

BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

IN THE MATTER OF THE APPLICATION OF)
OKLAHOMA GAS AND ELECTRIC COMPANY)
FOR AN ORDER OF THE COMMISSION)
APPROVING A RECOVERY MECHANISM FOR)
EXPENDITURES RELATED TO THE)
OKLAHOMA GRID ENHANCEMENT PLAN)

Cause No. PUD 202000021



Rebuttal Testimony

of

Gwin Cash

on behalf of

Oklahoma Gas and Electric Company

September 14, 2020

Gwin Cash
Rebuttal Testimony

1 **Q. Would you please state your name and business address?**

2 A. My name is Gwin Cash. My business address is 321 North Harvey, Oklahoma City,
3 Oklahoma, 73102.

5 **Q. Are you the same Gwin Cash that previously filed direct testimony in this proceeding?**

6 A. Yes.

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

9 A. The purpose of my testimony is to respond to the Responsive Testimony filed on August
10 25, 2020 by witnesses Michael P. Gorman on behalf of the Federal Executive Agency, Lisa
11 V. Perry on behalf of Walmart Inc., and Mark E. Garrett on behalf of Oklahoma Industrial
12 Energy Consumers.

14 **Q. What issues specifically will you be addressing?**

15 A. I will address the following three issues raised by witnesses.

- 16 • Grid Enhancement Mechanism (“GEM”) rates for demand billed customers should
17 be a per kW charge instead of a per kWh charge, as stated by Witness Gorman¹ and
18 Witness Perry.²
- 19 • Within the GEM formula, true-up balances should be included with the amounts to
20 be allocated, to avoid a perceived error in the calculation, as stated by Witness
21 Gorman.³
- 22 • GEM cost should not be allocated to service level one (“SL1”) and two (“SL2”)
23 customers as stated by witness Garrett.⁴

¹ Gorman Responsive p. 16 lns. 2 – 9

² Perry Responsive p. 13 ln 19 – p. 17 ln. 18

³ Gorman Responsive p. 16 ln 10 – p. 17 ln. 22

⁴ Garrett Responsive p. 28 ln 10 – p. 32 ln. 15

1 **kW rate for Demand Billed Customers**

2
3 **Q. What is the Company's response to the claims of Witness Gorman and Witness Perry**
4 **that demand-billed customers should be billed GEM charges on a per kW rate?**

5 A. OG&E does not oppose this request and has prepared a redlined version of the proposed
6 GEM tariff to accommodate this change. This redlined GEM tariff is attached to this
7 testimony as Rebuttal Exhibit GC-1.
8

9 **Q. Please explain the updates to the GEM tariff that accommodate this change.**

10 A. In the Factor Calculation section, I added explanatory language that the billing units in the
11 denominator of the calculation will be either kW for tariffs with demand charges or kWh
12 for tariffs without demand charges.

13 In the Rate Classes, Allocators, and GEM Factors sections, I added an additional
14 separately billed rate class, Public Schools Large, because this class of customers has tariffs
15 with demand charges. These customers were previously included in the Other category.

16 In the GEM Factors section, I added a column for the kW factors for tariffs with
17 demand charges.
18

19 **Allocation of GEM True-Up Balances**

20
21 **Q. What is the Company's response to the claim of Witness Gorman that the GEM true-**
22 **up balances should be included with the amounts to be allocated within the GEM**
23 **formula to correct a perceived error?**

24 A. The Company rejects this request and instead seeks to clarify that the true-up amounts D,
25 G, J, and N of the GEM formula are intended to be the individual true-up balances for each
26 defined class and service level. This direct assignment of the true-up balances negates the
27 need to allocate any portion of it. The Company acknowledges that this may not be clearly
28 stated in the tariff and has updated the Factor Calculation section, which can be seen on
29 page two of Rebuttal Exhibit GC-1, to address this matter. These updates add subscripts,
30 that read "Class and SL", to each of these true-up amounts.

GEM Cost Allocation to SL1 and SL2 Customers

Q. What is the Company's response to the claims of Witness Garrett that GEM cost should not be allocated to SL1 and SL2 customers?

A. The Company disagrees that SL1 and SL2 customers should not be allocated any GEM cost. Mr. Garrett's position ignores the outcomes of general rate case proceedings in which the Commission has supported cost-of-service studies that allocate similar cost items to customers at all service levels. Additionally, Mr. Garrett frames the issue of proper allocation around an argument of transmission vs. distribution customers and attempts to support this position by incorrectly interpreting the Company's tariffs.

Q. As proposed by the Company, what GEM costs will be allocated to SL1 and SL2 customers?

A. Generally speaking there will be two types of cost that will be allocated to these customers, distribution substation-related and IT/software-related. The distribution substation cost is allocated to SL2 through SL5 customers and the IT/software cost is allocated to customers at all service levels.

Q. How did the Company determine the appropriate allocation methodology for IT/software-related cost?

A. The Company looked at recent base rate cases to determine the proper allocation methodology where it found the following: software cost is booked to Intangible plant FERC account 303. Within the Company's cost-of-service study FERC account 303 is allocated utilizing the Supervised O&M allocator. This Supervised O&M allocator is used to allocate cost for multiple Intangible and General plant items booked to FERC accounts 301, 303, and 389 – 399. This allocator does allocate cost to customers at all service levels.

Q. Did the Company take a similar approach to determine the appropriate allocation methodology for distribution substation-related cost?

A. Yes. The Company looked at recent base rate cases to determine the proper allocation methodology where it found the following: distribution substation-related plant is booked

1 to distribution plant FERC accounts 360, 361, and 362. Within the Company's cost-of-
2 service study these FERC accounts are allocated utilizing a mix of class coincident peak
3 loads and direct assignment. This has resulted in cost for these accounts being allocated to
4 SL2 through SL5 customers.
5

6 **Q. Which rate cases did the Company review to help make its allocation determinations?**

7 A. The Company looked at the last decade's worth of OG&E filed general rate case
8 proceedings: Cause Nos. PUD 201100087, 201500273, 201700496, and 201800140. In
9 all four of these Causes software cost was booked to FERC account 303 and allocated
10 using the Supervised O&M allocator and allocated cost to customers at all service levels.
11 Also, in all four of these Causes, distribution substation plant-related cost was allocated
12 using a mix of class coincident peak demand load data and direct assignment and
13 allocated cost to SL2 through SL 5 customers.
14

15 **Q. Was the OIEC an intervening party in these Causes?**

16 A. Yes.
17

18 **Q. Did Witness Garrett file testimony on behalf of OIEC in these Causes?**

19 A. Yes.
20

21 **Q. Did Witness Garrett, or any other OIEC witness, take issue with the allocation
22 methods the Company chose for software-related and distribution substation-related
23 plant cost?**

24 A. No.
25

26 **Q. What reason does Witness Garrett offer to support his belief that GEM cost should
27 not be allocated to SL1 and SL2 customers?**

28 A. Witness Garrett's argues that GEM investment should not be allocated to transmission
29 level customers and supports this argument by characterizing both SL1 and SL2 customers
30 as being transmission level customers.

1 Q. **Does the Company agree with Mr. Garretts's characterization that both SL1 and SL2**
2 **customers are transmission level customers?**

3 A. No. Mr. Garrett's characterization of SL2 customers as transmission level customers is
4 incorrect and at odds with the Company's definition of SL2.
5

6 Q. **What are the Company's definitions of SL1 and SL2?**

7 A. The definition of SL1 is:

8 **Service Level 1:** Shall mean service at any nominal standard voltage of
9 the Company above 50 kV where service is rendered through a direct tap
10 to the Company's prevailing transmission source.
11

12 The definition of SL2 is:

13 **Service Level 2:** Shall mean service at any nominal standard voltage of
14 the Company between 2 kV and 50 kV, both inclusive, where service is
15 rendered through a Company Substation which has a transmission voltage
16 source and the point of delivery is at the load side of the substation or
17 from a circuit dedicated to the customer.
18

19 These definitions are listed in the Company's tariffs and copies of the Power and Light,
20 Power and Light Time-of-Use, Large Power and Light Standard, and Large Power and
21 Light Time-of-Use tariffs are attached to this testimony as Rebuttal Exhibit GC-2.
22

23 Q. **What about the definition of SL2 indicates that these customers are not transmission**
24 **level, but, are instead distribution level?**

25 A. The fact that service for SL2 customers is rendered through a Company substation, and
26 possibly also a dedicated circuit, requires this interpretation. The substation and circuit
27 plant referenced in this definition are asset types that are booked to *distribution* FERC
28 accounts. Distribution substation-related costs will settle to FERC accounts 360 through

362 and distribution circuit related costs will settle to FERC accounts 364 through 367.⁵
Because SL2 customers are rendered service via these distribution assets they must be
considered distribution level customers.

Q. What is Witness Garrett's source for his interpretation of SL2?

A. As indicated by his response to a Company data request, Mr. Garrett's source for his
interpretation is also the Company's tariffs. This data request response is attached to my
testimony as Rebuttal Exhibit GC-3. As the definition of SL2 clearly indicates that these
customers are distribution level, one can only conclude that Witness Garrett has
erroneously misinterpreted this definition and relied on this misinterpretation to mistakenly
request that no GEM cost be allocated to SL2 customers.

Recommendations

Q. What are your recommendations to the Commission?

A. I recommend that the Commission make the following determinations:

- Demand billed customers will be billed on a kW rate,
- All GEM true-up balances are to be direct assigned to each of the GEM classes,
- It is appropriate to allocate GEM cost to SL1 and SL2 customers,
- SL2 customers are, in fact, distribution-level customers, and
- Approve the updates to the GEM tariff that reflect the change to a per kW charge
for demand billed customers and the clarifying edits that indicate direct
assignment of the true-up balances.

Q. Does this conclude your Rebuttal Testimony?

A. Yes.

⁵ "Code of Federal Regulations, Title 18, Conservation of Power and Water Resources, Parts 1 to 399", Revised as of April 1, 2011, pgs. 459 - 461

OKLAHOMA GAS AND ELECTRIC COMPANY
P. O. Box 321
Oklahoma City, Oklahoma 73101

Rebuttal Exhibit GC-1
Original Sheet No. 57.00

Date Issued XXXX XX, 20XX

STANDARD PRICING SCHEDULE: GEM
GRID ENHANCEMENT MECHANISM

STATE OF OKLAHOMA

EFFECTIVE IN: All territory served.

PURPOSE: The purpose of the Grid Enhancement Mechanism (“GEM”) is to recover the Oklahoma retail jurisdictional portion of the annual revenue requirement for non-normal grid enhancement expenditures approved in Cause No. PUD 202000021.

APPLICABILITY: For distribution grid enhancement expenditures associated with FERC accounts 360 through 363 this mechanism is applicable to all Oklahoma retail rate classes in Service Levels 2, 3, 4, and 5. For distribution grid enhancement expenditures associated with FERC accounts 364 through 368 this mechanism is applicable to all Oklahoma retail rate classes in Service Levels 3, 4 and 5. For intangible, general, and transmission plant grid enhancement expenditures, this mechanism is applicable to all Oklahoma retail rate classes.

TERM: This GEM shall become effective upon a final order of the Commission in Cause No. PUD 202000021 and shall continue until all costs permitted to be included in this GEM have been recovered or the GEM is modified, reviewed, or replaced by order of the Oklahoma Corporation Commission (“OCC” or “Commission”).

REVENUE REQUIREMENT: The revenue requirement shall be based on grid enhancement expenditures that have been completed and are in service. This recovery shall include the return on rate base at the Commission’s most recent authorized rate of return, associated depreciation expense, and property taxes. The rate base for the revenue requirement shall include plant-in-service, accumulated depreciation, and any associated accumulated deferred income taxes.

REPORTING REQUIREMENTS: The Company shall submit a quarterly report of completed and in-service projects to the PUD inclusive of the revenue requirement associated with all in-service projects. The quarterly report shall be submitted on February 1st, May 1st, August 1st, and November 1st of each year and will begin subsequent to a Final Order approving this GEM in Cause No. PUD 202000021. Each submission shall include a listing of projects included for recovery, the purpose of each project, detailed engineering studies, and any authorizations for expenditures (“AFE”).

Additionally, by July 15th of each year, beginning in [20202021](#), the Company will provide an annual investment plan.

FACTOR REDETERMINATION SCHEDULE: Factor redeterminations shall be submitted on a quarterly basis along with the report of completed in-service projects. The PUD will have thirty (30) calendar days to review the proposed factors before the effective date. These factors shall be effective the first day of the month following submission (March 1st, June 1st, September 1st, and December 1st).—

FACTOR CALCULATION: The Company will calculate the GEM mechanism factors using the following formulas, on a per kilowatt-hour (kWh) basis [for non demand-billed customers and on a per kilowatt \(kW\) basis for demand-billed customers](#), for each of the major rate classes, combined

Rates Authorized by the Oklahoma Corporation Commission:		
(Effective)	(Order No.)	(Cause/Docket No.)
		PUD 202000021

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OKLAHOMA GAS AND ELECTRIC COMPANY
P. O. Box 321
Oklahoma City, Oklahoma 73101

Rebuttal Exhibit GC-1
Original Sheet No. 57.01

Date Issued XXXX XX, 20XX

STANDARD PRICING SCHEDULE: GEM
GRID ENHANCEMENT MECHANISM

STATE OF OKLAHOMA

minor classes, and service level ("SL"). The factor shall reflect actual completed projects in service, with any accumulated over/under amortized over a 3-month period. No projections for upcoming projects may be included in the factor calculation. The GEM factors will be computed as follows:

$$\text{GEM Factor}_{\text{Class and SL}} = \frac{(A * B * C + D_{\text{Class and SL}}) + (E * F + G_{\text{Class and SL}}) + (H * I + J_{\text{Class and SL}}) + (K * L * M + N_{\text{Class and SL}})}{O_{\text{Class and SL}}}$$

Where:

A = Transmission Retail Revenue Requirement;

B = Oklahoma Jurisdiction Transmission Allocation = 91.0346%;

C = Oklahoma Transmission Demand Class and SL Allocator;

D = Transmission Annual True Up;

And

E = Distribution FERC Accounts 360-363 Revenue Requirement;

F = Distribution FERC Accounts 360-363 Class and SL Allocator;

G = Distribution FERC Accounts 360-363 Annual True Up;

And

H = Distribution FERC Accounts 364-368 Revenue Requirement;

I = Distribution FERC Accounts 364-368 Class and SL Allocator;

J = Distribution FERC Accounts 364-368 Annual True Up;

And

K = General and Intangible Plant Revenue Requirement;

L = Oklahoma Jurisdiction General and Intangible Plant Allocation = 91.5044%;

M = General and Intangible Plant Class and SL Allocator;

N = General and Intangible Plant Annual True Up;

And

O = Base kWh for each Applicable ~~Class and SL~~ non demand-billed Class and SL or Base kW for each Applicable demand-billed Class and SL

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PUD 202000021

**STANDARD PRICING SCHEDULE: GEM
GRID ENHANCEMENT MECHANISM**

STATE OF OKLAHOMA

RATE CLASSES: The applicable rate classes are as follows:

Rate Class	Distribution	Intangible, General Plant	Transmission
Residential	SL 2, 3, 4, 5	All SLs	All SLs
General Service	SL 2, 3, 4, 5	All SLs	All SLs
<u>Public School Large</u>	<u>SL 3, 4, 5</u>	<u>SL 3, 4, 5</u>	<u>SL 3, 4, 5</u>
Power and Light	SL 2, 3, 4, 5	All SLs	All SLs
Large Power and Light	SL 2, 3, 4, 5	All SLs	All SLs
Other	SL 2, 3, 4, 5	All SLs	All SLs

Combined Minor Rate Classes (Other) = *Oil and Gas Producers + Public Schools (Small-and Large) + Municipal Pumping + Municipal Lighting + Outdoor Security Lighting + LED Lighting; Power and Light = Power and Light Standard, Power and Light Time-of-Use, Back-Up and Maintenance Services*

BASE CLASS AND OTHER kWhskWh AND kW: The applicable projected Oklahoma jurisdictional kWh and kW as determined in the Company's last general rate review.

ALLOCATORS: The transmission, distribution FERC, and intangible and general plant allocators as determined in PUD 201800140. These allocators will be updated upon the issuance of a final order in subsequent general rate case proceedings filed by OG&E.

Rate Class	Distribution FERC Accounts 360 - 363	Distribution FERC Accounts 364-368	Intangible, General Plant	Transmission (rebased to 100%)
Residential	45.7875%	60.7752%	56.8958%	46.76937694%
General Service*	8.2041%	13.4030%	10.2362%	8.4287%
<u>Public Schools Large</u>				
<u>Service Level 3</u>	<u>0.0435%</u>	<u>0.0152%</u>	<u>0.0279%</u>	<u>0.0320%</u>
<u>Service Level 4</u>	<u>0.0825%</u>	<u>0.0348%</u>	<u>0.0503%</u>	<u>0.0550%</u>
<u>Service Level 5</u>	<u>0.8352%</u>	<u>0.8350%</u>	<u>0.6202%</u>	<u>0.6728%</u>
Power and Light				
Service Level 1	0.0000%	0.0000%	0.0878%	0.2645%
Service Level 2	1.5578%	0.0000%	0.2005%	0.2434%
Service Level 3	2.2458%	0.7951%	1.8169%	2.4998%
Service Level 4	0.7857%	0.4010%	0.6908%	0.9657%
Service Level 5	18.5485%	19.4188%	17.0787%	20.7687%
Large Power & Light				
Service Level 1	0.0000%	0.0000%	0.9137%	1.9334%
Service Level 2	14.7363%	0.0000%	5.7504%	11.1079%
Service Level 3	1.9711%	0.6723%	1.6129%	2.2696%
Service Level 4	0.6533%	0.2659%	0.5457%	0.7703%
Service Level 5	0.9529%	0.7828%	0.8060%	1.0667%
Other*	<u>4.55693.5957%</u>	<u>3.48592.6008%</u>	<u>3.36462.6662%</u>	<u>2.91201.521%</u>

* Service Levels 2 through 5 are combined.

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PUD 202000021

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OKLAHOMA GAS AND ELECTRIC COMPANY
P. O. Box 321
Oklahoma City, Oklahoma 73101

Rebuttal Exhibit GC-1
Original Sheet No. 57.03

Date Issued XXXX XX, 20XX

STANDARD PRICING SCHEDULE: GEM
GRID ENHANCEMENT MECHANISM

STATE OF OKLAHOMA

GEM Factors

Class	\$/kWh	\$/kW
Residential	<u>X.XXXXXXX</u>	
General Service*	<u>X.XXXXXXX</u>	
<u>Public Schools Large</u>		
<u>Service Level 3</u>		<u>X.XXXXXXX</u>
<u>Service Level 4</u>		<u>X.XXXXXXX</u>
<u>Service Level 5</u>		<u>X.XXXXXXX</u>
Power and Light		
Service Level 1		<u>X.XXXXXXX</u>
Service Level 2		<u>X.XXXXXXX</u>
Service Level 3		<u>X.XXXXXXX</u>
Service Level 4		<u>X.XXXXXXX</u>
Service Level 5		<u>X.XXXXXXX</u>
Large Power & Light		
Service Level 1		<u>X.XXXXXXX</u>
Service Level 2		<u>X.XXXXXXX</u>
Service Level 3		<u>X.XXXXXXX</u>
Service Level 4		<u>X.XXXXXXX</u>
Service Level 5		<u>X.XXXXXXX</u>
Other*	<u>X.XXXXXXX</u>	

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PUD 202000021

OKLAHOMA GAS AND ELECTRIC COMPANY
P. O. Box 321
Oklahoma City, Oklahoma 73101

Rebuttal Exhibit GC-2
4th Revised Sheet No. 15.30
Replacing 3rd Revised Sheet No. 15.30
Date Issued September 19, 2019

STANDARD PRICING SCHEDULE: PL-1
POWER AND LIGHT

STATE OF OKLAHOMA
Code No. 39

EFFECTIVE IN: All territory served.

AVAILABILITY: Power and light service. Alternating current. Service will be rendered at one location at one voltage. No resale, breakdown, auxiliary or supplementary service permitted.

The application of this rate is limited to consumers meeting one of the following conditions:

1) Annual Maximum Kilowatt Demand (AkW) during the last 12 months must be greater than or equal to 10 kW but less than 400 kW with a Load Factor of 25% or more. The Load Factor calculation is:

$$\text{Load Factor} = \frac{\text{Total Annual kWh}}{(\text{AkW} \times 8760)}$$

Or

2) AkW must be greater than or equal to 400 kW.

Additionally, the application of this rate is limited to consumers with annual kWh consumption of less than 15,000,000 kWh.

APPLICATION OF FUEL COST ADJUSTMENT (FCA): The FCA_s and FCA_w as defined in the FCA rider shall apply to the energy components within this tariff as follows: The FCA_s shall apply to kWh sales during the five revenue months of June through October; and, the FCA_w shall apply to kWh sales during the seven revenue months of November through May.

TRANSMISSION (Service Level 1):

Customer Charge: \$234.00 per bill per month.

Capacity Charge:

Summer Season Maximum Demand: \$8.90 per kW per month.

Winter Season Maximum Demand: \$4.45 per kW per month.

Energy Charge:

All kWh per month: 0.59¢ per kWh.

Rates Authorized by the Oklahoma Corporation Commission:

(Effective)	(Order No.)	(Cause/Docket No.)
October 1, 2019	702531	PUD 201800140
July 1, 2018	679358	PUD 201700496
May 1, 2017	662059	PUD 201500273
August 2, 2012	599558	PUD 201100087

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APPROVED
September 27, 2019
DIRECTOR
of
PUBLIC UTILITY DIVISION

OKLAHOMA GAS AND ELECTRIC COMPANY
P. O. Box 321
Oklahoma City, Oklahoma 73101

Rebuttal Exhibit GC-2
5th Revised Sheet No. 15.31
Replacing 4th Revised Sheet No. 15.31
Date Issued September 19, 2019

STANDARD PRICING SCHEDULE: PL-1
POWER AND LIGHT

STATE OF OKLAHOMA
Code No. 39

DISTRIBUTION SUBSTATION (Service Level 2):

Customer Charge: \$234.00 per bill per month.

Capacity Charge:

Summer Season Maximum Demand: \$8.75 per kW per month.

Winter Season Maximum Demand: \$3.95 per kW per month.

Energy Charge:

All kWh per month: 0.89¢ per kWh.

DISTRIBUTION (Service Level 3):

Customer Charge: \$121.00 per bill per month.

Capacity Charge:

Summer Season Maximum Demand: \$10.96 per kW per month.

Winter Season Maximum Demand: \$5.43 per kW per month.

Energy Charge:

All kWh per month: 0.89¢ per kWh.

DISTRIBUTION (Service Level 4):

Customer Charge: \$91.00 per bill per month.

Capacity Charge:

Summer Season Maximum Demand: \$11.10 per kW per month.

Winter Season Maximum Demand: \$5.55 per kW per month.

Energy Charge:

All kWh per month: 0.98¢ per kWh.

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(Effective)	(Order No.)	(Cause/Docket No.)
October 1, 2019	702531	PUD 201800140
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Rebuttal Exhibit GC-2
5th Revised Sheet No. 15.32
Replacing 4th Revised Sheet No. 15.32
Date Issued September 19, 2019

STANDARD PRICING SCHEDULE: PL-1
POWER AND LIGHT

STATE OF OKLAHOMA
Code No. 39

SECONDARY (Service Level 5):

Customer Charge: \$79.00 per bill per month.

Capacity Charge:

Summer Season Maximum Demand: \$14.84 per kW per month.

Winter Season Maximum Demand: \$7.45 per kW per month.

Energy Charge:

All kWh per month: 1.05¢ per kWh.

DEFINITION OF SEASON:

SUMMER SEASON: The five OG&E Revenue Months of June through October.

WINTER SEASON: The seven OG&E Revenue Months of November through May.

DETERMINATION OF MAXIMUM DEMAND: The customer's Maximum Demand shall be the maximum rate at which energy is used for any period of 15 consecutive minutes of the month for which the bill is rendered as shown by the Company's demand meter. In the event a customer taking service under this rate has a demand meter with an interval greater than 15 minutes, the Company shall have a reasonable time to change the metering device.

DETERMINATION OF BILLING DEMAND: The Billing Demand upon which the capacity charge is based shall be the Maximum Demand as determined above corrected for power factor, set forth under Power Factor Clause; provided that no Billing Demand shall be considered as less than 25 percent of the highest Maximum Demand corrected for power factor previously determined during the 12 months ending with the current month.

POWER FACTOR CLAUSE: The consumer shall at all times take and use power in such manner that the power factor shall be as nearly 100 percent as possible, but when the average power factor as determined by continuous measurement of lagging reactive kilovolt-ampere (kVAr) hours is less than 90 percent, the billing demand shall be determined by multiplying the maximum demand, measured by the demand meter for the billing period, by 90 and dividing the product thus obtained by the actual average power factor expressed in percent.

Rates Authorized by the Oklahoma Corporation Commission:

(Effective)	(Order No.)	(Cause/Docket No.)
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Rebuttal Exhibit GC-2
4th Revised Sheet No. 15.33
Replacing 3rd Revised Sheet No. 15.33
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STANDARD PRICING SCHEDULE: PL
POWER AND LIGHT

STATE OF OKLAHOMA
Code No. 39

Customers under this schedule that have a minimum of 300 kW Maximum Demand must have suitable measuring equipment at the metering point to determine the customer's monthly maximum kVAr. For all customers with a monthly Maximum Demand of 300 kW or more, the Company shall install suitable measuring equipment to determine the customer's monthly maximum kVAr.

The Company may install suitable measuring equipment at the metering point for any customer to determine the customer's monthly maximum kVAr if, in its sole judgment, such equipment is necessary.

SERVICE LEVELS: For purposes of this rate, the following shall apply:

Service Level 1: Shall mean service at any nominal standard voltage of the Company above 50 kV where service is rendered through a direct tap to the Company's prevailing transmission source.

Service Level 2: Shall mean service at any nominal standard voltage of the Company between 2 kV and 50 kV, both inclusive, where service is rendered through a Company Substation, which has a transmission voltage source, and the point of delivery is at the load side of the substation or from a circuit dedicated to the customer.

Service Level 3: Shall mean service at any nominal standard voltage of the Company between 2 kV and 50 kV, both inclusive, by a direct tap to the Company's prevailing distribution source from a circuit not dedicated to the customer.

Service Level 4: Shall mean service at any nominal standard voltage of the Company between 2 kV and 50 kV, both inclusive, where service is rendered through transformation from a Company prevailing distribution voltage source (2 kV to 50 kV) to a lower distribution voltage with metering at distribution voltage.

Service Level 5: Shall mean service at any nominal standard voltage of the Company less than 2,000 volts with metering at less than 2,000 volts.

Metering Adjustment:

If the Company chooses to install its metering equipment on the load side of the customer's transformers, the kWh billed shall be increased by the amount of the transformer losses calculated as follows:

Service Level 1: 0.50 percent of the total kVA rating of the customer's transformers times 730 hours.

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September 27, 2019
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Rebuttal Exhibit GC-2
4th Revised Sheet No. 15.34
Replacing 3rd Revised Sheet No. 15.34
Date Issued September 19, 2019

STANDARD PRICING SCHEDULE: PL
POWER AND LIGHT

STATE OF OKLAHOMA
Code No. 39

Service Level 3: 0.60 percent of the total kVA rating of the customer's transformers times 730 hours.

LATE PAYMENT CHARGE: A late payment charge in an amount equal to 1.5 percent of the total balance for services and charges remaining unpaid on the due date stated on the bill shall be added to the amount due. The due date as stated on the bill shall be 20 days after the bill is issued.

MINIMUM BILL: The minimum monthly bill shall be the Customer Charge, plus the applicable Capacity Charge as computed under the above schedule. The Company shall specify a larger minimum monthly bill, calculated in accordance with the Company's Allowable Expenditure Formula in its Terms and Conditions of Service on file with and approved by the Commission, when necessary to justify the investment required to provide service.

FRANCHISE PAYMENT: The above stated rates do not include any amount for franchise payments levied upon the Company by a municipality.

When a municipality, by a franchise or other ordinance approved by the qualified electors of the municipality, levies or imposes upon the Company franchise payments or fees (based upon a percent of gross revenues) to be paid by the Company to the municipality, such franchise payment will be added as a percentage of charges for electric service to the bills of all customers receiving service from the Company within the corporate limits of the municipality exacting said payment.

RIDERS: All applicable riders apply. Please refer to the Applicability section of individual Riders to determine if it is relevant to this Pricing Schedule.

TERM: The Company, at its option, may require a written contract for a year or longer, subject also to special minimum guarantees, which may be necessary in cases warranted by special circumstances or unusually large investments by the Company. Such special minimum guarantees shall be calculated in accordance with the Company's Allowable Expenditure Formula in its Terms and Conditions of Service on file with and approved by the Commission.

Customers who request to be changed to the Power and Light Rate from another rate will remain on the Power and Light Rate for one year before being permitted to change rates again unless they demonstrate a permanent change in electric consumption.

Rates Authorized by the Oklahoma Corporation Commission:

(Effective)	(Order No.)	(Cause/Docket No.)
October 1, 2019	702531	PUD 201800140
July 1, 2018	679358	PUD 201700496
May 1, 2017	662059	PUD 201500273
August 2, 2012	599558	PUD 201100087

Public Utilities Division Stamp

APPROVED
September 27, 2019
DIRECTOR
of
PUBLIC UTILITY DIVISION

OKLAHOMA GAS AND ELECTRIC COMPANY
P. O. Box 321
Oklahoma City, Oklahoma 73101

Rebuttal Exhibit GC-2
4th Revised Sheet No. 15.40
Replacing 3rd Revised Sheet No. 15.40
Date Issued September 19, 2019

STANDARD PRICING SCHEDULE: PL-TOU
POWER AND LIGHT TIME-OF-USE

STATE OF OKLAHOMA
Code No. 36

EFFECTIVE IN: All territory served.

AVAILABILITY: Power and light service. Alternating current. Service will be rendered at one location at one voltage. No resale, breakdown, auxiliary or supplementary service permitted.

The application of this rate is limited to consumers meeting one of the following conditions:

1) Annual Maximum Kilowatt Demand (AkW) during the last 12 months must be greater than or equal to 10 but less than 400 with a Load Factor of 25% or more. The Load Factor calculation is:

$$\text{Load Factor} = \frac{\text{Total Annual kWh}}{(\text{AkW} \times 8760)}$$

Or

2) AkW must be greater than or equal to 400.

Additionally, the application of this rate is limited to consumers with annual kWh consumption of less than 15,000,000 kWh.

APPLICATION OF FUEL COST ADJUSTMENT (FCA): The FCA_{on}, FCA_{off} and FCA_w as defined in the FCA rider shall apply to the energy components within this tariff as follows: The FCA_{on} shall apply to all On-Peak kWh sales; the FCA_{off} shall apply to all Off-Peak kWh sales; and, the FCA_w shall apply to kWh sales during the seven revenue months of November through May.

TRANSMISSION (Service Level 1):

Customer Charge: \$234.00 per month.

Capacity Charge:

Maximum Billing Demand per kW: \$3.57 per kW per month.

Energy Charge:

Summer Season:

All On-Peak kWh: 5.52¢ per kWh per month.

All Off-Peak kWh: 0.48¢ per kWh per month.

Winter Season: All kWh: 0.48¢ per kWh per month.

Rates Authorized by the Oklahoma Corporation Commission:

(Effective)	(Order No.)	(Cause/Docket No.)
October 1, 2019	702531	PUD 201800140
July 1, 2018	679358	PUD 201700496
May 1, 2017	662059	PUD 201500273
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September 27, 2019
DIRECTOR
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OKLAHOMA GAS AND ELECTRIC COMPANY
P. O. Box 321
Oklahoma City, Oklahoma 73101

Rebuttal Exhibit GC-2
5th Revised Sheet No. 15.41
Replacing 4th Revised Sheet No. 15.41
Date Issued September 19, 2019

STANDARD PRICING SCHEDULE: PL-TOU
POWER AND LIGHT TIME-OF-USE

STATE OF OKLAHOMA
Code No. 36

DISTRIBUTION SUBSTATION (Service Level 2):

Customer Charge: \$ 234.00 per month.

Capacity Charge:

Maximum Billing Demand per kW: \$3.95 per kW per month.

Energy Charge:

Summer Season:

All On-Peak kWh: 8.17¢ per kWh per month.

All Off-Peak kWh: 0.84¢ per kWh per month.

Winter Season: All kWh: 0.84¢ per kWh per month.

DISTRIBUTION (Service Level 3):

Customer Charge: \$ 121.00 per month.

Capacity Charge:

Maximum Billing Demand per kW: \$5.39 per kW per month.

Energy Charge:

Summer Season:

All On-Peak kWh: 8.78¢ per kWh per month.

All Off-Peak kWh: 0.92¢ per kWh per month.

Winter Season: All kWh: 0.92¢ per kWh per month.

DISTRIBUTION (Service Level 4):

Customer Charge: \$ 91.00 per month.

Capacity Charge:

Rates Authorized by the Oklahoma Corporation Commission:

(Effective)	(Order No.)	(Cause/Docket No.)
October 1, 2019	702531	PUD 201800140
July 1, 2018	679358	PUD 201700496
May 1, 2017	662059	PUD 201500273
August 2, 2012	599558	PUD 201100087

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of
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OKLAHOMA GAS AND ELECTRIC COMPANY
P. O. Box 321
Oklahoma City, Oklahoma 73101

Rebuttal Exhibit GC-2
5th Revised Sheet No. 15.42
Replacing 4th Revised Sheet No. 15.42
Date Issued September 19, 2019

STANDARD PRICING SCHEDULE: PL-TOU
POWER AND LIGHT TIME-OF-USE

STATE OF OKLAHOMA
Code No. 36

Maximum Billing Demand per kW: \$5.80 per kW per month.

Energy Charge:

Summer Season:

All On-Peak kWh: 8.56¢ per kWh per month.

All Off-Peak kWh: 1.10¢ per kWh per month.

Winter Season: All kWh: 1.10¢ per kWh per month.

SECONDARY (Service Level 5):

Customer Charge: \$79.00 per month.

Capacity Charge:

Maximum Billing Demand per kW: \$ 6.00 per kW per month.

Energy Charge:

Summer Season:

All On-Peak kWh per month: 10.14¢ per kWh per month.

All Off-Peak kWh per month: 1.31¢ per kWh per month.

Winter Season: All kWh: 1.31¢ per kWh per month.

DEFINITION OF SEASON:

Summer Season: The five OG&E Revenue Months of June through October.

On-Peak Hours: From June 1 through September 30, beginning each day at 2:00 p.m. until 7:00 p.m. local time, excluding Saturday, Sundays, Independence Day (as observed) and Labor Day.

Off-Peak Hours: All hours not defined as On-Peak hours.

Winter Season: The seven OG&E Revenue Months of November through May.

Rates Authorized by the Oklahoma Corporation Commission:

(Effective)	(Order No.)	(Cause/Docket No.)
October 1, 2019	702531	PUD 201800140
July 1, 2018	679358	PUD 201700496
May 1, 2017	662059	PUD 201500273
August 2, 2012	599558	PUD 201100087

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OKLAHOMA GAS AND ELECTRIC COMPANY
P. O. Box 321
Oklahoma City, Oklahoma 73101

Rebuttal Exhibit GC-2
4th Revised Sheet No. 15.43
Replacing 3rd Revised Sheet No. 15.43
Date Issued September 19, 2019

STANDARD PRICING SCHEDULE: PL-TOU
POWER AND LIGHT TIME-OF-USE

STATE OF OKLAHOMA
Code No. 36

DETERMINATION OF MAXIMUM DEMAND: The customer's Maximum Demand shall be the maximum rate at which energy is used for any period of 15 consecutive minutes of the month for which the bill is rendered as shown by the Company's demand meter. In the event a customer taking service under this rate has a demand meter with an interval greater than 15 minutes, the Company shall have a reasonable time to change the metering device.

DETERMINATION OF MAXIMUM BILLING DEMAND: The Maximum Billing Demand upon which the capacity charge is based shall be the Maximum Demand as determined above corrected for power factor, as set forth under Power Factor Clause; provided that no Maximum Billing Demand shall be considered as less than 25 percent of the highest Maximum Billing Demand corrected for power factor previously determined during the 12 months ending with the current month.

POWER FACTOR CLAUSE: The consumer shall at all times take and use power in such manner that the power factor shall be as nearly 100 percent as possible, but when the average power factor as determined by continuous measurement of lagging reactive kilovolt-ampere (kVAr) hours is less than 90 percent, the billing demand shall be determined by multiplying the maximum demand, measured by the demand meter for the billing period, by 90 and dividing the product thus obtained by the actual average power factor expressed in percent.

Customers under this schedule that have a minimum of 300 kW Maximum Demand must have suitable measuring equipment at the metering point to determine the customer's monthly maximum kVAr. For all customers with a monthly Maximum Demand of 300 kW or more, the Company shall install suitable measuring equipment to determine the customer's monthly maximum kVAr.

The Company may install suitable measuring equipment at the metering point for any customer to determine the customer's monthly maximum kVAr if, in its sole judgment, such equipment is necessary.

SERVICE LEVELS: For purposes of this rate, the following shall apply:

Service Level 1: Shall mean service at any nominal standard voltage of the Company above 50 kV where service is rendered through a direct tap to the Company's prevailing transmission source.

Service Level 2: Shall mean service at any nominal standard voltage of the Company between 2 kV and 50 kV, both inclusive, where service is rendered through a Company Substation, which has a transmission voltage source, and the point of delivery is at the load side of the substation or from a circuit dedicated to the customer.

Rates Authorized by the Oklahoma Corporation Commission:

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(Effective)	(Order No.)	(Cause/Docket No.)
October 1, 2019	702531	PUD 201800140
July 1, 2018	679358	PUD 201700496
May 1, 2017	662059	PUD 201500273
August 2, 2012	599558	PUD 201100087

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OKLAHOMA GAS AND ELECTRIC COMPANY
P. O. Box 321
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Rebuttal Exhibit GC-2
4th Revised Sheet No. 15.44
Replacing 3rd Revised Sheet No. 15.44
Date Issued September 19, 2019

STANDARD PRICING SCHEDULE: PL-TOU
POWER AND LIGHT TIME-OF-USE

STATE OF OKLAHOMA
Code No. 36

Service Level 3: Shall mean service at any nominal standard voltage of the Company between 2 kV and 50 kV, both inclusive, by a direct tap to the Company's prevailing distribution source from a circuit not dedicated to the customer.

Service Level 4: Shall mean service at any nominal standard voltage of the Company between 2 kV and 50 kV, both inclusive, where service is rendered through transformation from a Company prevailing distribution voltage source (2 kV to 50 kV) to a lower distribution voltage with metering at distribution voltage

Service Level 5: Shall mean service at any nominal standard voltage of the Company less than 2,000 volts with metering at less than 2,000 volts.

Metering Adjustment:

If the Company chooses to install its metering equipment on the load side of the customer's transformers, the kWh billed shall be increased by the amount of the transformer losses calculated as follows:

Service Level 1: 0.50 percent of the total kVA rating of the customer's transformers times 730 hours.

Service Level 3: 0.60 percent of the total kVA rating of the customer's transformers times 730 hours.

LATE PAYMENT CHARGE: A late payment charge in an amount equal to 1.5 percent of the total balance for services and charges remaining unpaid on the due date stated on the bill shall be added to the amount due. The due date as stated on the bill shall be 20 days after the bill is issued.

MINIMUM BILL: The minimum monthly bill shall be the Customer Charge plus the applicable Capacity Charge as computed under the above schedule. The Company shall specify a larger minimum monthly bill, calculated in accordance with the Company's Allowable Expenditure Formula in its Terms and Conditions of Service on file with and approved by the Commission, when necessary to justify the investment required to provide service.

FRANCHISE PAYMENT: The above stated rates do not include any amount for franchise payments levied upon the Company by a municipality.

When a municipality, by a franchise or other ordinance approved by the qualified electors of the municipality, levies or imposes upon the Company franchise payments or fees (based upon a percent of gross revenues) to be paid by the Company to the municipality, such franchise payment

Rates Authorized by the Oklahoma Corporation Commission:

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(Effective)	(Order No.)	(Cause/Docket No.)
October 1, 2019	702531	PUD 201800140
July 1, 2018	679358	PUD 201700496
May 1, 2017	662059	PUD 201500273
August 2, 2012	599558	PUD 201100087

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P. O. Box 321
Oklahoma City, Oklahoma 73101

Rebuttal Exhibit GC-2
4th Revised Sheet No. 15.45
Replacing 3rd Revised Sheet No. 15.45
Date Issued September 19, 2019

STANDARD PRICING SCHEDULE: PL-TOU
POWER AND LIGHT TIME-OF-USE

STATE OF OKLAHOMA
Code No. 36

will be added as a percentage of charges for electric service to the bills of all customers receiving service from the Company within the corporate limits of the municipality exacting said payment.

RIDERS: All applicable riders apply. Please refer to the Applicability section of individual Riders to determine if it is relevant to this Pricing Schedule.

TERM: The Company, at its option, may require a written contract for a year or longer, subject also to special minimum guarantees, which may be necessary in cases warranted by special circumstances or unusually large investments by the Company. Such special minimum guarantees shall be calculated in accordance with the Company's Allowable Expenditure Formula in its Terms and Conditions of Service filed with and approved by the Commission.

Customers who request to be changed to the Power and Light Time-of-Use rate from another rate will remain on the Power and Light Time-of-Use for one year before being permitted to change rates again unless they demonstrate a permanent change in electric consumption.

Rates Authorized by the Oklahoma Corporation Commission:

(Effective)	(Order No.)	(Cause/Docket No.)
October 1, 2019	702531	PUD 201800140
July 1, 2018	679358	PUD 201700496
May 1, 2017	662059	PUD 201500273
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OKLAHOMA GAS AND ELECTRIC COMPANY
P. O. Box 321
Oklahoma City, Oklahoma 73101

Rebuttal Exhibit GC-2
1st Revised Sheet No. 17.00
Replacing Original Sheet No. 17.00
Date Issued September 19, 2019

STANDARD PRICING SCHEDULE: LPL-1
LARGE POWER AND LIGHT STANDARD

STATE OF OKLAHOMA
Code No. 60

EFFECTIVE IN: All territory served.

AVAILABILITY: Power and light service. Alternating current. Service will be rendered at one location at one voltage. No resale, breakdown, auxiliary or supplementary service permitted.

The application of this rate is limited to consumers meeting all of the following conditions:

1) Load Factor of 70% or more. The Load Factor calculation is:

$$\text{Load Factor} = \frac{\text{Total Annual kWh}}{(AkW \times 8760)}$$

where AkW is the Annual Maximum Kilowatt Demand

and

2) during the 12 months ending with the current month, has established a minimum annual kWh consumption of 150,000,000 kWh

and

3) who are Service Level 1 or Service Level 2 classification.

APPLICATION OF FUEL COST ADJUSTMENT (FCA): The FCA_s and FCA_w as defined in the FCA rider shall apply to the energy components within this tariff as follows: The FCA_s shall apply to kWh sales during the five revenue months of June through October; and, the FCA_w shall apply to kWh sales during the seven revenue months of November through May.

TRANSMISSION (Service Level 1):

Customer Charge: \$300.00 per month.

Capacity Charge:

Maximum Billing Demand: \$8.262 per kW per month.

Energy Charge:

All kWh per month: 0.31¢ per kWh.

DISTRIBUTION SUBSTATION (Service Level 2):

Rates Authorized by the Oklahoma Corporation Commission:		
(Effective)	(Order No.)	(Cause/Docket No.)
October 1, 2019	702531	PUD 201800140
July 1, 2018	679358	PUD 201700496

Public Utilities Division Stamp

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September 27, 2019
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OKLAHOMA GAS AND ELECTRIC COMPANY
P. O. Box 321
Oklahoma City, Oklahoma 73101

Rebuttal Exhibit GC-2
1st Revised Sheet No. 17.01
Replacing Original Sheet No. 17.01
Date Issued September 19, 2019

STANDARD PRICING SCHEDULE: LPL-1

STATE OF OKLAHOMA

LARGE POWER AND LIGHT STANDARD

Code No. 60

Customer Charge: \$300.00 per month.

Capacity Charge:

Maximum Billing Demand: \$8.262 per kW per month.

Energy Charge:

All kWh per month: 0.31¢ per kWh.

Rates Authorized by the Oklahoma Corporation Commission:

(Effective)	(Order No.)	(Cause/Docket No.)
October 1, 2019	702531	PUD 201800140
July 1, 2018	679358	PUD 201700496

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September 27, 2019
DIRECTOR
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OKLAHOMA GAS AND ELECTRIC COMPANY
P. O. Box 321
Oklahoma City, Oklahoma 73101

Rebuttal Exhibit GC-2
1st Revised Sheet No. 17.02
Replacing Original Sheet No. 17.02
Date Issued September 19, 2019

STANDARD PRICING SCHEDULE: LPL-1
LARGE POWER AND LIGHT STANDARD

STATE OF OKLAHOMA
Code No. 60

DEFINITION OF SEASON:

Summer Season: The five OG&E Revenue Months of June through October.

Winter Season: The seven OG&E Revenue Months of November through May.

DETERMINATION OF MAXIMUM DEMAND: The customer's Maximum Demand shall be the maximum rate at which energy is used for any period of 15 consecutive minutes of the month for which the bill is rendered as shown by the Company's demand meter.

DETERMINATION OF MAXIMUM BILLING DEMAND: The Maximum Billing Demand upon which the capacity charge is based shall be the Maximum Demand as determined above corrected for power factor, as set forth under Power Factor Clause; provided that no Maximum Billing Demand shall be considered as less than 80 percent of the highest Maximum Billing Demand corrected for power factor previously determined during the 12 months ending with the current month.

POWER FACTOR CLAUSE: The consumer shall at all times take and use power in such manner that the power factor shall be as nearly 100 percent as possible, but when the average power factor as determined by continuous measurement of lagging reactive kilovolt-ampere (kVAr) hours is less than 90 percent, the billing demand shall be determined by multiplying the maximum demand, measured by the demand meter for the billing period, by 90 and dividing the product thus obtained by the actual average power factor expressed in percent.

Customers under this schedule must have suitable measuring equipment at the metering point to determine the customer's monthly maximum kVAr and the Company shall install suitable measuring equipment to determine the customer's monthly maximum kVAr.

SERVICE LEVELS: For purposes of this rate, the following shall apply:

Service Level 1: Shall mean service at any nominal standard voltage of the Company above 50 kV where service is rendered through a direct tap to the Company's prevailing transmission source.

Service Level 2: Shall mean service at any nominal standard voltage of the Company between 2 kV and 50 kV, both inclusive, where service is rendered through a Company Substation which has a transmission voltage source and the point of delivery is at the load side of the substation or from a circuit dedicated to the customer.

Rates Authorized by the Oklahoma Corporation Commission:

(Effective)	(Order No.)	(Cause/Docket No.)
October 1, 2019	702531	PUD 201800140
July 1, 2018	679358	PUD 201700496

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September 27, 2019
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P. O. Box 321
Oklahoma City, Oklahoma 73101

Rebuttal Exhibit GC-2
1st Revised Sheet No. 17.03
Replacing Original Sheet No. 17.03
Date Issued September 19, 2019

STANDARD PRICING SCHEDULE: LPL-1

STATE OF OKLAHOMA

LARGE POWER AND LIGHT STANDARD

Code No. 60

Metering Adjustment:

If the Company chooses to install its metering equipment on the load side of the customers' transformers, the kWh billed shall be increased by the amount of the transformer losses calculated as follows:

Service Level 1: 0.50 percent of the total kVA rating of the customer's transformers times 730 hours.

LATE PAYMENT CHARGE: A late payment charge in an amount equal to 1.5 percent of the total balance for services and charges remaining unpaid on the due date stated on the bill shall be added to the amount due. The due date as stated on the bill shall be 20 days after the bill is issued.

MINIMUM BILL: The minimum monthly bill shall be the Customer Charge plus the applicable Capacity Charge as computed under the above schedule. The Company shall specify a larger minimum monthly bill, calculated in accordance with the Company's Allowable Expenditure Formula in its Terms and Conditions of Service on file with and approved by the Commission, when necessary to justify the investment required to provide service.

FRANCHISE PAYMENT: The above stated rates do not include any amount for franchise payments levied upon the Company by a municipality.

When a municipality, by a franchise or other ordinance approved by the qualified electors of the municipality, levies or imposes upon the Company franchise payments or fees (based upon a percent of gross revenues) to be paid by the Company to the municipality, such franchise payment will be added as a percentage of charges for electric service to the bills of all customers receiving service from the Company within the corporate limits of the municipality exacting said payment.

RIDERS: All applicable riders apply that would also apply to Large Power and Light Time-of-Use-Rate. Please refer to the Applicability section of individual Riders to determine if it is relevant to this Pricing Schedule.

TERM: The Company, at its option, may require a written contract for a year or longer, subject also to special minimum guarantees, which may be necessary in cases warranted by special circumstances or unusually large investments by the Company. Such special minimum guarantees shall be calculated in accordance with the Company's Allowable Expenditure Formula in its Terms and Conditions of Service filed with and approved by the Commission.

Customers receiving service on this schedule will remain on this schedule as long as their annual kWh consumption is 150,000,000 kWh or greater and their annual load factor is at least 70%.

Rates Authorized by the Oklahoma Corporation Commission:

(Effective)	(Order No.)	(Cause/Docket No.)
October 1, 2019	702531	PUD 201800140
July 1, 2018	679358	PUD 201700496

Public Utilities Division Stamp

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September 27, 2019
DIRECTOR
of
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OKLAHOMA GAS AND ELECTRIC COMPANY
P. O. Box 321
Oklahoma City, Oklahoma 73101

Rebuttal Exhibit GC-2
5th Revised Sheet No. 18.00
Replacing 4th Revised Sheet No. 18.00
Date Issued September 19, 2019

STANDARD PRICING SCHEDULE: LPL-TOU
LARGE POWER AND LIGHT TIME-OF-USE

STATE OF OKLAHOMA
Code No. 35

EFFECTIVE IN: All territory served.

AVAILABILITY: Power and light service. Alternating current. Service will be rendered at one location at one voltage. No resale, breakdown, auxiliary or supplementary service permitted.

The application of this rate is limited to any consumer who, during the 12 months ending with the current month, has established a minimum annual kWh consumption of 15,000,000 kWh.

APPLICATION OF FUEL COST ADJUSTMENT (FCA): The FCA_{on}, FCA_{off} and FCA_w as defined in the FCA rider shall apply to the energy components within this tariff as follows: The FCA_{on} shall apply to all On-Peak kWh sales; the FCA_{off} shall apply to all Off-Peak kWh sales; and, the FCA_w shall apply to kWh sales during the seven revenue months of November through May.

TRANSMISSION (Service Level 1):

Customer Charge: \$300.00 per month.

Capacity Charge:

Maximum Billing Demand: \$6.74 per kW per month.

Energy Charge:

Summer Season:

On-Peak kWh per month: 4.43¢ per kWh.

Off-Peak kWh per month: 0.31¢ per kWh.

Winter Season:

All kWh per month: 0.31¢ per kWh.

DISTRIBUTION SUBSTATION (Service Level 2):

Customer Charge: \$300.00 per month.

Capacity Charge:

Maximum Billing Demand: \$7.128 per kW per month.

Rates Authorized by the Oklahoma Corporation Commission:

(Effective)	(Order No.)	(Cause/Docket No.)
October 1, 2019	702531	PUD 201800140
July 1, 2018	679358	PUD 201700496
May 1, 2017	662059	PUD 201500273
August 2, 2012	599558	PUD 201100087

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OKLAHOMA GAS AND ELECTRIC COMPANY
P. O. Box 321
Oklahoma City, Oklahoma 73101

Rebuttal Exhibit GC-2
5th Revised Sheet No. 18.01
Replacing 4th Revised Sheet No. 18.01
Date Issued September 19, 2019

STANDARD PRICING SCHEDULE: LPL-TOU
LARGE POWER AND LIGHT TIME-OF-USE

STATE OF OKLAHOMA
Code No. 35

Energy Charge:

Summer Season:

On-Peak kWh per month: 4.43¢ per kWh per month.

Off-Peak kWh per month: 0.31¢ per kWh per month.

Winter Season:

All kWh per month: 0.31¢ per kWh.

DISTRIBUTION (Service Levels 3):

Customer Charge: \$135.00 per month.

Capacity Charge:

Maximum Billing Demand: \$8.12 per kW per month.

Energy Charge:

Summer Season:

On-Peak kWh per month: 7.58¢ per kWh per month.

Off-Peak kWh per month: 0.39¢ per kWh per month.

Rates Authorized by the Oklahoma Corporation Commission:

(Effective)	(Order No.)	(Cause/Docket No.)
October 1, 2019	702531	PUD 201800140
July 1, 2018	679358	PUD 201700496
May 1, 2017	662059	PUD 201500273
August 2, 2012	599558	PUD 201100087

Public Utilities Division Stamp

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September 27, 2019
DIRECTOR
of
PUBLIC UTILITY DIVISION

OKLAHOMA GAS AND ELECTRIC COMPANY
P. O. Box 321
Oklahoma City, Oklahoma 73101

Rebuttal Exhibit GC-2
4th Revised Sheet No. 18.02
Replacing 3rd Revised Sheet No. 18.02
Date Issued September 19, 2019

STANDARD PRICING SCHEDULE: LPL-TOU
LARGE POWER AND LIGHT TIME-OF-USE

STATE OF OKLAHOMA
Code No. 35

Winter Season:

All kWh per month: 0.39¢ per kWh per month.

DISTRIBUTION (Service Levels 4):

Customer Charge: \$135.00 per month.

Capacity Charge:

Maximum Billing Demand: \$8.15 per kW per month.

Energy Charge:

Summer Season:

On-Peak kWh per month: 7.58¢ per kWh per month.

Off-Peak kWh per month: 0.39¢ per kWh per month.

Winter Season:

All kWh per month: 0.39¢ per kWh per month.

SECONDARY (Service Level 5):

Customer Charge: \$77.00 per month.

Capacity Charge:

Maximum Billing Demand: \$11.51 per kW per month.

Energy Charge:

Summer Season:

On-Peak kWh per month: 8.44¢ per kWh per month.

Off-Peak kWh per month: 0.73¢ per kWh per month

Winter Season:

Rates Authorized by the Oklahoma Corporation Commission:

Public Utilities Division Stamp

(Effective)	(Order No.)	(Cause/Docket No.)
October 1, 2019	702531	PUD 201800140
July 1, 2018	679358	PUD 201700496
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Rebuttal Exhibit GC-2
4th Revised Sheet No. 18.03
Replacing 3rd Revised Sheet No. 18.03
Date Issued September 19, 2019

STANDARD PRICING SCHEDULE: LPL-TOU
LARGE POWER AND LIGHT TIME-OF-USE

STATE OF OKLAHOMA
Code No. 35

All kWh per month: 0.73¢ per kWh per month.

DEFINITION OF SEASON:

Summer Season: The five OG&E Revenue Months of June through October.

On-Peak Hours: From June 1 through September 30, beginning each day at 2:00 p.m. until 7:00 p.m. local time, excluding Saturday, Sundays, Independence Day (as observed) and Labor Day.

Off-Peak Hours: All hours not defined as On-Peak hours.

Winter Season: The seven OG&E Revenue Months of November through May.

DETERMINATION OF MAXIMUM DEMAND: The customer's Maximum Demand shall be the maximum rate at which energy is used for any period of 15 consecutive minutes of the month for which the bill is rendered as shown by the Company's demand meter.

DETERMINATION OF MAXIMUM BILLING DEMAND: The Maximum Billing Demand upon which the capacity charge is based shall be the Maximum Demand as determined above corrected for power factor, as set forth under Power Factor Clause; provided that no Maximum Billing Demand shall be considered as less than 25 percent of the highest Maximum Billing Demand corrected for power factor previously determined during the 12 months ending with the current month.

POWER FACTOR CLAUSE: The consumer shall at all times take and use power in such manner that the power factor shall be as nearly 100 percent as possible, but when the average power factor as determined by continuous measurement of lagging reactive kilovolt-ampere (kVAr) hours is less than 90 percent, the billing demand shall be determined by multiplying the maximum demand, measured by the demand meter for the billing period, by 90 and dividing the product thus obtained by the actual average power factor expressed in percent.

Customers under this schedule that have a minimum of 300 kW Maximum Demand must have suitable measuring equipment at the metering point to determine the customer's monthly maximum kVAr. For all customers with a monthly Maximum Demand of 300 kW or more, the Company shall install suitable measuring equipment to determine the customer's monthly maximum kVAr.

Rates Authorized by the Oklahoma Corporation Commission:

(Effective)	(Order No.)	(Cause/Docket No.)
October 1, 2019	702531	PUD 201800140
July 1, 2018	679358	PUD 201700496
May 1, 2017	662059	PUD 201500273
August 2, 2012	599558	PUD 201100087

Public Utilities Division Stamp

APPROVED
September 27, 2019
DIRECTOR
of
PUBLIC UTILITY DIVISION

OKLAHOMA GAS AND ELECTRIC COMPANY
P. O. Box 321
Oklahoma City, Oklahoma 73101

Rebuttal Exhibit GC-2
4th Revised Sheet No. 18.04
Replacing 3rd Revised Sheet No. 18.04
Date Issued September 19, 2019

STANDARD PRICING SCHEDULE: LPL-TOU
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The Company may install suitable measuring equipment at the metering point for any customer to determine the customer's monthly maximum kVA_r if, in its sole judgment, such equipment is necessary.

SERVICE LEVELS: For purposes of this rate, the following shall apply:

Service Level 1: Shall mean service at any nominal standard voltage of the Company above 50 kV where service is rendered through a direct tap to the Company's prevailing transmission source.

Service Level 2: Shall mean service at any nominal standard voltage of the Company between 2 kV and 50 kV, both inclusive, where service is rendered through a Company Substation which has a transmission voltage source and the point of delivery is at the load side of the substation or from a circuit dedicated to the customer.

Service Level 3: Shall mean service at any nominal standard voltage of the Company between 2 kV and 50 kV, both inclusive, by a direct tap to the Company's prevailing distribution source from a circuit not dedicated to the customer.

Service Level 4: Shall mean service at any nominal standard voltage of the Company between 2 kV and 50 kV, both inclusive, where service is rendered through transformation from a Company prevailing distribution voltage source (2 kV to 50 kV) to a lower distribution voltage with metering at distribution voltage.

Service Level 5: Shall mean service at any nominal standard voltage of the Company less than 2,000 volts with metering at less than 2,000 volts.

Metering Adjustment:

If the Company chooses to install its metering equipment on the load side of the customers' transformers, the kWh billed shall be increased by the amount of the transformer losses calculated as follows:

Service Level 1: 0.50 percent of the total kVA rating of the customer's transformers times 730 hours.

Service Level 3: 0.60 percent of the total kVA rating of the customer's transformers times 730 hours.

Rates Authorized by the Oklahoma Corporation Commission:

(Effective)	(Order No.)	(Cause/Docket No.)
October 1, 2019	702531	PUD 201800140
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LATE PAYMENT CHARGE: A late payment charge in an amount equal to 1.5 percent of the total balance for services and charges remaining unpaid on the due date stated on the bill shall be added to the amount due. The due date as stated on the bill shall be 20 days after the bill is issued.

MINIMUM BILL: The minimum monthly bill shall be the Customer Charge plus the applicable Capacity Charge as computed under the above schedule. The Company shall specify a larger minimum monthly bill, calculated in accordance with the Company's Allowable Expenditure Formula in its Terms and Conditions of Service on file with and approved by the Commission, when necessary to justify the investment required to provide service.

FRANCHISE PAYMENT: The above stated rates do not include any amount for franchise payments levied upon the Company by a municipality.

When a municipality, by a franchise or other ordinance approved by the qualified electors of the municipality, levies or imposes upon the Company franchise payments or fees (based upon a percent of gross revenues) to be paid by the Company to the municipality, such franchise payment will be added as a percentage of charges for electric service to the bills of all customers receiving service from the Company within the corporate limits of the municipality exacting said payment.

RIDERS: All applicable riders apply. Please refer to the Applicability section of individual Riders to determine if it is relevant to this Pricing Schedule.

TERM: The Company, at its option, may require a written contract for a year or longer, subject also to special minimum guarantees, which may be necessary in cases warranted by special circumstances or unusually large investments by the Company. Such special minimum guarantees shall be calculated in accordance with the Company's Allowable Expenditure Formula in its Terms and Conditions of Service filed with and approved by the Commission.

Customers receiving service on the Large Power and Light Time-of-Use Rate will remain on the Large Power and Light Time-of-Use Rate as long as their annual kWh consumption is 15,000,000 kWh or greater.

Rates Authorized by the Oklahoma Corporation Commission:

(Effective)	(Order No.)	(Cause/Docket No.)
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Public Utilities Division Stamp

APPROVED
September 27, 2019
DIRECTOR
of
PUBLIC UTILITY DIVISION

BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

IN THE MATTER OF THE APPLICATION OF)
OKLAHOMA GAS AND ELECTRIC COMPANY)
FOR AN ORDER OF THE COMMISSION)
APPROVING A RECOVERY MECHANISM FOR) CAUSE NO. PUD 202000021
EXPENDITURES RELATED TO THE)
OKLAHOMA GRID ENHANCEMENT PLAN)

**OKLAHOMA INDUSTRIAL ENERGY CONSUMERS RESPONSES TO
OKLAHOMA GAS AND ELECTRIC COMPANY'S FIRST SET OF DATA REQUESTS**

Question No. 1-3 Please provide a definition of a Service Level 2 Customer.

Response No. 1-3 The definition for Service Level 2 is set forth in OG&E's tariffs on file with
the Commission.

SPONSORED BY: Mark Garrett

DATE: September 4, 2020

By responding to these Data Requests, OIEC is not acknowledging that the provided information is relevant or material and OIEC 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.