

Type of Filing: ____Original ____Updated ____Revised

Page ____ of ____

Work Paper Reference No(s).: _____

Witness Responsible: _____

Line No.	Account No.	Account Title	Total Company Adjustments	Allocation %	Jurisdictional Adjustment
-------------	----------------	---------------	---------------------------------	-----------------	------------------------------

Adjustment Title

(Accounts and Subaccounts Affected by other Rate Base Items Adjustment)

Total Adjustment

Description and Purpose of Adjustment

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Contributions in Aid of Construction by Accounts and Subaccounts

As of _____

Data: _____Actual _____Estimated

Schedule B-6.2

Type of Filing: ____Original ____Updated ____Revised

Page ____ of ____

Work Paper Reference No(s).: _____

Witness Responsible: _____

Line No.	Account No.	Account Title	Total Company	Allocation %	Allocated Total	Adjustments	Adjusted Jurisdiction
			\$		\$	\$	\$
TOTAL			\$		\$	\$	\$

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Jurisdictional Allocation Factors

Rate Base and Operating Income

Data: _____ Months Actual & _____ Months Estimated

Schedule B-7

Type of Filing: ___Original ___Updated ___Revised

Page ___ of ___

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Acct. No.	Account Title	Allocation Factor	Description of Factors and/or Method of Allocation
-------------	--------------	------------------	----------------------	--

Rate Base

(Listing of Accounts and Subaccounts)

Operating Income

(Listing of Accounts and/or Components)

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.:_____

Jurisdictional Allocation Statistics

Data: _____ Months Actual & _____ Months Estimated

Schedule B-7.1

Type of Filing: Original Updated Revised

Page__of __

Work Paper Reference No(s):: _____

Witness Responsible:_____

Line No. (A)	Allocation Factor (B)	Statistic Total Company (C)	Adjustment to Total Company Statistic (D)	Adjusted Statistic for Total Company (E=C+D)	Statistic for Rate (F)	Allocation Factor (G=F÷ E)
-----------------	--------------------------	--------------------------------	--	---	---------------------------	-------------------------------

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Explanation of Changes in Allocation Procedures

Data: _____ Months Actual & _____ Months Estimated

Schedule B-7.2

Type of Filing: ___ Original ___ Updated ___ Revised

Page ___ of ___

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Acct. No.	Description	Procedures Approved in Prior Case	Rationale for Change
-------------	--------------	-------------	--------------------------------------	----------------------

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Water Data*

For the Twelve Months Ended _____

Data: _____ Actual _____ Estimated

Schedule B-8

Type of Filing: _____ Original _____ Updated _____ Revised

Page _____ of _____

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Description	LBS
<hr/>		
(1)	Annual Maximum Pumping Capacity of System	
(2)	Total Water Pumped (Output)	
(3)	Total Metered Sales	
(4)	Total Non-Metered Sales	
(5)	Difference Between Output and Sales (2) - (3) - (4)	
(6)	Company Use - Normal Operations	
(7)	Company Use - Extraordinary Maintenance/Hydrant Flushing	
(8)	Other Company Use - Main Breakage, Etc.	
(9)	Unaccounted for Water (5 - 6 - 7 - 8)	
(10)	Unaccounted for Water Percentage (9) ÷ (2)	

*This Schedule Applies To Waterworks Companies Only.

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Steam Heating Data*

For the Twelve Months Ended _____

Data: _____ Actual _____ Estimated

Schedule B-8

Type of Filing: ___ Original ___ Updated ___ Revised

Page ___ of ___

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Description	M LBS.
(1)	Annual Maximum Production Capacity	
(2)	Steam Sales	
(3)	Steam Production	

*This schedule applies to steam utilities only.

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Gas Data*

For the Twelve Months Ended _____

Data: _____ Actual _____ Estimated

Schedule B-8

Type of Filing: _____ Original _____ Updated _____ Revised

Page _____ of _____

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Description	MCF as Measured	MCF at Standard Temp. & Pressure
<hr/>			
(1)	Gas Received (Purchased, Produced Etc.)		
(2)	Sales and Other Deliveries		
(3)	Company Use		
(4)	Unaccounted for Gas (1 - 2 - 3)		
(5)	Unaccounted for Gas Percentage (4 ÷ 1)		

* This schedule for gas companies only.

** Twelve months selected should reflect most recently available actual operating cycle encompassing one heating season.

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Mirrored CWIP Allowances

Data: _____ Actual _____ Months Estimated

Schedule B-9

Type of Filing: _____ Original _____ Updated _____ Revised

Page _____ of _____

Work Paper Reference No(s).: _____

Witness Responsible: _____

Line No. (A)	Project No. (B)	Description of Project (C)	Prior Case Reference(s) (D)	Effective Date of Rates Including CWIP (E)	In Service Date of Project (F)	Allowance Included in Rates (G)
--------------------	-----------------------	----------------------------------	-----------------------------------	---	---	--

\$

Total CWIP Allowances to be Mirrored.

\$ _____

Note: When completing forms, either portrait or landscape formatting is acceptable

Section C
Operating Income
(Large Utilities)

Company: _____

Case No.: _____

Test Year: _____

Date Certain: _____

- C-1 Jurisdictional proforma income statement
- C-2 Adjusted test year operating income - electric utilities
- C-2 Adjusted test year operating income - gas utilities
- C-2 Adjusted test year operating income - waterworks and sewage disposal system utilities
- C-2.1 Operating revenues and expenses by accounts - jurisdictional allocation
- C-3 Summary of jurisdictional adjustments to test year operating income - electric utilities
- C-3 Summary of jurisdictional adjustments to operating income - gas utilities
- C-3 Summary of jurisdictional adjustments to operating income - waterworks and sewage disposal system utilities
- C-3.1 Detailed adjustments
- C-4 Adjusted jurisdictional federal income taxes
- C-4.1 Development of jurisdictional federal income taxes before adjustments
- C-5 Social and service club dues
- C-6 Charitable contributions
- C-7 Customer service and information, sales, and general advertising expense (electric and gas)
- C-7 Customer service, sales promotion, and miscellaneous advertising expense (waterworks and sewage disposal system)
- C-8 Rate case expense
- C-9 Operation and maintenance payroll costs
- C-9.1 Total company payroll analysis by employee classification/payroll distribution
- C-10.1 Comparative balance sheet for the most recent five calendar years
- C-10.2 Comparative income statement for the most recent five calendar years
- C-11.1 Revenue statistics - total company (electric, gas, and waterworks utilities)
- C-11.2 Revenue statistics - jurisdictional (electric, gas, and waterworks utilities)
- C-11.3 Sales statistics - total company (electric, gas, and waterworks utilities)
- C-11.4 Sales statistics - jurisdictional (electric, gas, and waterworks utilities)
- C-12 Analysis of reserve for uncollectible accounts

Section C Instructions
Operating Income

(A) General

Account classifications

The schedules included in section C "Operating Income" do not prescribe specific account classifications in order that the schedules may be applicable to more than one type of utility. Utilities shall use account classifications as provided in the "Uniform System of Accounts" relative to the type of utility.

(B) Operating income schedules

(1) Jurisdictional proforma income statement (Schedule C-1)

Provide the jurisdictional condensed proforma income statement for the jurisdiction for which a rate increase is requested, both at the current rates and at the proposed rates. The operating income statement shall be in the format specified in Schedule C-1. Revenues reported on this schedule, both at current and proposed rates, shall be supported by and equal to revenue calculated on Section "E" schedules before mirrored CWIP revenue, except for telephone companies. Federal income taxes reported on this schedule, both at current and proposed rate, should be supported by and equal to the federal income taxes calculated on Schedule C-4. Provide a work paper showing the derivation of any expense item affected by the proposed increase and reflected on this schedule.

(2) Adjusted test year operating income (Schedule C-2)

Provide an operating income statement in the format specified on the appropriate Schedule C-2.

(3) Operating revenues and expenses by account - jurisdictional allocation (Schedule C-2.1)

Provide a detailed operating income statement by FERC, NARUC or PUCO account in generally the same format as specified on Schedule C-2.1. The column labeled "total utility" shall represent the total of the monthly operating revenues and expenses and shall be traceable directly to the general ledger and/or the corporate budget(s) relating to any portion of the test year.

(4) Within the total utilities monthly operating revenues and expenses, identify all rider revenues and expenses applicable to the test year period, and adjust the operating revenues and expenses within Schedule C-3 in order to exclude from base rates rider revenue and expenses that are not being proposed to be incorporated in base rates. In Schedule C-2, include rider revenues and expenses in the unadjusted amount with the corresponding C-3 adjustment such that the adjusted total company excludes all rider revenue and expenses that are not being proposed to be incorporated in base rates.

(C) Adjustments to jurisdictional operating income

(1) Summary of jurisdictional adjustments to operating income (Schedule C-3)

Summarize each adjustment to jurisdictional operating revenues and/or expenses at current rates in Schedule C-3. For each adjustment show the impact upon the related

element of operating income. Each adjustment shall be referenced by title of adjustment to the appropriate supporting schedules. The classifications and adjustment titles are provided only as examples since adjustments will vary from company to company.

(2) Titles of adjustments (Schedules C-3.1, .2, .3, Etc.)

Provide for each adjustment included on Schedule C-3 a separate schedule showing:

- (a) Purpose and description of the adjustment.
- (b) Summary calculations of the adjustment as it affects the elements of operating income as detailed on Schedule C-3.

(D) Account analyses

(1) Adjusted jurisdictional income taxes (Schedule C-4)

Provide a detailed calculation of income taxes in the format and detail as specified on Schedule C-4. Itemize and total the "other reconciling items" and "other tax deferrals" and identify each item by brief descriptive titles. Indicate those items for which the utility is requesting authorization to normalize the associated deferred taxes.

(2) Development of jurisdictional income taxes before adjustments (Schedule C-4.1)

Provide the computation of the jurisdictional federal income taxes as specified on Schedule C-4.1. This schedule shall be provided in same detail as shown on Schedule C-4.

(3) Social and charitable expenses (Schedules C-5 and C-6)

If included in test year operating expenses, provide a detailed schedule listing the payee, the amount, the description, and the account(s) charged for each of the following:

- (a) Social and service club dues (Schedule C-5)
- (b) Charitable contributions (Schedule C-6)

The required details shall be provided for individual items \$1,000 or more each. Items under \$1,000 each may be provided in total.

(4) Customer service and informational, sales, and miscellaneous advertising expense or marketing expense (Schedule C-7)

If included in test year operating expenses, provide the amounts charged to each of the accounts listed on the Schedule C-7 applicable to the utility. Amounts listed under each account shall be broken down between labor and other than labor.

(5) Rate case expense (Schedule C-8)

As specified on Schedule C-8 provide an analysis of rate case expenses and rate case expense amortization. Also provide write-offs of rate case expense included in test year operating income.

Prior cases to be used for comparison purposes shall be the most recent rate proceedings involving the same jurisdiction as the current case.

A revised estimate of the current rate case expense shall be provided within ten days of the close of the hearings and shall be filed as a late filed exhibit.

(6) Operation and maintenance payroll costs (Schedule C-9)

Provide a schedule showing the distribution of the test year operation and maintenance (O&M) payroll costs for the total utility as specified in Schedule C-9. "Total utility" should include only the regulated entity seeking a rate case. Itemize and total the "other benefits" and "other payroll taxes." O&M labor, other benefits and payroll taxes must agree with the O&M amounts as included in Schedules C-2 and C-2.1.

(7) Total company payroll analysis by employee classifications/payroll distribution (Schedule C-9.1)

Provide the payroll analysis as specified on Schedule C-9.1 for the most recent five calendar years and the test year. One form shall be completed for the total company data and one form for each of the utility's employee classification or payroll distributions. The data should reflect the data provided in Schedule C-9 and should clearly identify total labor for the regulated entity seeking a rate case.

(E) Historical data

(1) Comparative balance sheets for the most recent five calendar years (Schedule C-10.1)

Provide for the total company summary balance sheets for the most recent five calendar years, and as of the date certain. Include any applicable notes and an explanation of any significant accounting changes.

This schedule shall show the total company assets, liabilities, and net worth, whether the application covers the entire company service area or only a portion of its service area. Balance sheets shall be constructed in accordance with the regulatory annual report form filed with the commission.

If date certain balance sheet actual figures are not available at the time the original application is filed, the actual date certain balance sheet shall be provided with the two-month update filing.

Notwithstanding the above provisions, any natural gas, waterworks, or sewage disposal system company that elects to use a date certain that is beyond the application filing date need not provide actual date certain balance figures at the time the application is filed or at the time of the two-month update. Such natural gas, waterworks, or sewage disposal system company shall instead file the most recent actual data available within 30 days of the date certain.

(2) Comparative income statements for the most recent five calendar years (Schedule C-10.2)

Provide a total company comparative income statement for the most recent five calendar years and the test year. Include any applicable notes and an explanation of any significant accounting changes.

This schedule shall show the total company complete income statements, whether the application covers the entire company service area or only a portion of its service area. Income statements shall be constructed in accordance with the regulatory annual report form filed with the commission.

If the applicant has "other income" exceeding five percent of utility operating income, provide separately a schedule in the form of an income statement showing the derivation of the "other income" amount. Revenues or income on this schedule shall be categorized

consistent with the applicant's normal accounting practices except that no category shall be larger than one percent of the applicant's gross operating income.

(3) Sales and revenue statistics (Schedules C-11.1, C-11.2, C-11.3, and C-11.4)

Electric, gas, and waterworks utilities shall provide, for the total company and the jurisdiction, the sales and revenue statistics specified on Schedules C-11.1, C-11.2, C-11.3, and C-11.4 as applicable to the utility.

(4) Analysis of reserve for uncollectible accounts (Schedule C-12)

Provide a total company analysis of uncollectibles for the three most recent calendar years and the test year in the format specified on Schedule C-12.

(Company)
Case No.: _____

Jurisdictional Proforma Income Statement
For the Twelve Months Ended _____

Data: _____ Months Actual & _____ Months Estimated

Schedule C-1

Type of Filing: ___ Original ___ Updated ___ Revised

Page ___ of ___

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Description	Adjusted Revenue & Expenses	Proposed Increase	Proforma Revenue & Expenses
	Operating Revenues	\$	\$	\$
	<u>Operating Expenses</u>			
	Operation & Maintenance			
	Depreciation			
	Taxes - other	_____	_____	_____
	Operating Expenses Before Income Taxes			
	Income Taxes	_____	_____	_____
	Total Operating Expenses	_____	_____	_____
	Net Operating Income	\$ _____	\$ _____	\$ _____
	Rate Base	\$ _____		\$ _____
	Rate of Return	_____ %		_____ %

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)
Case No.: _____
Adjusted Test Year Operating Income
For the Twelve Months Ended _____
(Electric Utilities)

Data: _____ Months Actual & _____ Months Estimated

Schedule C-2

Type of Filing: ___ Original ___ Updated ___ Revised

Page ___ of ___

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Description	Unadjusted Revenue & Expenses	Adjustments	Adjusted Revenue & Expenses
	<u>Operating Revenues</u>	\$	\$	\$
	Base Revenues			
	<u>Rider Revenues</u>			
	Fuel Revenues			
	Other Operating Revenues	_____	_____	_____
	Total Operating Revenues			
	<u>Operating Expenses</u>			
	<u>Rider Expenses</u>			
	Fuel And Purchased Power			
	Other Operation and Maintenance	_____	_____	_____
	Total Operation and Maintenance			
	Depreciation			
	Taxes other than Income Taxes			
	Income Taxes	_____	_____	_____
	Total Operating Expenses	_____	_____	_____
	Net Operating Income	\$_____	\$_____	\$_____

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)
Case No.: _____
Adjusted Test Year Operating Income
For the Twelve Months Ended _____
(Gas Utilities)

Data: _____ Months Actual & _____ Months Estimated

Schedule C-2

Type of Filing: ___ Original ___ Updated ___ Revised

Page ___ of ___

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Description	Unadjusted Revenue & Expenses	Adjustments	Adjusted Revenue & Expenses
	<u>Operating Revenues</u>	\$	\$	\$
	Base Revenues			
	<u>Rider Revenues</u>			
	Gas Cost Revenues			
	Other Operating Revenues	_____	_____	_____
	Total Operating Revenues			
	<u>Operating Expenses</u>			
	<u>Rider Expenses</u>			
	Purchased Gas			
	Other Operation and Maintenance	_____	_____	_____
	Total Operation and Maintenance			
	Depreciation			
	Taxes other than Income Taxes			
	Income Taxes	_____	_____	_____
	Total Operating Expenses	_____	_____	_____
	Net Operating Income	\$_____	\$_____	\$_____

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Adjusted Test Year Operating Income
For the Twelve Months Ended _____
(Waterworks and Sewage Disposal System Utilities)

Data: _____ Months Actual & _____ Months Estimated

Schedule C-2

Type of Filing: ___ Original ___ Updated ___ Revised

Page ___ of ___

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Description	Unadjusted Revenue & Expenses	Adjustments	Adjusted Revenue & Expenses
	<u>Operating Revenues</u>	\$	\$	\$
	Metered Sales Revenues			
	Unmetered Sales Revenues			
	Other Operating Revenues	_____	_____	_____
	Total Operating Revenues			
	<u>Operating Expenses</u>			
	Purchased Water			
	Other Operation and Maintenance	_____	_____	_____
	Total Operation and Maintenance			
	Depreciation			
	Taxes other than Income Taxes			
	Income Taxes	_____	_____	_____
	Total Operating Expenses	_____	_____	_____
	Net Operating Income	\$_____	\$_____	\$_____

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Operating Revenue and Expenses by Accounts – Jurisdictional Allocation

For the Twelve Months Ended _____

Data: _____ Months Actual & _____ Months Estimated

Schedule C-2.1

Type of Filing: ___ Original ___ Updated ___ Revised

Page ___ of ___

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Acct. No.	Account Title	Unadjusted Total Utility (1)	Allocation % (2)	Unadjusted Jurisdiction (3)	Allocation Code/ Description (4)
			\$		\$	

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)
Case No.: _____
Summary of Jurisdictional Adjustments to Operating Income
For the Twelve Months Ended _____
(Electric Utilities)

Data: _____ Months Actual & _____ Months Estimated

Schedule C-3

Type of Filing: ___ Original ___ Updated ___ Revised

Page ___ of ___

Work Paper Reference No(s): _____

Witness Responsible: _____

Schedule Reference	Title of Adjustment	
	<u>Operating Revenue Adjustments</u>	
C-3.1	Base Rate Revenue	\$ _____
C-3.2	Total Base Revenue Adjustment	\$ _____
C-3.3	Fuel Cost Revenue	\$ _____
	Other Operating Revenue Adjustments	\$ _____
C-3.4	Forfeited Discount	\$ _____
C-3.5		
C-3.6		
	Total other Revenue Adjustments	\$ _____
	Total Revenue Adjustments	\$ _____
	<u>Operating Expense Adjustments</u>	
C-3.7	Fuel and Purchased Power	\$ _____
	Other Operation and Maintenance	\$ _____
C-3.8		
C-3.9		
C-3.10		
C-3.11		
	Total other Operation and Maintenance	\$ _____
C-3.12	Depreciation	\$ _____
C-3.13	Taxes other than Income	\$ _____
C-3.14	Income Taxes	\$ _____
	Total Expense Adjustments	\$ _____

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Summary of Jurisdictional Adjustments to Operating Income

For the Twelve Months Ended _____

(Gas Utilities)

Data: _____ Months Actual & _____ Months Estimated

Schedule C-3

Type of Filing: ___ Original ___ Updated ___ Revised

Page ___ of ___

Work Paper Reference No(s): _____

Witness Responsible: _____

Schedule Reference	Title of Adjustment	
	<u>Operating Revenue Adjustments</u>	
C-3.1	Base Rate Revenue	\$ _____
C-3.2	Total Base Revenue Adjustment	\$ _____
C-3.3	Gas Cost Revenue	\$ _____
	Other Operating Revenue Adjustments	\$ _____
C-3.4	Forfeited Discount	\$ _____
C-3.5		
C-3.6		
	Total other Revenue Adjustments	\$ _____
	Total Revenue Adjustments	\$ _____
	<u>Operating Expense Adjustments</u>	
C-3.7	Cost of Gas Purchased	\$ _____
	Other Operation and Maintenance	\$ _____
C-3.8		
C-3.9		
C-3.10		
C-3.11		
	Total other Operation and Maintenance	\$ _____
C-3.12	Depreciation	\$ _____
C-3.13	Taxes other than Income	\$ _____
C-3.14	Income Taxes	\$ _____
	Total Expense Adjustments	\$ _____

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Summary of Jurisdictional Adjustments to Operating Income

For the Twelve Months Ended _____

(Waterworks and Sewage Disposal System Utilities)

Data: _____ Months Actual & _____ Months Estimated

Schedule C-3

Type of Filing: ___ Original ___ Updated ___ Revised

Page ___ of ___

Work Paper Reference No(s): _____

Witness Responsible: _____

Schedule Reference	Title of Adjustment	
	<u>Operating Revenue Adjustments</u>	
C-3.1	Metered Sales Revenue	\$ _____
C-3.2	Unmetered Sales Revenues	\$ _____
C-3.3	Forfeited Discount Revenue	\$ _____
	Total Revenue Adjustment	\$ _____
	<u>Operating Expense Adjustments</u>	
	Operation and Maintenance	\$ _____
C-3.4		
C-3.5		
C-3.6		
C-3.7		
C-3.8		
C-3.9		
C-3.10		
C-3.11		
C-3.12		
	Total Operation and Maintenance	\$ _____
C-3.13	Depreciation	\$ _____
C-3.14	Taxes other than Income	\$ _____
C-3.15	Income Taxes	\$ _____
	Total Expense Adjustments	\$ _____

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Title of Adjustment

For the Twelve Months Ended _____

Data: _____ Months Actual & _____ Months Estimated

Schedule C-3.1, etc.

Type of Filing: ___Original ___Updated ___Revised

Page ___ of ___

Work Paper Reference No(s): _____

Witness Responsible: _____

Purpose and Description	Amount
Total Adjustment	\$ _____
Jurisdictional Allocation Percentage	\$ _____
Jurisdictional Amount	\$ _____

Individual adjustment schedules shall not show effect of federal or state income taxes.

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)
Case No.: _____
Adjusted Jurisdictional Income Taxes
For the Twelve Months Ended _____

Data: _____ Months Actual & _____ Months Estimated

Schedule C-4

Type of Filing: ___ Original ___ Updated ___ Revised

Page ___ of ___

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Description	At Current Rates Schedule C-3			At Proposed Rates	
		Unadjusted Adjustments (1)	Adjusted (2)	Adjusted (3)	Proforma Adjustments (4)	Proforma (5)
1	Operating Income Before F.I.T.	\$_____	\$_____	\$_____	\$_____	\$_____
2	Reconciling Items:					
3	Interest Charges	_____	_____	_____	_____	_____
4	Tax Accelerated Depreciation	_____	_____	_____	_____	_____
5	Book Depreciation	_____	_____	_____	_____	_____
6	Excess of Tax Over Book Depr.	_____	_____	_____	_____	_____
7	Other Reconciling Items (Specify & List)	_____	_____	_____	_____	_____
8	Total Reconciling Items	_____	_____	_____	_____	_____
9	Taxable Income	_____	_____	_____	_____	_____
10	Federal, state, local income taxes:					
11	\$_____ @ Applicable Tax Bracket					
12	\$_____ @ Applicable Tax Bracket					
13	\$_____ @ Applicable Tax Bracket					
14	\$_____ @ Applicable Tax Bracket					
15	\$_____ @ Applicable Tax Bracket					
16	\$_____ @ Applicable Tax Bracket					
17	\$_____ @ Applicable Tax Bracket					
18	\$_____ @		Applicable		Tax	Bracket

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)
Case No.: _____
Adjusted Jurisdictional Income Taxes
For the Twelve Months Ended _____

Data: _____ Months Actual & _____ Months Estimated

Schedule C-4

Type of Filing: ___ Original ___ Updated ___ Revised

Page ___ of ___

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Description	At Current Rates			At Proposed Rates	
		Jurisdictional	Schedule C-3 Adjustments	Adjusted	Proforma Adjustments	Proforma
		(1)	(2)	(3)	(4)	(5)
19	Federal Income Tax Liability	\$_____	\$_____	\$_____	\$_____	\$_____
20	Federal Income Taxes - Current:	=====	=====	=====	=====	=====
21	Deferred Income Taxes	_____	_____	_____	_____	_____
22	Tax Accelerated Depreciation	_____	_____	_____	_____	_____
23	Tax Straight-Line Depreciation	_____	_____	_____	_____	_____
24	Excess of Accelerated Over Straight-Line Depreciation	_____	_____	_____	_____	_____
25	Deferred Income Tax @ _____%	_____	_____	_____	_____	_____
26	Amortization of Prior Years Deferred Income Taxes	_____	_____	_____	_____	_____

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)
Case No.: _____
Adjusted Jurisdictional Income Taxes
For the Twelve Months Ended _____

Data: _____ Months Actual & _____ Months Estimated

Schedule C-4

Type of Filing: ___ Original ___ Updated ___ Revised

Page ___ of ___

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Description	At Current Rates			At Proposed Rates	
		Unadjusted Jurisdictional (1)	Schedule C-3 Adjustments (2)	Adjusted (3)	Proforma Adjustments (4)	Proforma (5)
27	Net Deferred Income Taxes Resulting from Depreciation	\$_____	\$_____	\$_____	\$_____	\$_____
28	Amortization of Prior Years L.T.C.	_____	_____	_____	_____	_____
29	Other Tax Deferrals (Specify And List Separately)	_____	_____	_____	_____	_____
30	Total Deferred Income Taxes	\$=====	\$=====	\$=====	\$=====	\$=====
31	Total Federal Income Taxes (20) + (30)	\$=====	\$=====	\$=====	\$=====	\$=====

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)
Case No.: _____
Development of Jurisdictional Income Taxes
Before Adjustments
For the Twelve Months Ended _____

Data: _____ Months Actual & _____ Months Estimated Schedule C-4.1

Type of Filing: ___ Original ___ Updated ___ Revised Page ___ of ___

Work Paper Reference No(s).: _____ Witness Responsible: _____

Line No.	Account Title	Total Utility (1)	Allocation % (2)	Unadjusted Jurisdiction (3)	Allocation Code/ Expiration (4)
1	Operating Income Before F.I.T.	\$		\$	
2	Reconciling Items:				
3	Interest Charges				
4	Tax Accelerated Depreciation				
5	Book Depreciation	_____		_____	
6	Excess of Tax Over Book				
7	Other Reconciling Items (Specify & List)	_____		_____	
8	Total Reconciling Items	_____		_____	
9	Taxable Income	_____			
10	Federal, State, Local Income Taxes:				
11	\$_____ @ Applicable Tax Bracket				
12	\$_____ @ Applicable Tax Bracket				
13	\$_____ @ Applicable Tax Bracket				
14	\$_____ @ Applicable Tax Bracket				
15	\$_____ @ Applicable Tax Bracket				
16	\$_____ @ Applicable Tax Bracket				
17	\$_____ @ Applicable Tax Bracket				
18	\$_____ @ Applicable Tax Bracket				

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)
Case No.: _____
Development of Jurisdictional Income Taxes
Before Adjustments
For the Twelve Months Ended _____

Data: _____ Months Actual & _____ Months Estimated Schedule C-4.1

Type of Filing: ___ Original ___ Updated ___ Revised Page ___ of ___

Work Paper Reference No(s): _____ Witness Responsible: _____

Line No.	Account Title	Total Utility (1)	Allocation % (2)	Jurisdiction (3)	Allocation Code/ Explanation (4)
19	Federal Income Tax Liability				
20	Federal Income Taxes - Current	\$_____		\$_____	
21	Deferred Income Taxes				
22	Tax Accelerated Depreciation				
23	Tax Straight-Line Depreciation	\$_____		\$_____	
24	Excess of Accelerated Over Straight-Line Depreciation				
25	Deferred Income Tax @____%				

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)
Case No.: _____
Development of Jurisdictional Income Taxes
Before Adjustments
For the Twelve Months Ended _____

Data: _____ Months Actual & _____ Months Estimated Schedule C-4.1

Type of Filing: ___ Original ___ Updated ___ Revised Page ___ of ___

Work Paper Reference No(s): _____ Witness Responsible: _____

Line No.	Account Title	Total Utility (1)	Allocation % (2)	Jurisdiction (3)	Allocation Code/ Explanation (4)
26	Amortization of Prior Years Deferred Income Taxes	\$ _____		\$ _____	
27	Net Deferred Income Taxes Resulting from Depreciation	_____		_____	
28	Amortization of Prior Years L.T.C.	_____		_____	
29	Other Tax Deferrals (Specify and List Separately)	_____		_____	
30	Total Deferred Income Taxes	\$ _____		\$ _____	
31	Total Federal Income Taxes (20 + 30)	\$ _____		\$ _____	

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Social and Service Club Dues

For the Twelve Months Ended _____

Data: _____ Months Actual & _____ Months Estimated

Schedule C-5

Type of Filing: ___Original ___Updated ___Revised

Page ___ of ___

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Account No.	Social Organization/ Service Club	Total Utility	Allocation %	Jurisdiction
		\$	\$		

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)
Case No.: _____
Charitable Contributions
For the Twelve Months Ended _____

Data: _____ Months Actual & _____ Months Estimated

Schedule C-6

Type of Filing: ___ Original ___ Updated ___ Revised

Page ___ of ___

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Account No.	Charitable Organization	Total Utility	Allocation %	Jurisdiction
			\$		\$

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)
Case No.: _____
Customer Service and Informational, Sales, and
General Advertising Expense*
For the Twelve Months Ended _____

Data: _____ Months Actual & _____ Months Estimated

Schedule C-7

Type of Filing: ___ Original ___ Updated ___ Revised

Page ___ of ___

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Acct. No.	Description of Expenses	Total Utility	Allocation %	Jurisdiction
<u>Customer Service And Information Expenses</u>					
907		Supervision			
908		Customer Assistance			
909		Informational and Instructional Advertising			
910		Misc. Customer Service & Informational			
<u>Sales Expense</u>					
911		Supervision			
912		Demonstration & Selling			
913		Advertising			
916		Misc. Sales Expense			
930.1		General Advertising Expense			

*This schedule applies to electric and gas companies only.

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Customer Service, Sales Promotion, and
Miscellaneous Advertising Expense*
For the Twelve Months Ended _____

Data: _____ Months Actual & _____ Months Estimated

Schedule C-7

Type of Filing: ___Original ___Updated ___Revised

Page ___ of ___

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Account No.	Description of Expenses	Total Utility	Allocation %	Jurisdiction
		<u>Customer Service Expense</u>			
	907	Customer Service & Information Expense			
		<u>Sales Promotion Expense</u>			
	910	Sales Promotion			
	930.1	Institutional or Goodwill Advertising Expense			

*This schedule applies to waterworks and sewage disposal system companies only.

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Rate Case Expense (Jurisdiction)
For the Twelve Months Ended _____

Data: _____ Months Actual & _____ Months Estimated

Schedule C-8

Type of Filing: ___ Original ___ Updated ___ Revised

Page ___ of ___

Work Paper Reference No(s): _____

Witness Responsible: _____

Comparison of Projected Expenses Associated with the Current Case to Prior Rate Cases

Item of Expense	Current Case Estimated	Most Recent Prior Case Actual	Most Recent Prior Case Estimate	Next Most Recent Case Actual	Next Most Recent Case Estimate	Justification of Significant Change
-----------------	------------------------	-------------------------------	---------------------------------	---	---	-------------------------------------

Legal
Accounting
Rate of Return studies
Cost-of-Service studies
Other Major Rate Case Expenses (List & Specify)

Schedule of Rate Case Expense Amortization

Rate Case	Total Expense to be Amortized	Opinion/ Order Date	Authorized Amortization Period	Amount Amortized/ Expensed to Date	Expenses Included in Unadjusted Test Year Expense
-----------	-------------------------------	---------------------	--------------------------------	------------------------------------	---

Current (Estimated) \$

Most Recent

Next Most Recent

\$ _____⁽¹⁾

⁽¹⁾ Represents rate case expense included in Schedule C-2

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)
Case No.: _____
Operation and Maintenance Payroll Costs
For the Twelve Months Ended _____

Data: _____ Months Actual & _____ Months Estimated

Schedule C-9

Type of Filing: ___ Original ___ Updated ___ Revised

Page ___ of ___

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Description	Operation and Maintenance Expense				
		Total Company Unadjusted	Allocation %	Jurisdictional Unadjusted	Adjustments	Jurisdictional Adjusted
1	Payroll Costs	\$		\$	\$	\$
2	Labor					
3	Employee Benefits					
4	Pension					
5	Other Benefits					
	(Specify & List)	_____		_____	_____	_____
6	Total Benefits					
7	Payroll Taxes					
8	FICA					
9	Federal Unemployment					
10	State Unemployment					
11	Other Payroll Taxes					
	(Specify & List)	_____		_____	_____	_____
12	Total Payroll Taxes	_____		_____	_____	_____
13	Total Payroll Costs	=====		=====	=====	=====

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)
Case No.: _____
Total Company Payroll Analysis
By Employee Classifications / Payroll Distribution
For the Twelve Months Ended _____

Data: _____ Months Actual & _____ Months Estimated Schedule C-9.1
Type of Filing: ___ Original ___ Updated ___ Revised Page ___ of ___
Work Paper Reference No(s): _____ Witness Responsible: _____

Line No.	Description	Most Recent Five Calendar Years					Test
		20XX	20XX	20XX	20XX	20XX	
1	<u>Manhours</u>						
2	Straight-Time Hours						
3	Overtime Hours	_____	_____	_____	_____	_____	_____
4	Total Manhours	=====	=====	=====	=====	=====	=====
5	Ratio of Overtime Hours to Straight-Time Hours						
6	<u>Labor Dollars</u>	\$	\$	\$	\$	\$	\$
7	Straight-Time Dollars						
8	Overtime Dollars	_____	_____	_____	_____	_____	_____
9	Total Labor Dollars	=====	=====	=====	=====	=====	=====
10	Ratio of Overtime Dollars to Straight-Time Dollars						
11	O&M Labor Dollars	\$	\$	\$	\$	\$	\$
12	Ratio of O&M Labor Dollars to Total Labor Dollars	=====	=====	=====	=====	=====	=====
13	Total Employee Benefits	\$	\$	\$	\$	\$	\$
14	Employee Benefits Expensed						
15	Ratio of Benefits Expensed to Total Benefits	=====	=====	=====	=====	=====	=====
16	Total Payroll Taxes	\$	\$	\$	\$	\$	\$
17	Payroll Taxes Expensed						
18	Ratio of Payroll Taxes Expensed to Total Payroll Taxes	=====	=====	=====	=====	=====	=====
19	Average Employee Levels						
20	Year	End	Employee				Levels

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Comparative Balance Sheets (Total Company)

As of _____ and December 31, 20XX – 20XX

Schedule C-10.1

Type of Filing: ___Original ___Updated ___Revised

Page ___ of ___

Work Paper Reference No(s).: _____

Witness Responsible: _____

Line No.	Description	Date Certain ¹	Most Recent Five Calendar Years				
			20XX	20XX	20XX	20XX	20XX
	Assets and Other Debits	\$	\$	\$	\$	\$	\$
		<u> </u> \$	<u> </u> \$	<u> </u> \$	<u> </u> \$	<u> </u> \$	<u> </u> \$
	Liabilities and Other Credits	\$	\$	\$	\$	\$	\$
		<u> </u> \$	<u> </u> \$	<u> </u> \$	<u> </u> \$	<u> </u> \$	<u> </u> \$

¹ If date certain actual balance sheet is not available at the date of filing, it shall be provided with the two-month update filing.

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Comparative Income Statements (Total Company)

20XX – 20XX and the Twelve Months Ending _____

Schedule C-10.2

Type of Filing: ___Original ___Updated ___Revised

Page ___ of ___

Work Paper Reference No(s).: _____

Witness Responsible: _____

Line No.	Description	Test Year	Most Recent Five Calendar Years				
			20XX	20XX	20XX	20XX	20XX
	<u>Operating Revenues</u>	\$	\$	\$	\$	\$	\$
	Total Operating Revenues	_____	_____	_____	_____	_____	_____
	<u>Operating Expenses</u>						
	Total Operating Expenses	_____	_____	_____	_____	_____	_____
	Net Operating Income	_____	_____	_____	_____	_____	_____
	<u>Other Income And Deductions</u>						
	Total Other Income & Deductions	_____	_____	_____	_____	_____	_____
	Net Income	\$ _____	\$ _____	\$ _____	\$ _____	\$ _____	\$ _____

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)
Case No.: _____
Revenue Statistic – Total Company
(Electric, Gas, and Waterworks Utilities)
20XX – 20XX and the Twelve Months Ending _____

Schedule C-11.1

Type of Filing: ___Original ___Updated ___Revised

Page ___ of ___

Work Paper Reference No(s).: _____

Witness Responsible: _____

Line No.	Description	<u>Most Recent Five Calendar Years</u>					Test Year	<u>Five Projected Calendar Years</u>				
		20XX	20XX	20XX	20XX	20XX		20XX	20XX	20XX	20XX	20XX
	Revenue by Customer Class:											
	Residential	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$
	Commercial											
	Industrial											
	Other											
	Total											
	Number of Customers by Class: ¹											
	Residential											
	Commercial											
	Industrial											
	Other											
	Total											
	Average Revenue per Customer: ²											
	Residential	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$
	Commercial											
	Industrial											

¹ Provide number of customers for both a twelve-month average and at year end.

² The number of customers shall be the twelve-month average number of customers.

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Revenue Statistic – Jurisdictional

(Electric, Gas, and Waterworks Utilities)

20XX – 20XX and the Twelve Months Ending _____

Schedule C-11.2

Type of Filing: ___Original ___Updated ___Revised

Page ___ of ___

Work Paper Reference No(s).: _____

Witness Responsible: _____

Line No.	Description	<u>Most Recent Five Calendar Years</u>					Test Year	<u>Five Projected Calendar Years</u>				
		20XX	20XX	20XX	20XX	20XX		20XX	20XX	20XX	20XX	20XX
	Sales Revenue by Customer Class:											
	Residential	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$
	Commercial											
	Industrial											
	Other											
	Total											
	Number of Customers by Class: ¹											
	Residential											
	Commercial											
	Industrial											
	Other											
	Total											
	Average Revenue per Customer: ²											
	Residential	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$
	Commercial											
	Industrial											

¹ Provide number of customers for both a twelve-month average and at year end.

² The number of customers shall be the twelve-month average number of customers.

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Sales Statistic – Total Company

(Electric, Gas, and Waterworks Utilities)

20XX – 20XX and the Twelve Months Ending _____

Schedule C-11.3

Type of Filing: ___Original ___Updated ___Revised

Page ___ of ___

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Description	<u>Most Recent Five Calendar Years</u>					Test Year	<u>Five Projected Calendar Years</u>				
		20XX	20XX	20XX	20XX	20XX		20XX	20XX	20XX	20XX	20XX
	Sales Revenue by Customer Class:											
	Residential	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$
	Commercial											
	Industrial											
	Other											
	Total											
	Number of Customers by Class: ¹											
	Residential											
	Commercial											
	Industrial											
	Other											
	Total											
	Average Revenue per Customer: ²											
	Residential	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$
	Commercial											
	Industrial											

¹ Provide number of customers for both a twelve-month average and at year end.

² The number of customers shall be the twelve-month average number of customers.

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Sales Statistic – Jurisdictional

(Electric, Gas, and Waterworks Utilities)

20XX – 20XX and the Twelve Months Ending _____

Schedule C-11.4

Type of Filing: ___Original ___Updated ___Revised

Page ___ of ___

Work Paper Reference No(s).: _____

Witness Responsible: _____

Line No.	Description	<u>Most Recent Five Calendar Years</u>					Test Year	<u>Five Projected Calendar Years</u>				
		20XX	20XX	20XX	20XX	20XX		20XX	20XX	20XX	20XX	20XX

Sales Revenue by Customer Class:

Residential												
Commercial	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$
Industrial												
Other												

Total

Number of Customers by Class:¹

Residential
Commercial
Industrial
Other

Total

Average Revenue per Customer:²

Residential	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$
Commercial											
Industrial											

¹ Provide number of customers for both a twelve-month average and at year end.

² The number of customers shall be the twelve-month average number of customers.

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)
Case No.: _____

Analysis of Reserve for Uncollectible Accounts

20xx – 20xx and the Twelve Months Ending _____

Schedule C-12

Type of Filing: ___Original ___Updated ___Revised

Page ___ of ___

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Description	Most Recent Three Calendar Years				Year	Test
		20XX	20XX	20XX			
(1)	Reserve at Beginning of Year	\$	\$	\$		\$	\$
(2)	Current Year's Provision						
(3)	Recoveries						
(4)	Amount Charged Against Reserve						
(5)	Reserve at End of Year	\$	\$	\$		\$	\$
(6)	Net Write Off Ratio [(4)-(3)] / (5)	%	%	%		%	%
(7)	Uncollectible Expense/Provision Ratio (2)/(5)	%	%	%		%	%

If lines (6) and (7) differ, provide the reasons for the difference.

Note: When completing forms, either portrait or landscape formatting is acceptable

Section D
Rate of Return
(Large Utilities)

Company: _____

Case No.: _____

Test Year: _____

Date Certain: _____

D-1	Rate of return summary
D-1.1	Common equity
D-2	Embedded cost of short-term debt
D-3	Embedded cost of long-term debt
D-4	Embedded cost of preferred stock
D-5	Comparative financial data

Section D Instructions

Rate of Return

(A) General

Provide all data requested in section "D" applicable to the public utility submitting an application for adjustment of utility rates. If the applicant has filed projected test year data in its application, it must file (or have previously filed) actual data as of the date certain within two months of the date of filing. For an applicant any of whose securities are not traded publicly, also submit all data required in section "D" on an applicant- stand-alone basis and also on a parent-consolidated basis. If the applicant has filed projected test year data in its application, the most current actual data available for the parent-consolidated company may be filed. An applicant must file data on a parent-consolidated basis. Within two months of the date of filing, actual data for the applicant and parent-consolidated company as of the date certain must be filed.

Notwithstanding the above provisions, any natural gas, waterworks, or sewage disposal system company that elects to use a date certain that is beyond the application filing date need not provide actual data as of the date certain within two months of the date of filing. Such natural gas, waterworks, or sewage disposal system company shall instead file the most recent actual data available as part of the two-month update filing.

(B) Rate of return summary (Schedule D-1)

Provide a proposed rate of return summary schedule as of the date certain or most recent available historic calendar quarter showing the calculation of the weighted average cost of capital as illustrated in Schedule D-1, lines 1-4. If the rate of return shown on Schedule D-1, line 4 is not the same as that shown on Schedule A-1, line 4, provide an explanation of difference.

(C) Parent-consolidated common equity (Schedule D-1.1)

Provide parent company and applicant company's common equity

(D) Debt and preferred stock (Schedules D-2, D-3, and D-4)

Provide supporting schedules as of the date certain or most recent available historic calendar quarter for the following:

- (1) Embedded cost of short-term debt, if any, Schedule D-2.
- (2) Embedded cost of long-term debt, if any, Schedule D-3.
- (3) Embedded cost of preferred stock, if any, Schedule D-4. (Cost is computed by dividing dividends by net proceeds from the sale of each preferred stock issue.)

(E) Comparative financial data (Schedule D-5)

Provide a comparison of financial data for the test year and the ten most recent fiscal years (recent fiscal year is the applicant's normal annual closing, usually the calendar year) as illustrated in Schedule D-5.

(F) Definitions

- (1) "Percentage of construction financed internally" - $(\text{Net income less preferred dividends and common dividends plus depreciation plus deferred taxes and investment tax credits (net) less AFUDC}) \div (\text{Gross construction expenditures less AFUDC})$.
- (2) "Return on average net plant in service" - $(\text{Operating income}) \div (\text{Average net plant in service})$.
- (3) "Pre-tax interest coverage" - $(\text{Income available for fixed charges plus federal income tax expense}) \div (\text{Interest charges})$.
- (4) "Indenture provision coverage" - company should provide this definition and also the minimum coverage required; if other restrictions are contained in indenture, (e.g. capitalization ratio test) list on separate page.
- (5) "After-tax fixed charge coverage" - $(\text{Income available for fixed charges}) \div (\text{Interest charges plus preferred dividends})$.
- (6) "Book value per share" - year-end common stock equity divided by number of common shares outstanding at year end.
- (7) "Return on average total capital" - $(\text{Income available for fixed charges}) \div (\text{Average total capitalization including short-term debt})$.
- (8) "Return on average common stock equity" - $(\text{Earnings on common shares}) \div (\text{Average common stock equity})$.

(Company)

Case No.: _____

Rate of Return Summary

Schedule D-1

Type of Filing: ___Original ___Updated ___Revised

Page ___ of ___

Work Paper Reference No(s).: _____

Witness Responsible: _____

Line No	Class of Capital	Reference	(\$) Amount	% of Total	(%) Cost	Weighted Cost (%)
1	Long-Term Debt	D-3				
2	Preferred Stock	D-4				
3	Common Equity	_____	_____	_____	_____	_____
4	Total Capital	=====	=====	=====	=====	=====
5	Accumulated Deferred Investment Tax Credit		_____			
6	Accumulated Deferred Income Taxes (Accelerated Amortization)		_____			
7	Accumulated Deferred Income Taxes (Other Property)		_____			

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Common Equity

Schedule D-1.1

Date of Capital Structure: _____

Page ____ of ____

Type of Filing: ___Original ___Updated ___Revised

Witness Responsible: _____

Work Paper Reference No(s): _____

Line No.	Class of Capital	Reference	Common Stock (\$) Amount	Paid-In Capital (\$) Amount	Retained Earnings (\$) Amount	Other Misc. Common Equity (\$) Amount	Intercompany Eliminations (\$) Amount	Total Common Equity (\$) Amount
1	Applicant		_____	_____	_____	_____	_____	_____
2	Applicant's PUCO - Regulated Affiliate 1		_____	_____	_____	_____	_____	_____
3	Applicant's PUCO - Regulated Affiliate 2		_____	_____	_____	_____	_____	_____
4	Applicant's PUCO - Regulated Affiliate N		_____	_____	_____	_____	_____	_____
5	Total Parent-Consolidated		=====	=====	=====	=====	=====	=====

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Embedded Cost of Short-Term Debt

Schedule D-2

Date of Short-Term Debt: _____

Page ____ of ____

Type of Filing: ____ Original ____ Updated ____ Revised

Witness Responsible: _____

Work Paper Reference No(s): _____

Line No.	Issue (A)	Amount Outstanding (B)	Interest Rate (C)	Interest Requirement (D)
-------------	--------------	------------------------------	-------------------------	--------------------------------

List

Total

Cost of Short-Term Debt (D-B)

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Embedded Cost of Long-Term Debt

Schedule D-3

Date of Long-Term Debt: _____

Page ___ of ___

Type of Filing: ___ Original ___ Updated ___ Revised

Work Paper Reference No(s): _____

Witness Responsible: _____

Line No.	Debt Issue Type, Coupon Rate	Date Issued (Mo/Day/Yr) (A)	Maturity Date (Mo/Day/Yr) (B)	Principal Amount (C)	Face Amount Outstanding (D)	Unamort. (Discount) or Premium (E)	Unamort. Debt Expense (F)	Unamort. Gain or (Loss) on Reacquired Debt (G)	Carrying Value (H=D+E-G)	Annual Interest Cost* (I)
----------	------------------------------	-----------------------------	-------------------------------	----------------------	-----------------------------	------------------------------------	---------------------------	--	--------------------------	---------------------------

Bonds:
(List)

Debentures:
(List)

Notes:
(List)

Totals:

Embedded Cost
of Long-Term
Debt (I ÷ H)

=====

D-1

* Annualized interest cost plus (or minus amortization of discount or premium plus amortization of issue costs minus (or plus) amortization of gain (or loss) on reacquired debt. Applicant may include additional computation based on "yield to maturity method". If adjustments are made for sinking fund provisions, show computation.

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Embedded Cost of Preferred Stock

Schedule D-4

Date of Preferred Stock: _____

Page ____ of ____

Type of Filing: ____ Original ____ Updated ____ Revised

Witness Responsible: _____

Work Paper Reference No(s): _____

Line No.	Dividend Rate, Type, Par Value	Date Issued (A)	Dollar Amounts Outstanding at Par Value (\$) (B)	(\$) Premium or (Discount) (C)	(\$) Issue Expense (D)	(\$) Gain (or Loss) on Reacquired Stock (E)	(\$) Net Proceeds (F=B+C-D+E)	(\$) Annual Dividends (G)
----------	--------------------------------	-----------------	--	-----------------------------------	---------------------------	--	----------------------------------	------------------------------

(List)

Total _____

Embedded Cost of Preferred Stock =====

G ÷ F =====

D-1

If adjustments are made for sinking fund provisions show calculations.
Net proceeds should reflect amount outstanding.

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Comparative Financial Data

Schedule D-5

Date Certain: _____

Page ____ of ____

Type of Filing: ___ Original ___ Updated ___ Revised

Witness Responsible: _____

Work Paper Reference No(s): _____

Line No	Description	Test Year	Most Recent Calendar Years									
			1	2	3	4	5	6	7	8	9	10

Plant Data

Gross Plant In Service by Major Property Groupings*
(Average or Normal Classifications)*

Construction Work in Progress by Major Property
Groupings (Average) or Normal Classifications

Total

Percentage of Construction Expenditures
Financed Internally

Capital Structure: (Dollars Based Upon Year-End
Accounts)

Long-Term Debt

Preferred Stock

Common Equity

Condensed Income Statement Data:

Operating Revenues

Operating Expenses (Excluding F.I.T.)

Federal Income Tax (Current)

Federal Income Tax and Investment Tax Credits
(Deferred) (Net)

Operating Income

AFUDC

Other Income (Net)

* Also Include Net Plant In Service For Each Type Of Utility Service.

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Comparative Financial Data

Schedule D-5

Date Certain: _____

Page ____ of ____

Type of Filing: ____ Original ____ Updated ____ Revised

Witness Responsible: _____

Work Paper Reference No(s): _____

Line No	Description	Test Year	Most Recent Calendar Years									
			1	2	3	4	5	6	7	8	9	10

Income Available for Fixed Charges:

Interest Charges

Net Income

Preferred Dividends

Earnings Available for Common Equity

AFUDC - % of Earnings Available for Common Equity

Costs of Capital:

Embedded Cost of Long-Term Debt %

Embedded Cost of Preferred Stock

Fixed Charge Coverage:

Pre-Tax Interest Coverage

Pre-Tax Interest Coverage (Excluding AFUDC)

After Tax Interest Coverage

Indenture Provision Coverage

After Tax Fixed Charge Coverage

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Comparative Financial Data

Schedule D-5

Date Certain: _____

Page ____ of ____

Type of Filing: ____ Original ____ Updated ____ Revised

Witness Responsible: _____

Work Paper Reference No(s): _____

Line No	Description	Test Year	Most Recent Calendar Years									
			1	2	3	4	5	6	7	8	9	10

Stock And Bond Ratings:

Moody's Bond Rating

S&P Bond Rating

Moody's Preferred Stock Rating

S&P Preferred Stock Rating

Common Stock Related Data:

Shares Outstanding - Year-End

Shares Outstanding - Weighted Average (Monthly)

Earnings per Share - Weighted Average

Dividends Paid per Share

Dividends Declared per Share

Dividend Payout Ratio (Declared Basis)

Market Price - High, (Low)

1st Quarter

2nd Quarter

3rd Quarter

4th Quarter

Book Value per Share (Year-End)

Rate of Return Measures:

Return on Common Equity (Average)

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Comparative Financial Data

Schedule D-5

Date Certain: _____

Page ___ of ___

Type of Filing: ___ Original ___ Updated ___ Revised

Witness Responsible: _____

Work Paper Reference No(s): _____

Line No	Description	Test Year	Most Recent Calendar Years									
			1	2	3	4	5	6	7	8	9	10

Return on Total Capital - Average
Return on Net Plant In Service
(Average) - Total Company ***

Other Financial And Operating Data:

Mix of Sales (Gas and Electric)

Mix of Fuel (Gas and Electric)

Composite Depreciation Rates

*** If combination company, e.g. gas & electric, also show computation for each operation.

Note: When completing forms, either portrait or landscape formatting is acceptable

Section E
Rate and Tariffs
(Large Utilities)

Company:_____

Case No.:_____

Test Year:_____

Date Certain:_____

- E-1 Clean copy of proposed tariff schedules
- E-2 Clean copy of current tariff schedules
- E-2.1 Scored and redlined copy of current tariff schedules showing all proposed changes
- E-3 Narrative rationales for tariff changes
- E-3.1 Customer charge/minimum bill rationale
- E-3.2 Cost-of-service study
- E-4 Class and schedule revenue summary
- E-4.1 Annualized test year revenues at proposed rates vs. most current rates
- E-4.3 Actual test year revenue at actual rates
- E-5 Typical bill comparison

Section E Instructions

Rate and Tariffs

(A) General

Rates and tariffs definition of terms

- (1) "Unit cost for the test year of fuel costs" - total fuel cost for the year divided by the applicable unit of usage.
- (2) "Actual purchased gas cost unit cost for the test year of purchased gas expenses" - this computation is to be made in compliance with existing and proposed purchased gas cost adjustment clause provisions.
- (3) "Unit cost for fuel" - is that which is in effect for the most recent month for which actual data is available or the last month of the test period. The per unit fuel cost is annualized by multiplying by the volume of sales appropriate to the specific schedule.
- (4) "Annualized purchased gas costs" - the unit cost for purchased gas in effect for the most recent month for which actual data is available or the last month of the test period. The computation is to be made in compliance with current and proposed purchased gas cost adjustment clauses. The per unit purchased gas cost is annualized by multiplying the volume of sales appropriate to the specific schedule.
- (5) "Annualized sales" - sales volumes adjusted from test year by normalization of sales because of unusual circumstances.
- (6) "Average price" - computed by dividing revenue by unit sales. Average price will differ from actual rate in effect during the test year only if there has been a change in rates during the test year.
- (7) "Level of demand" - demand changes associated with classifications of electric energy users.
- (8) "Level of usage" - specific consumption per month of a commodity (e.g., 740 kwh, 221 mcf, etc.).
- (9) "Most current rate" - rate per unit in effect at the time the application was filed.
- (10) "Proposed rate" - the noticed rate in accordance with division (B) of section 4909.43 of the Revised Code which is one in the same rates requested by applicant in Schedule E-1.
- (11) "Demand ratchet" - any provision which utilizes customer demands in prior billing periods for establishing minimum billing demand.

(B) Current and proposed rate schedules

- (1) Clean copy of proposed tariff schedules (Schedule E-1)
- (2) Current tariff schedules
 - (a) Clean copy of current tariff schedules (Schedule E-2)
 - (b) Scored and redlined copy of current tariff schedules showing all proposed changes (Schedule E-2.1)

Identify each page with Schedule E-2 and E-2.1, page ____ of ____ in the upper right hand corner of the schedule.

(3) Rationale for tariff changes (Schedule E-3)

Provide the rationale, on Schedule E-3, underlying the proposed changes to the tariff. Changes common to multiple rate forms need only be discussed once (e.g., minimum bill charges have been increased above ten per cent on all rates because _____). Provide the rationale explaining rates which have not been changed or not changed as significantly as other rates in a general revenue change proposal. Provide a specific source of data supporting each rationale for change. The source of data need not be submitted with the application but must be available for future request. Reference the appropriate current or proposed rate schedules to which the rationale is applicable. Use the proper schedule and page number.

The company may elect to code the rationale statements by letter in the rate column. The rationale applicable to the various rates can be indicated by adding a column to Schedule E-4.1, headed "rationale code," and including on the schedule the code letters for each rationale applicable to each rate.

Designate in the margin the type of proposed change by using the following designation:

- (C) - To signify changed regulations.
- (D) - To signify discontinued rate or regulation.
- (I) - To signify increased rate.
- (R) - To signify reduced rate.
- (S) - To signify reissued matter.
- (T) - To signify a change in text, but no change in rate or regulation.

(4) Customer charge/minimum bill rationale (Schedule E-3.1)

All utilities provide the methodologies utilized in the calculation of any proposed customer charge or minimum bill as well as the accounts and the amount per account used in such calculation.

(5) Cost-of-service study (Schedule E-3.2)

(a) Electric and gas utilities shall select at least one cost-of-service study methodology from:

- (i) Coincident peak demand.
- (ii) Non-coincident peak demand.
- (iii) Average and excess.

The selection shall be the utility's opinion of the most appropriate for its system characteristics. The testimony submitted shall include the basis for the selection. For the study methodology selected provide the allocations used in the studies and corresponding calculations. Include testimony support for the selected methodology and cost study. Applicant may submit additional cost of service studies using other methodologies accompanied by supporting testimony. The cost of service studies shall be filed with the original application. The support testimony shall be filed within fourteen days of the filing of the application for increase in rates.

- (b) Waterworks and/or sewage disposal system companies shall provide a fully allocated cost of service study following accepted "American Water Works Association" guidelines, segregating the costs incurred for basic water services from costs incurred for basic sewage disposal system services where applicable. Include a description of the methodology to be used with the original filing and include testimony support for that methodology and cost study. For the study methodology selected, provide the allocations used in the study and the corresponding calculations. The study shall be filed with the original application. The support testimony shall be filed within fourteen days of the filing of the application for increase in rates.

(C) Revenue summary

NOTE: The revenue summary portion of the rates and tariffs standard filing requirements (Schedules E-4, E-4.1, and E-4.3) varies by the type of utility. Two sets of rates and tariffs schedules are enclosed. One set is applicable to the gas and electric companies and one set is applicable to the waterworks and sewage disposal system companies.

(1) General instructions

- (a) Provide separately the information required by Schedules E-4 and E-4.1 for services and/or equipment subject to commission tariffs or contracts, but not a part of the rate increase application. Separate line items are required for each revenue source greater than one per cent of total utility operating revenue. Separate line items are required to reflect the dollar amount of the mirrored CWIP revenue offset. Revenue sources may be classified according to rate classifications, tariff schedules type of contract, type of equipment, and use of service or functional nature, classifications used must be specified.
- (b) Schedules pursuant to paragraph (C)(1)(a) above are required to be filed with any application to increase rates, but not more frequently than once every twelve months.
- (c) All utilities should maintain records sufficient to complete Schedule E-4.1 within thirty days, pursuant to data requests.
- (d) The proposed revenue total on Schedule E-4 must match the proposed revenue on Schedule C-2.

(2) Electric and gas utilities

- (a) Class and schedule revenue summary (Schedule E-4)
Provide the information required on Schedule E-4 by carrying forward the class and rate schedule totals from Schedule E-4.1 and performing the calculations required. For columns (G) and (L), the rate schedule percentages should be expressed as a percentage of the class revenue and the class percentage should be expressed as a percentage of total revenue.
- (b) Annualized test year revenues at proposed rates vs. most current rates (Schedule E-4.1).
Complete for each rate schedule the information required in Schedule E-4.1.

Include and separately delineate any applicable revenue offset(s) resulting from mirrored CWIP revenue provisions. Work papers which depict the calculation of all charges, offsets, and discounts should be provided. All miscellaneous revenue and miscellaneous revenue offset should also be included such that the revenue totals of Schedules C-1, C-2, E-4, and E-4.1 are equal. All rate schedule totals are to be computed, as well as a grand total which will be class total. The percentages computed in column (G) are to be expressed as percentages of rate schedule total.

Schedule E-4.1 shall include line items for each block; each charge and each rider to total "rate related" revenue. In addition, each component of any "other operating revenue" must be identified

- (c) Actual test year revenues at actual rates (Schedule E-4.3)

If a projected test period is used, within three months after the completion of the test year, compute for each rate schedule the information required in Schedule E-4.3. This data is to be actual test year data. The percentage computed in columns (G) and (J) are to be expressed as a percentage of the rate schedule total. The rate schedule totals are to be expressed as a percentage of the class total. Use of same consumption levels as used in Schedule E-4.1.

- (3) Waterworks and sewage disposal system companies

- (a) Class and schedule revenue summary (Schedule E-4)

Provide the information required on Schedule E-4 by carrying forward the class and rate schedule totals from Schedule E-4.1 and performing the calculations required. For columns (G) and (J), the rate schedule percentages should be expressed as a percentage of total revenue.

- (b) Annualized test year revenues at proposed rates vs. most current rates (Schedule E-4.1)

Complete for each rate schedule the information required in Schedule E-4.1. For levels of consumption within each rate schedule, select at least three points within each block (column (B)). For customer bills within each rate schedule, provide an indication of billing frequency (e.g., monthly, bi-monthly, etc.) (column (C)). Separately delineate any applicable revenue and billing determinants for all miscellaneous charges and discounts (bad check charges, employee discounts, reconnection charges, late payment charges, etc.) include and separately delineate any applicable revenue offset(s) resulting from mirrored CWIP revenue provisions. Work papers which depict the calculation of all charges, offsets and discounts should be provided. All miscellaneous revenue and miscellaneous revenue offset should also be included such that the revenue totals of schedules C-1, C-2, E-4, and E-4.1 are equal. All rate schedule totals are to be computed as well as a grand total which will be class total. The percentages computed in column (G) are to be expressed as percentages of rate schedule total. Rate schedule totals are to be expressed as a percentage of class total.

- (c) Actual test year revenues at actual rates (Schedule E-4.3)

If a projected test period is used, within three months after the completion of the test year compute for each rate schedule the information required in Schedule E-4.3. This data is to be actual test year data. The percentages computed in column (G) are to be expressed as a percentage of the rate schedule total. The rate schedule totals are to be expressed as a percentage of the class total. Use the same consumption levels as used in Schedule (E-4.1.)

(D) Typical bill comparison

NOTE: There are two schedules labeled E-5. One schedule is applicable to gas and electric companies and the other schedule is applicable to the waterworks and sewage disposal system companies.

Typical bills by class and schedule (Schedule E-5)

Compute typical bills for each schedule of user and provide the information required in Schedule E-5. The consumption levels used for the computation should, as a minimum, include:

- (1) Levels of consumption at both the present and proposed block ends. (Tail block "end" is at greatest level of consumption expected.)
- (2) Levels of consumption which accurately represents customer consumption patterns.

(Company)

Case No.: _____

Narrative Rationale for Tariff Changes

Schedule E-3

Data: ___Months Actual & ___Months Estimated

Page___of ___

Type of Filing: ___Original ___Updated ___Revised

Witness Responsible:_____

Work Paper Reference No(s):_____

Rate	Type	Explanation of Change	Rational of Change	Data Reference
------	------	-----------------------	--------------------	----------------

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)
Case No.: _____

Proposed
Class and Schedule Revenue Summary
(Electric and Gas Utilities)

Schedule E-4

Data: ___Months Actual & ___Months Estimated

Page ___ of ___

Type of Filing: ___Original ___Updated ___Revised

Witness Responsible: _____

Work Paper Reference No(s): _____

Proposed Annualized								
Line No.	Rate Code (A)	Class/ Descript. (B)	Customer Bills (C)	Sales KW/ KWH MC/ MLB (D)	Proposed Rate (E)	Proposed Revenue (F)	% of Revenue To Total Revenue (G)	Proposed Revenue Total (H)

- (X) Total revenue before mirrored CWIP revenue offset
- (Y) Mirrored CWIP revenue offset
- (Z) Revenue excluding mirrored CWIP revenue

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Class and Schedule Revenue Summary
(Waterworks and Sewage Disposal System Companies)

Schedule E-4

Data: ____Months Actual & ____Months Estimated

Page ____ of ____

Type of Filing: ____Original ____Updated ____Revised

Witness Responsible: _____

Work Paper Reference No(s): _____

			<u>Proposed-Annualized</u>					<u>Current-Annualized</u>				Total Revenue % Increase (L=F-I) (I)
Line No.	Rate Code (A)	Class/ De- scription (B)	Customer Bills (C)	Sales FT ³ /GAI (D)	Prpsd. Rate (E)	Proposed Total Revenue (F=DxE)	% of Revenue Total (G)	Most Current Rate (H)	Current Annualized Total Revenue (I)	% of Revenue Total (J)	Dollar Increase (K=F-J)	

- (X) Total revenue before mirrored CWIP revenue offset
- (Y) Mirrored CWIP revenue offset
- (Z) Revenue excluding mirrored CWIP revenue

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Current

Annualized Test Year Revenues at Proposed Rates vs.

Most Current Rates

(Electric and Gas Utilities)

Schedule E-4.1

Data: ___Months Actual & ___Months Estimated

Page ___ of ___

Type of Filing: ___Original ___Updated ___Revised

Witness Responsible: _____

Work Paper Reference No(s): _____

Current Annualized

Line No.	Rate Code (A)	Class/ De- scription (B)	Customer Bills (C)	Sales KW/KWH MCF/MLB (D)	Most Current Rate (J)	Current Annual- ized Revenue (K)	% of Revenue To Total Revenue (L)	% Increase In Revenue (N=F-K) (K)	Total Revenue % Increase (O)
-------------	---------------------	-----------------------------------	--------------------------	-----------------------------------	--------------------------------	--	--	--	--

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Annualized Test Year Revenues at Proposed Rates vs. Most Current Rates
(Waterworks and Sewage Disposal System Companies)

Schedule E-4.1

Data: ___Months Actual & ___Months Estimated

Page ___ of ___

Type of Filing: ___Original ___Updated ___Revised

Witness Responsible: _____

Work Paper Reference No(s): _____

Proposed-Annualized						Current-Annualized						Total Revenue % Increase
Line No.	Rate Code (A)	Class/De- scription (B)	Customer Bills (C)	Sales FT ³ /Gal (D)	Prpsd. Rate (E)	Proposed Total Revenue (F=DxE)	% of Revenue To Total (G)	Most Current Rate (H)	Current Annualized Total Revenue (I)	% of Revenue To Total (J)	Dollar Increase (K=F-I)	Total Revenue % Increase (L=F-I) (I)

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Actual Test Year Revenue

At Actual Rates

(Electric and Gas Utilities)

Schedule E-4.3

Data: ___Months Actual & ___Months Estimated

Page ___ of ___

Type of Filing: ___Original ___Updated ___Revised

Witness Responsible: _____

Work Paper Reference No(s): _____

Test Year Actual									
Line No	Rate Code	Schedule/Description	Customer Bills	Actual Sales KW/KWH MCF/LB	Test Year Revenue	Average Rate	% of Revenue To Revenue	Revenue Total	% of Revenue to Total
(A)	(B)	(C)	(D)	(E)	(F)=E÷D	(G)	(H)	(I=E+H)	(J)

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Actual Test Year Revenue at Actual Rates

(Waterworks and Sewage Disposal System Companies)

Schedule E-4.3

Data: ___Months Actual & ___Months Estimated

Page ___ of ___

Type of Filing: ___Original ___Updated ___Revised

Witness Responsible: _____

Work Paper Reference No(s): _____

Test Year Actual							
Line No.	Rate Code (A)	Schedule/ Description (B)	Customer Bills (C)	Actual Sales FT ³ /Gal (D)	Test Year Revenue (E)	Average Rate (F=E÷D)	% of Revenue To Total (G)

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)
Case No.: _____
Typical Bill Comparison
(Electric and Gas Utilities)

Schedule E-5

Data: ____Months Actual & ____Months Estimated

Page ____ of ____

Type of Filing: ____Original ____Updated ____Revised

Witness Responsible: _____

Work Paper Reference No(s): _____

Line No.	Rate Code	Level of Demand (A)	Level of Usage (B)	Current Bill (C)	Proposed Bill (D)	Dollar Increase (E=D-C)	% Increase (F=E÷C)	Current Total Bill Inc. (H)	Proposed Total Bill (I)	% Change (J= $\frac{E}{H}$) H
-------------	--------------	------------------------------	-----------------------------	------------------------	-------------------------	-------------------------------	--------------------------	--------------------------------------	-------------------------------	---

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Typical Bill Comparison

(Waterworks and Sewage Disposal System Companies)

Schedule E-5

Data: ___Months Actual & ___Months Estimated

Page ___ of ___

Type of Filing: ___Original ___Updated ___Revised

Witness Responsible: _____

Work Paper Reference No(s): _____

Bill Data (Less Gas or Fuel Cost)											
Line No.	Rate Code	Level Of Demand (A)	Level Of Usage (B)	Current Bill (C)	Proposed Bill (D)	Dollar Increase (E=D-C)	% Increase (F=E÷C)	Annu- alized Fuel Cost Additions To Bill (G)	Current Total Bill Inc. (H)	Proposed Total Bill (I)	% Change (J= $\frac{E}{H}$) H (J)

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Typical Bill Comparison

(Waterworks and Sewage Disposal System Companies)

Schedule E-5

Data: ___Months Actual & ___Months Estimated

Page ___ of ___

Type of Filing: ___Original ___Updated ___Revised

Witness Responsible: _____

Work Paper Reference No(s): _____

Line No.	Level Of Usage (A)	Rate Data				Bill Data			
		Most Current Rate (B)	Proposed Rate (C)	Dollar Increase (D=C-B)	% Increase (E=D÷B)	Current Bill (F)	Proposed Bill (G)	Dollar Increase (H=G-F)	% Increase (I=H÷F)

\$

Note: When completing forms, either portrait or landscape formatting is acceptable

Chapter III
Standard Filing Requirements
Small Utilities

Gas Utilities more than 7,500 but less than 30,000 customers

Waterworks Utilities more than 7,500 but less than 30,000
Sewage Disposal
System Utilities

Steam Utilities All

For the purpose of determining the size of the utility (small or large), each utility company shall include in its customer count all customers over which the public utilities commission of Ohio has jurisdiction without regard to the number of customers proposed to be affected by the application.

(A) General instructions

(1) Purpose

The "Standard Filing Requirements" are designed to assist the commission in performing a thorough and expeditious review of applications for rate increases. Schedules contained in the filing requirements may be designed to provide support for the applicant utility's position or to provide supplemental information to facilitate the commission staff's review of the rate application.

(2) Applicability

The schedules contained in these standard filing requirements are applicable to all utilities under the jurisdiction of the public utilities commission of Ohio with customers within the limits stated. The standard filing requirement schedules are also generally applicable to all types of utilities, i.e., gas, waterworks, etc.; however, certain unique aspects of utility's business may require some schedules to be tailored to a specific type of utility. Schedules which are unique to a specific type of utility are identified in the instructions at the beginning of each section. In completing the schedules, each utility must follow the account classification provided for in the Uniform System of Accounts prescribed for each utility.

(3) Minimum requirements

The "Standard Filing Requirements" contain the minimum information which utilities are required to submit with their application for an increase in rates. The schedules contained in the filing requirements provide the basic information normally required to support a utility's rate request. If the applicant utility believes that additional information is necessary to support its case or is proposing a position which requires a departure from the basic schedules (e.g., a special revenue adjustment proposal), the utility should supplement the standard filing requirements as required to support its position. In addition, the commission may require utilities to supply information to supplement these requirements during the course of the staff investigation of a specific case.

(4) Waiver of information requirements and determination of filing date

(a) The commission may, upon an application or a motion filed by a party, waive any requirement of these standard filing requirements, other than a requirement mandated by statute, for good cause shown.

(b) All information required by these standard filing requirements, unless waived, must be included with the application at the time of the original docketing of the application with the public utilities commission of Ohio. The commission may reject any filing not complying with these requirements or request the public utility to refile the items found noncomplying. Any application failing to comply with any of these standard filing requirements, unless waived, shall not be considered as having been filed with the commission for purposes of calculating the time periods provided in section 4909.42 of the Revised Code. An application filed during the pendency of waiver requests which are subsequently denied in whole or in part will be considered as failing to comply with the standard filing requirements. The applicant shall file within fifteen days after the date the waivers are denied such information not waived by the commission. If the

information is provided within fifteen days and renders the application in compliance with the standard filing requirements, the application will be deemed as having been filed as of the date upon which the original application was received for purposes of calculating the time periods.

- (c) Within sixty days from the date of the original docketing of the application with the commission, the commission will issue an entry indicating whether the application has complied with the standard filing requirements. The commission shall consider supplemental information filed by the utility in determining the completeness of the filing.
 - (i) If such supplemental information was required to render the application in substantial and technical compliance with the standard filing requirements, unless waived, the application will be deemed as having been filed as of the date upon which the solicited supplemental information was received for purposes of calculating the time periods provided in section 4909.42 of the Revised Code.
 - (ii) If the application as originally docketed substantially complied with the standard filing requirements, and the supplemental information filed renders the application in technical compliance with the standard filing requirements, the application will be deemed as having been filed as of the date upon which the original application was received for purposes of calculating the time periods.
 - (iii) If the commission issues no entry within sixty days from the date of the original docketing of the application with the commission, the application shall be considered in compliance with the standard filing requirements and as having been filed as of the date of the original docketing of the application for purposes of calculating the time periods provided in section 4909.42 of the Revised Code.
- (d) A request for waiver of any of the provisions of the standard filing requirements must set forth the specific reasons in support of the request. The commission shall, upon good cause shown by the utility, grant the request for a waiver. In determining whether good cause has been shown, the commission shall give due regard, among other things, to:
 - (i) Whether other information, which the utility would provide if the waiver is granted, is sufficient so that the commission staff can effectively and efficiently review the rate application.
 - (ii) Whether the information, which is the subject of the waiver request, is normally maintained by the utility or reasonably available to it from the information which it maintains.
 - (iii) The expense to the utility in providing the information, which is the subject of the waiver request.
- (e) Except for good cause shown, all waiver requests must be filed thirty days or more before the docketing of the application with the commission. If a waiver request is not granted or denied by the commission within thirty days of its filing, the request shall be considered denied. If, by complying with this

requirement, the waiver requests are received before the filing of the notice of intent to file an application for an increase in rates, a docket number of the rate case series will be assigned to the waiver request. This same docket number shall then be used for the notice of the intent to file an application and the application for an increase in rates.

(5) Definition of terms

- (a) "Witness responsible" - each schedule contains an area specified as "witness responsible." The utility must fill in the name of the individual who is anticipated to testify at the hearing as to the material contained in the schedule.
- (b) "Projected test year data" - to comply with the statutory requirements regarding the test year, the utility may use estimated valuation data and up to twelve months of estimated data in the operating income schedules in its application for an increase in rates. However, if estimated valuation data and/or more than nine months of estimated operating income data is provided, the utility must provide within two months of the date of filing, actual valuation data and operating income statements which include no less than three months of actual data. The utility must also explain any material differences between the estimated and actual data.

The utility must file a comparison of the twelve-month actual income statement versus the partially forecasted income statement and any variances within three months after the end of the test year. The utility must also explain any material differences between estimated and actual data.

- (c) "Jurisdictional data" - the term "jurisdictional" refers to the portion of a utility's service area for which the requested rate increase is applicable.
- (d) "Data" - most schedules contain an area specified as "Data". Indicate in the area provided the number of actual and estimated months of information reflected on the schedule or whether the valuation data represents actual or estimated information.
- (e) "Type of filing" - the utility should indicate whether the schedule was filed with the application for an increase in rates (original), with an update, or represents a revision to a previously filed schedule. If the schedule is a revision, the utility also should indicate whether it represents a revision to the original or to the update filing.
- (f) "Work paper reference no(s)." - some schedules contain an area specified as "Work Paper Reference No(s)." This area should be filled in to indicate all the reference numbers for work papers, as defined in paragraph (A)(8) of Chapter III of this appendix, which relate to the schedule.

(6) Submission of written testimony

Utilities shall file the prepared direct testimony of utility personnel or other expert witnesses in support of the utility's proposal within fourteen days of the filing of the application for increase in rates. Prepared direct testimony should be in question and

answer format and should, in all particulars, conform to the requirements of rule 4901-1-29 of the Administrative Code.

Individually identify, quantify, and justify as just and reasonable any proposed adjustment(s) made to operating income items, and included in the company's application pursuant to R.C. 4909.15(D), that the company believes is reasonably expected to occur during the 12-month period following the test period.

(7) Schedule format

Schedules shown are for illustrative purposes only and can be modified to fit the individual company, as long as the data intent is complied with. Utilities are not required to submit data on reproduced copies of the schedules, but should submit the data in substantially the same format as contained in the schedule. All schedules submitted to the commission should be typed. Additional schedules should be submitted, as required, to support the company's application; such schedules should be identified by the next unassigned schedule in the appropriate section.

(8) Working papers

Working papers supporting schedules in the standard filing requirements shall be delivered to the commission staff at the time of the filing of the application. Working papers must be keyed to the appropriate standard filing schedules, must be indexed, contain the date prepared, and should be cross-indexed wherever possible. Data contained on the working papers should be footnoted to identify the source document. When assumptions are made of working paper schedule amounts, narrative or other support should be included so that the reasonableness of the work paper can be reviewed. Working papers shall also be provided for the two-month update.

The following working paper referencing system shall be used for all working papers: a minimum of a four position code shall be used, when positions 5 and 6 are not required, they shall be left blank. Working papers shall indicate whether they pertain to the original filing, the two-month update filing, or a revision to either the original or two-month update filing.

<u>Position</u>	1 & 2	3	4	5	6
	Note: Always "WP" denotes work paper				
	WP	B	- 2	.1	a

<u>Position</u>	<u>Description</u>
-----------------	--------------------

1 & 2	"WP" first and second characters will always be "WP" which denotes working papers.
-------	--

3	Position 3 will always represent the section of standard filing schedules the work papers are related to.
---	---

The sections are:

- A - Revenue requirements
- B - Rate base
- C - Operating income
- D - Rate of return
- E - Rates and tariffs

4	Position 4 will always represent the schedule number within a section. The first schedule within a section will always be "1", the second "2", etc. Several standard
---	--

schedule numbers have been assigned. If the applicant wants to supply additional schedules in any section, the next available (unassigned) schedule number in the appropriate section shall be used.

- 5 Position 5 shall be used for supporting schedules which feed a specific schedule number identified by the fourth position. The first supporting schedule shall have positions 3 and 4 coded with the section and schedule number which the supporting schedules feed and it shall be numbered "1", the second "2", etc.

For example:

The standard number assigned to the operating income adjustment summary schedule is C-3. The first adjustment shall be supported by a separate schedule numbered C-3.1. The second adjustment supporting schedule shall be C-3.2. The working papers would be indexed WPC-3.1 and WPC-3.2, respectively.

- 6 Position 6 shall only be used (as required) when data is required for supporting a supporting schedule identified by the position 5 digit. The first additional supporting schedule shall be identified with the lower case letter "a", the second "b", etc. In all cases where the sixth position is used, the third, fourth, and fifth position characters shall be coded with the section, schedule, and supporting schedule which the additional data supports.

For example: Information provided as additional support for adjustment C-3.1 would be coded in the working papers as:

WPC-3.1a, b, c ... etc.

(B) Supplemental information

The applicant utility must make available the following supplemental information to Commission staff at the start of the field work:

- (1) General ledger, journals, and journal entries.
- (2) Monthly balance sheets for the test year.
- (3) Current organization chart.
- (4) Current federal income tax returns.
- (5) Independent auditor's report and letter of recommendation.

The applicant utility must provide four copies of the working papers specified in paragraph (A)(8) of Chapter III of this appendix to the utilities department, office of the rate case manager, at the time of the filing of the application.

Form
(Sample Cover Sheet of Application)
(Small Utilities)

General Application for Change in)	
Utility Rates Before the Public)	Case No.:_____
Utilities Commission)	Date:_____
of Ohio.)	

Exact Company Name:_____

Mailing Address:_____

Company Official to be contacted pertaining to rate case matters:_____

Telephone Number (including area code):_____

E-Mail Address:_____

Attorney for Applicant:_____

Address:_____

Attorney's Telephone Number (including area code):_____

E-Mail Address:_____

Approved Test Year:_____

Approved Date Certain:_____

Section A
Revenue Requirements
(Small Utilities)

No revenue requirement schedules are required for small utilities.

Section B
Rate Base
(Small Utilities)

Company: _____

Case No.: _____

Test Year: _____

Date Certain: _____

- B-1(s) Jurisdictional rate base summary
- B-2(s) Plant in service analysis
- B-3(s) Depreciation accrual rates and jurisdictional reserve
balances by accounts

Section B Instructions
Rate Base

(A) General

The schedules included in section B - "Rate Base" are designed to be applicable to more than one type of utility.

(B) Jurisdictional rate base summary

Provide summary rate base information as specified in Schedule B-1(s).

(C) Plant in service analysis

Provide the following information requested in Schedule B-2(s) by accounts:

- (1) Ending plant balances from the date certain of the last rate case filed with the commission.
- (2) Additions, retirements, and transfers which occurred in the interim period from the date certain of the last rate case filed with the commission to the date certain in this case.
- (3) Date certain balances.

(D) Depreciation accrual rates and jurisdictional reserve balances by accounts

Provide the information as specified on Schedule B-3(s) for depreciation reserve balances and depreciation accrual rates by accounts. If available, provide columns (H), % Net Salvage, (I), Average Service Life, and (J), Curve Form.

(Company)

Case No.: _____

Jurisdictional Rate Base Summary

As of _____

Schedule B-1(s)

Data: ___Actual ___Estimated

Page ___ of ___

Type of Filing: ___Original ___Updated ___Revised

Witness Responsible: _____

Work Paper Reference No(s): _____

Line No.	Rate Base Component	Date Certain Amount
1	Plant in service	\$
2	Reserve for accumulated depreciation	()
3	Net plant in service (1 + 2)	
4	Construction work in progress 75% complete	
5	Working capital allowance	
6	Contributions in aid of construction	()
7	Other rate base items	()
8	Jurisdictional rate base (3) thru (7)	\$

(Company)

Case No.: _____

Plant in Service Analysis

As of _____

Data: ___Actual ___Estimated

Schedule B-2(s)

Type of Filing: ___Original ___Updated ___Revised

Page ___ of ___

Witness Responsible: _____

Work Paper Reference No(s): _____

Line No.	Acct. No.	Account Title	Beginning Balance	Additions	Retirements	Transfers/Reclassifications		Other Accts. Involved	Ending Balance
						Amount	Explanation of Transfers		
			\$	\$	\$	\$			\$

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Depreciation Accrual Rates and

Jurisdictional Reserve Balances by Accounts

As of _____

Schedule B-3(s)

Data: ___Actual ___Estimated

Page ___ of ___

Type of Filing: ___Original ___Updated ___Revised

Witness Responsible: _____

Work Paper Reference No(s): _____

Jurisdictional									
Line No. (A)	Acct. No. (B)	Account Title (C)	Plant Investment (D)	Reserve Balance (E)	Current Accrual Rate* (F)	Calculated Depr. Expense (G=DxF)	% Net Salvage* (H)	Average Service Life* (I)	Curve Form* (J)
			\$	\$		\$			

* Columns (F) and (H) through (J) shall represent values as prescribed by this commission for booking purposes. If such values have not been prescribed, the utility shall so indicate on schedule by footnote.

Note: When completing forms, either portrait or landscape formatting is acceptable

Section C
Operating Income
(Small Utilities)

Company:_____

Case No.:_____

Test Year:_____

Date Certain:_____

- C-1(s) Jurisdictional pro forma income statement
- C-2(s) Detailed jurisdictional operating income statement at current rates
- C-3(s) Summary of jurisdictional adjustments to operating income

Section C Instructions

Operating Income

(A) General

The schedules included in section C "Operating Income" do not prescribe specific account classifications in order that the schedules may be applicable to more than one type of utility.

(B) Jurisdictional pro forma income statement

Provide the jurisdictional pro forma income statement in the format specified in Schedule C-1(s).

(C) Detailed Jurisdictional operating income statement at current rates

Provide a detailed operating income statement by major functional classification in the format specified on Schedule C-2(s).

(D) Summary of jurisdictional adjustments to operating income

Summarize each adjustment to jurisdictional operating income in Schedule C-3(s) showing for each adjustment the following:

- (1) The title of adjustment and reference to operating income Schedule C-2(s).
- (2) The purpose and description of the adjustment.
- (3) The amount of the adjustment.

Section D
Rate of Return
(Small Utilities)

Company:_____

Case No.:_____

Test Year:_____

Date Certain:_____

D-1(s)	Rate of return summary
D-1.1(s)	Common equity
D-2(s)	Embedded cost of short-term debt
D-3(s)	Embedded cost of long-term debt
D-4(s)	Embedded cost of preferred stock

Section D
Rate of Return
(Small Utilities)

Small utilities shall submit the same data required in Chapter II, section D "Rate of return" (Large Utilities), of this appendix except that Schedule D-5 "Comparative financial data" is not required.

Section E
Rates and Tariffs
(Small Utilities)

Company: _____

Case No.: _____

Test Year: _____

Date Certain: _____

- | | |
|----------|---|
| E-1(s) | Clean copy of proposed tariff schedules |
| E-2(s) | Clean copy of current tariff schedules |
| E-2.1(s) | Scored and redlined copy of current tariff
schedules showing all proposed changes. |
| Ee-3(s) | Narrative rationales for tariff changes |
| E-3.1(s) | Customer charge/ minimum bill rationale |
| E 3.2(s) | Cost of service study |
| E-4(s) | Class and schedule revenue summary |
| E-5(s) | Typical bill comparison |

Section E Instructions
Rates and Tariffs

(A) Current and proposed rate schedules

- (1) Clean copy of proposed tariff schedules (Schedule E-1(s))
- (2) Current tariff schedules
 - (a) Clean copy of current tariff schedules (Schedules E-2(s))
 - (b) Scored and redlined copy of current tariff schedules showing all proposed changes (Schedule E-2.1(s))
- (3) Rationale for tariff changes (Schedule E-3(s))

Provide the rationale, on Schedule E-3(s), underlying the proposed changes to the tariff. Changes common to multiple rate forms need only be discussed once (e.g., minimum bill charges have been increased ten percent on all rates because...). Provide the rationale explaining rates which have not been changed or not increased in accordance with the average increase in revenue which is proposed. Provide a specific source of data supporting each rationale for change. Reference the appropriate current or proposed rate schedules to which the rationale is applicable. Use the proper schedule and page number references.

The utility may elect to code the rationale statements by lettering in the rate column. The rationale applicable to the various rates can be indicated by adding a column to Schedule E-4.1, titled "rationale code" and including on the schedule the cost letters for each rationale applicable to each rate.

Designate in the margin the type of proposed change by using the following designation:

- (C) - To signify changed regulations.
- (D) - To signify discontinued rate or regulation.
- (I) - To signify increased rate.
- (R) - To signify reduced rate.
- (S) - To signify reissued rate.
- (T) - To signify a change in text, but no change in rate or regulation.

Identify each Schedule E-2.(s) and E-2.1(s), page ____ of ____ in the upper right hand corner of the schedule.

(4) Customer charge/ minimum bill rationale (Schedule E-3.1(s))

All utilities are to provide the methodologies utilized in the calculation of any proposed customer charge or minimum bill, the accounts utilized in the calculation and the account balances used in the calculations.

(5) Cost-of-service study (Schedule E-3.2(s))

The following requirements pertain to small sized utilities.

Waterworks/sewage disposal system companies shall provide a fully allocated cost of service study following accepted "American Waterworks Association" guidelines, segregating the costs incurred for basic water services from costs incurred for basic sewage disposal system services where applicable. Include a description of the methodology to be used with original filing and include testimony support for that methodology and cost study. For the study methodology selected, provide the allocations used in the study and corresponding calculations. The study shall be filed with the application. The support testimony shall be filed within fourteen days of the filing of the application for increase in rates.

(B) Class and schedule revenue summary (Schedule E-4(s))

Provide the information and perform the calculations required in Schedule E-4(s). There are two schedules labeled E-4(s). One is applicable to gas and steam companies and the other is applicable to the waterworks and sewage disposal system companies.

(1) Telephone utilities

- (a) Provide separately the information required by Schedule E-4(s) for services and/or equipment subject to commission tariffs or contracts, but not a part of the rate increase application. Separate line items are required for each revenue source greater than one per cent of total utility operating revenue. Revenue sources may be classified according to rate classifications, tariff schedules type of contract, type of equipment, and use of service or functional nature, classifications used must be specified.
- (b) If the applicant has "other income" exceeding five percent of utility operating income, provide separately a schedule in the form of an income statement showing the derivation of the "other income" amount. Revenues or income on this schedule should be categorized consistent with the applicant's normal accounting practices except that no category should be larger than one percent of the applicant's operating income.
- (c) Schedules pursuant to (B)(1)(a) above are required to be filed with any application to increase rates, but not more frequently than once every twelve months.

(2) Waterworks/sewage disposal system companies

- (a) Provide separately the information required by Schedule E-4 for services and/or equipment subject to commission tariffs or contracts, but not a part of the rate increase application. Separate line items are required for each revenue source greater than one percent of total utility operating revenue. Separate line items are required to reflect the dollar amount of the mirrored CWIP revenue offset. Revenue sources may be classified according to rate classifications, tariff schedules type of contract, type of equipment, and use of service or functional nature. Classifications used must be specified.
- (b) Schedules pursuant to (B)(2)(a) above are required to be filed with any application to increase rates, but not more frequently than once every twelve months.

(C) Typical bill comparison

NOTE:

There are two schedules labeled E-5(s). One schedule is applicable to gas and steam companies, and the other schedule is applicable to the waterworks and sewage disposal system companies.

Typical bills by class and schedule (Schedule E-5(s))

Compute typical bills for each schedule of user and provide the information required in Schedule (E-5(s)). The consumption levels used for the computation should, as a minimum include:

- (1) Levels of consumption at both the present and proposed block ends. (Tail block "end" is at greatest level of consumption expected.)
- (2) Levels of consumption which accurately represents customer consumption patterns.
- (3) Billing frequency information (e.g., bi-monthly, etc.) is required in column (C) when billing is other than monthly.

(Company)

Case No.: _____

Narrative Rational for Tariff Changes

Schedule E-3

Data: ___Months Actual & ___Estimated

Page___of ___

Type of Filing: ___Original ___Updated ___Revised

Witness Responsible:_____

Work Paper Reference No(s):_____

Rate	Type	Explanation of Change	Rationale for Change	Data Reference
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Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Proposed
Class and Schedule Revenue Summary
(Electric, Gas, and Steam Utilities)

Schedule E-4

Data: ___ Months Actual & ___ Estimated

Page ___ of ___

Type of Filing: ___ Original ___ Updated ___ Revised

Witness Responsible: _____

Work Paper Reference No(s): _____

Line No.	Rate Code (A)	Class/ Descrip. (B)	Customer Bills (C)	Sales KW/KWH MCF/MLB (D)	Proposed Rate (E)	Proposed Revenue (F)	% of Revenue To Total Revenue (G)	Proposed Revenue Total (H)
-------------	---------------------	---------------------------	--------------------------	-----------------------------------	-------------------------	----------------------------	--	-------------------------------------

- (X) Total revenue before mirrored CWIP revenue offset
- (Y) Mirrored CWIP revenue offset
- (Z) Revenue excluding mirrored CWIP revenue

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Current
Class and Schedule Revenue Summary
(Electric, Gas, and Steam Utilities)

Schedule E-4

Data: ___ Months Actual & ___ Months Estimated

Page ___ of ___

Type of Filing: ___ Original ___ Updated ___ Revised

Witness Responsible: _____

Work Paper Reference No(s): _____

Current Annualized

Line No.	Rate Code (A)	Class/ Descrip. (B)	Customer Bills (C)	Sales KW/KWH MCF/MLB (D)	Most Current Rate (J)	Current Annualized Revenue (K)	% of Revenue To		% Increase in Revenue (N=F-K) (K)	Total Revenue % Increase (O)
							Total	Increase		
							(L)	(M=F-K)		

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Class and Schedule Revenue Summary
(Waterworks and Sewage Disposal System Companies)

Schedule E-4

Data: ___ Months Actual & ___ Months Estimated

Page ___ of ___

Type of Filing: ___ Original ___ Updated ___ Revised

Witness Responsible: _____

Work Paper Reference No(s): _____

<u>Proposed-Annualized</u>							<u>Current-Annualized</u>					Total Revenue % Increase (L=F-I) (I)
				Sales		Proposed	% of		Current	% of		
Line	Rate	Class/	Customer	FT ³ /	Prpsd.	Total	Revenue	Most	Annualized	Revenue	Dollar	
No.	Code	Descrip.	Bills	GAL	Rate	Revenue	To	Current	Total	Total	Increase	
	(A)	(B)	(C)	(D)	(E)	(F=DxE)	(G)	(H)	(I)	(J)	(K=F-I)	

- (X) Total revenue before mirrored CWIP revenue offset
- (Y) Mirrored CWIP revenue offset
- (Z) Revenue excluding mirrored CWIP revenue

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Typical Bill Comparison
(Electric, Gas, and Steam Utilities)

Schedule E-5

Data: ___ Months Actual & ___ Months Estimated

Page ___ of ___

Type of Filing: ___ Original ___ Updated ___ Revised

Witness Responsible: _____

Work Paper Reference No(s): _____

Bill Data

Line No.	Rate Code	Level of Demand (A)	Level of Usage (B)	Current Bill (C)	Prop. Bill (D)	Dollar Increase (E=D-C)	% Increase (F=E+C)	Current Total Bill Inc. (H)	Proposed Total Bill (I)	% Change (J= $\frac{E}{H}$)
-------------	--------------	------------------------------	-----------------------------	------------------------	----------------------	-------------------------------	--------------------------	---	----------------------------------	------------------------------------

Note: When completing forms, either portrait or landscape formatting is acceptable

(Company)

Case No.: _____

Typical Bill Comparison
(Waterworks and Sewage Disposal System Companies)

Schedule E-5

Data: ___ Months Actual & ___ Months Estimated

Page ___ of ___

Type of Filing: ___ Original ___ Updated ___ Revised

Witness Responsible: _____

Work Paper Reference No(s): _____

Line No.	Level of Usage (A)	Most Current Rate (B)	Rate Data			Current Bill (F)	Bill Data		
			Proposed Rate (C)	Dollar Increase (D=C-B)	% Increase (E=D÷B)		Proposed Bill (G)	Dollar Increase (H=G-F)	% Increase (I=H÷F)

Note: When completing forms, either portrait or landscape formatting is acceptable

Chapter IV

Standard Filing Requirements

Abbreviated Filing

Gas Utilities7,500 or less customers

Waterworks Utilities7,500 or less customers
Sewage Disposal System
Utilities

For the purpose of determining the size of the utility which may qualify for the abbreviated filing requirements each utility company shall include in its customer count all customers over which the public utilities commission of Ohio has jurisdiction without regard to the number of customers proposed to be affected by the application.

(A) General instructions

(1) Purpose

The abbreviated standard filing requirements provide a simplified and less expensive procedure in applying to the commission for increases in rates and charges.

A utility under the jurisdiction of the public utilities commission of Ohio with customers within the limits stated, has the option of applying for rate adjustments by means of the compliance with the standard filing requirements for small utilities, outlined in Chapter III of this appendix, or by following the procedure prescribed in this chapter.

This latter procedure is intended to minimize the necessity for formal hearings in most cases, to reduce filing requirements, and, in many cases, shorten the time period between the application and commission order. This procedure assumes that the applicant has maintained adequate financial records pursuant to the Uniform Systems of Accounts prescribed by the commission for utility companies, and requires that the applicant have on file with the commission fully completed annual reports, including their supplemental schedules, for the most recent calendar year and at least the two prior years, if the applicant has been in existence that long. Under this procedure, the applicant is to select a historical test year.

(2) Case record

Unless a motion for a hearing is filed by the applicant and/or any intervening party, or objections to the Staff Report of Investigation are filed, the commission will make its decision on the basis of the information contained in the application, responses to commission staff data requests, annual reports for the most recent calendar year and the preceding two prior years, and the information and recommendations submitted in the Staff Report of Investigation.

(B) Instructions for completing the application

(1) Filing application

The abbreviated application following these instructions shall be used by small utilities for the purpose of having the public utilities commission of Ohio review the reasonableness of existing utility rates.

To complete the application form follow the steps outlined below:

- (a) Insert the name of the utility requesting an increase in blank number 1. The case number blank will be completed by the commission.
- (b) Insert the name of the utility requesting an increase in blank number 2.
- (c) List the type of utility business in which the utility requesting the increase is engaged in blank number 3. For purposes of this form, utilities are classified as a natural gas company, a water works company, or a sewage disposal system

company. It is possible for a utility to be engaged in more than one type of utility business. For example, a small utility may be engaged in utility business as both a water works company and a sewage disposal system company. Where a small utility is engaged in more than one type of utility business, all types of utility business should be listed in blank number 3.

- (d) Place the total number of customers which receive utility service from the small utility requesting an increase in blank number 4.
- (e) In blank number 5, place the municipality within which the small utility requesting the increase in rates provides utility service. If the small utility requesting an increase in rates does not provide utility service within the political boundaries of a municipality, place the name of the county in which the utility renders service in blank number 5.

If the small utility requesting an increase in rates provides utility service within the political boundaries of a municipality, a notice of intent to file an application for increase in rates must be completed and filed with the commission and governmental representatives of the municipality thirty days before the application for an increase in rates may be filed.

- (f) In blank number 6, place the ending date for the twelve-month period utilized to determine the gross annual revenues provided in blank number 7 and total operating expenses in blank number 8.
- (g) In blank number 7, place the dollar amount of the gross annual revenues for the twelve months ending on the date specified in blank number 6.
- (h) In blank number 8, place the dollar amount of total operating expenses for the twelve months ending on the date specified in blank number 6.
- (i) In blank number 9, place the ending date of the proposed test period which should be the same as the date placed in blank number 6.
- (j) In blank number 10, place the date as of which the utility proposes the rate base to be determined. This date shall be the ~~mid-point~~last day of the proposed test period, unless another date can be justified by the utility.
- (k) The president/vice president and the secretary/treasurer of the utility requesting an increase in rates should sign the application form at blank number 11 and provide the address and telephone number of the utility at which they can be reached during business hours. The utility officials signing the application form must be authorized by the utility to take such action. Verification of the signatures by a notary public should be provided on page 3 of 3 of the abbreviated application in this chapter.
- (l) Attach a copy of the utility's proposed rate schedules to the application form as Exhibit 1.

- (m) Attach a copy of the utility's current rate schedules to the application form as Exhibit 2. This should be consistent with the utility's current rate schedules found in the utility's tariff.
 - (n) Attach a copy of the utility's most recent annual report as Exhibit 3.
 - (o) Attach a copy of the utility's most recent federal income tax return as Exhibit 4.
- (2) Assistance in preparing the application

Assistance in the preparation of the application and any supporting documents may be obtained by contacting the commission's ~~utilities department~~docketing division at (614) 466-~~37054095 and, or by arranging through the commission's rate case manager (same telephone number)~~requesting an informal conference with an appropriate member of the commission staff.

The utility is required to fully cooperate with the commission's staff in providing all the necessary information to complete the application, if the utility is unable to do so on its own. The utility is also required to provide, to the best of its ability, information requested by the commission's staff in the course of its investigation of this application.

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)
_____ ¹ for an Increase in) Case No.
Rates and Charges.)

SMALL UTILITY APPLICATION
FOR AN INCREASE IN RATES
AND CHARGES

_____², the applicant in this proceeding, is a
_____³ company providing utility service to _____⁴
customers in the area of _____⁵, Ohio. For the twelve (12) months ended
_____, _____⁶, the current rates and charges of applicant produced annual
gross revenues of \$ _____⁷. The expenses for the same twelve-month period were
\$ _____⁸. Based upon current expense levels, the existing rates do not provide a reasonable
level of compensation for utility service.

Applicant proposes the rates attached as Exhibit 1 to this application. Exhibit 2 is a copy of the rates currently in effect. Applicant has attached, as Exhibit 3, its most recent annual report filed with the Commission, and its most recent federal income tax return as Exhibit 4.

Applicant agrees to supply, to the best of its ability, information requested by the Commission's staff in the course of its investigation of this application.

Considering the statements made above, applicant requests the Public Utilities Commission of Ohio to:

1. Waive the filing requirements specified in Section 4909.18 (A) through (E), Revised Code.
2. Establish a test period of the twelve-month period ending _____⁹, and date certain of _____¹⁰, for purposes of examining the reasonableness of the current rates and the determination of rate base.
3. Specify the form of notice which should be employed by applicant to inform the public of the substance and prayer of this application.
4. Cause an investigation to be made of the facts set forth in this application.

5. Determine if the rates and charges proposed by applicant are reasonable or, in the alternative, determine what rates should be charged by applicant in order to provide a reasonable level of compensation for utility service.

Respectfully submitted,

_____,¹¹
President/Vice President

Secretary/Treasurer

Company Address: _____

Company
Telephone No.: (_____) _____

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

10/20/2021 2:25:42 PM

in

Case No(s). 19-2103-AU-ORD

Summary: Finding & Order adopting the proposed amendments to Ohio Adm.Code Chapter 4901-7 on the standard filing requirements for rate increases electronically filed by Heather A. Chilcote on behalf of Public Utilities Commission of Ohio