#### **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	А.	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	А.	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	А.	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.

# 1Q.Does OG&E capitalize CWIP related property tax as allowed by FERC systems of2accounts?

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

7 8

9

#### **PRODUCTION DEMAND ALLOCATORS**

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

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

19

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

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

<sup>&</sup>lt;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		<b>OTHER ISSUES</b>
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	А.	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	А.	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	А.	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	А.	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.

- Q. Did the Company state that it will not file a rate case in 2020, as Wal-Mart witness 1 2 Mr. Chriss suggests? No. In response to data request WMT-2.1 attached herein as Rebuttal Exhibit DRR-3, the 3 A. Company stated that it does not have a planned date for a general rate case in Arkansas. 4 5 Mr. Chriss seems to suggest that the Company stated it specifically would not be filing a rate case until 2020. This simply is not the case. 6 7 Does this conclude your testimony? 8 Q.
- 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:7/15/2015Date Required:7/30/2015Requested 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.

Chart	2: Average Mont	hly Customer Impact		
Class	Average Monthly kWh *	ECP Rider Factor By Class *	Monthly Impact	
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)	2	(c) 015/2016	(d)	(e)		(f)	(g)
	Rate Base								
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 Deprecia	ition	\$	(661,831)					
5	Regulatory Asset								
6	Total Rate Base		\$	42,190,489					
_									
7	Return on Rate Base @ 8.20%		\$	3,459,620					
	Expenses								
8	O&M Expense		\$	-					
9	Depreciation Expense		\$	568,759					
10	Property Taxes		\$	428,523					
	Total Expenses		\$	997,283					
12	Revenue Requirement @ 100%		\$	4,456,903					
	(a)	(b)		(c)	(d)	(e)		(f)	(g)
	Allocation Methods:			<u>AR Juris</u>	<u>Residential</u>	<u>GS</u>		<u>PL</u>	Other **
13	Production Demand Allocator *			10.9927%	3.4569%	1.02	67%	6.4361%	0.0730%

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

\*\* Other includes pumping and lighting classes.

ent:			
Allocator	2	2015/2016	Rebased 100%
10.9927%	\$	489,934	100%
3.4569%	\$	154,071	31.4472%
1.0267%	\$	45,759	9.3398%
6.4361%	\$	286,851	58.5489%
0.0730%	\$	3,254	0.6641%
	Allocator 10.9927% 3.4569% 1.0267% 6.4361%		Allocator         2015/2016           10.9927%         \$         489,934           3.4569%         \$         154,071           1.0267%         \$         45,759           6.4361%         \$         286,851

		Average Monthly kWh			
	Class		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

	Annual KWH Approved 10-067-U	Class Revenue Requirement	ECP Rider Factor By Class	Check
Arkansas Jurisdiction	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 workpapers
PRO FORMA YEAR ENDING DECEMBER 31, 2010
DOCKET NO. 10.067 U

SC GENERAL STAFF le for all workpapers TO FORMA YEAR ENDING DECEMBER 31, 2010													SCHEDULE E-13 ARY OF ADJUSTMENTS IUSTMENTS TO BOOKS	
CKET NO. 10-067-U		1000				CTRICITY BY RATE	SCHEDULE							
JURISDICTION/ RATE DESCRIPTION	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	12 MONTHS TOTAL	
ARKANSAS ESIDENTIAL S/L 5 - KWH	76,141,810	69,256,405	50,927,524	33,513,235	52,466,284	51,450,426	84,090,280	80,765,658	64,169,206	42,616,347	42,059,928	60,976,095	708,433,198	708,433,198
1-600 (W)	29.474.538	30,166,395	27,729,421	20.397.032	33.658.978						26.497.691	27.409.660	195.333.714	
601- (W)	29,474,538 46,667,272	39,090,010	27,729,421 23,198,103	13,116,203	33,658,978 18,807,306	-	-		-		26,497,691 15,562,238	27,409,660 33,566,435	195,333,714 190,007,567	
-1500 (S)	-	· ·	-	-	-	44,577,922 6.872,504	63,348,122 20,742,158	63,956,404 16,809,254	55,562,902 8,606,304	40,334,096 2,282,251	-	-	267,779,445	
1501- (S)	0.00	0.00	0.00	0.00	- 0.00	6,872,504	20,742,158	16,809,254	8,606,304	2,282,251	- 0.87	- 0.00	55,312,472 0.87	
NERAL SERVICE - KWH														
S/L 2 S/L 3	45,391	62,458	45,282	64,414	39,886	12,720	63,300	36,840	41,040	30,485	37,100	45,127	524,043	524.043
S/L 4		-					-						-	
S/L 5	17,593,024	16,727,009	14,518,761	12,737,274	18,008,056	17,438,035	23,988,058	23,631,053	20,402,154	15,517,209	14,412,938	16,271,840	211,245,411	211,245,411
TOTAL	17,638,415	16,789,467	14,564,043	12,801,688	18,047,942	17,450,755	24,051,358	23,667,893	20,443,194	15,547,694	14,450,038	16,316,967	211,769,454	
S/L 2 1-1000 (W)	-	-	-	-		-	-	-	-	-	-	-		
S/L 2 1001- (W) S/L 2 STANDARD (S)	-	-	-						-		-		-	
S/L 3 1-1000 (W) S/L 3 1001- (W)	5,896 39,495	8,967 53,491	7,124 38,158	10,467 53,947	7,832 32,054	-	-	-		-	6,222 30,878	6,222 38,905	52,732 286,926	
S/L 3 1001- (W) S/L 3 STANDARD (S)	39,495	53,491	38,158	53,947	32,054	12,720	63.300	36.840	41.040	30.485	30,878	38,905	286,926	
	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
S/L 4 1-1000 (W) S/L 4 1001- (W)	-		-	-	-		-		-		-	-		
S/L 4 STANDARD (S)											-		-	
04 5 4 4000 000	6.088.181	6.106.332	5.724.228	5.080.512	6.501.928	-	-	-	-	-	5.589.147	5.809.432	40 899 761	
S/L 5 1-1000 (W) S/L 5 1001- (W)	11,504,843	10.620.677	8,794,533	7,656,762	11,506,128	-	-	-	-		8,823,791	10,462,407	40,899,761	
S/L 5 STANDARD (S)		-				17,438,035	23,988,058	23,631,053	20,402,154	15,517,209	-		100,976,509	
WER AND LIGHT - REGULAR - KWH	0.00	0.00	0.00	0.88	0.00	0.00	0.00	0.00	0.00	0.00	0.00	(0.99)	(0.12)	
S/L 1			-	-				-				-		
S/L 2	2,417,600	2,429,600	2,460,000	2,314,400	2,707,200	3,071,200	2,831,200	2,952,000	3,156,000	2,826,400	2,700,800	2,599,200	32,465,600	32,465,600
S/L 3 S/L 4	17,159,640	17,488,560	17,901,493	18,284,371	19,539,942	22,216,760	22,065,800 35,200	22,831,560 25,600	22,946,360 240,000	18,103,424 77,333	16,944,981 67,355	17,243,338	232,726,229 445,488	232,726,229 445,488
S/L 5	34,898,132	35,327,618	32,374,609	34,009,470	36,380,918	47,431,951	48,221,797	50,241,816	50,610,168	35,774,965	35,250,038	34,820,742	475,342,224	475,342,224
TOTAL	54,475,372	55,245,778	52,736,102	54,608,241	58,628,060	72,719,911	73,153,997	76,050,976	76,952,528	56,782,122	54,963,174	54,663,280	740,979,541	
WER AND LIGHT - TOU - KWH														
S/L 1 S/L 2	47,043,194 9,275,200	42,375,570 8,572,800	41,138,251 9,980,800	28,415,083 10,147,200	40,048,395 11,097,600	37,513,526 12,137,600	40,285,704 11,833,600	40,874,331 11,656,000	38,135,671 11,630,400	40,768,395 10,116,800	38,287,000 9,736,000	19,445,681 8,939,200	454,330,801 125,123,200	454,330,801 125,123,200
S/L 3	21,331,600	24,727,600	22,725,200	23,701,200	25,598,400	31,155,200	29,559,200	30,953,600	31,308,000	25,594,400	25,024,800	22,614,400	314,293,600	314,293,600
S/L 4			· · · · ·										-	
S/L 5 TOTAL	9,405,567 87,055,561	9,584,291 85,260,261	9,395,036 83,239,287	9,902,985 72,166,468	10,676,558 87,420,953	11,774,850 92,581,176	11,219,122 92,897,626	11,725,328 95,209,259	12,170,487 93,244,558	9,943,613 86,423,208	9,367,735 82,415,535	9,948,432 60,947,713	125,114,004 1.018.861.605	125,114,004
WER AND LIGHT - REGULAR - KW S/L 1														
S/L 2	3,972	3,940	3,897	4,227	4,495	4,874	4,925	4,831	4,784	4,810	4,546	4,197	53,498	53,498
S/L 3 S/L 4	34,950 475	38,287 475	37,421 475	38,147 475	40.819 475	47,249 475	46,921 767	47,984 747	46,472 475	43,210 475	40,630 475	36,563 475	498,653 6,264	498,653 6,264
S/L 5	103.974	109.138	102.983	107.866	112,892	129,178	130,701	135,206	129,868	116.675	110.705	105,118	1.394.304	1.394.304
TOTAL	143,371	151,840	144,776	150,715	158,681	181,776	183,314	188,768	181,599	165,170	156,356	146,353	1,952,719	
WER AND LIGHT - TOU MAX - KW														
S/L 1	85,584	94,404	85,894	85,507	85,606	89,258	90,406	90,680	90,669	90,252	90,785	87,401	1,066,446	1,066,446
S/L 2 S/L 3	20,092 45,945	19,222 52,900	19,966 49,929	20,348 53,017	20,919 56,292	24,039 63,279	24,582 64,688	24,574 66,235	24,240 63,743	22,840 58,093	21,777 54,526	18,993 49,153	261,592 677,800	261,592 677,800
S/L 4	-		-			-	-		-	-	-	-	-	
S/L 5 TOTAL	21,504	21,975	21,627	22,326 181,198	23,819 186,636	25,562	23,825	25,273	25,385	22,497 193,682	21,154	21,722	276,669	276,669
	173,125	188,501	177,416	181,198	186,636	202,138	203,501	206,762	204,037	193,682	188,242	177,269	2,282,507	
WER AND LIGHT - TOU ON PEAK - KW														
S/L 1 S/L 2	85,584	94,404	85,894	85,507	85,606	89,258 23,008	90,406 23,587	90,680 23 186	90,669 22,528	90,252 21,323	90,785	87,401	1,066,446	1,066,446 113,632
S/L 3		-	-	-	-	61,059	62,268	63,245	61,236	55,722	-	-	303,530	303,530
S/L 4	-	-	-	-	-	24 739	22.837	24 389	24 682	21 983	-	-	118.630	-
S/L 5 TOTAL	85,584	94,404	85,894	85 507	85.606	24,739 198,064	22,837	24,389 201,500	24,682 199,115	21,983 189,280	90 785	87,401	118,630	118,630

#### Rebuttal Exhibit DRR-1 Page 6 of 7

APSC GENERAL STAFF Title for all workpapers PRO FORMA YEAR ENDING DECEMBER 31, 2010 DOCKET NO. 10-067-U		1000											SCHEDULE E-13 MARY OF ADJUSTMENTS DJUSTMENTS TO BOOKS	
DOCKET NO: 10-067-0		1000				ECTRICITY BY RATE								
JURISDICTION/ RATE DESCRIPTION	JAN JAN. 2010	FEB FEB. 2010	MAR MAR. 2010	APR APR. 2010	AI MAY MAY. 2010	DJUSTED KWH & KV JUNE JUNE. 2010	V JULY JULY. 2010	AUG AUG. 2010	SEP SEP. 2010	OCT OCT. 2010	NOV NOV. 2010	DEC DEC. 2010	12 MONTHS TOTAL	
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 S/L 5 TOTAL	5,600 171,453 177,053	4,800 217,552 222,352	4,800 151,630 156,430	4,800 132,000 136,800	5,600 105,946 111,546	4,800 87,557 92,357	1,600 85,753 87,353	88,474	800 96,072 96.872	800 72,857 73,657	- 92,908 92,908	5,600 147,373 152,973	39,200 1,449,575 1,488,775	39,200 1,449,575
	177,053	222,352	156,430	136,800	111,546	92,357	87,353	88,474	96,872	/3,65/	92,908	152,973	1,488,775	
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
ARKANSAS RETAIL - KWH	237,931,115	229,231,606	204,068,421	175,667,386	219,136,162	236,772,659	276,759,405	278,233,726	257,382,926	203,909,538	196,433,624	195,497,170	2,711,023,738	
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 Workpapers:	kWh and kW ACT	WP-E13-ADJ-1	WP-E13-ADJ-5	WP-E13-ADJ-6a	WP-E13-ADJ-7	WP-E13-ADJ-9								
Recap Schedules:	ARK KWH			WP-E13-ADJ-6b										

For Arkansas Jurisdiction Environmental Case:

Allocation Methods:	<u>AR Juris</u>	<b>Residential</b>	<u>GS</u>	<u>PL</u>	Other **
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.

<u>1<sup>st</sup> Revised</u> Sheet No. <u>78.0</u>	
Replacing <u>Original</u> Sheet No. 78.0	
OKLAHOMA GAS AND ELECTRIC COMPANY Name of Company	
Kind of Service:     Electric     Class of Service:     All	
Part I. Schedule No. <u>ECP</u>	
Title: ENVIRONMENTAL COMPLIANCE PLAN RIDER	
	PSC File Mark Only

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

- 78.2 **<u>PURPOSE</u>**: 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 **<u>APPLICABILITY</u>**: This rider is applicable to all Arkansas retail rate classes.
- 78.4 **<u>TERM</u>**: 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

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

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

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

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.

1 <sup>st</sup> Revised Sheet No. 78.1	
Replacing <u>Original</u> Sheet No. <u>78.1</u>	
OKLAHOMA GAS AND ELECTRIC COMPANY Name of Company	
Kind of Service: <u>Electric</u> Class of Service: <u>All</u>	
Part I. Schedule No. <u>ECP</u>	
Title: ENVIRONMENTAL COMPLIANCE PLAN RIDER	
A = Arkansas Jurisdiction ECP Revenue Requirement	PSC File Mark Only

- 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) <u>Arkansas Jurisdiction ECP Revenue Requirement</u>: 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.

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<u>Original</u> Sheet No. 78.2	
Replacing Sheet No	
OKLAHOMA GAS AND ELECTRIC COMPANY Name of Company	
Kind of Service: <u>Electric</u> Class of Service: <u>All</u>	
Part I. Schedule No. <u>ECP</u>	
Title: ENVIRONMENTAL COMPLIANCE PLAN RIDER	
	PSC File Mark Only

**B)** <u>Allocation Factors</u>: 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.

EGP Class	Class Allocator Percentage	Class kWh Allocator Percentage	Class kW Allocator Percentage
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%		

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<u>Original</u> 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. <u>ECP</u>	
Title: ENVIRONMENTAL COMPLIANCE PLAN RIDER	
	PSC File Mark Only

C) <u>Jurisdictional billing units</u>: 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:7/23/2015Date Required:8/7/2015Requested 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.