

**BEFORE THE ARKANSAS PUBLIC SERVICE COMMISSION**

IN THE MATTER OF AN INTERIM RATE SCHEDULE )  
OF OKLAHOMA GAS AND ELECTRIC COMPANY )  
IMPOSING A SURCHARGE TO RECOVER ALL ) DOCKET NO. 15-034-U  
INVESTMENTS AND EXPENSES INCURRED )  
THROUGH COMPLIANCE WITH LEGISLATIVE OR )  
ADMINISTRATIVE RULES, REGULATIONS OR )  
REQUIREMENTS RELATING TO THE PUBLIC HEALTH, )  
SAFETY OR THE ENVIRONMENT UNDER THE )  
FEDERAL CLEAN AIR ACT FOR CERTAIN OF ITS )  
EXISTING GENERATION FACILITIES )

Rebuttal Testimony

of

Donald R. Rowlett

on behalf of

Oklahoma Gas and Electric Company

August 26, 2015

Donald R. Rowlett  
*Rebuttal Testimony*

1 Q. **Please state your name, by whom you are employed, and your business address.**

2 A. My name is Donald R. Rowlett. I am employed by Oklahoma Gas and Electric Company  
3 (“OG&E” or “Company”) and my business address is 321 N. Harvey, P.O. Box 321,  
4 Oklahoma City, Oklahoma 73101.

5  
6 Q. **Did you previously file direct testimony in this proceeding?**

7 A. Yes.

8  
9 Q. **Have you reviewed the direct testimony filed in this cause?**

10 A. Yes.

11

12 Q. **What is the purpose of your Rebuttal Testimony?**

13 A. The purpose of my Rebuttal Testimony is to address issues raised by Staff, AG, ARVEC  
14 and Wal-Mart. Specifically, I will be discussing Property Tax Expense, Production  
15 Demand Allocators, Rate Design, modifications to the tariff language, and OG&E’s  
16 choice to seek Rider Recovery versus filing a general rate case.

17

18 **PROPERTY TAX EXPENSES**

19

20 Q. **Do you agree with Mr. Matthews and Attorney General witness Mr. William  
21 Marcus to disallow property tax expense on CWIP costs?**

22 A. No. OG&E, as a centrally assessed utility, is required to include CWIP costs to the  
23 APSC Tax Division for valuation purposes each year. The APSC Tax Division forms  
24 provided to utilities list CWIP as a line item on at least four of the forms used for  
25 valuation purposes to determine OG&E’s tax liability for Arkansas. Based on these facts,  
26 OG&E believes it is appropriate to include property taxes related to CWIP in expense.

1 Q. **Does OG&E capitalize CWIP related property tax as allowed by FERC systems of**  
2 **accounts?**

3 A. No, OG&E historically has not capitalized any property taxes on CWIP projects.  
4 Therefore, it is appropriate to include CWIP in the calculation of property tax expense.  
5 However, the Company does not dispute that property tax may be capitalized as a  
6 component of CWIP.<sup>1</sup>

7

8

**PRODUCTION DEMAND ALLOCATORS**

9

10 Q. **Should an adjustment regarding production demand allocators be made in this**  
11 **case?**

12 A. Yes. Mr. Matthews took issue with OG&E’s production demand class allocators used for  
13 estimating customer impacts. He noted that OG&E’s Arkansas jurisdictional allocator  
14 was correct. However, the allocation factors for the customer classes were incorrect.  
15 OG&E inadvertently used its “filed” class factors from its last base rate case, Docket No.  
16 10-067-U and agrees with Mr. Matthews that the Company should have used the “as  
17 settled” class factors. Even though a correction was needed, the class differences were  
18 minimal.

19

20 Q. **Did OG&E revise its customer class factors as described above to reflect “settled”**  
21 **class allocators?**

22 A. Yes. After additional review and correspondence with Mr. Matthews regarding the  
23 difference in allocators, the Company informed him that the difference was actually a  
24 case of using “filed” versus “settled” factors from the case, and not as he described in his  
25 testimony. As part of OG&E’s response to data request WMT-1.5, the Company  
26 provided new customer class impacts utilizing the revised class allocators. See Rebuttal  
27 Exhibit DRR-1.

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<sup>1</sup> 18 CFR Chapter 1, Part 101, Uniform System of Accounts: Electric Plant Instructions (16).

1 Q. **Did other Intervenors also comment on Production Demand Allocators?**

2 A. Yes. Arkansas River Valley Energy Consumers (“ARVEC”) witness Mr. Garrett and  
3 Wal-Mart witness Mr. Chriss both suggested that an Average & Excess production plant  
4 allocator using four month coincident peaks June through September be used as the  
5 Production Demand Allocator in this filing. It is the Company’s understanding that Act  
6 310 directs the Company to use the settled allocation methodology which was 1 CP and  
7 Average, as established in its most recent base rate case, Docket No. 10-067-U.

8

9

**RATE DESIGN**

10

11 Q. **Are there certain aspects of Staff and the Intervenor’s rate design recommendations  
12 with which OG&E agrees?**

13 A. Yes. OG&E agrees that the Power & Light (“PL”) and the Power & Light-Time of Use  
14 (“PL-TOU”) subclasses could be separated by their respective rate classes for any  
15 charges resulting from this filing. Further, OG&E agrees that, for those classes that have  
16 demand charges, the approved revenue requirements could be recovered through a  
17 demand rate on a \$/kW basis, not a \$/kWh basis.

18 In addition, the Company agrees to change the tariff formula to calculate the  
19 billing factors on a demand and energy basis for PL and PL-TOU customers as proposed  
20 in Staff witness William Matthew’s direct exhibit WMT-2. The revised tariff is attached  
21 as Rebuttal Exhibit DRR-2.

22

23

**OTHER ISSUES**

24

25 Q. **Do you agree with Staff witness Mr. Matthews on the purpose of a utility filing  
26 under Act 310?**

27 A. Yes. In his Direct Testimony, Mr. Matthews clearly lays out the reasons for an Act 310  
28 filing, specifically the acknowledgement by the Arkansas Legislature that the need exists  
29 for recovery of costly environmental controls. Mr. Matthews also states that OG&E has  
30 met the burden of proof set forth in Docket No. 09-059-U, where the Commission  
31 explained the procedures for an Act 310 filing.

1 Q. **Do you agree with AG witness Mr. Marcus that an exact recovery rider is a**  
2 **replacement for the relief supported by Act 310?**

3 A. No. Pursuant to Act 310, OG&E does not believe that recovery under an exact recovery  
4 rider is allowed. The Company does not believe that its current rates are subject to  
5 adjustment until it files its next rate case. An exact recovery rider would, at its essence,  
6 be allowing for new billing determinates to be utilized to charge customers. These new  
7 billing determinates would be unsupported by any Commission Order or approved Tariff.

8  
9 Q. **Do you agree with ARVEC witness Mr. Garrett that no rider recovery is an option?**

10 A. No. Under my reading of Act 310 and Staff witness Mr. Matthews' testimony in this  
11 case, I believe it is clear that the cost recovery being sought in the Company's filing is  
12 directly allowed for under Act 310 and Order No. 4 in Docket No. 09-059-U.

13  
14 Q. **Do you agree with Mr. Garrett's suggestion that if rider recovery is allowed under**  
15 **Act 310 recovery it should commence only upon the Company's filing of a base rate**  
16 **case?**

17 A. No. Again, I believe this suggestion is not what the Arkansas Legislature had in mind  
18 when Ark. Code Ann. § 23-4-503 was drafted.

19  
20 Q. **Please state your thoughts on Mr. Chriss' suggestion that a time and dollar amount**  
21 **limit should be placed on recovery under this filing.**

22 A. Mr. Chriss asserts that because OG&E will not file a rate case in the near future that a  
23 time limit on recovery of costs and a dollar amount cap should be implemented on  
24 recovery in this docket until such time that OG&E files a general rate case. I believe that  
25 the Act itself imposes limits on the dollar amount cap. Per Act 310, OG&E cannot add  
26 costs for recovery without another filling and cannot request additional recovery more  
27 often than every six months.

1 Q. **Did the Company state that it will not file a rate case in 2020, as Wal-Mart witness**  
2 **Mr. Chriss suggests?**

3 A. No. In response to data request WMT-2.1 attached herein as Rebuttal Exhibit DRR-3, the  
4 Company stated that it does not have a planned date for a general rate case in Arkansas.  
5 Mr. Chriss seems to suggest that the Company stated it specifically would not be filing a  
6 rate case until 2020. This simply is not the case.

7  
8 Q. **Does this conclude your testimony?**

9 A. Yes.

**OKLAHOMA GAS AND ELECTRIC COMPANY**  
**Response to Wal-Mart Stores Arkansas, LLC and Sam's West, Inc.**  
**Staff Data Request WMT-1**  
*Docket No. 15-034-U*

Date Requested: 7/15/2015

Date Required: 7/30/2015

Requested by: Rick D. Chamberlain

**1.5 Please explain in detail any and all ways in which the production cost allocator used in the proposed ECP Rider differs from the production cost allocator approved by the Arkansas Public Service Commission in Docket No. 10-067-U.**

Response\*: The Arkansas Jurisdiction production cost allocator is the same jurisdictional allocator from the settled class cost of service (CCOS) in OG&E's last rate case (10-067-U). However, the *Class* production allocators used in this filing were the "as filed" allocators rather than the settled Class allocators from 10-067-U. The difference in the settled class allocators and OG&E's "as filed" are as follows:

	Residential	GS	PL	Other
OG&E Filed	3.4858%	1.0244%	6.4131%	.0694%
Staff COSS	3.4569%	1.0267%	6.4361%	.0730%

See attachment WMT-1.5\_Att.xlsx for the revised customer impact file (originally provided as part of the Company's workpapers as "Customer IMPACTS -Low NOx ONLY").

Response provided by: Donald Rowlett  
Response provided on: July 30, 2015  
Contact & Phone No: Sheri Richard (405) 553-3747

\*By responding to these Data Requests, OG&E is not indicating that the provided information is relevant or material and OG&E is not waiving any objection as to relevance or materiality or confidentiality of the information or documents provided or the admissibility of such information or documents in this or in any other proceeding.

<b>Chart 2: Average Monthly Customer Impact</b>				
<b>Class</b>	<b>Average Monthly kWh *</b>	<b>ECP Rider Factor By Class *</b>	<b>Monthly Impact</b>	
Residential	1,000	0.0002175	\$ 0.22	See tab "Low Nox Customer Impact", col./line (c)19
General Service	1,800	0.0002161	\$ 0.39	See tab "Low Nox Customer Impact", col./line (c)20
Power & Light	130,000	0.0001630	\$ 21.19	See tab "Low Nox Customer Impact", col./line (c)21

\* See tab "Arkansas kWh by Class", cells D6, D7, D8



**Arkansas Customer Impacts for Environmental Project cost as of April 2015**

	(a)	(b)	(c)	(d)	(e)	(f)	(g)
			<u>2015/2016</u>				
<b><u>Rate Base</u></b>							
1	Plant in Service		\$ 33,990,824				
2	Construction Work in Progress		\$ 8,861,496				
3	Total Capital Investment		\$ 42,852,320				
4	Accumulated Provision for Depreciation		\$ (661,831)				
5	Regulatory Asset						
6	<b>Total Rate Base</b>		<u>\$ 42,190,489</u>				
7	<b>Return on Rate Base @ 8.20%</b>		\$ 3,459,620				
<b><u>Expenses</u></b>							
8	O&M Expense		\$ -				
9	Depreciation Expense		\$ 568,759				
10	Property Taxes		\$ 428,523				
11	<b>Total Expenses</b>		<u>\$ 997,283</u>				
12	<b>Revenue Requirement @ 100%</b>		<u>\$ 4,456,903</u>				
	(a)	(b)	(c)	(d)	(e)	(f)	(g)
	<b><u>Allocation Methods:</u></b>		<b><u>AR Juris</u></b>	<b><u>Residential</u></b>	<b><u>GS</u></b>	<b><u>PL</u></b>	<b><u>Other **</u></b>
13	Production Demand Allocator *		10.9927%	3.4569%	1.0267%	6.4361%	0.0730%

\* Allocators per Docket No. 10-067-U settled case (See attached tab "Class Allocators")

\*\* Other includes pumping and lighting classes.

**Allocation of Revenue Requirement:**

Rev Req @ Demand:	Allocator	2015/2016	Rebased 100%
14 Arkansas Jurisdiction	10.9927%	\$ 489,934	100%
15 Residential	3.4569%	\$ 154,071	31.4472%
16 General Service	1.0267%	\$ 45,759	9.3398%
17 Power & Light	6.4361%	\$ 286,851	58.5489%
18 Other	0.0730%	\$ 3,254	0.6641%

Class	Average Monthly kWh	2015/2016	Calculation of Customer Impact
19 Residential	1,000	\$ 0.22	(c)15 / tab 'Arkansas kWh by Class'!B6 * (b)19
20 General Service	1,800	\$ 0.39	(c)16 / tab 'Arkansas kWh by Class'!B7 * (b)20
21 Power & Light	130,000	\$ 21.19	(c)17 / tab 'Arkansas kWh by Class'!B8 * (b)21

ECP Rider Factor Calculation

	<u>Annual KWH Approved 10-067-U</u>	<u>Class Revenue Requirement</u>	<u>ECP Rider Factor By Class</u>	Check
<b>Arkansas Jurisdiction</b>	2,711,023,738	489,934		489,934
Residential	708,433,198	154,071	0.0002175	154,071
General Service	211,769,454	45,759	0.0002161	45,759
Power & Light	1,759,841,146	286,851	0.0001630	286,851
Other	30,979,940	3,254	0.0001050	3,254

Monthly Impact ¢/kWh:	Average Monthly kWh
Residential	1,000
General Service	1,800
Power & Light	130,000



APSC GENERAL STAFF  
Title for all worksheets  
PRO FORMA YEAR ENDING DECEMBER 31, 2010  
DOCKET NO. 10-067-U

SCHEDULE E-13  
SUMMARY OF ADJUSTMENTS  
REVENUE ADJUSTMENTS TO BOOKS

JURISDICTION/ RATE DESCRIPTION	SALES OF ELECTRICITY BY RATE SCHEDULE ADJUSTED KWH & KW												12 MONTHS TOTAL				
	JAN JAN. 2010	FEB FEB. 2010	MAR MAR. 2010	APR APR. 2010	MAY MAY. 2010	JUNE JUNE. 2010	JULY JULY. 2010	AUG AUG. 2010	SEP SEP. 2010	OCT OCT. 2010	NOV NOV. 2010	DEC DEC. 2010					
PLTOU - CBL - KWH S/L 1 RTP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
PLTOU - INCREMENTAL - KWH S/L 1 RTP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
PLTOU - DECREMENTAL - KWH S/L 1 RTP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
PLTOU - TOTAL - KWH S/L 1 RTP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	(0)	(0)
PLTOU - CBL MAX - KW S/L 1 RTP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
PLTOU - CBL ON PEAK - KW S/L 1 RTP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MUNICIPAL LIGHTING - KWH S/L 5	744,948	744,948	744,972	745,285	746,078	746,157	746,194	746,239	746,169	746,174	746,221	742,286	8,945,671	8,945,671			
OUTDOOR SECURITY LIGHTING - KWH S/L 5	1,602,199	1,612,836	1,618,999	1,615,861	1,619,351	1,610,465	1,624,105	1,612,994	1,620,275	1,611,937	1,620,531	1,606,036	19,375,589	19,375,589			
MUNICIPAL PUMPING - KWH S/L 4	5,600	4,800	4,800	4,800	5,600	4,800	1,600	-	800	800	-	5,600	39,200	39,200			
MUNICIPAL PUMPING - KWH S/L 5	171,453	217,552	151,630	132,000	105,946	87,557	85,753	88,474	96,072	72,857	92,908	147,373	1,449,575	1,449,575			
<b>TOTAL</b>	<b>177,053</b>	<b>222,352</b>	<b>156,430</b>	<b>136,800</b>	<b>111,546</b>	<b>92,357</b>	<b>87,353</b>	<b>88,474</b>	<b>96,872</b>	<b>73,657</b>	<b>92,908</b>	<b>152,973</b>	<b>1,488,775</b>				
ATHLETIC FIELD LIGHTING - KWH S/L 5	95,757	99,559	81,064	79,808	95,948	121,412	108,492	92,233	110,124	108,399	85,289	91,820	1,169,905	1,169,905			
<b>ARKANSAS RETAIL - KWH</b>	<b>237,931,115</b>	<b>229,231,606</b>	<b>204,068,421</b>	<b>175,667,386</b>	<b>219,136,162</b>	<b>236,772,659</b>	<b>276,759,405</b>	<b>278,233,726</b>	<b>257,382,926</b>	<b>203,909,538</b>	<b>196,433,624</b>	<b>195,497,170</b>	<b>2,711,023,738</b>				
ARKANSAS UNBILLED	-	-	-	-	-	-	-	-	-	-	-	-	-	-			
OTHER JURISDICTIONS - KWH	2,301,490,058	2,116,856,391	1,980,316,060	1,864,558,564	1,951,183,751	2,369,384,053	2,795,250,664	2,758,538,740	2,522,637,098	2,023,655,643	1,916,710,594	2,177,575,105	26,778,156,721				
TOTAL COMPANY - KWH	2,538,075,227	2,349,358,635	2,191,812,884	2,064,891,204	2,159,537,733	2,606,668,223	3,063,380,377	3,031,055,708	2,782,813,932	2,237,988,513	2,130,989,392	2,398,743,853	29,555,315,681				
Supporting Schedules and Worksheets:	KWh and KW ACT	WP-E13-ADJ-1	WP-E13-ADJ-5	WP-E13-ADJ-6a WP-E13-ADJ-6b	WP-E13-ADJ-7	WP-E13-ADJ-9											
Recap Schedules:	ARK KWH																

For Arkansas Jurisdiction Environmental Case:

<b><u>Allocation Methods:</u></b>	<b><u>AR Juris</u></b>	<b><u>Residential</u></b>	<b><u>GS</u></b>	<b><u>PL</u></b>	<b><u>Other **</u></b>
Production Demand Allocator *	10.9927%	3.4569%	1.0267%	6.4361%	0.0730%
Energy Allocator *	11.4613%	3.0653%	0.9162%	7.3457%	0.1341%

\* Allocators per Docket No. 10-067-U settled case

\*\* Other includes pumping and lighting classes.

ARKANSAS PUBLIC SERVICE COMMISSION

1<sup>st</sup> Revised Sheet No. 78.0

Replacing Original Sheet No. 78.0

OKLAHOMA GAS AND ELECTRIC COMPANY

Name of Company

Kind of Service: Electric

Class of Service: All

**Part I. Schedule No.** ECP

Title: ENVIRONMENTAL COMPLIANCE PLAN RIDER

PSC File Mark Only

78.1 **EFFECTIVE IN:** All territory served.

78.2 **PURPOSE:** The purpose of this rider is to recover the Arkansas retail jurisdictional portion of the annual revenue requirement for expenditures related to environmental compliance projects.

78.3 **APPLICABILITY:** This rider is applicable to all Arkansas retail rate classes.

78.4 **TERM:** The ECP rider will remain in effect until all costs are included in base rates or is terminated by order of the Commission.

78.5 **ENVIRONMENTAL COMPLIANCE PLAN RIDER (ECP) CALCULATIONS:**  
The following formulae calculate the charges, on a per kilowatt-hour (kWh) and per kilowatt (kW) basis, for each of the major rate classes and the combined minor rate classes.

The ECP<sub>Energy</sub> factors for each class are calculated as follows

$$ECP_{kWh} \text{ Class Factor } (\$ \text{ per kWh}) = \frac{A * B * C_{kWh}}{D_{kWh}}$$

The ECP<sub>Demand</sub> factors for each class are calculated as follows

$$ECP_{kW} \text{ Class Factor } (\$ \text{ per max kW}) = \frac{A * B * C_{kW}}{D_{kW}}$$

Where:

ECP Classes =

- **Residential** (including optional Residential tariffs);
- **General Service** (including optional General Service tariffs);
- **Power and Light** (by service level);
- **Power and Light Time-of-Use** (by service level);
- **All Other Classes**, which is the combination of all other rate classes such as Municipal Roadway and Area Lighting, Outdoor Security Lighting, Athletic Field Lighting, and Municipal Water Pumping.

ARKANSAS PUBLIC SERVICE COMMISSION

1<sup>st</sup> Revised Sheet No. 78.1

Replacing Original Sheet No. 78.1

OKLAHOMA GAS AND ELECTRIC COMPANY

Name of Company

Kind of Service: Electric

Class of Service: All

**Part I. Schedule No.** ECP

Title: ENVIRONMENTAL COMPLIANCE PLAN RIDER

PSC File Mark Only

A = Arkansas Jurisdiction ECP Revenue Requirement

B = Production Demand Allocator for the ECP class, adjusted to exclude jurisdictions not at issue

$C_{kWh}$  = Percentage of the revenue requirement for each rate class allocated to kilowatt-hours

$C_{kW}$  = Percentage of the revenue requirement for each rate class allocated to kilowatts

$D_{kWh}$  = Annual kWh for each ECP Class

$D_{kW}$  = Annual billing kW for each ECP Class

Where:

**A) Arkansas Jurisdiction ECP Revenue Requirement:** The revenue requirement will be calculated as described in Docket No. 15-034-U, and, shall be based upon the most recently approved return on rate base (ROR) adjusted for income taxes for any Plant In Service costs and an Allowance for Funds Used During Construction (“AFUDC”) for any applicable Construction Work in Progress (“CWIP”) costs. Only those project expenditures included in Docket No. 15-034-U shall be recovered as part of this rider.

ARKANSAS PUBLIC SERVICE COMMISSION

Original Sheet No. 78.2

Replacing \_\_\_\_\_ Sheet No. \_\_\_\_\_

OKLAHOMA GAS AND ELECTRIC COMPANY

Name of Company

Kind of Service: Electric

Class of Service: All

**Part I. Schedule No.** ECP

Title: ENVIRONMENTAL COMPLIANCE PLAN RIDER

PSC File Mark Only

**B) Allocation Factors:** The Class Allocator Percentage is the most recently approved production demand allocation factor adjusted to exclude jurisdictions not at issue. The Class kWh and kW Allocator Percentages are the kWh and kW revenues, approved by the APSC from the Company’s latest base rate filing, by percentage of total kWh and kW revenues.

<b>EGP Class</b>	<b>Class Allocator Percentage</b>	<b>Class kWh Allocator Percentage</b>	<b>Class kW Allocator Percentage</b>
Residential	31.4472%	100%	0%
General Service	9.3398%	100%	0%
Power and Light			
Service Level 1 & 2	1.0192%	30%	70%
Service Level 3	7.6014%	25%	75%
Service Level 4	0.0300%	5%	95%
Service Level 5	17.7633%	20%	80%
Power and Light Time-of Use			
Service Level 1	13.2239%	67%	33%
Service Level 2	3.8651%	57%	43%
Service Level 3	10.8960%	57%	43%
Service Level 4 & 5	4.1500%	57%	43%
All Other Classes	0.6641%	100%	0%
Total	100%		



ARKANSAS PUBLIC SERVICE COMMISSION

Original Sheet No. 78.3

Replacing \_\_\_\_\_ Sheet No. \_\_\_\_\_

OKLAHOMA GAS AND ELECTRIC COMPANY

Name of Company

Kind of Service: Electric

Class of Service: All

**Part I. Schedule No.** ECP

Title: ENVIRONMENTAL COMPLIANCE PLAN RIDER

PSC File Mark Only

C) **Jurisdictional billing units:** The applicable annual Arkansas retail jurisdictional kWh and kW for each class will be the most recently approved kWh and kW by the APSC from the Company’s latest base rate filing.

EGP Class	Annual kWh	Annual Billing kW
Residential	708,433,198	0
General Service	211,769,454	0
Power and Light		
Service Level 1 & 2	32,465,600	53,498
Service Level 3	232,726,229	498,653
Service Level 4	445,488	6,264
Service Level 5	475,342,224	1,394,304
Power and Light Time-of Use		
Service Level 1	454,330,801	1,066,446
Service Level 2	125,123,200	261,592
Service Level 3	314,293,600	677,800
Service Level 4 & 5	125,114,004	276,669
All Other Classes	30,979,940	0

**OKLAHOMA GAS AND ELECTRIC COMPANY**  
**Response to Wal-Mart Stores Arkansas, LLC and Sam's West, Inc.**  
**Staff Data Request WMT-2**  
*Docket No. 15-034-U*

Date Requested: 7/23/2015

Date Required: 8/7/2015

Requested by: Rick D. Chamberlain

**2.1 Please refer to p. 6, ln. 23 – p. 7, ln. 2, of Rowlett's Direct. Specifically identify the anticipated date when OG&E will file its next general rate case in Arkansas.**

Response\*: The Company does not have a planned date for a general rate case in Arkansas.

Response provided by: Donald Rowlett  
Response provided on: August 7, 2015  
Contact & Phone No: Sheri Richard (405) 553-3747

\*By responding to these Data Requests, OG&E is not indicating that the provided information is relevant or material and OG&E is not waiving any objection as to relevance or materiality or confidentiality of the information or documents provided or the admissibility of such information or documents in this or in any other proceeding.