Exhibit No.:
Issues: Rate Design
Witness: James C. Watkins
Sponsoring Party: MO PSC Staff
Type of Exhibit: Supplemental Testimony
Case No.: ER-2008-0318
Date Testimony Prepared: December 4, 2008

MISSOURI PUBLIC SERVICE COMMISSION
UTILITY OPERATIONS DIVISION

SUPPLEMENTAL TESTIMONY
OF

JAMES C. WATKINS
UNION ELECTRIC COMPANY d/b/a
AMERENUE

CASE NO. ER-2008-0318

Jefferson City, Missouri
December 2008

# BEFORE THE PUBLIC SERVICE COMMISSION 

## OF THE STATE OF MISSOURI

In the Matter of Union Electric Company ) $\mathrm{d} / \mathrm{b} / \mathrm{a}$ AmerenUE for Authority to File ) Tariffs Increasing Rates for Electric ) Service Provided to Customers in the )

## AFFIDAVIT OF JAMES C. WATKINS

## STATE OF MISSOURI ) ) ss COUNTY OF COLE )

James C. Watkins, of lawful age, on his oath states: that he has participated in the preparation of the following Supplemental Testimony in question and answer form, consisting of 5 pages of Supplemental Testimony to be presented in the above case, that the answers in the following Supplemental Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.


Subscribed and sworn to before me this $y^{\text {th }}$ day of December, 2008.


# SUPPLEMENTAL TESTIMONY <br> OF <br> JAMES C. WATKINS <br> UNION ELECTRIC COMPANY 

d/b/a

## AMERENUE

CASE NO. ER-2008-0318
Q. Please state your name and business address.
A. My name is James C. Watkins and my business address is Missouri Public Service Commission, 200 Madison Street, P. O. Box 360, Jefferson City, Missouri 65102.
Q. Who is your employer and what is your present position?
A. I am employed by the Missouri Public Service Commission (Commission) and my title is Manager, Economic Analysis, Energy Department, Operations Division.
Q. Are you the same James C. Watkins that prefiled direct and rebuttal testimony in this case?
A. Yes.
Q. What is the purpose of your supplemental testimony?
A. The purpose of my testimony is to address the nonunanimous stipulation and agreement regarding class cost of service and rate design.
Q. What is the Staff's recommendation?
A. The Staff recommends that the Commission reject the nonunanimous stipulation and agreement for the following reasons:

1. The revenue shifts are not consistent with any of the class cost-of-service studies relied on by the parties;
2. No provision is made to retain the following current rate design features of the AmerenUE rate schedules:
(1) The customer charges on the Small Primary Service (SPS), Large Primary Service (LPS), and Large Transmission Service (LTS) rate schedules should be the same dollar amounts.
(2) The rates (\$ per kW ) for Rider B voltage credits should be the same under all applicable rate schedules.
(3) The rate (\$ per billed kVar) associated with the Reactive Charge should be the same under all applicable rate schedules.
(4) The rate (\$ per month) associated with the Time-of-Day meter charge should be the same under all applicable rate schedules.
(5) The Time-of-Day energy charge adjustments should be the same on the LPS and LTS rate schedules.
3. Larger than system average increases are proposed for the lighting class, despite it not being included in any of the class cost-of-service studies.
4. A larger than system average increase is proposed for a customer whose contract with AmerenUE provides that any rate change will be at the level of the overall system average rate change.
5. The Staff's class cost-of-service study establishes that no class revenue shifts are necessary in this case given the class revenue shifts accomplished in AmerenUE's immediately preceding rate case, ER-2007-0002. Nonetheless, if the

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Commission adopted the class revenue shifts shown in the Staff's study, the class revenue shift for the LTS Class effectuated by the nonunanimous stipulation and agreement is in the opposite direction of the shift that is indicated as necessary and appropriate by the Staff's study.
Q. What were the results of the class cost-of-service studies filed in this case?

A: Please see below a summary table, which was attached to Staff witness David Roos Rebuttal Testimony as Schedule DCR-R-1:

|  | Residential | Small <br> General <br> Service | Lg General <br> Service/Sm <br> Primary <br> Service | Large <br> Primary <br> Service | Large <br> Transmission <br> Service |
| ---: | :---: | :---: | :---: | :---: | :---: |
| Staff | 3.160 | -3.063 | -5.092 | 2.901 | 4.882 |
| AmerenUE | 6.820 | -6.626 | -7.561 | 3.536 | -2.641 |
| OPC 1 | -1.850 | -9.900 | -2.130 | 14.470 | 23.010 |
| OPC 2 | 0.060 | -7.080 | -2.550 | 10.480 | 11.630 |
| MIEC | 12.300 | -5.800 | -11.000 | -3.800 | -16.200 |

Q. Does the Staff's class cost-of-service study support the proposed class revenue shifts?
A. No. While the Staff's class cost-of-service study establishes that no class revenue shifts are necessary in this case, the Staff's study shows that any rate increase for the Large Transmission Service (LTS) class should be about five percent (5\%) above the system average, not below the system average.
Q. Do the class cost-of-service studies performed by the Office of The Public Counsel (OPC) support the proposed class revenue shifts?
A. No. OPC's studies show that the LTS class's revenues should be increased in the range of about twelve percent (12\%) to twenty-three percent (23\%) above the system

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average, not below the system average. The OPC's studies also show that Residential rates, rather than being increased, should be lowered by as much as two percent ( $2 \%$ ) below the system average. However, in in filed, prepared Direct Testimony OPC interpreted its own studies together with other factors to indicate that no class revenue shifts are warranted at this time.
Q. Does AmerenUE's class cost-of-service study support the proposed class revenue shifts?
A. No. AmerenUE's study shows that the LTS class's revenues could be increased between two to three percent $(2 \%-3 \%)$ below the system average; however, AmerenUE in filed, prepared Direct Testimony interpreted its own study together with other factors to indicate that no class revenue shifts are warranted at this time.
Q. Does MIEC's class cost-of-service study support the proposed class revenue shifts?
A. No. MIEC's study is the only one that shows that the LTS class's revenues should be increased by an amount below the system average. It is also the only study that shows that the Large Primary Service (LPS) class's rates should be increased by less than the system average. Its study shows that LPS rates should be increased by about four percent (4\%) below the system average; however, the nonunanimous stipulation and agreement provides for an above average increase for the LPS class.
Q. Has the Staff been able to replicate the table on Attachment 1 of the nonunanimous stipulation and agreement?
A. The Staff has been able to calculate the rate increases to each class at each of the four revenue increase levels shown on Attachment 1 of the nonunanimous stipulation and

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agreement. The Staff has nothing to compare its calculations to for other levels of revenue increases. Attached as Appendix A to this testimony is the Staff's calculations of revenue increases for these and additional levels of revenue increase.
Q. Could the nonunanimous stipulation and agreement be easily implemented if the Commission would approve it?
A. Because of the complexities of the calculations, it would be difficult to implement. Therefore, I recommend that, if the Commission approves the nonunanimous stipulation and agreement, it should require the signatory parties to file in EFIS a fully functional Excel spreadsheet with one input cell for the amount of overall revenue increase granted by the Commission. The spreadsheet should then calculate and display the dollar and percentage increases for each class. This is the only way to ensure that tariff sheets bearing the new rates can be implemented in a timely fashion without disagreements as to what the language in the nonunanimous stipulation and agreement really means.

The Staff is prepared to assist with and review the spreadsheet before filing if the Commission would approve the nonunanimous stipulation and agreement.
Q. Does this conclude your supplemental testimony?
A. Yes, it does.

STAFF ANALYSIS OF STIPULATION AND AGREEMENT AT VARIOUS OVERALL REVENUE INCREASES by rate class and by type of adjustment

TABLE 1: THE SYSTEM AVERAGE PERCENTAGE INCREASE APPLIED TO ALL CLASSES

| TOTAL MO INCREASE | RESIDENTIAL | SMALL GS | COMBINED <br> LGS\&SPS | LARGE PRIMARY | LARGE <br> TRANSMISSION | LIGHTING \& MSD | SYSTEM AVG INCREASE |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| \$40,000,000 | \$17,250,545 | \$4,619,397 | \$12,017,379 | \$3,057,315 | \$2,505,703 | \$549,660 | 1.92\% |
| \$60,000,000 | \$25,875,818 | \$6,929,096 | \$18,026,069 | \$4,585,972 | \$3,758,555 | \$824,491 | 2.88\% |
| \$79,999,000 | \$34,500,659 | \$9,238,679 | \$24,034,458 | \$6,114,553 | \$5,011,344 | \$1,099,307 | 3.83\% |
| \$80,000,000 | \$34,501,090 | \$9,238,794 | \$24,034,758 | \$6,114,630 | \$5,011,406 | \$1,099,321 | 3.83\% |
| \$80,001,000. | \$34,501,522 | \$9,238,910 | \$24,035,059 | \$6,114,706 | \$5,011,469 | \$1,099,335 | 3.83\% |
| \$100,000,000 | \$43,126,363 | \$11,548,493 | \$30,043,448 | \$7,643,287 | \$6,264,258 | \$1,374,151 | 4.79\% |
| \$120,000,000 | \$51,751,636 | \$13,858,191 | \$36,052,137 | \$9,171,945 | \$7,517,110 | \$1,648,981 | 5.75\% |
| \$140,000,000 | \$60,376,908 | \$16,167,890 | \$42,060,827 | \$10,700,602 | \$8,769,961 | \$1,923,812 | 6.71\% |
| \$149,999,000 | \$64,689,113 | \$17,322,624 | \$45,064,871 | \$11,464,854 | \$9,396,324 | \$2,061,213 | 7.19\% |
| \$150,000,000 | \$64,689,544 | \$17,322,739 | \$45,065,172 | \$11,464,931 | \$9,396,387 | \$2,061,227 | 7.19\% |
| \$150,001,000 | \$64,689,976 | \$17,322,855 | \$45,065,472 | \$11,465,007 | \$9,396,450 | \$2,061,240 | 7.19\% |
| \$170,000,000 | \$73,314,817 | \$19,632,438 | \$51,073,861 | \$12,993,588 | \$10,649,238 | \$2,336,057 | 8.15\% |
| \$200,000,000 | \$86,252,726 | \$23,096,986 | \$60,086,896 | \$15,286,575 | \$12,528,516 | \$2,748,302 | 9.59\% |

TABLE 2: THE LARGE TRANSMISSION SERVICE REVENUE SHIFT

| TOTAL MO INCREASE | RESIDENTIAL | SMALL GS | COMBINED LGS\&SPS | LARGE PRIMARY | LARGE TRANSMISSION | $\begin{aligned} & \text { LIGHTING } \\ & \text { \& MSD } \end{aligned}$ | SUM OF <br> SHIFTS |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| \$40,000,000 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 |
| \$60,000,000 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 |
| \$79,999,000 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 |
| \$80,000,000 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 |
| \$80,001,000 | \$14 | \$4 | \$10 | \$3 | (\$31) | \$0 | (\$0) |
| \$100,000,000 | \$288,209 | \$77,177 | \$200,777 | \$51,079 | (\$626,426) | \$9,183 | \$0 |
| \$120,000,000 | \$576,418 | \$154,355 | \$401,554 | \$102,159 | (\$1,252,852) | \$18,367 | \$0 |
| \$140,000,000 | \$864,626 | \$231,532 | \$602,331 | \$153,238 | (\$1,879,277) | \$27,550 | (\$0) |
| \$149,999,000 | \$1,008,716 | \$270,117 | \$702,710 | \$178,775 | (\$2,192,459) | \$32,141 | (\$0) |
| \$150,000,000 | \$1,008,731 | \$270,121 | \$702,720 | \$178,777 | (\$2,192,490) | \$32,142 | (\$0) |
| \$150,001,000 | \$1,008,731 | \$270,121 | \$702,720 | \$178,777 | (\$2,192,490) | \$32,142 | (\$0) |
| \$170,000,000 | \$1,008,731 | \$270,121 | \$702,720 | \$178,777 | (\$2,192,490) | \$32,142 | (\$0) |
| \$200,000,000 | \$1,008,731 | \$270,121 | \$702,720 | \$178,777 | (\$2,192,490) | \$32,142 | (\$0) |

## STAFF ANALYSIS OF STIPULATION AND AGREEMENT AT VARIOUS OVERALL REVENUE INCREASES

 BY RATE CLASS AND BY TYPE OF ADJUSTMENTTABLE 3: THE RE-ASSIGNMENT OF THE RESIDENTIAL-LTS REVENUE SHIFT TO GENERAL SERVICE

| TOTAL MO INCREASE | RESIDENTIAL | SMALL GS | COMBINED LGS\&SPS | LARGE PRIMARY | LARGE TRANSMISSION | $\begin{aligned} & \text { LIGHTING } \\ & \text { \& MSD } \end{aligned}$ | SUM OF SHIFTS |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| \$40,000,000 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 |
| \$60,000,000 | \$0 | \$0 | \$0 | \$0 | So | \$0 | \$0 |
| \$79,999,000 | \$0 | \$0 | \$0 | \$0 | S0 | \$0 | \$0 |
| \$80,000,000 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 |
| \$80,001,000 | (\$14) | \$4 | \$10 | \$0 | \$0 | \$0 | (\$0) |
| \$100,000,000 | (\$288,209) | \$80,025 | \$208,184 | \$0 | \$0 | \$0 | (\$0) |
| \$120,000,000 | ( $\$ 576,418$ ) | \$160,049 | \$416,368 | \$0 | S0 | \$0 | (\$0) |
| \$140,000,000 | (\$864,626) | \$240,074 | \$624,553 | \$0 | \$0 | \$0 | \$0 |
| \$149,999,000 | $(\$ 1,008,716)$ | \$280,082 | \$728,634 | \$0 | S0 | \$0 | (\$0) |
| \$150,000,000 | (\$1,008,731) | \$280,086 | \$728,645 | \$0 | \$0 | \$0 | (\$0) |
| \$150,001,000 | (\$1,008,731) | \$280,086 | \$728,645 | so | So | \$0 | (\$0) |
| \$170,000,000 | (\$1,008,731) | \$280,086 | \$728,645 | \$0 | \$0 | \$0 | (\$0) |
| \$200,000,000 | (\$1,008,731) | \$280,086 | \$728,645 | \$0 | so | \$0 | (\$0) |

TABLE 4: THE RESIDENTIAL - GENERAL SERVICE REVENUE SHIFT

| TOTAL MO INCREASE | RESIDENTIAL | SMALL GS | COMBINED <br> LGS\&SPS | LARGE PRIMARY | LARGE <br> TRANSMISSION | LIGHTING <br> \& MSD | SUM OF <br> SHIFTS |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| \$40,000,000 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 |
| \$60,000,000 | \$0 | \$0 | \$0 | \$0 | S0 | \$0 | \$0 |
| \$79,999,000 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 |
| \$80,000,000 | \$2,699,560 | (\$749,565) | (\$1,949,996) | \$0 | \$0 | \$0 | \$0 |
| \$80,001,000 | \$2,699,560 | (\$749,565) | (\$1,949,996) | \$0 | \$0 | \$0 | \$0 |
| \$100,000,000 | \$2,699,560 | (\$749,565) | (\$1,949,996) | \$0 | \$0 | \$0 | \$0 |
| \$120,000,000 | \$2,699,560 | (\$749,565) | (\$1,949,996) | \$0 | \$0 | \$0 | \$0 |
| \$140,000,000 | \$2,699,560 | (\$749,565) | (\$1,949,996) | \$0 | \$0 | \$0 | \$0 |
| \$149,999,000 | \$2,699,560 | (\$749,565) | (\$1,949,996) | \$0 | \$0 | \$0 | \$0 |
| \$150,000,000 | \$2,699,560 | (\$749,565) | (\$1,949,996) | \$0 | \$0 | \$0 | \$0 |
| \$150,001,000 | \$2,699,560 | (\$749,565) | (\$1,949,996) | \$0 | \$0 | \$0 | \$0 |
| \$170,000,000 | \$2,699,560 | $(\$ 749,565)$ | (\$1,949,996) | \$0 | \$0 | \$0 | \$0 |
| \$200,000,000 | \$2,699,560 | (\$749,565) | (\$1,949,996) | _S0. | \$0 | \$0 | \$0 |

TABLE 5: THE SUM OF ALL THE REVENUE SHIFTS AMONG CLASSES

| TOTAL MO INCREASE | RESIDENTIAL | SMALL GS | COMBINED LGS\&SPS | LARGE PRIMARY | LARGE TRANSMISSION | $\begin{aligned} & \text { LIGHTING } \\ & \& \text { MSD } \end{aligned}$ | SUM OF SHIFTS |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| \$40,000,000 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 |
| \$60,000,000 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 |
| \$79,999,000 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 |
| \$80,000,000 | \$2,699,560 | (\$749,565) | $(\$ 1,949,996)$ | \$0 | \$0 | \$0 | \$0 |
| \$80,001,000 | \$2,699,560 | $(\$ 749,557)$ | (\$1,949,975) | \$3 | (\$31) | \$0 | \$0 |
| \$100,000,000 | \$2,699,560 | $(\$ 592,363)$ | $(\$ 1,541,034)$ | \$51,079 | $(\$ 626,426)$ | \$9,183 | (\$0) |
| \$120,000,000 | \$2,699,560 | $(\$ 435,161)$ | $(\$ 1,132,073)$ | \$102,159 | (\$1,252,852) | \$18,367 | \$0 |
| \$140,000,000 | \$2,699,560 | $(\$ 277,959)$ | $(\$ 723,112)$ | \$153,238 | (\$1,879,277) | \$27,550 | \$0 |
| \$149,999,000 | \$2,699,560 | $(\$ 199,366)$ | (\$518,651) | \$178,775 | (\$2,192,459) | \$32,141 | (\$0) |
| \$150,000,000 | \$2,699,560 | $(\$ 199,358)$ | (\$518,631) | \$178,777 | (\$2,192,490) | \$32,142 | \$0 |
| \$150,001,000 | \$2,699,560 | $(\$ 199,358)$ | $(\$ 518,631)$ | \$178,777 | (\$2,192,490) | \$32,142 | \$0 |
| \$170,000,000 | \$2,699,560 | $(\$ 199,358)$ | $(\$ 518,631)$ | \$178,777 | ( $\$ 2,192,490$ ) | \$32,142 | \$0 |
| \$200,000,000 | \$2,699,560 | $(\$ 199,358)$ | $(\$ 518,631)$ | \$178,777 | (\$2,192,490) | \$32,142 | \$0 |

TABLE 6: TOTAL DOLLAR INCREASE (EQUAL PERCENTAGE INCREASE PLUS REVENUE SHIFTS) BY CLASS

| TOTAL MO |  |  | COMBINED | LARGE | LARGE | LIGHTING |
| ---: | ---: | ---: | ---: | ---: | ---: | ---: |
| INCREASE | RESIDENTIAL. | SMALL GS | LGS\&SPS | PRIMARY | TRANSMISSION | \& MSD |
| $\$ 40,000,000$ | $\$ 17,250,545$ | $\$ 4,619,397$ | $\$ 12,017,379$ | $\$ 3,057,315$ | $\$ 2,505,703$ | $\$ 549,660$ |
| $\$ 60,000,000$ | $\$ 25,875,818$ | $\$ 6,929,096$ | $\$ 18,026,069$ | $\$ 4,585,972$ | $\$ 3,758,555$ | $\$ 824,491$ |
| $\$ 79,999,000$ | $\$ 34,500,659$ | $\$ 9,238,679$ | $\$ 24,034,458$ | $\$ 6,114,553$ | $\$ \$, 011,344$ | $\$ 1,099,307$ |
| $\$ 80,000,000$ | $\$ 37,200,651$ | $\$ 8,489,229$ | $\$ 22,084,763$ | $\$ 6,114,630$ | $\$ 5,011,406$ | $\$ 1,099,321$ |
| $\$ 80,001,000$ | $\$ 37,201,082$ | $\$ 8,489,353$ | $\$ 22,085,084$ | $\$ 6,114,709$ | $\$ 5,011,438$ | $\$ 1,099,335$ |
| $\$ 100,000,000$ | $\$ 45,825,923$ | $\$ 10,956,130$ | $\$ 28,502,414$ | $\$ 7,694,367$ | $\$ 5,637,832$ | $\$ 1,383,334$ |
| $\$ 120,000,000$ | $\$ 54,451,196$ | $\$ 13,423,030$ | $\$ 34,920,065$ | $\$ 9,274,103$ | $\$ 6,264,258$ | $\$ 1,667,348$ |
| $\$ 140,000,000$ | $\$ 63,076,469$ | $\$ 15,889,931$ | $\$ 41,337,715$ | $\$ 10,853,840$ | $\$ 6,890,684$ | $\$ 1,951,362$ |
| $\$ 149,999,000$ | $\$ 67,388,674$ | $\$ 17,123,258$ | $\$ 44,546,220$ | $\$ 11,643,629$ | $\$ 7,203,865$ | $\$ 2,093,354$ |
| $\$ 150,000,000$ | $\$ 67,389,105$ | $\$ 17,123,381$ | $\$ 44,546,541$ | $\$ 11,643,708$ | $\$ 7,203,897$ | $\$ 2,093,368$ |
| $\$ 150,001,000$ | $\$ 67,389,536$ | $\$ 17,123,497$ | $\$ 44,546,841$ | $\$ 11,643,785$ | $\$ 7,203,959$ | $\$ 2,093,382$ |
| $\$ 170,000,000$ | $\$ 76,014,377$ | $\$ 19,433,080$ | $\$ 50,555,231$ | $\$ 13,172,366$ | $\$ 8,456,748$ | $\$ 2,368,199$ |
| $\$ 200,000,000$ | $\$ 88,952,286$ | $\$ 22,897,627$ | $\$ 59,568,265$ | $\$ 15,465,352$ | $\$ 10,336,026$ | $\$ 2,780,444$ |

TABLE 7: TOTAL PERCENTAGE INCREASE BY CLASS

| TOTAL MO INCREASE | RESIDENTIAL | SMALL GS | $\begin{aligned} & \text { COMBINED } \\ & \text { LGS\&SPS } \end{aligned}$ | LARGE PRIMARY | LARGE TRANSMISSION | $\begin{aligned} & \text { LIGHTING } \\ & \text { \& MSD } \end{aligned}$ | SYSTEM AVG INCREASE |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| \$40,000,000 | 1.92\% | 1.92\% | 1.92\% | 1.92\% | 1.92\% | 1.92\% | 1.92\% |
| \$60,000,000 | 2.88\% | 2.88\% | 2.88\% | 2.88\% | 2.88\% | 2.88\% | 2.88\% |
| \$79,999,000 | 3.83\% | 3.83\% | 3.83\% | 3.83\% | 3.83\% | 3.83\% | 3.83\% |
| \$80,000,000 | 4.13\% | 3.52\% | 3.52\% | 3.83\% | 3.83\% | 3.83\% | 3.83\% |
| \$80,001,000 | 4.13\% | 3.52\% | 3.52\% | 3.83\% | 3.83\% | 3.83\% | 3.83\% |
| \$100,000,000 | 5.09\% | 4.55\% | 4.55\% | 4.82\% | 4.31\% | 4.82\% | 4.79\% |
| \$120,000,000 | 6.05\% | 5.57\% | 5.57\% | 5.82\% | 4.79\% | 5.82\% | 5.75\% |
| \$140,000,000 | 7.01\% | 6.59\% | 6.59\% | 6.81\% | 5.27\% | 6.81\% | 6.71\% |
| \$149,999,000 | 7.49\% | 7.11\% | 7.11\% | 7.30\% | 5.51\% | 7.30\% | 7.19\% |
| \$150,000,000 | 7.49\% | 7.11\% | 7.11\% | 7.30\% | 5.51\% | 7.30\% | 7.19\% |
| \$150,001,000 | 7.49\% | 7.11\% | 7.11\% | 7.30\% | 5.51\% | 7.30\% | 7.19\% |
| \$170,000,000 | 8.45\% | 8.06\% | 8.06\% | 8.26\% | 6.47\% | 8.26\% | 8.15\% |
| \$200,000,000 | 9.89\% | 9.50\% | 9.50\% | 9.70\% | 7.91\% | 9.70\% | 9.59\% |

TABLE 8: PERCENTAGE POINT DIFFERENCE FROM SYSTEM AVERAGE

| TOTAL MO <br> INCREASE | RESIDENTIAL | SMALL GS | COMBINED LGS\&SPS | LARGE PRIMARY | LARGE <br> TRANSMISSION | $\begin{aligned} & \text { LIGHTING } \\ & \text { \& MSD } \end{aligned}$ |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| \$40,000,000 | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% |
| \$60,000,000 | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% |
| \$79,999,000 | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% |
| \$80,000,000 | 0.30\% | -0.31\% | -0.31\% | 0.00\% | 0.00\% | 0.00\% |
| \$80,001,000 | 0.30\% | -0.31\% | -0.31\% | 0.00\% | 0.00\% | 0.00\% |
| \$100,000,000 | 0.30\% | -0.25\% | -0.25\% | 0.03\% | -0.48\% | 0.03\% |
| \$120,000,000 | 0.30\% | -0.18\% | -0.18\% | 0.06\% | -0.96\% | 0.06\% |
| \$140,000,000 | 0.30\% | -0.12\% | -0.12\% | 0.10\% | -1.44\% | 0.10\% |
| \$149,999,000 | 0.30\% | -0.08\% | -0.08\% | 0.11\% | -1.68\% | 0.11\% |
| \$150,000,000 | 0.30\% | -0.08\% | -0.08\% | 0.11\% | -1.68\% | 0.11\% |
| \$150,001,000 | 0.30\% | -0.08\% | -0.08\% | 0.11\% | -1.68\% | 0.11\% |
| \$170,000,000 | 0.30\% | -0.08\% | -0.08\% | 0.11\% | -1.68\% | 0.11\% |
| \$200,000,000 | 0.30\% | -0.08\% | -0.08\% | 0.11\% | -1.68\% | 0.11\% |
|  |  |  |  |  |  |  |

## STAFF ANALYSIS OF STIPULATION AND AGREEMENT AT VARIOUS OVERALL REVENUE INCREASES

 BY RATE CLASS AND BY TYPE OF ADJUSTMENTTABLE 9: TOTAL CLASS INCREASE RELATIVE TO SYSTEM AVERAGE (SYSTEM AVERAGE $=1.00$ )

| TOTAL MO INCREASE | RESIDENTIAL | SMALL GS | COMBINED <br> LGS\&SPS | LARGE PRIMARY | LARGE TRANSMISSION | LIGHTING <br> \& MSD | SYSTEM AVG <br> INCREASE |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| \$40,000,000 | 1.000 | 1.000 | 1.000 | 1.000 | 1.000 | 1.000 | 1.000 |
| \$60,000,000 | 1.000 | 1.000 | 1.000 | 1.000 | 1.000 | 1.000 | 1.000 |
| \$79,999,000 | 1.000 | 1.000 | 1.000 | 1.000 | 1.000 | 1.000 | 1.000 |
| \$80,000,000 | 1.078 | 0.919 | 0.919 | 1.000 | 1.000 | 1.000 | 1.000 |
| \$80,001,000 | 1.078 | 0.919 | 0.919 | 1.000 | 1.000 | 1.000 | 1.000 |
| \$100,000,000 | 1.063 | 0.949 | 0.949 | 1.007 | 0.900 | 1.007 | 1.000 |
| \$120,000,000 | 1.052 | 0.969 | 0.969 | 1.011 | 0.833 | 1.011 | 1.000 |
| \$140,000,000 | 1.045 | 0.983 | 0.983 | 1.014 | 0.786 | 1.014 | 1.000 |
| \$149,999,000 | 1.042 | 0.988 | 0.988 | 1.016 | 0.767 | 1.016 | 1.000 |
| \$150,000,000 | 1.042 | 0.988 | 0.988 | 1.016 | 0.767 | 1.016 | 1.000 |
| \$150,001,000 | 1.042 | 0.988 | 0.988 | 1.016 | 0.767 | 1.016 | 1.000 |
| \$170,000,000 | 1.037 | 0.990 | 0.990 | 1.014 | 0.794 | 1.014 | 1.000 |
| \$200,000,000 | 1.031 | 0.991 | 0.991 | 1.012 | 0.825 | 1.012 | 1.000 |

