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August 31, 2001

**FILED<sup>3</sup>**

AUG 31 2001 *ms*

Missouri Public  
Service Commission

Mr. Dale Hardy Roberts  
Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

**RE: Missouri Public Service - Case No. ER-2001-672**

Dear Mr. Roberts:

Enclosed for filing in the above-referenced proceeding please find an original and eight copies of UtiliCorp's Response to Additional Suggestions. Please stamp the enclosed extra copy "filed" and return same to me.

If you have any questions concerning this matter, then please do not hesitate to contact me. Thank you very much for your attention to this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

*Dean Cooper*  
Dean L. Cooper *ly Rg*

DLC/rhg

Enclosures

cc: Office of the Public Counsel  
Nathan Williams, General Counsel  
John Coffman, OPC  
Stuart Conrad  
Duncan Kinchloe  
Mark Comley  
Jeremiah Finnegan  
John McKinney

FILED<sup>3</sup>

AUG 31 2001

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

Missouri Public  
Service Commission

In the Matter of the tariff filing of Missouri )  
Public Service, a division of UtiliCorp )  
United Inc., to implement a general rate )  
increase for retail electric service provided )  
to customers in the Missouri service )  
area of MPS. )

Case No. ER-2001-672

**UTILICORP'S RESPONSE TO ADDITIONAL SUGGESTIONS**

Comes now UtiliCorp United Inc. ("UtiliCorp") d/b/a Missouri Public Service ("MPS"), and, in response to the additional suggestions filed by the Office of the Public Counsel ("OPC"), Jackson County and the Missouri Public Service Commission ("Commission") Staff ("Staff"), respectfully states as follows to the Commission:

1. The Commission's August 15, 2001 Order and Notice stated, in part, that "any response to any additional suggestions . . . must be filed on or before August 31, 2001." Additional suggestions were timely filed by the OPC, Jackson County and the Staff. UtiliCorp will respond to those suggestions herein.

**OPC SUGGESTIONS**

2. UtiliCorp will address one by one what the OPC refers to as its "inescapable legal conclusions."

A. The OPC first suggests that "UtiliCorp is the only entity that the Commission may recognize as a proper applicant in a request for an electric rate increase." UtiliCorp agrees with this statement. Missouri Public Service<sup>1</sup> ("MPS") is a

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<sup>1</sup> The name for UtiliCorp's internal division is "Missouri Public Service," not "Missouri Public Service Company" as stated by the OPC. Missouri Public Service Company is not a fictitious name, but instead is a separate Missouri general business

name for an internal division of UtiliCorp.<sup>2</sup> UtiliCorp owns the name Missouri Public Service and is authorized by its filing of this name with the Missouri Secretary of State and by the actions of this Commission to conduct business under this name. However, UtiliCorp disagrees with the OPC's conclusion that this somehow answers the question that is before the Commission. The question posed by the OPC's motion is not whether UtiliCorp or MPS is the ultimate party in interest, it is whether a public utility will be forced to file revised tariffs when it does not believe or allege that the existing rates are improper and does not believe that there is a need for a new "rate or charge."

The Missouri regulatory system has previously established two ways for the Commission to change rates – either the utility puts its rates at issue with the filing of new tariffs or a complaint action is initiated alleging that new rates are required. The OPC wants to create a third method. It wants to place an obligation on public utilities to file new tariffs where the utility does not believe existing rates need be changed. There is no authority for this in statute, rule or practice and should not be ordered by the Commission.

B. The OPC next alleges that "UtiliCorp chose to request a change in its corporate identity in the [St. Joseph Light & Power] merger case. The Commission authorized this change and has recognized that UtiliCorp is now a new, larger entity for the purposes of regulation."

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corporation created on May 2, 1985.

<sup>2</sup> The OPC additionally alleges that Missouri Public Service "used to be a trade name that was used to represent UtiliCorp's total Missouri-jurisdictional electric operations." This statement does not go far enough. The name also has historically represented UtiliCorp's natural gas and water operations.

It is unclear to UtiliCorp what this "new, larger entity" is. Prior to the merger, UtiliCorp was a Delaware corporation, in good standing, authorized to conduct business in Missouri in the name Missouri Public Service. After the merger, UtiliCorp is still a Delaware corporation, in good standing, authorized to conduct business in Missouri in the name Missouri Public Service. It also is authorized to conduct business in Missouri under the name St. Joseph Light & Power Company ("SJLP"). However, there has been no change to the entity itself.

Based upon its erroneous allegation concerning the base entity, the OPC suggests that "one of the consequences that UtiliCorp must now accept is that all of the rates for its Missouri jurisdictional operations must be considered at one time whenever it requests an electric rate increase." It is unclear how the OPC distinguishes electric services from other services provided by UtiliCorp. If there is a "larger entity," it also includes MPS natural gas, SJLP natural gas and SJLP steam. The OPC has yet to clarify how far its legal theory goes. There is no corporate distinction among any of these entities. UtiliCorp is a single corporation conducting multiple utility businesses before this Commission and has been doing this for many years. Nothing about the merger with SJLP has changed UtiliCorp's corporate identity.

C. The OPC next argues that the "all relevant factors requirement" "requires the Commission to establish a total revenue requirement in any rate increase request or any excess earnings complaint case." The OPC goes on to allege that these factors "may not be split among two or more different cases."

UtiliCorp certainly agrees that "all relevant factors," as described by the courts, must be considered in the setting of rates. However, UtiliCorp would emphasize that it

is the Commission's duty to consider all *relevant* factors, not *all* factors.

UtiliCorp assumes, and has confidence, that before setting rates for the MPS service territory, the Commission will consider all elements of expense, revenue, rate base, and return, as well as any another factors it deems relevant to the setting of those rates. To do this, the Commission must decide in this case what it deems to be relevant and then consider those factors. The relevant factors will not be spread over "two or more different cases."

The OPC believes instead that "if the Commission does not have the benefit of a detailed audit of all of UtiliCorp's Missouri jurisdictional operations, the Commission will not have the competent and substantial evidence to make a decision in this case." This is a standard that has never been met before the Commission. The Commission has never had "a detailed audit of all of UtiliCorp's Missouri jurisdictional operations" before it when setting UtiliCorp's electric rates. As stated previously, UtiliCorp has always had Missouri jurisdictional natural gas operations and previously had water operations. It now also has Missouri jurisdictional steam operations. These Missouri jurisdictional operations have never been addressed in a single detailed audit.

The OPC further alleges that requiring parties to file earning complaint cases, if they think rates are inappropriate, would constitute "an inappropriate shifting of the burden of proof." There is no "shifting of the burden of proof" in this situation. The statutes provide two methods of placing a utility's rates in issue. The fact that the OPC would prefer to proceed in one statutorily authorized manner, rather than another, does not constitute "inappropriate shifting."

The OPC goes on to state that it is "unclear whether UtiliCorp agrees with Public

Counsel regarding the Commission's responsibility to set a revenue requirement in a rate case which covers an electrical corporation's total Missouri jurisdictional operations." To the extent this issue remains, UtiliCorp will again state the following as it has in previous pleadings:

There is nothing inherent about this case that will prohibit the Commission from fixing electric rates for the MPS division after hearing and investigation "upon consideration of all relevant factors." *State ex rel. Utility Consumer's Council of Missouri v. PSC*, 585 S.W.2d 41, 56 (Mo banc 1979). The Commission has the ability to, and should, determine a total UtiliCorp Missouri jurisdictional revenue requirement based on a total cost of service and then allocate responsibility for the appropriate amount of that revenue requirement to the MPS division and specifically to the MPS electric operations.

Lastly, the OPC alleges that UtiliCorp's responses to certain data requests make it "clear . . . that UtiliCorp still believes that the revenue requirement in this case is limited to its 'MPS division'." The OPC attaches two data request responses that it believes supports this point. If this is so clear to the OPC, UtiliCorp would be interested to learn how the OPC explains other data request responses it has received from UtiliCorp during the same time period. Examples of these responses are attached hereto as Appendix A. These OPC data requests expressly request data related to the SJLP electric division (which the data requests attached to the OPC's suggestions did not). Detailed responses to each of these requests, including the SJLP data, were clearly provided. UtiliCorp has provided SJLP data in this case in response to OPC discovery requests, where asked, and will continue to do so.

D. Next, the OPC alleges that "no statute, no case law, and no Commission rule allows an electrical corporation to limit what rates the Commission may review when a rate case is filed." Again, this is not a question that is before the Commission at

this time in the proceeding, nor is it clear how this relates to the OPC's argument. The jurisdictional question which the Commission will decide in ruling on the Motion to Reject Tariffs is whether a rate case can be initiated by the filing of less than all of UtiliCorp's Missouri electric rate schedules.

The language of Section 393.150 and past Commission practice<sup>3</sup> does not require a public utility to propose new rates for all its operating divisions simultaneously when those divisions provide service under separate tariffs. No statute, rule or case law has been presented to the Commission that refutes this proposition. Section 393.150 provides the Commission with jurisdiction to entertain the UtiliCorp filing.

On the other hand, if the literal meaning of the OPC's statement is correct -- that is, a utility may not "limit what rates the Commission may review when a rate case is filed" -- then there are even less grounds for a jurisdictional objection. The OPC has expressed its fear that somehow the relevant revenue requirement or SJLP rates will not be addressed because of the tariffs that UtiliCorp has proposed. However, if UtiliCorp cannot "limit what rates the Commission may review," as the OPC alleges,

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<sup>3</sup> Past practice is of some importance to the Commission. In *Jackson County v. Public Service Commission*, 532 S.W.2d 20, 28-29 (Mo. 1975), the Missouri Supreme Court utilized past Commission practice in interpreting a provision of the Public Service Commission statutes as follows: "All parties and the trial court have recognized that the Commission, since its establishment many years ago, has accepted the 'file and suspend' method as proper for proposed rate changes. In addition, the General Assembly (of which the Commission is an arm) as recently as 1967 amended these very statutes creating the present controversy. That those of immediate concern remained essentially the same is indicative of the fact that they are being interpreted by the Commission as intended by the General Assembly. In light of the fact that such approval has now extended over sixty years, and any contrary finding necessarily would be premised on the obviously ambiguous statutory provisions noted, a court should refrain from substituting new and novel interpretation thereof."

what is the problem? In that situation, UtiliCorp's actions are certainly not jurisdictionally deficient. The question for the Commission is how the Commission will decide this case, not whether the case will be allowed to proceed.

In regard to the decision making process, UtiliCorp must additionally express its disagreement with one OPC statement. The OPC states that:

It is here that it is important to understand the relationship between revenue requirement and rate design. . . . Once a proper revenue requirement is determined, a multitude of potential rate designs are possible for this Company; however, there may only be one company-wide revenue requirement determined by the Commission.

This is of questionable accuracy as UtiliCorp believes that it is highly unlikely that under any scenario the Commission will determine a "company-wide revenue requirement." Because UtiliCorp is one corporate entity with many operating divisions, a company-wide revenue requirement would necessarily include electric operations in Missouri, Kansas and Colorado; natural gas operations in Missouri, Kansas, Colorado, Nebraska, Iowa, Michigan and Minnesota; and steam operations in Missouri. In the past, revenue requirements have been determined for each of these operations separately, both by the Missouri Commission and the other states having jurisdiction of those operations, without challenge of legal deficiency. The OPC's interpretation of revenue requirement appears to go greatly beyond any prior rate making experience.

E. Lastly, the OPC alleges that filing separate rate cases will "create the potential for tremendous mischief." As stated by UtiliCorp counsel at the oral argument, UtiliCorp believes that to the extent there is any opportunity for mischief the risk lies with UtiliCorp. The risk that allocations will be made to divisions of the Company that are not before the Commission obviously exposes UtiliCorp to the risk that it will not



recover all revenues to which it otherwise would be entitled. The OPC goes on to try and indicate that there is some sort of danger that UtiliCorp will double recover revenues if it has MPS and SJLP tariffs before the Commission in relatively close time frames.<sup>4</sup> UtiliCorp cannot envision any scenario where the Commission would allow it to recover more revenue from the MPS service territory or the SJLP service territory than the revenue for which the Commission believes that division should be responsible.

### **JACKSON COUNTY SUGGESTIONS**

3. Jackson County's Revised Suggestions in Support of Public Counsel's Motion to Reject Tariff argue that UtiliCorp's filing violates the Section 387.110.1, RSMo prohibition against undue or unreasonable preference or advantage or subjecting any locality to any undue or unreasonable prejudice or disadvantage. It is not clear where the improper advantage or disadvantage lies in this situation; however, it appears that Jackson County is concerned about the fact that UtiliCorp has filed to increase rates in one division and not the other.

4. Even if this created some kind of advantage, disadvantage, preference or prejudice, there is no statutory prohibition against these. The Commission has previously recognized that "as a practical matter the cost of serving each customer is different. This is the reason discrimination is allowed in utility rates. It is only undue discrimination which is proscribed by statutes and court decisions." *In the Matter of*

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<sup>4</sup> The OPC actually uses the phrase "'pancaked' rate case filing." UtiliCorp counsel have never heard this phrase used in relation to rate case filings and are unsure what it means in this context.

*Missouri Utilities Company*, 20 Mo.P.S.C. (N.S.) 294 (December 2, 1975). In other words, if the cost of service differs among the operating divisions of a single corporation, the rates may also lawfully differ.

5. On the federal level, Jackson County's argument has also been dispatched as ineffective. The U.S. Court of Appeals for the District of Columbia Circuit has asserted that "[t]he mere fact of a rate disparity...does not establish unlawful rate discrimination under section 205(b) of the Federal Power Act. Rate differences may be justified and rendered lawful by 'facts—cost of service or otherwise.'" *Bethany v. FERC*, 727 F.2d 1131 (D.C. Cir. 1984) citing *St. Michaels Utilities Commission v. FPC*, 377 F. 2d 912, 915 (4<sup>th</sup> Cir. 1967).

6. Only *unreasonable* rate differences are deemed improper, allowing a utility company by and through the flexibility granted the Commission to establish a varying schedule of rates that may include legitimate and reasonable differences. See *State of Missouri ex rel. Capital City Water Co. v. Missouri Public Service Commission*, 850 S.W.2d 903, 911 (Mo. App. 1993). The ultimate question will be whether the MPS rates ordered by the Commission in this case are just and reasonable. This is something that we will not know until the Commission has rendered its decision.

### **STAFF SUGGESTIONS**

7. While the Commission Staff is generally supportive of UtiliCorp's position concerning the OPC's Motion to Reject Tariff Filing, UtiliCorp will take this opportunity to expand somewhat on a couple of the points made by the Staff in its Additional Response.

A. In addressing the question of "undue or unreasonable preference," the

Staff cites the Commission to *State ex el. McKittrick v. Public Service Commission*, 175 S.W.2d 857 (Mo.banc 1943) for the proposition that different rates in different parts of a public utility's service areas do not necessarily create an undue or unreasonable preference.

UtiliCorp would also direct the Commission to another case where the Commission's wide-ranging power to establish different rates was upheld by the courts. In 1958, the Supreme Court of Missouri was asked to review a Commission decision authorizing a telephone company to file tariffs allowing it to add to its basic rates in each community it serves the pro rata amount of the occupational tax levied in said community. A telephone industry case is relevant to this question as its statute regarding charges, section 392.200, RSMo (2000), contains the same key language as the statute regarding electric service, section 393.130, RSMo (2000), that is, "just and reasonable," "undue or unreasonable preference or advantage," and "undue or unreasonable prejudice or disadvantage."

In *State ex rel. City of West Plains, Missouri v. Public Service Commission*, 310 S.W.2d 925 (Mo. banc. 1958), the Court discussed the "theory of ratemaking" as follows:

It is true that the theory of ratemaking on a system wide basis assumes that inequities of a sort will exist within the system and that a rough balance of such inequities will usually result, so that the discrimination remaining is not unjust discrimination.

*Id.* at 930.

After a review of the law and the facts, the Court then concluded as follows:

...we may amplify our views insofar as concerns system wide ratemaking. We are able to discern no legitimate reason or basis for the view that a

utility must operate exclusively either under a system wide rate structure or a local unit rate structure, or the view that an expense item under a system wide rate structure must of necessity be spread over the entire system regardless of the nature of the item involved. (emphasis added).

*Id.* at 933. The *West Plains* case establishes the broad discretion of the Commission to establish rates.

In this particular case, the contrary approach, to combine the SJLP and MPS divisions for rate making and order UtiliCorp-wide rates would in fact be detrimental to the SJLP customers. MPS's cost of service is currently higher than that of SJLP. If these rates are blended, the SJLP rates will necessarily have to rise to meet the MPS rates. This was not MPS's intention when it acquired SJLP. MPS asserted in the merger case concerning the SJLP property, and the Commission apparently agreed, that UtiliCorp could operate the property without any detrimental effect on SJLP rate payers. The OPC and Jackson County's approach would defeat that theory and guarantee detriment for the SJLP rate payers.

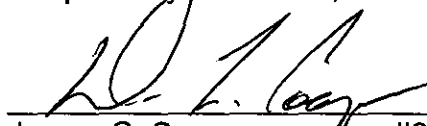
B. Lastly, the Staff pointed out in its Additional Response that counsel for UtiliCorp indicated during the oral argument that the UtiliCorp would eventually move SJLP rates toward the UtiliCorp rates. The Staff has read too much into this statement. Certainly, UtiliCorp's operations would be somewhat simplified if the rates were constant between the MPS and SJLP divisions and UtiliCorp would hope to reach that point some day. However, it is not UtiliCorp's intention to do this unless and until the cost of service justifies it.

WHEREFORE, UtiliCorp respectfully requests that the Commission:

(a) deny the OPC's Motion to Reject Tariff Filing; and,

(b) grant such further relief as the Commission deems appropriate.

Respectfully submitted,



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Attorneys for UtiliCorp United Inc.

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered, on this 31<sup>st</sup> day of August, 2001, to:

Mr. Nathan Williams  
Missouri Public Service Commission  
Governor State Office Building  
P.O. Box 360  
Jefferson City, MO 65102-0360

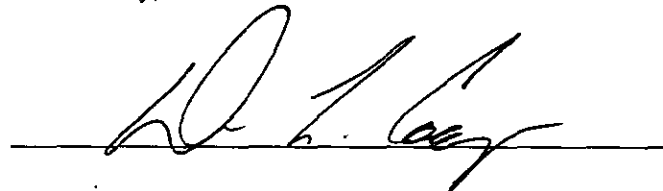
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**UTILICORP UNITED**  
**CASE NO. ER-01-672**  
**DATA REQUEST NO. OPC-1021**

**DATE OF REQUEST:** July 10, 2001

**DATE RECEIVED:** July 11, 2001

**DATE DUE:** July 31, 2001

**REQUESTOR:** Ted Robertson

**QUESTION:**

Please provide the UtiliCorp United Inc., the MPS electric division and the St. Joseph electric division accrual AFUDC rates for the calendar years 1998, 1999 and 2000. If the information is available on a monthly basis, please provide that data also.

**RESPONSE:** AFUDC rates for St. Joseph are as follows:

	Annual			Monthly		
	Debt	Equity	Total	Debt	Equity	Total
1998						
Jan - June	3.72%	6.44%	10.16%	0.003100%	0.005367%	0.008467%
July - Dec.	3.89%	6.09%	9.98%	0.003242%	0.005075%	0.008317%

	Annual			Monthly		
	Debt	Equity	Total	Debt	Equity	Total
1999						
January	4.32%	4.83%	9.15%	0.003600%	0.004025%	0.007625%
February	4.67%	3.91%	8.58%	0.003892%	0.003258%	0.007150%
March	5.12%	2.66%	7.78%	0.004267%	0.002217%	0.006484%
April	5.66%	1.15%	6.81%	0.004717%	0.000958%	0.005675%
May - Dec.	5.99%	0.00%	5.99%	0.004992%	0.000000%	0.004992%

APPENDIX A

2000	Annual			Monthly		
	Debt	Equity	Total	Debt	Equity	Total
Jan – May	5.81%	0.00%	5.81%	0.004842%	0.000000%	0.004842%
June – July	6.10%	0.00%	6.10%	0.005083%	0.000000%	0.005083%
Aug – Sept	6.40%	0.00%	6.40%	0.005333%	0.000000%	0.005333%
Oct – Dec	6.72%	0.00%	6.72%	0.005600%	0.000000%	0.005600%

**ATTACHMENTS:** None

**ANSWERED BY:** Larry Mulligan

**UTILICORP UNITED  
CASE NO. ER-01-672  
DATA REQUEST NO. MPSC-134**

**DATE OF REQUEST:** August 20, 2001  
**DATE RECEIVED:** August 20, 2001  
**DATE DUE:** September 9, 2001  
**REQUESTOR:** Janis Fischer

**QUESTION:**

Please provide the following information for St. Joe Light & Power (ref DR 23)

- 1) Please provide a listing and corresponding amounts for all sources of revenues classified as other operating revenues for the 12 months ending June 30, 2001.
- 2) Please provide other operating revenues by month for the period of January 1996 through June 30, 2001. Please update as additional information becomes available.

**RESPONSE:** Please see the attachments listed below

In response to 1) Included also is January through June 2000.

In response to 2) Data for 1999, 1998, 1997 and 1996 is not available by month

**ATTACHMENTS:**

- 1) Other Operating Revenues for 18 months ending June 30, 2001  
January 1 through December 31, 2000 – 1 page  
January 1 through June 30, 2001 – 1 page
- 2) 6 months ending June 30, 2001  
12 months ending December 31, 2000  
12 months ending December 31, 1999  
12 months ending December 31, 1998  
12 months ending December 31, 1997  
12 months ending December 31, 1996  
-All years are combined on 1 page

**ANSWERED BY: Stephanie Murphy**



Unit	SJLP
SJLP FERC	456000
Year	2000
Prod Trans	(All)

SJLP Operating Revenues for July thru Dec 2000

Sum of Monetary Amount	Period												
Journal Line Description2	1	2	3	4	5	6	7	8	9	10	11	12	Grand Total
Missouri Dept	(1)			(1)	(3,233)	(3,292)	(4,780)	4,780		(0)	0		(6,526)
Missouri Director	(347)	(227)	(246)	(238)	(235)	(140)	(227)	(241)	(239)	(217)	(236)	(311)	(2,903)
Missouri Sales Tax	(3,127)	(3,328)	(3,233)	(3,144)			(4,781)	(5,034)	(5,035)	(5,062)	(3,517)	(3,364)	(39,624)
Other Revenues	(1,396)	(705)	(3,218)	(660)	(944)	(347)	(293)	(1,360)	(144)	(4,191)	(729)	(21,211)	(30,377)
Sale of Trans Svcs	(30,089)	(26,033)	(35,872)	(9,107)	(9,341)	(9,667)	(130,250)	(286,671)	(86,893)	(120,897)	(70,817)	(112,788)	(928,425)
Stores	39	48	1,254	139	420	200		5,636	2,376	578	562	150	11,401
United Parcel Svc	31	8	4										43
Misc Jo Entry			114										114
Grand Total	(34,889)	(30,239)	(41,196)	(13,011)	(13,333)	(13,246)	(140,330)	(282,890)	(89,934)	(129,789)	(74,735)	(137,524)	(1,001,118)

Year	2001
Utility	Electric
Ferc Accl	456000

**SJLP Operating Revenues for Jan thru Jun 2001**

Sum of Sum Total Am		Period				
Accl	Accl Desc	1	3	4	5	6 Grand Total
400000	Revenue Sales	(6,095)	(1,352)	(100)	(50)	(7,597)
400054	Revenue Wheeling-Power Pools			(265,667)	(178,384)	(444,051)
400061	Revenue Wheeling-Other	(81,780)	(58,651)	(33,765)	(36,816)	(211,012)
400999	Other Revenue And Royalties	(24,031)	(36,897)	(9,224)	(9,224)	(79,376)
Grand Total		(24,031)	(87,875)	(96,901)	(308,756)	(224,474) (742,036)

## Monthly for January thru June 2001

Monthly for January thru December 2000

**YTD Total for 1999, 1998, 1997, 1996**

## SJP 2001

		Jan-01	Feb-01	Mar-01	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	YTD Total
450000	Fortified Discount-Electric	(21,593)	(20,683)	(18,529)	(17,779)	(7,170)	(24,271)	-	-	-	-	-	-	(110,005)
451000	Misc Service Revenues-Electric	(1,380)	(510)	(4,220)	(5,100)	(8,885)	(17,252)	-	-	-	-	-	-	(37,346)
454000	Rent From Property-Electric	(37,411)	-	-	(3,688)	(922)	(822)	-	-	-	-	-	-	(42,843)
456000	Other Electric Revenues	(24,031)	-	(87,875)	(88,801)	(308,756)	(224,474)	-	-	-	-	-	-	(742,006)
	Total for 2001	(84,415)	(21,173)	(110,624)	(123,467)	(325,733)	(266,818)	-	-	-	-	-	-	(832,330)

## SJLP 2030

	Jan-00	Feb-00	Mar-00	Apr-00	May-00	Jun-00	Jul-00	Aug-00	Sep-00	Oct-00	Nov-00	Dec-00	YTD Total
450000 Forfeited Discount-Electrnc	(30,697)	(13,837)	(15,221)	(14,902)	(12,697)	(12,118)	(19,070)	(22,795)	(29,109)	(30,654)	(16,618)	(19,115)	(240,119)
451000 Misc Service Revenues-Electrnc	(3,456)	(3,735)	(4,807)	(6,048)	(5,619)	(5,619)	(5,518)	(5,263)	(5,263)	(7,471)	(4,315)	(3,707)	(1)
454000 Rent From Property-Electrnc	(39,070)	(922)	(922)	(922)	(922)	(922)	(45,093)	(922)	(922)	(922)	(922)	(922)	(1,001,118)
455000 Other Electric Revenues	(39,858)	(30,197)	(41,166)	(12,961)	(13,314)	(13,226)	(140,318)	(282,469)	(89,922)	(129,786)	(74,730)	(136,131)	(1,001,118)
Total per 2000 Form 1	(108,081)	(48,691)	(62,116)	(36,277)	(32,980)	(32,084)	(212,442)	(317,724)	(125,296)	(169,033)	(99,584)	(161,873)	(1,400,232)

## SJLP 1999

450000	Forfeited Discount-Electric	(205,430)
451000	Misc Service Revenues-Electric	(68,383)
454000	Rent From Property-Electric	(101,310)
456000	Other Electric Revenues	95,433
	<b>Total per 1999 Form 1</b>	<b>(279,690)</b>

## S J L P 1996

450000	Fortified Discount-Electric	(221,468)
451000	Misc. Service Revenues-Electric	(57,784)
454000	Rent From Property-Electric	(73,099)
456000	Other Electric Revenues	(737,763)
	Total per 1998 Form 1	<u>(1,080,115)</u>

## SJLP 1997

450000	Forfeited Discount-Electric	(201,745)
451000	Misc Service Revenues-Electric	(35,768)
454000	Rent From Property-Electric	(26)
455000	Other Electric Revenues	(15)
	<b>Total per 1997 Form 1</b>	<b>(1,046,854)</b>

**SJLP 1986**

450000	Fortified Discount-Electric	(187,413)
451000	Misc Service Revenues-Electric	(48,513)
454000	Rent From Property-Electric	(120,878)
456000	Other Electric Revenues	(456,026)
411000	Gain from disposition of Allowances	(6,722)
	Total per 1996 Form 1	(833,548)