

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 AUTHORIZING)	CASE NO. PUD2023-000087
APPLICANT TO MODIFY ITS RATES,)	
CHARGES, AND TARIFFS FOR RETAIL)	
ELECTRIC SERVICE IN OKLAHOMA)	

**RESPONSIVE TESTIMONY AND EXHIBITS OF JUSTIN BIEBER
ON BEHALF OF CMC STEEL OKLAHOMA**

COMES NOW, CMC Steel Oklahoma (“CMC”) by and through the undersigned counsel, and, pursuant to the Preliminary Order entered in this cause, hereby submits the Responsive Testimony and Exhibits of Justin Bieber in the above captioned proceeding. Thank you for your attention to this matter.

Respectfully submitted,

Paul D. Trimble, OBA No. 13790
 Trimble Law Group, PLLC
 5510 N. Francis Avenue
 Oklahoma City, Oklahoma 73118
 Telephone: (405) 594-7100
 Email: ptrimble@trimblelawgroup.com

Attorney for CMC Steel Oklahoma

May 3, 2024

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I. INTRODUCTION

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Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Justin Bieber. My business address is 111 E Broadway, Suite 1200, Salt Lake City, Utah, 84111.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am a Principal at Energy Strategies, LLC. Energy Strategies is a private consulting firm specializing in economic and policy analysis applicable to energy production, transportation, and consumption.

Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?

A. My testimony is being sponsored by CMC Steel Oklahoma (“CMC”). CMC operates a steel mill that receives electric service from Oklahoma Gas & Electric (“OG&E” or the “Company”).

Q. PLEASE DESCRIBE YOUR PROFESSIONAL EXPERIENCE AND QUALIFICATIONS.

A. My academic background is in business and engineering. I earned a Bachelor of Science in Mechanical Engineering from Duke University in 2006 and a Master of Business Administration from the University of Southern California in 2012. I am also a registered Professional Civil Engineer in the state of California.

I joined Energy Strategies in 2017, where I provide regulatory and technical support on a variety of energy issues, including regulatory services, transmission and renewable development, and financial and economic analyses. I have also filed and supported the development of testimony before various state utility regulatory commissions.

Prior to joining Energy Strategies, I held positions at Pacific Gas and Electric Company as Manager of Transmission Project Development, ISO Relations and FERC Policy Principal, and Supervisor of Electric Generator Interconnections. During my career at Pacific Gas and Electric

1 Company, I supported multiple facets of utility operations, and led efforts in policy, regulatory,
2 and strategic initiatives, including supporting the development of testimony before and submittal
3 of comments to the FERC, California ISO, and the California Public Utilities Commission. Prior
4 to my work at Pacific Gas & Electric, I was a project manager and engineer for heavy construction
5 bridge and highway projects.

6 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?**

7 A. No, this is my first opportunity to testify before this Commission.

8 **Q. HAVE YOU TESTIFIED BEFORE UTILITY REGULATORY COMMISSIONS IN**
9 **OTHER STATES?**

10 A. Yes. I have testified before state utility commissions in Colorado, Indiana, Kentucky, Michigan,
11 Montana, Nevada, New Mexico, North Carolina, Ohio, Oregon, Pennsylvania, Texas, Utah,
12 Virginia, Washington, and Wisconsin.

13

14 **II. OVERVIEW AND CONCLUSIONS**

15 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

16 A. My testimony addresses the following topics:

- 17 1) OG&E's proposed class cost of service study ("COSS");
18 2) OG&E's proposed revenue allocation; and
19 3) OG&E's proposed modifications to the Load Reduction ("LR") tariff.

20 **Q. PLEASE SUMMARIZE YOUR PRIMARY RECOMMENDATIONS.**

21 A. I offer the following primary recommendations and conclusions:

- 1 1) I recommend that the Commission order OG&E to allocate transmission costs among
2 Oklahoma retail customer classes based on a four coincident peak (“4 CP”) allocator,
3 consistent with how OG&E has allocated such costs in prior cases.
- 4 2) I recommend that the Commission order OG&E to continue to allocate wind production plant
5 based on the same 4 CP average and excess (“4 CP A&E”) allocator that is used allocate all
6 other production plant.
- 7 3) OG&E’s proposed revenue allocation methodology would limit the maximum base rate
8 increase for any customer class to no more than 135% of the retail system average rate increase
9 and the minimum base rate increase to no less than 0%. Given the circumstances of this case,
10 I agree that OG&E’s stated revenue allocation methodology is reasonable. However, OG&E’s
11 proposed revenue allocation also includes arbitrary rate mitigations for certain customer
12 classes that are not required to achieve the proposed revenue allocation *methodology*. I
13 recommend that OG&E’s proposed maximum and minimum base rate increase limits be
14 applied consistently across all customer classes and any necessary rate mitigation subsidies
15 should be spread pro rata among the remaining customer classes.
- 16 4) I recommend that the Commission reject OG&E’s proposal to remove the option for
17 subscribers of the Day Ahead Pricing (“DAP”) or Flex Pricing (“FP”) tariffs to co-subscribe
18 to the LR tariff. Load reductions are a valuable and effective way for utilities to reduce capacity
19 requirements and help mitigate the need for expensive new infrastructure and should not be
20 unnecessarily limited.

1 **III. CLASS COST OF SERVICE STUDY**

2 **Q. WHAT IS THE PURPOSE OF COST OF SERVICE ANALYSIS?**

3 A. A cost of service analysis is conducted to assist in determining appropriate rates for each customer
4 class. It involves the assignment of revenues, expenses, and rate base to each customer class and
5 includes the following steps:

- 6 • *Functionalization*: Separating the utility's costs in accordance with the various *functions* of its
7 system (*e.g.*, generation (or production), transmission, and distribution);
- 8 • *Classification*: Classifying the utility's costs with respect to the manner in which they are
9 incurred by customers (*e.g.*, customer-related costs, demand-related costs, and energy-related
10 costs); and
- 11 • *Allocation*: Allocating responsibility for the utility's costs to the various customer classes
12 based on principles of cost causation.

13 **Q. WHAT IS THE ROLE OF THE COST OF SERVICE ANALYSIS IN SETTING RATES?**

14 A. Each of the three steps above has an important role in the ratemaking process. Cost
15 functionalization guides classification and the allocation method based on the utility function
16 served.

17 The classification of costs informs the selection of allocation methods, (*i.e.*, demand,
18 energy, or customer-based). The classification of costs is also critical to the rate design process
19 (*i.e.*, in determining the proper customer charge, demand charge, and energy charge for each rate
20 schedule).

21 Finally, the allocation of costs to customer classes guides the revenue allocation across
22 customer classes. In determining revenue allocation, it is important to align rates with cost
23 causation to the greatest extent practicable. Properly aligning rates with the costs caused by each

1 customer class is essential for ensuring fairness, as it minimizes cross subsidies among customers.

2 It also sends proper price signals, which improves efficiency in resource utilization.

3

4 **A. Transmission Cost Allocation**

5 **Q. HOW DOES OG&E PROPOSE TO ALLOCATE TRANSMISSION COSTS AMONG**
6 **RETAIL CLASSES WITHIN THE OKLAHOMA JURISDICTION?**

7 A. OG&E's cost of service witness Lauren E. Maxey explains that OG&E is proposing to use a 12
8 coincident peak ("12 CP") allocator to allocate transmission costs within the Oklahoma
9 jurisdiction.¹

10 **Q. HOW HAS OG&E HISTORICALLY ALLOCATED TRANSMISSION COSTS AMONG**
11 **RETAIL CLASSES WITHIN THE OKLAHOMA JURISDICTION?**

12 A. According to Ms. Maxey, the 4 CP allocator has been used to allocate transmission costs among
13 customer classes in Oklahoma.² Thus, the Company's proposal to change to a 12 CP allocation
14 method for customer classes in Oklahoma in this proceeding would represent a departure from its
15 past practice.

16 **Q. DOES OG&E ALLOCATE TRANSMISSION COSTS DIFFERENTLY IN ITS OTHER**
17 **JURISDICTIONS?**

18 A. Yes. According to Ms. Maxey, OG&E allocates transmission costs using the 12 CP allocator across
19 its jurisdictions and also within its other jurisdictions.³

¹ OG&E Direct Testimony of Lauren E. Maxey at 17:22-23.

² *Id.* at 18:4-6.

³ *Id.* at 18:2-4.

1 **Q. CAN YOU PLEASE EXPLAIN THE DIFFERENCE BETWEEN A 4 CP AND 12 CP**
2 **ALLOCATION METHOD.**

3 A. A 12 CP allocation method assigns costs to customer classes based on the 12 monthly coincident
4 peak demands for that class during every month of the year. In contrast, a 4 CP allocation method
5 would assign transmission costs to customer classes based on the coincident peak demands for
6 each customer class during the summer peak months of June through September.

7 **Q. WHAT JUSTIFICATION DOES OG&E PROVIDE TO SUPPORT ITS PROPOSAL TO**
8 **CHANGE THE OKLAHOMA TRANSMISSION COST ALLOCATION METHOD FROM**
9 **4 CP TO 12 CP?**

10 A. Ms. Maxey claims that a 12 CP allocator makes sense when you consider that Southwest Power
11 Pool (“SPP”) plans for and operates the transmission grid in order to provide access to the most
12 cost-effective power to all customers throughout the SPP footprint across all twelve months of the
13 year. She alleges that transmission is not built to only meet peak demand in certain seasons, but to
14 transmit electric energy from generating facilities during all months of the year. Ms. Maxey also
15 explains that SPP utilizes a 12 CP allocator to assign costs across its footprint and that OG&E uses
16 the 12 CP method to allocate transmission costs in its other jurisdictions.⁴

17 Lastly, Ms. Maxey claims that the 4 CP method for allocating transmission costs allows
18 certain customer classes to receive the benefits of transmission while not paying their proportionate
19 share of plant costs. In support of this claim, Ms. Maxey provides a chart that demonstrates that
20 Oklahoma retail customer classes would be assigned differing levels of transmission costs
21 depending on whether the 4 CP or 12 CP allocation method is utilized.⁵

⁴ *Id.* at 18:21-19:2.

⁵ *Id.* at 19:3-5.

1 **Q. WHAT IS YOUR ASSESSMENT OF OG&E'S PROPOSAL TO CHANGE THE**
2 **OKLAHOMA RETAIL TRANSMISSION COST ALLOCATOR FROM 4 CP TO 12 CP?**

3 A. I recommend that the Commission reject OG&E's proposal to change its transmission cost
4 allocator from the 4 CP to the 12 CP method and instead continue to utilize the 4 CP allocator.
5 Although transmission is typically utilized throughout the year, the underlying cost causation is
6 driven by the need to plan and build a transmission system that can serve peak loads. OG&E is a
7 summer peaking utility with very pronounced summer coincident peaks relative to the rest of the
8 year and the transmission system is planned in order to meet those peak needs. The 4 CP allocation
9 method more accurately aligns with cost causation driven by the needs of OG&E's summer
10 peaking system.

11 **Q. WHEN WOULD IT BE APPROPRIATE TO UTILIZE A 12 CP ALLOCATOR TO**
12 **ALLOCATE TRANSMISSION COSTS?**

13 A. According to the National Association of Regulatory Utility Commissioners Electric Utility Cost
14 Allocation Manual ("NARUC Manual"), a 12 CP allocator can be appropriate when there are not
15 significant variations in demand throughout the year. Specifically, the NARUC Manual states that:

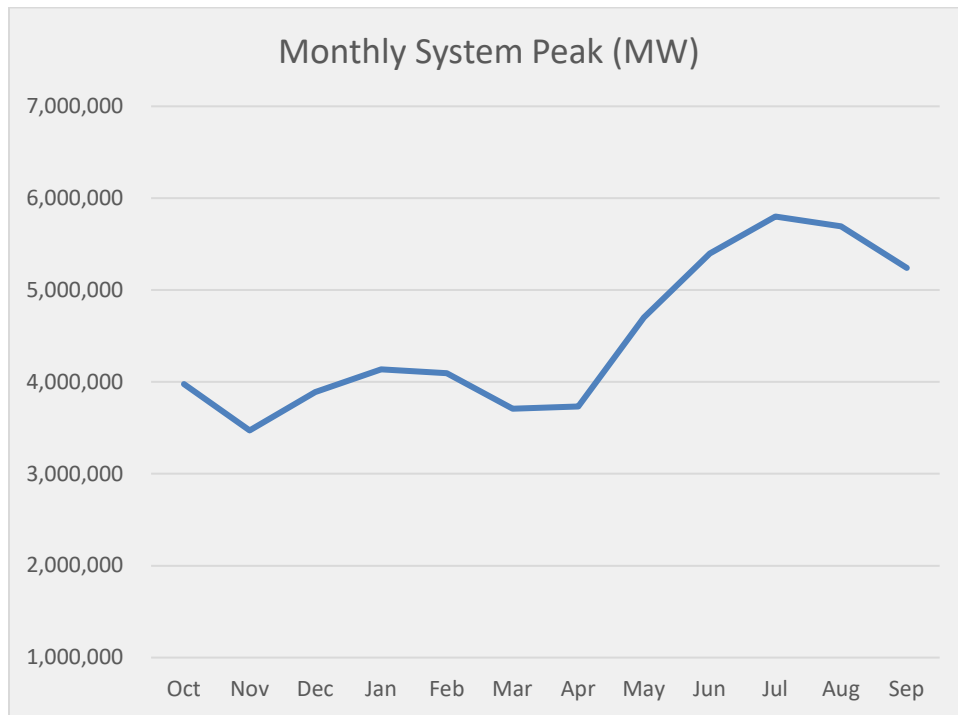
16 [t]he utilization of a "12 CP" allocation method is based on the principle that a
17 utility installs facilities to maintain a reasonably constant level of reliability
18 throughout the year or that significant variations in monthly peak demands are not
19 present. Under this method, no single peak demand or seasonal peak demands are
20 of any significantly greater magnitude than any of the other monthly coincident
21 peak demands. Thus, the relative importance of each month is considered.⁶

22 **Q. DO OG&E'S OKLAHOMA RETAIL LOADS MEET THE CRITERIA IN THE NARUC**
23 **MANUAL FOR THE UTILIZATION OF THE 12 CP METHOD TO ALLOCATE**
24 **TRANSMISSION COSTS?**

⁶ NARUC Electric Utility Cost Allocation Manual at 79 (Jan. 1992).

1 A. No. As can be seen in Figure JB-1 below, OG&E’s Oklahoma retail peaks vary significantly
 2 throughout the year and the seasonal demand clearly peaks during the summer months.

3 **Figure JB-1**
 4 **OG&E Oklahoma Retail Monthly System Peaks⁷**
 5 **Test Year Ending September 30, 2023**



6 **Q. HAVE YOU PERFORMED ANY QUANTITATIVE ANALYSIS OF OG&E’S SYSTEM**
 7 **PEAKS TO SUPPORT YOUR RECOMMENDATION THAT THE 4 CP ALLOCATION**
 8 **METHOD IS APPROPRIATE TO ALLOCATE OG&E’S OKLAHOMA RETAIL**
 9 **TRANSMISSION COSTS?**

10 A. Yes. My recommendation is supported by the results of the three Federal Energy Regulatory
 11 Commission (“FERC”) coincident peak (“CP”) tests. Historically, FERC has considered three
 12 quantitative tests in determining whether a system is better characterized as three coincident peak

⁷ OG&E Cost of Service Study Workpaper “Okla PUD 2023000087 to File,” ‘DEMANDS @ SYSTEM PEAKS (CPsys), CPsys62.’

1 (“3 CP”) or 12 CP.⁸ Based on OG&E’s Oklahoma retail monthly peak loads during the test year,
2 none of the results of these FERC CP tests meet the criteria that FERC considers to be indicative
3 of a 12 CP system.

4 **Q. CAN YOU PLEASE DESCRIBE THE THREE FERC CP TESTS?**

5 A. The three FERC CP tests are summarized below:

6 1) On and Off Peak Test: compares the average of the monthly system peaks during the on-peak
7 months, as a percentage of the annual peak, to the average of the system peaks during the off-
8 peak months, as a percentage of the annual peak. Generally, FERC has held that a 19% or less
9 difference between these two figures supports the use of the 12 CP method.

10 2) Low to Annual Peak Test: compares the lowest monthly peak as a percentage of the annual
11 monthly peak. FERC considers a range of 66% or higher as indicative of a 12 CP system.

12 3) Average to Annual Peak Test: computes the average of the twelve monthly peaks as a
13 percentage of the annual peak. Generally, the range for a utility system to be considered 12 CP
14 is 81% or higher.⁹

15 **Q. WHAT ARE THE RESULTS OF THE FERC CP TESTS BASED ON OG&E’S**
16 **OKLAHOMA RETAIL MONTHLY PEAKS DURING THE TEST YEAR?**

17 A. The results of the FERC CP tests are presented in Exhibit JB-1 and summarized in Table JB-1
18 below.

⁸ *Golden Spread Electric Cooperative, Inc., Lyntegar Electric Cooperative, Inc., Farmers’ Electric Cooperative, Inc., Lea County Electric Cooperative, Inc., Central Valley Electric Cooperative, Inc., Roosevelt County Electric Cooperative, Inc. v. Southwestern Public Service Company*, Docket Nos. EL05-19-004 and ER05-168-001, Opinion No. 501-A Order on Rehearing, ¶ 27 (Aug. 15, 2013).

⁹ *Id.*

**Table JB-1
FERC CP Test Results
For OG&E Oklahoma Retail Monthly Peak Loads**

	On and Off Peak Test	Low-to-Annual Peak Test	Average to Annual Peak Test
Historical Commission Range for 12 CP	19% or Less	66% of Higher	81% or Higher
OG&E OK Retail Load	27%	60%	77%
Result	Does Not Support 12 CP	Does Not Support 12 CP	Does Not Support 12 CP

4 **Q. THE RESULTS OF THE FERC CP TESTS THAT YOU SUMMARIZE ABOVE ARE**
 5 **BASED ON OG&E’S OKLAHOMA RETAIL SYSTEM PEAKS. HAVE YOU ALSO**
 6 **ANALYZED OG&E’S OTHER JURISDICTIONS?**

7 **A.** Yes. I performed the same FERC CP tests on OG&E’s total retail load peaks for Oklahoma and
 8 Arkansas, as well as for the total system load peaks inclusive of wholesale loads. None of the
 9 results of these analyses indicate that a 12 CP allocator would be appropriate. These results are
 10 also presented in Exhibit JB-1.

11 **Q. YOU EXPLAIN ABOVE THAT THE FERC HAS HISTORICALLY CONSIDERED THE**
 12 **THREE FERC CP TESTS TO DETERMINE WHETHER A SYSTEM IS BETTER**
 13 **CHARACTERIZED AS 3 CP OR 12 CP. WHY ARE YOU RECOMMENDING A 4CP**
 14 **TRANSMISSION COST ALLOCATOR IN THIS CASE INSTEAD OF A 3CP**
 15 **ALLOCATOR?**

16 **A.** My recommendation is consistent with the fact that OG&E’s peak loads occur in the four summer
 17 months from June through September and aligns with OG&E’s historical practice of allocating
 18 transmission costs among the Oklahoma retail customers classes using the 4 CP method.

1 Additionally, the use of a 4 CP demand allocator comports with OG&E's use of the 4 CP variation
2 of the Average & Excess (4 CP A&E) allocation method for production plant.

3 **Q. ARE YOU AWARE OF THIS COMMISSION'S PAST PRECEDENT REGARDING THE**
4 **PROPER ALLOCATION METHOD FOR TRANSMISSION COSTS?**

5 A. Yes. In Public Service Company of Oklahoma's ("PSO") 2017 general rate case, this Commission
6 directed PSO to utilize a 4 CP allocator for transmission costs. In the Final Order, the Commission
7 rejected PSO's proposal to change from a 4 CP to a 12 CP allocator because the Commission
8 determined that PSO's system was clearly a summer peaking system, which was the reason that
9 both PSO's production and transmission costs were historically allocated using a 4 CP allocation
10 methodology. The Final Order also notes that PSO made the same recommendation in Cause PUD
11 2015-00208, which the Commission also rejected.¹⁰

12 **Q. HOW DO YOU RESPOND TO MS. MAXEY'S CLAIM THAT UTILIZING A 4 CP**
13 **ALLOCATION FACTOR FOR TRANSMISSION COSTS ALLOWS CERTAIN**
14 **CUSTOMER CLASSES TO RECEIVE THE BENEFITS WHILE NOT PAYING THEIR**
15 **PROPORTIONATE SHARE OF COSTS?**

16 A. Ms. Maxey attempts to support this claim by comparing the cost allocation that would result from
17 utilizing a 4 CP transmission cost allocator to the cost allocation that would result from utilizing a
18 12 CP transmission cost allocator. However, the mere fact that the cost-of-service results differ
19 depending on which allocation method is used does not demonstrate one way or another whether
20 certain classes may be assigned their proportionate share of transmission costs. Ms. Maxey's claim

¹⁰ Cause No. PUD 2017-00151, *Application of Public Service Company of Oklahoma, An Oklahoma Corporation For An Adjustment In Its Rates And Charges And The Electric Service Rules, Regulations And Conditions Of Service In The State of Oklahoma*, Order No. 672864 (Final Order) at 35 (Dec. 11, 2017).

1 is based on the incorrect premise that a 12 CP allocator is more closely aligned with cost causation.

2 On the contrary, as I have quantitatively demonstrated above, a 4 CP transmission cost allocator will

3 more effectively align with OG&E's peak loads which are the main driver of transmission costs.

4

5 **B. Production Plant Cost Allocation**

6 **Q. HOW DOES OG&E PROPOSE TO ALLOCATE PRODUCTION PLANT?**

7 A. OG&E's COSS allocates most production plant using the 4 CP A&E allocation method. However,

8 as Ms. Maxey explains, OG&E is proposing to modify the allocation of wind production costs in

9 this proceeding. According to Ms. Maxey, OG&E is proposing to change the allocation of wind

10 production costs to a blended allocation based on 84% energy and 16% demand.¹¹

11 **Q. CAN YOU ELABORATE REGARDING OG&E'S PROPOSAL TO ALLOCATE WIND**

12 **BASED ON A BLENDED ALLOCATION OF 84% ENERGY AND 16% DEMAND?**

13 A. In OG&E's proposed COSS, 84% of wind plant is allocated on the basis of class energy usage

14 while the remaining 16% of wind plant, which Ms. Maxey refers to as being allocated on demand,

15 is allocated using the 4 CP A&E allocation method.

16 **Q. PLEASE DESCRIBE THE 4 CP A&E ALLOCATION METHOD.**

17 A. The 4 CP A&E allocation method is a variant of the A&E method, which is described in detail in

18 the NARUC Manual in its section entitled "Energy Weighting Methods." As stated in the NARUC

19 Manual, the A&E method "effectively uses an average demand or total energy allocator to allocate

20 the portion of the utility's generating capacity that would be needed if all customers used energy

21 at a constant 100 percent load factor."¹² This portion of the cost is weighted by the system load

¹¹ OG&E Direct Testimony of Lauren E. Maxey at 14:14-15.

¹² NARUC Electric Utility Cost Allocation Manual at 49 (Jan. 1992).

1 factor. The cost of capacity above average demand is then allocated in proportion to each class's
2 *excess* demand, where excess demand, per the 4 CP A&E variant, is measured as the *difference*
3 between each class's 4 CP demand and its average demand. This portion of the cost is weighted
4 by 1 minus the system load factor. This allocation of excess demand ensures that the incremental
5 amount of production plant that is required to meet loads that are above average demand is assigned
6 to the users who create the need for the additional capacity.

7 **Q. DO YOU HAVE ANY CONCERNS WITH MS. MAXEY'S STATEMENT THAT OG&E**
8 **IS PROPOSING TO ALLOCATE WIND BASED ON A BLENDED ALLOCATION OF**
9 **84% ENERGY AND 16% DEMAND?**

10 A. Yes, I think that the characterization of the wind allocation method being based on a blended
11 allocation of 84% energy and 16% demand is misleading. As I explain above, the 16% of wind
12 plant that Ms. Maxey characterizes as being allocated based on demand is actually allocated based
13 on the 4 CP A&E method. And as I further explain, the 4 CP A&E allocation method includes
14 both a demand *and energy* component. Therefore, the 16% of wind plant that Ms. Maxey
15 characterizes as being allocated based on demand in OG&E's COSS is actually allocated based on
16 a combination of class demand *and energy*.

17 **Q. WHAT PROPORTION OF OG&E'S WIND COSTS ARE CURRENTLY ALLOCATED**
18 **ON THE BASIS OF ENERGY UNDER THE CURRENT 4 CP A&E ALLOCATION**
19 **METHOD?**

20 A. According to OG&E's proposed COSS, the system load factor is 57.5%, which means that under
21 the 4 CP A&E allocation method, 57.5% of all Company-owned production plant is allocated
22 among Oklahoma retail customer classes on an energy basis.

1 **Q. WHAT PROPORTION OF OG&E'S WIND COSTS WOULD BE ALLOCATED ON THE**
2 **BASIS OF ENERGY UNDER THE 16%/84% BLENDED ALLOCATION METHOD**
3 **PROPOSED BY OG&E?**

4 A. As I explain above, OG&E's proposed 16%/84% blended allocation method would allocate 16%
5 of Company-owned wind resources using the 4 CP A&E method and 84% of Company-owned
6 wind resources on an energy basis. Since the 4 CP A&E method already includes a 57.5% energy
7 weighting based on the system load factor, that means 93.2% of Company-owned wind would
8 effectively be allocated on an energy basis.¹³

9 **Q. WHAT REASONS DOES OG&E PROVIDE TO JUSTIFY THE PROPOSED**
10 **ALLOCATION OF WIND PLANT?**

11 A. Ms. Maxey claims that the proposed change to the allocation of wind costs is intended to better
12 align cost allocation with cost causation.¹⁴ Ms. Maxey explains that SPP's effective load carrying
13 capability ("ELCC") method to establish resource capacity value has resulted in OG&E's wind
14 facilities being assigned a capacity value of 14% of their nameplate capacity, and that the proposed
15 blended allocation method is intended to reflect the capacity value of the wind resources.¹⁵ She
16 also claims that the main benefit of producing wind energy is the fuel savings and that high volume
17 users retain a greater proportion of fuel offsets relative to allocation of wind costs using the
18 production demand allocator.¹⁶

¹³ 16% Wind Plant Allocated on 4 CP A&E x 57.5% 4 CP A&E Energy Weighting + 84% Wind Plant Allocated on Energy = 93.2%.

¹⁴ Direct Testimony of Lauren E. Maxey at 14:22-23.

¹⁵ *Id.* at 15:3-16.

¹⁶ *Id.* at 16:3-7.

1 Despite the fact that the ELCC capacity value of OG&E's wind resources is 14%, Ms.
2 Maxey explains that OG&E is proposing a 16%/84% split to reflect the average summer value of
3 wind in the SPP ELCC Wind and Solar Study.¹⁷ Ms. Maxey also claims that this methodology was
4 supported by other parties¹⁸ and approved by the Commission in PSO's most recent rate case for
5 the Sundance wind facility.¹⁹

6 **Q. DO YOU HAVE ANY CONCERNS WITH OG&E'S PROPOSAL TO CARVE OUT COST**
7 **ALLOCATION FOR WIND FACILITIES FROM THE REST OF THE PRODUCTION**
8 **PORTFOLIO?**

9 A. Yes, I do, particularly in the manner proposed by OG&E. Utilities like OG&E plan their production
10 portfolios on a comprehensive basis to provide the best overall product to their customers. There
11 are interactive effects between all of the resources used to serve load, and wind resources that
12 provide low variable cost energy complement the other resources in the portfolio. Certain
13 technologies like wind and combined cycle gas plants trade off higher fixed costs for lower
14 variable costs, while technologies like simple cycle combustion turbines can be built with lower
15 fixed costs but operate with higher variable costs. The entire portfolio of resources works together
16 to serve load.

17 When OG&E's wind plants displace generation from thermal resources in the generation
18 portfolio the operating profiles of the thermal resources will change. Thermal resources will still
19 provide capacity, but they will produce less net generation and operate at a lower annual capacity
20 factor. In other words, these thermal resources are dispatched to follow generation in addition to

¹⁷ *Id.* at 15:21-23.

¹⁸ *Id.* at 16:26-27.

¹⁹ *Id.* at 17:14-18.

1 following load. Carving out specific wind plants to be allocated on a different basis ignores these
2 interactive effects that result from the way OG&E operates its generation fleet. As such, from a
3 cost causation perspective, each resource should be viewed and allocated as part of a
4 comprehensive portfolio to serve system load, not as a stand-alone facility. It is neither necessary
5 nor desirable to isolate individual generation facilities piecemeal and allocate their costs on an
6 entirely different basis than the generation fleet as a whole.

7 Further, as I explain above, the 4 CP A&E method is an *energy weighting method* which
8 allocates a significant portion of all production costs, equal to the system load factor, based on
9 average demand or energy. This component of the A&E allocator already reflects the fact that
10 certain resources are built to serve primarily energy needs. Even if one accepts the assertion that
11 wind resources primarily provide low cost variable energy, the 4 CP A&E method can still be an
12 appropriate method to allocate the entire generation portfolio because it already incorporates a
13 substantial energy weighting that applies to the allocation of all of OG&E's production resources,
14 not just the wind resources.

15 **Q. WHAT IS YOUR ASSESSMENT OF OG&E'S USE OF THE 4 CP A&E METHOD TO**
16 **ALLOCATE NON-WIND PRODUCTION PLANT AMONG CUSTOMER CLASSES?**

17 A. I support OG&E's use of the 4 CP A&E method to allocate production plant among customer
18 classes. The 4 CP A&E method is a robust cost allocation method that can properly be used to
19 allocate a utility's entire generation fleet. In fact, I generally believe that the 4 CP A&E method
20 should be used to allocate the entirety of a utility's production plant.

21 **Q. HOW DO YOU RESPOND TO MS. MAXEY'S CLAIM THAT OG&E'S PROPOSED**
22 **BLENDED ALLOCATION METHOD FOR WIND PLANT WAS SUPPORTED BY**

1 **OTHER PARTIES AND APPROVED BY THE COMMISSION IN PSO'S MOST RECENT**
2 **RATE CASE FOR THE SUNDANCE WIND FACILITY?**

3 A. In the Commission's Order, the Commission made it clear that its authorization of the blended
4 allocation methodology for the Sundance wind facility was not a final determination on the issue,
5 but rather an effort to utilize Sundance as a pilot project to further evaluate proper allocations. The
6 Commission also made it clear that its findings did not apply to other wind facilities within PSO's
7 portfolio. Further, while the stipulating parties proposed to allocate the Sundance and Rock Falls
8 wind facilities using a blended allocator, the non-stipulating parties opposed the blended allocator
9 and instead recommended that the wind facilities should be allocated using a 4 CP A&E
10 allocator.²⁰

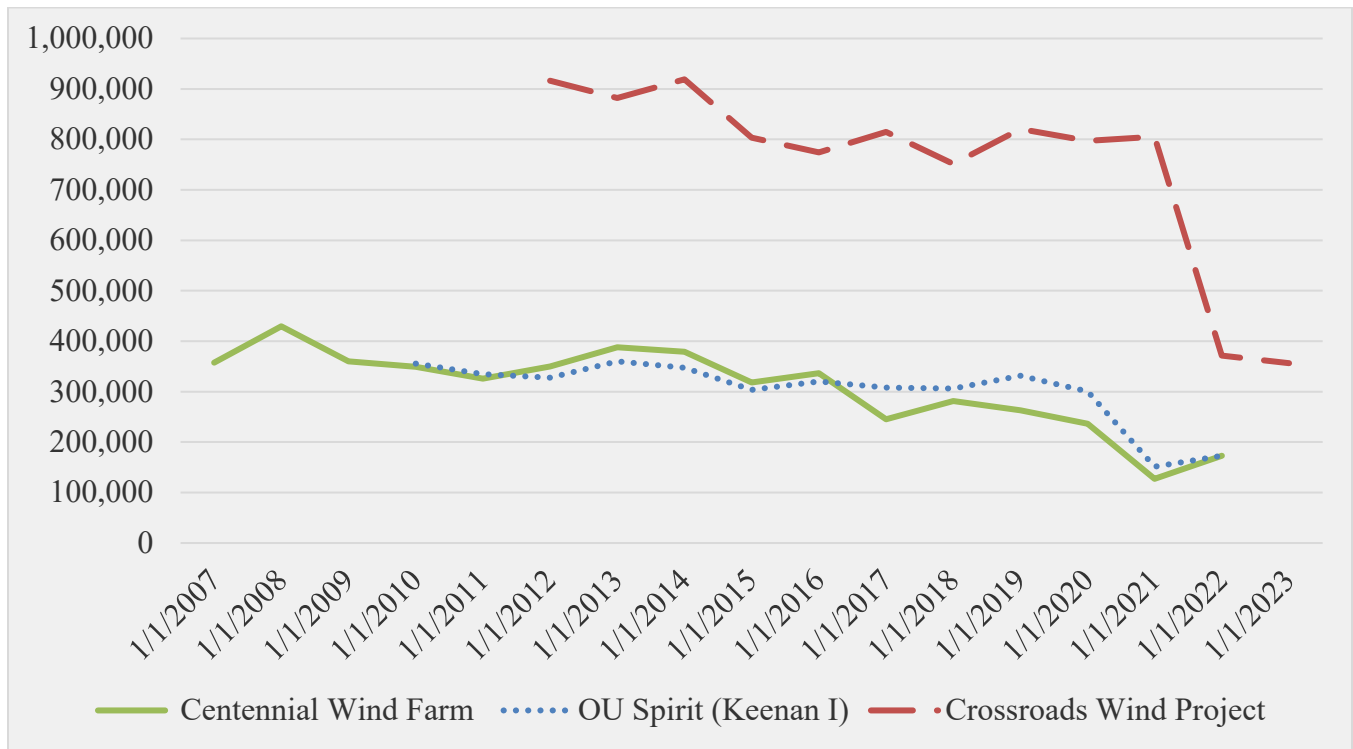
11 **Q. DO YOU HAVE ANY OTHER CONCERNS RELATED TO OG&E'S PROPOSAL TO**
12 **CHANGE THE ALLOCATION OF WIND PLANT IN THIS PROCEEDING?**

13 A. The Company's owned wind plant facilities Centennial Wind Farm, OU Spirit Wind Farm, and
14 Crossroads Wind Farm were installed in 2006, 2009, and 2012, respectively. As can be seen in
15 Figure JB-2, overall production from these facilities has decreased dramatically in recent years.
16 While the facilities may have provided a significant benefit in the form of low-cost variable energy
17 production and production tax credits in the past, the production tax credits have expired, and
18 relative energy production has dropped dramatically. OG&E's proposal to change the cost
19 allocation methodology for these wind facilities, which have all been online for well over a decade,
20 comes at a time when the benefits provided by these facilities are substantially reduced.

²⁰ See Case No. PUD 2022-000093, *Application Of Public Service Company Of Oklahoma, An Oklahoma Corporation, For An Adjustment In Its Rates And Charges And The Electric Service Rules, Regulations, And Conditions Of Service For Electric Service In The State Of Oklahoma And To Approve A Formula Base Rate Proposal*, Order No. 738571 (Order Modifying Final Order No. 738226) at 16 (Nov. 21, 2023).

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**Figure JB-2
OG&E Owned Wind Generation (MWh)**



Source: S&P Capital IQ: Generation Data

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C. CMC Recommended COSS

Q. DID OG&E PROVIDE ANY UPDATES TO ITS FILED COSS?

A. Yes. OG&E provided an updated COSS in response in response to the Public Utility Division – Staff (“PUD”) Data Request PUD 10-07 Supplement 2. The updated COSS reflects the Company’s six-month post-test year updates.

Q. DO YOU RECOMMEND THAT THE COMPANY’S COSS THAT INCLUDES THE SIX-MONTH POST-TEST-YEAR UPDATES SHOULD BE USED AS THE BASIS FOR COST ALLOCATION?

12

1 A. Yes. The Company's six-month post-test year updates provide more accurate information
2 regarding customer class usage and demand during the test year and should be used as the basis
3 for cost allocation.

4 **Q. HAVE YOU PREPARED A REVISED CLASS COSS THAT INCORPORATES THE**
5 **CHANGES YOU ARE RECOMMENDING?**

6 A. Yes. The results of my recommended COSS, which is based on the Company's six-month post-
7 test year updates, and which also incorporates my recommended modifications to the cost
8 allocation methods, are presented in Exhibit JB-2. A summary of the results of my recommended
9 COSS compared to OG&E's COSS is presented in Table JB-2 below.

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Table JB-2
CMC Recommended COSS Compared to OG&E COSS
at OG&E Proposed Revenue Requirement

	OG&E COSS	CMC COSS	Difference %
	At Equalized ROR	At Equalized ROR	
	Base Rate Increase %	Base Rate Increase %	
RESIDENTIAL STANDARD	23.7%	24.7%	1.0%
TOU	51.2%	49.8%	-1.4%
VPP	29.5%	28.9%	-0.6%
GENERAL SVC STANDARD	25.4%	24.7%	-0.7%
TOU	34.8%	32.0%	-2.8%
VPP	41.8%	42.9%	1.1%
OIL & GAS PROD STANDARD S/L-3	22.4%	8.2%	-14.3%
S/L-5	0.2%	-5.9%	-6.0%
TOU S/L-5	3.2%	-4.3%	-7.5%
VPP S/L-5	0.9%	-6.1%	-7.0%
PUBLIC SCHOOLS SM-STANDARD S/L-5	44.6%	47.7%	3.1%
SM-TOU	72.7%	77.1%	4.4%
SM-VPP	75.2%	77.7%	2.5%
PUBLIC SCHOOLS LG-STANDARD S/L-3	70.9%	75.8%	4.9%
S/L-4	61.8%	62.6%	0.8%
S/L-5	27.4%	28.3%	1.0%
PUBLIC SCHOOLS LG-TOU S/L-3	60.6%	65.1%	4.5%
S/L-4	58.7%	60.1%	1.4%
S/L-5	52.6%	54.2%	1.6%
PWR & LGHT STANDARD S/L-1	20.7%	3.8%	-16.9%
S/L-2	65.0%	66.3%	1.3%
S/L-3	4.1%	-0.4%	-4.5%
S/L-4	13.9%	14.9%	1.0%
S/L-5	18.9%	17.7%	-1.1%
PWR & LGHT TOU S/L-1	-68.4%	-79.7%	-11.4%
S/L-2	42.0%	-1.6%	-43.6%
S/L-3	8.8%	3.6%	-5.2%
S/L-4	19.0%	21.8%	2.7%
S/L-5	30.3%	26.7%	-3.6%
LRG. PWR & LGHT STANDARD S/L-2	43.3%	28.6%	-14.6%
LRG. PWR & LGHT TOU S/L-1	23.8%	12.4%	-11.3%
S/L-2	33.3%	18.7%	-14.6%
S/L-3	23.0%	20.4%	-2.6%
S/L-4	24.4%	24.6%	0.2%
S/L-5	13.3%	11.3%	-2.0%
MUNICIPAL PUMPING	19.6%	12.0%	-7.6%
MUNICIPAL PUMPING - TOU	22.7%	2.0%	-20.6%
MUNICIPAL LIGHTING	1.3%	-13.3%	-14.5%
SECURITY LIGHTING	-12.5%	-24.8%	-12.3%
LED LIGHTING	42.1%	50.7%	8.6%
BACK UP & MAINTENANCE	129.2%	81.5%	-47.8%
OKLA RETAIL JURISDICTION	25.2%	23.5%	-1.8%

1 **Q. YOU EXPLAIN ABOVE THAT YOUR RECOMMENDED COSS IS BASED ON THE**
2 **COMPANY'S COSS THAT INCLUDES THE COMPANY'S SIX-MONTH POST YEST-**
3 **YEAR UPDATES. HAVE YOU ALSO PREPARED A REVISED CLASS COSS THAT**
4 **INCORPORATES COMPANY'S COSS PROVIDED IN ITS INITIAL FILING?**

5 A. Yes. To be clear, I recommend that a COSS that includes the Company's six-month post test-
6 year updates be used as the basis for cost allocation. However, for informational purposes, I have
7 also provided alternative COSS results that reflect my recommended changes to the transmission
8 and production cost allocation methods based on the COSS provided in the Company's initial
9 filing. The results of this alternative COSS are presented in Exhibit JB-3.

10
11 **IV. REVENUE ALLOCATION**

12 **Q. WHAT GENERAL GUIDELINES SHOULD BE EMPLOYED IN ALLOCATING ANY**
13 **CHANGE IN REVENUE?**

14 A. In determining revenue allocation, it is important to align rates with cost causation to the greatest
15 extent practicable. Properly aligning rates with the costs caused by each customer group is essential
16 for ensuring fairness, as it minimizes cross subsidies among customers. It also sends proper price
17 signals, which improves efficiency in resource utilization.

18 At the same time, it can be appropriate to mitigate the impact of moving immediately to
19 cost-based rates for customer classes that would experience significant rate increases from doing
20 so. This principle of ratemaking is known as "gradualism." When employing this principle, it is
21 important to adopt a long-term strategy of moving in the direction of cost causation, and to avoid
22 schemes that result in permanent cross-subsidies from other customers.

1 **Q. WHAT WERE OG&E'S CONSIDERATIONS IN THE REVENUE ALLOCATION**
2 **PROCESS?**

3 A. OG&E's revenue allocation witness Bryan Scott explains that from OG&E's perspective, the
4 preference is to set each class's revenue requirement as close as possible to achieve an equalized
5 rate of return ("ROR") and that each customer group should pay the full cost for its electric service.
6 However, he explains that external or unusual circumstances are legitimate considerations in the
7 revenue allocation process and the Company's pricing proposals have historically reflected other
8 circumstances.²¹

9 **Q. PLEASE EXPLAIN OG&E'S PROPOSED REVENUE ALLOCATION METHOD.**

10 A. According to Mr. Scott, OG&E's proposed base rate increase in this case is 25.2%. For revenue
11 allocation, Mr. Scott explains that OG&E's proposed revenue allocation methodology would limit
12 the maximum base rate increase for any customer classes to no more than 135% of the retail system
13 average rate increase, or 34.1%, and the minimum base rate increase to no less than 0%.²² OG&E's
14 proposed revenue allocation is summarized in Table JB-3 below.

²¹ OG&E Direct Testimony of Bryan Scott at 5:12-17.

²² *Id.* at 6:8-10.

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**Table JB-3
OG&E Proposed Revenue Allocation
at OG&E COSS and OG&E Revenue Requirement**

	OG&E COSS At Equalized ROR	OG&E Revenue Allocation	Subsidy Paid/(Received)
	Base Rate Increase %	Base Rate Increase %	Difference %
RESIDENTIAL STANDARD	23.7%	24.1%	0.4%
TOU	51.2%	34.1%	-17.1%
VPP	29.5%	29.5%	0.0%
GENERAL SVC STANDARD	25.4%	30.2%	4.8%
TOU	34.8%	34.1%	-0.7%
VPP	41.8%	34.1%	-7.7%
OIL & GAS PROD STANDARD S/L-3	22.4%	22.4%	0.0%
S/L-5	0.2%	0.2%	0.0%
TOU S/L-5	3.2%	3.2%	0.0%
VPP S/L-5	0.9%	0.9%	0.0%
PUBLIC SCHOOLS SM-STANDARD S/L-5	44.6%	15.5%	-29.1%
SM-TOU	72.7%	15.5%	-57.2%
SM-VPP	75.2%	15.5%	-59.7%
PUBLIC SCHOOLS LG-STANDARD S/L-3	70.9%	19.0%	-51.9%
S/L-4	61.8%	19.0%	-42.8%
S/L-5	27.4%	27.4%	0.0%
PUBLIC SCHOOLS LG-TOU S/L-3	60.6%	19.0%	-41.6%
S/L-4	58.7%	19.0%	-39.7%
S/L-5	52.6%	19.0%	-33.7%
PWR & LGHT STANDARD S/L-1	20.7%	20.7%	0.0%
S/L-2	65.0%	34.1%	-30.9%
S/L-3	4.1%	12.2%	8.1%
S/L-4	13.9%	13.9%	0.0%
S/L-5	18.9%	19.8%	1.0%
PWR & LGHT TOU S/L-1	-68.4%	0.0%	68.4%
S/L-2	42.0%	34.1%	-7.9%
S/L-3	8.8%	8.8%	0.0%
S/L-4	19.0%	19.0%	0.0%
S/L-5	30.3%	31.4%	1.1%
LRG. PWR & LGHT STANDARD S/L-2	43.3%	34.1%	-9.2%
LRG. PWR & LGHT TOU S/L-1	23.8%	23.8%	0.0%
S/L-2	33.3%	34.1%	0.8%
S/L-3	23.0%	23.0%	0.0%
S/L-4	24.4%	24.4%	0.0%
S/L-5	13.3%	16.0%	2.7%
MUNICIPAL PUMPING	19.6%	19.6%	0.0%
MUNICIPAL PUMPING - TOU	22.7%	22.7%	0.0%
MUNICIPAL LIGHTING	1.3%	22.8%	21.5%
SECURITY LIGHTING	-12.5%	22.8%	35.3%
LED LIGHTING	42.1%	22.8%	-19.3%
BACK UP & MAINTENANCE	129.2%	34.1%	-95.1%
OKLA RETAIL JURISDICTION	25.2%	25.2%	0.0%

1 **Q. PLEASE DESCRIBE HOW TABLE JB-3 IS ORGANIZED.**

2 A. The first column shows the percentage change for base rates that would result if each class had its
3 rates set exactly at cost of service using OG&E's COSS at OG&E's requested revenue
4 requirement. The second column shows the percentage change for base rates that would result
5 from OG&E's proposed revenue allocation. The third column shows the relative subsidy that
6 would result from the proposed revenue allocation. A positive number means that the class is
7 funding a rate mitigation subsidy while a negative number means the class is receiving a rate
8 mitigation subsidy.

9 **Q. WHAT IS YOUR ASSESSMENT OF OG&E'S PROPOSED REVENUE ALLOCATION**
10 **METHODOLOGY?**

11 A. Given the circumstances of this case, I agree that OG&E's proposal to moderate the revenue
12 allocation so that no class will receive a base rate increase that is more than 135% of the system
13 average, and that no class will receive a base rate decrease is reasonable. However, OG&E's
14 proposed revenue allocation also includes arbitrary rate mitigations for certain customer classes
15 that are not required to achieve the proposed revenue allocation *methodology*.

16 Specifically, under OG&E's proposed revenue allocation, there are certain rate schedules
17 that would require a cost-based rate increase greater than 34.1% that would receive a rate increase
18 that is less than 34.1%. This additional level of rate mitigation is unnecessary to limit the base rate
19 increase for certain classes to less than 135% of the system average is not applied consistently
20 across all rate schedules. Additionally, the funding for the required rate mitigation subsidies is not
21 spread evenly or consistently across rate schedules. For example, the General Service Standard
22 and Power and Light TOU S/L-3 rate schedules would receive rate increases that are 4.8% and

1 8.1%, respectively, greater than what would be required to recover the cost of service, while other
2 classes would contribute much lower levels of funding toward rate mitigation subsidies on a
3 relative basis.

4 **Q. PLEASE EXPLAIN YOUR RECOMMENDED REVENUE ALLOCATION**
5 **METHODOLOGY.**

6 A. I recommend that the Commission accept OG&E's proposed revenue allocation *methodology* that
7 would limit the maximum base rate increase for any customer class to no more than 135% of the
8 retail system average rate increase and the minimum base rate increase to no less than 0%.
9 However, I recommend that no rate schedule receive a rate mitigation subsidy that is larger than
10 what is required to limit the base rate increase to 135% of the system average. And I recommend
11 that funding for the required rate mitigation subsidies should be provided on a pro rata basis from
12 the rate schedules that do not require a rate mitigation subsidy based on the total base rate cost of
13 service.

14 **Q. WHAT IS YOUR RECOMMENDED REVENUE ALLOCATION AT OG&E'S**
15 **PROPOSED COSS AND REVENUE REQUIREMENT?**

16 A. Table JB-4 illustrates my recommended revenue allocation at OG&E's Supplemental Class COSS
17 and proposed revenue requirement. Exhibit JB-4 presents these results in greater detail.

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**Table JB-4
CMC Proposed Revenue Allocation
at OG&E COSS and OG&E Revenue Requirement**

	OG&E COSS At Equalized ROR	CMC Revenue Allocation	Subsidy Paid/(Received)
	Base Rate Increase %	Base Rate Increase %	Difference %
RESIDENTIAL STANDARD	23.7%	24.5%	0.8%
TOU	51.2%	34.1%	-17.2%
VPP	29.5%	30.3%	0.8%
GENERAL SVC STANDARD	25.4%	26.2%	0.8%
TOU	34.8%	34.1%	-0.7%
VPP	41.8%	34.1%	-7.7%
OIL & GAS PROD STANDARD S/L-3	22.4%	23.2%	0.7%
S/L-5	0.2%	0.8%	0.6%
TOU S/L-5	3.2%	3.8%	0.6%
VPP S/L-5	0.9%	1.5%	0.6%
PUBLIC SCHOOLS SM-STANDARD S/L-5	44.6%	34.1%	-10.5%
SM-TOU	72.7%	34.1%	-38.6%
SM-VPP	75.2%	34.1%	-41.2%
PUBLIC SCHOOLS LG-STANDARD S/L-3	70.9%	34.1%	-36.8%
S/L-4	61.8%	34.1%	-27.7%
S/L-5	27.4%	28.1%	0.8%
PUBLIC SCHOOLS LG-TOU S/L-3	60.6%	34.1%	-26.5%
S/L-4	58.7%	34.1%	-24.6%
S/L-5	52.6%	34.1%	-18.6%
PWR & LGHT STANDARD S/L-1	20.7%	21.5%	0.7%
S/L-2	65.0%	34.1%	-30.9%
S/L-3	4.1%	4.8%	0.6%
S/L-4	13.9%	14.6%	0.7%
S/L-5	18.9%	19.6%	0.7%
PWR & LGHT TOU S/L-1	-68.4%	0.0%	68.4%
S/L-2	42.0%	34.1%	-8.0%
S/L-3	8.8%	9.5%	0.7%
S/L-4	19.0%	19.7%	0.7%
S/L-5	30.3%	31.1%	0.8%
LRG. PWR & LGHT STANDARD S/L-2	43.3%	34.1%	-9.2%
LRG. PWR & LGHT TOU S/L-1	23.8%	24.5%	0.8%
S/L-2	33.3%	34.1%	0.8%
S/L-3	23.0%	23.8%	0.7%
S/L-4	24.4%	25.1%	0.8%
S/L-5	13.3%	14.0%	0.7%
MUNICIPAL PUMPING	19.6%	20.3%	0.7%
MUNICIPAL PUMPING - TOU	22.7%	23.4%	0.7%
MUNICIPAL LIGHTING	1.3%	1.9%	0.6%
SECURITY LIGHTING	-12.5%	0.0%	12.5%
LED LIGHTING	42.1%	34.1%	-8.1%
BACK UP & MAINTENANCE	129.2%	34.1%	-95.2%
OKLA RETAIL JURISDICTION	25.2%	25.2%	0.0%

1 **Q. YOU RECOMMEND MODIFICATIONS TO OG&E'S COSS METHODS. WHAT IS**
2 **YOUR RECOMMENDED REVENUE ALLOCATION BASED ON YOUR**
3 **RECOMMENDED MODIFICATIONS TO THE CLASS COSS?**

4 A. Table JB-5 below illustrates my recommended revenue allocation methodology at my
5 recommended COSS and OG&E's proposed revenue requirement. Exhibit JB-5 presents these
6 results in greater detail.

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**Table JB-5
CMC Proposed Revenue Allocation
at CMC COSS and OG&E Revenue Requirement**

	CMC COSS At Equalized ROR	CMC Revenue Allocation	Subsidy Paid/(Received)
	Base Rate Increase %	Base Rate Increase %	Difference %
RESIDENTIAL STANDARD	24.7%	25.5%	0.8%
TOU	49.8%	31.7%	-18.1%
VPP	28.9%	29.7%	0.8%
GENERAL SVC STANDARD	24.7%	25.5%	0.8%
TOU	32.0%	31.7%	-0.3%
VPP	42.9%	31.7%	-11.2%
OIL & GAS PROD STANDARD S/L-3	8.2%	8.8%	0.7%
S/L-5	-5.9%	0.0%	5.9%
TOU S/L-5	-4.3%	0.0%	4.3%
VPP S/L-5	-6.1%	0.0%	6.1%
PUBLIC SCHOOLS SM-STANDARD S/L-5	47.7%	31.7%	-16.0%
SM-TOU	77.1%	31.7%	-45.5%
SM-VPP	77.7%	31.7%	-46.1%
PUBLIC SCHOOLS LG-STANDARD S/L-3	75.8%	31.7%	-44.1%
S/L-4	62.6%	31.7%	-30.9%
S/L-5	28.3%	29.1%	0.8%
PUBLIC SCHOOLS LG-TOU S/L-3	65.1%	31.7%	-33.4%
S/L-4	60.1%	31.7%	-28.4%
S/L-5	54.2%	31.7%	-22.6%
PWR & LGHT STANDARD S/L-1	3.8%	4.5%	0.6%
S/L-2	66.3%	31.7%	-34.6%
S/L-3	-0.4%	0.0%	0.4%
S/L-4	14.9%	15.6%	0.7%
S/L-5	17.7%	18.5%	0.7%
PWR & LGHT TOU S/L-1	-79.7%	0.0%	79.7%
S/L-2	-1.6%	0.0%	1.6%
S/L-3	3.6%	4.2%	0.6%
S/L-4	21.8%	22.5%	0.8%
S/L-5	26.7%	27.5%	0.8%
LRG. PWR & LGHT STANDARD S/L-2	28.6%	29.4%	0.8%
LRG. PWR & LGHT TOU S/L-1	12.4%	13.1%	0.7%
S/L-2	18.7%	19.4%	0.7%
S/L-3	20.4%	21.1%	0.7%
S/L-4	24.6%	25.4%	0.8%
S/L-5	11.3%	12.0%	0.7%
MUNICIPAL PUMPING	12.0%	12.7%	0.7%
MUNICIPAL PUMPING - TOU	2.0%	2.7%	0.6%
MUNICIPAL LIGHTING	-13.3%	0.0%	13.3%
SECURITY LIGHTING	-24.8%	0.0%	24.8%
LED LIGHTING	50.7%	31.7%	-19.0%
BACK UP & MAINTENANCE	81.5%	31.7%	-49.8%
OKLA RETAIL JURISDICTION	23.5%	23.5%	0.0%

1 **Q. WHAT REVENUE ALLOCATION DO YOU RECOMMEND IF THE REVENUE**
2 **REQUIREMENT IS REDUCED BELOW THE LEVEL REQUESTED BY OG&E?**

3 A. My recommendations above represent different COSS methodologies and revenue allocations at
4 *OG&E's proposed revenue requirement*. However, to the extent that the Commission approves a
5 revenue requirement that is lower than OG&E's request, I recommend that my proposed revenue
6 allocation, summarized in Table JB-5, should be used to establish each rate schedule's percentage
7 share of the final base rate revenue requirement. Specifically, each customer class's total base rate
8 revenue requirement should be adjusted by an equal percentage in order to recover the final
9 approved revenue requirement.

10 **Q. WHAT IS THE BENEFIT OF USING YOUR RECOMMENDED APPROACH TO**
11 **APPORTIONING A LOWER REVENUE REQUIREMENT?**

12 A. A major benefit of my recommended approach is that it preserves the relationships among the
13 customer classes that are reflected in my recommended COSS and revenue allocation results at
14 OG&E's proposed revenue requirement. In retaining these relationships, the movement toward
15 cost that is embedded in my proposed revenue allocation is preserved in the final revenue
16 allocation. My recommended approach will result in a reasonable revenue allocation that is
17 calibrated to a lower revenue requirement. This method of adjusting the revenue allocation for a
18 lower revenue requirement will ensure that there is sufficient movement towards cost while
19 employing gradualism and mitigating rate shock to customer classes that would otherwise require
20 a more significant rate increase.

21 **Q. CAN YOU PROVIDE AN EXAMPLE THAT DEMONSTRATES HOW YOUR**
22 **RECOMMENDATION COULD BE IMPLEMENTED IF THE COMMISSION**
23 **APPROVES A RATE INCREASE THAT IS LESS THAN THE COMPANY'S REQUEST?**

1 A. Yes, I have prepared an example to show how my recommended revenue allocation should be
2 allocated if the Commission approves a base rate increase that is \$100 million less than the
3 Company's request. To be clear, I am not recommending that \$100 million is the appropriate
4 adjustment to OG&E's proposed revenue requirement. However, this example is intended to
5 demonstrate how my recommended revenue allocation can be applied for a rate increase that is
6 less than OG&E's proposed rate increase.

7 This example assumes that the total base rate revenues for each rate schedule resulting from
8 my recommended revenue allocation at OG&E's proposed revenue requirement are reduced by a
9 pro rata amount so that each class receives a proportional benefit from this hypothetical reduction
10 to the revenue requirement. The results of my recommended revenue allocation using my
11 recommended COSS at this hypothetical adjusted revenue requirement are summarized in Table
12 JB-6 below.

Table JB-6

Example Adjustment to CMC Recommended Revenue Allocation

At A \$100 Million Rate Reduction Relative to OG&E Proposed Revenue Requirement

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	CMC Revenue Allocation At OG&E Rev. Req.			% of Total Base	CMC Revenue Allocation At Reduced Rev. Req.		
	Base Rate Increase		Total Base Revenue		Total Base Revenue	Base Rate Increase	
RESIDENTIAL STANDARD	25.5%	\$146,762,226	\$723,042,822	43.8%	\$679,206,293	\$102,925,698	17.9%
TOU	31.7%	\$4,440,032	\$18,458,115	1.1%	\$17,339,039	\$3,320,957	23.7%
VPP	29.7%	\$18,473,906	\$80,656,773	4.9%	\$75,766,727	\$13,583,860	21.8%
GENERAL SVC STANDARD	25.5%	\$31,297,390	\$154,222,004	9.4%	\$144,871,856	\$21,947,242	17.9%
TOU	31.7%	\$3,467,249	\$14,414,057	0.9%	\$13,540,163	\$2,593,356	23.7%
VPP	31.7%	\$2,183,886	\$9,078,858	0.6%	\$8,528,426	\$1,633,455	23.7%
OIL & GAS PROD STANDARD S/L-3	8.8%	\$350,996	\$4,326,942	0.3%	\$4,064,609	\$88,663	2.2%
S/L-5	0.0%	\$0	\$7,461,491	0.5%	\$7,009,116	(\$452,374)	-6.1%
TOU S/L-5	0.0%	\$0	\$659,538	0.0%	\$619,551	(\$39,986)	-6.1%
VPP S/L-5	0.0%	\$0	\$269,308	0.0%	\$252,981	(\$16,328)	-6.1%
PUBLIC SCHOOLS SM-STANDARD S/L	31.7%	\$483,449	\$2,009,794	0.1%	\$1,887,944	\$361,599	23.7%
SM-TOU	31.7%	\$1,013,990	\$4,215,362	0.3%	\$3,959,794	\$758,422	23.7%
SM-VPP	31.7%	\$1,606,622	\$6,679,051	0.4%	\$6,274,115	\$1,201,685	23.7%
PUBLIC SCHOOLS LG-STANDARD S/L-	31.7%	\$14,307	\$59,476	0.0%	\$55,870	\$10,701	23.7%
S/L-4	31.7%	\$23,578	\$98,017	0.0%	\$92,074	\$17,635	23.7%
S/L-5	29.1%	\$587,436	\$2,603,199	0.2%	\$2,445,373	\$429,610	21.3%
PUBLIC SCHOOLS LG-TOU S/L-3	31.7%	\$108,514	\$451,114	0.0%	\$423,764	\$81,164	23.7%
S/L-4	31.7%	\$147,515	\$613,251	0.0%	\$576,071	\$110,335	23.7%
S/L-5	31.7%	\$2,418,793	\$10,055,411	0.6%	\$9,445,773	\$1,809,155	23.7%
PWR & LGHT STANDARD S/L-1	4.5%	\$7,246	\$169,021	0.0%	\$158,773	(\$3,001)	-1.9%
S/L-2	31.7%	\$1,032,736	\$4,293,294	0.3%	\$4,033,001	\$772,443	23.7%
S/L-3	0.0%	\$0	\$10,534,896	0.6%	\$9,896,188	(\$638,708)	-6.1%
S/L-4	15.6%	\$555,391	\$4,110,186	0.2%	\$3,860,994	\$306,200	8.6%
S/L-5	18.5%	\$28,001,370	\$179,643,215	10.9%	\$168,751,834	\$17,109,989	11.3%
PWR & LGHT TOU S/L-1	0.0%	\$0	\$3,983,818	0.2%	\$3,742,287	(\$241,530)	-6.1%
S/L-2	0.0%	\$0	\$4,355,216	0.3%	\$4,091,168	(\$264,047)	-6.1%
S/L-3	4.2%	\$747,214	\$18,370,855	1.1%	\$17,257,070	(\$366,571)	-2.1%
S/L-4	22.5%	\$1,113,753	\$6,061,528	0.4%	\$5,694,031	\$746,256	15.1%
S/L-5	27.5%	\$26,451,658	\$122,731,406	7.4%	\$115,290,466	\$19,010,717	19.7%
LRG. PWR & LGHT STANDARD S/L-2	29.4%	\$3,368,624	\$14,812,484	0.9%	\$13,914,435	\$2,470,575	21.6%
LRG. PWR & LGHT TOU S/L-1	13.1%	\$1,756,049	\$15,142,706	0.9%	\$14,224,636	\$837,979	6.3%
S/L-2	19.4%	\$20,209,447	\$124,374,487	7.5%	\$116,833,930	\$12,668,890	12.2%
S/L-3	21.1%	\$5,620,535	\$32,228,327	2.0%	\$30,274,393	\$3,666,601	13.8%
S/L-4	25.4%	\$1,105,718	\$5,461,948	0.3%	\$5,130,802	\$774,572	17.8%
S/L-5	12.0%	\$1,316,719	\$12,293,313	0.7%	\$11,547,996	\$571,402	5.2%
MUNICIPAL PUMPING	12.7%	\$538,871	\$4,790,289	0.3%	\$4,499,864	\$248,446	5.8%
MUNICIPAL PUMPING - TOU	2.7%	\$1,194	\$45,823	0.0%	\$43,045	(\$1,584)	-3.5%
MUNICIPAL LIGHTING	0.0%	\$0	\$4,868,587	0.3%	\$4,573,415	(\$295,172)	-6.1%
SECURITY LIGHTING	0.0%	\$0	\$7,520,035	0.5%	\$7,064,112	(\$455,924)	-6.1%
LED LIGHTING	31.7%	\$8,135,047	\$33,819,039	2.1%	\$31,768,663	\$6,084,671	23.7%
BACK UP & MAINTENANCE	31.7%	\$101,525	\$422,062	0.0%	\$396,473	\$75,937	23.7%
OKLA RETAIL JURISDICTION	23.5%	\$313,442,987	\$1,649,407,114	100.0%	\$1,549,407,114	\$213,442,987	16.0%

1 **Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS REGARDING REVENUE**
2 **ALLOCATION.**

3 A. I recommend that the Commission should approve my recommended revenue allocation at CMC's
4 recommended COSS as presented in Exhibit JB-5 and summarized in Table JB-5 above, at
5 *OG&E's proposed revenue requirement*. And to the extent that the Commission approves a
6 revenue requirement that is less than OG&E's request, then I recommend that the Commission
7 utilize the methodology I have presented above, and summarized in Table JB-6, to adjust the
8 revenue allocation for Oklahoma retail classes to recover the approved revenue requirement.

9 **V. LOAD REDUCTION RIDER TARIFF UPDATES**

10 **Q. WHAT CHANGES IS OG&E PROPOSING TO MAKE TO THE DAP, FP, AND LR**
11 **TARIFFS?**

12 A. Company witness James Alexander explains that the Company is proposing to modify the
13 availability sections of these tariffs to remove the option for subscribers of the DAP or FP tariffs
14 to co-subscribe to the LR tariff.²³

15 **Q. WHAT IS YOUR ASSESSMENT OF THE COMPANY'S PROPOSAL TO REMOVE THE**
16 **OPTION FOR CUSTOMERS TO CO-SUBSCRIBE TO THE DAP OR FP AND THE LR**
17 **TARIFFS?**

18 A. I recommend that the Commission reject OG&E's proposal to remove the option for subscribers
19 of the DAP or FP tariffs to co-subscribe to the LR tariff. Load reductions are a valuable and
20 effective way for utilities to reduce capacity requirements and help mitigate the need for expensive

²³ OG&E Direct Testimony of James Alexander at 5:9-12.

1 new infrastructure and should not be unnecessarily limited. Further, under the existing tariffs, for
2 customers that are subscribed to both the DAP or FP and LR tariffs, the subscribed curtailment
3 load (“SCL”) is limited to the customer’s baseline load (“CBL”). Since the DAP and FP tariffs
4 only apply to a customer’s load *in excess of its CBL*, and the credits for load reductions are applied
5 *to the CBL*, the LR tariff does not apply to the same portion of a co-subscribed customer’s load
6 that is subject to DAP or FP pricing tariffs.

7 **Q. DOES THIS CONCLUDE YOUR RESPONSIVE TESTIMONY?**

8 A. Yes, it does.

CERTIFICATE OF SERVICE

This is to certify that on the ____ day of _____ 2024, a true and correct copy of the above and foregoing document was electronically served via the Electronic Case Filing System to those on the Official Electronic Case Filing Service List, or via electronic mail to the following persons:

William L. Humes
Oklahoma Gas and Electric Company
P.O. Box 321, MC 1208
Oklahoma City, OK 73101-0321
humeswl@oge.com
reginfor@oge.com

Deborah R. Thompson
Kenneth A. Tillotson
Thompson Tillotson PLLC
P.O. Box 54632
Oklahoma City, OK 73154
deborah@ttfirm.com
kenneth@ttfirm.com

Natasha Scott
Michael L. Velez
Jonathon Herndon
Michael S. Ryan
Justin Cullen
E.J. Thomas
Oklahoma Corporation Commission
P.O. Box 52000
Oklahoma City, OK 73152-2000
natasha.scott@occ.ok.gov
michael.velez@occ.ok.gov
jonathon.herndon@occ.ok.gov
michael.ryan@occ.ok.gov
justin.cullen@occ.ok.gov
ej.thomas@occ.ok.gov
PUDenergy@occ.ok.gov

Thomas P. Schroedter
Hall, Estill, Hardwick, Gable, Golden & Nelson, P.C.
521 East 2nd St., Suite 1200
Tulsa, OK 74120
tschroedter@hallestill.com

Leslie R. Newton
Ashley N. George
Thomas A. Jernigan
Ebony Payton
Rafael A. Franjul
Federal Executive Agencies (FEA)
139 Barnes Drive, Suite 1
Tyndall AFB, Florida 32403-5317
leslie.newton.1@us.af.mil
ashley.george.4@us.af.mil
Thomas.Jernigan.3@us.af.mil
Ebony.Payton.ctr@us.af.mil
Rafael.Franjul@us.af.mil

Scott A. Hodges, Colonel, USAF
AFIMSC/JA
2261 Hughes Ave, Ste. 133
JBSA-Lackland, TX
scott.hodges@us.af.mil

A. Chase Snodgrass
K. Christine Chevis
Ashley N. Youngblood
**Office of the Attorney General
Utility Regulation Unit**
313 N.E. 21st Street
Oklahoma City, OK 73105
chase.snodgrass@oag.ok.gov
christine.chevis@oag.ok.gov
ashley.youngblood@oag.ok.gov
utility.regulation@oag.ok.gov

Jack G. Clark Jr.
Clark, Wood & Patten, P.C.
3545 N.W. 58th Street, Suite 400
Oklahoma City, OK 73112
cclark@cswp-law.com

Responsive Testimony and Exhibits of Justin Bieber

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J. David Jacobson
Jacobson & Laasch
212 East Second Street
Edmond, OK 73034
jdj8788@aol.com

Adam J. Singer
J. Eric Turner
Derryberry & Naifeh, LLP
4800 N. Lincoln Blvd.
Oklahoma City, OK 73105
asinger@derryberrylaw.com
eturner@derryberrylaw.com

Ronald E. Stakem
Cheek & Falcone, PLLC
6301 Waterford Blvd., Suite 320
Oklahoma City, OK 73118
rstakem@cheekfalcone.com

Rick D Chamberlain
P.O. Box 21866
Oklahoma City, OK 73156-1866
rick@chamberlainlawoffices.com

Paul D. Trimble

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)
AUTHORIZING APPLICANT TO)
MODIFY ITS RATES, CHARGES, AND)
TARIFFS FOR RETAIL ELECTRIC)
SERVICE IN OKLAHOMA)

CASE NO. PUD 2023-000087

AFFIDAVIT OF JUSTIN BIEBER

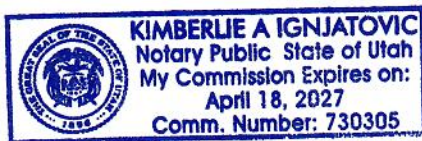
STATE OF UTAH)
)
COUNTY OF SALT LAKE)


Justin Bieber, being first duly sworn, deposes and states that:

1. He is a Principal with Energy Strategies. L.L.C., in Salt Lake City, Utah;
2. He is the witness who sponsors the accompanying testimony entitled "Responsive Testimony of Justin Bieber;"
3. Said testimony was prepared by him and under his direction and supervision;
4. If inquiries were made as to the facts and schedules in said testimony he would respond as therein set forth; and
5. The aforesaid testimony and schedules are true and correct to the best of his knowledge, information and belief.


Justin Bieber

Subscribed and sworn to or affirmed before me this 2nd day of May, 2024, by Justin Bieber.




Notary Public

OG&E FERC CP Test Results

	On-Peak or Month Off-Peak	OG&E OK Retail Load (kW)	OG&E OK and AR Retail Load (kW)	OG&E System Load (kW)
October	Off-Peak	3,975,987	4,369,558	4,981,795
November	Off-Peak	3,472,281	3,800,804	4,318,188
December	Off-Peak	3,890,669	4,275,548	4,945,045
January	Off-Peak	4,136,909	4,533,627	5,167,025
February	Off-Peak	4,095,933	4,490,682	5,080,871
March	Off-Peak	3,709,514	4,034,081	4,528,819
April	Off-Peak	3,733,066	4,053,259	4,594,217
May	Off-Peak	4,701,155	5,041,969	5,727,458
June	On-Peak	5,398,757	5,886,611	6,807,867
July	On-Peak	5,800,458	6,305,754	7,177,099
August	On-Peak	5,695,078	6,225,669	7,196,824
September	On-Peak	5,240,155	5,723,279	6,542,819

On and Off Peak Test

Avg of System On-Peak Monthly Peaks (MW)	5,533,612	6,035,328	6,931,152
Avg of System Off-Peak Monthly Peaks (MW)	3,964,439	4,324,941	4,917,927
Annual Peak (MW)	5,800,458	6,305,754	7,196,824
Avg of System On-Peak Monthly Peaks/Annual Peak	95.40%	95.71%	96.31%
Avg of System Off-Peak Monthly Peaks/Annual Peak	68.3%	68.6%	68.3%
Difference Between On-Peak and Off-Peak Avg Compared to Annual Peak	27.1%	27.1%	28.0%
19% or Less Indicates 12CP	Does Not Indicate 12 CP	Does Not Indicate 12 CP	Does Not Indicate 12 CP

Low to Annual Peak Test

Lowest Monthly Peak (MW)	3,472,281	3,800,804	4,318,188
Annual Peak (MW)	5,800,458	6,305,754	7,196,824
Lowest Peak/Annual Peak	59.9%	60.3%	60.0%
66% or Greater Indicates 12CP	Does Not Indicate 12 CP	Does Not Indicate 12 CP	Does Not Indicate 12 CP

Average to Annual Peak Test

Avg of System Peaks (MW)	4,487,497	4,895,070	5,589,002
Annual Peak (MW)	5,800,458	6,305,754	7,196,824
Avg Peak/Annual Peak	77.4%	77.6%	77.7%
81% or Greater Indicates 12CP	Does Not Indicate 12 CP	Does Not Indicate 12 CP	Does Not Indicate 12 CP

CMC Recommended Class Cost of Service Study
At OG&E Proposed Revenue Requirement

ACCT(S) / DESCRIPTION	TOTAL COMPANY PRO FORMA	TOTAL OKLA RETAIL JURISDICTION	TOTAL JURISDICTIONS NOT AT ISSUE	RESIDENTIAL STANDARD S/L-5	RESIDENTIAL TOU S/L-5	RESIDENTIAL VPP S/L-5	GENERAL SERVICE STANDARD S/L-5
SUMMARY OF RATE BASE							
GROSS ELECTRIC PLANT IN SERVICE	15,333,506,949	13,858,094,676	1,475,412,273	6,050,018,160	176,328,095	671,065,942	1,296,371,306
LESS: ACCUM PROV FOR DEPR	5,617,977,599	5,082,307,696	535,669,903	2,248,618,288	64,477,025	245,449,212	461,767,419
CONSTRUCTION WORK IN PROGRESS	0	0	0	0	0	0	0
PLANT HELD FOR FUTURE USE	2,256,157	2,184,703	71,454	976,289	28,316	115,010	182,361
NET ELECTRIC UTILITY PLANT IN SERVICE	9,717,785,507	8,777,971,683	939,813,824	3,802,376,160	111,879,385	425,731,740	834,786,247
ADDITIONS TO RATE BASE:							
CASH WORKING CAPITAL	(60,236,091)	(52,953,095)	(7,282,996)	(24,600,700)	(711,182)	(2,736,777)	(4,749,776)
PREPAYMENTS	12,105,692	11,116,269	989,423	4,572,472	124,700	480,658	847,168
MATERIALS AND SUPPLIES	231,838,575	213,389,561	18,449,014	100,000,919	3,022,132	11,394,458	22,151,632
FUEL INVENTORIES	126,114,901	115,458,696	10,656,205	33,516,801	1,068,698	4,102,518	6,654,831
GAS IN STORAGE	8,785,076	8,042,772	742,304	2,334,757	74,445	285,779	463,571
REGULATORY ASSETS	280,089,477	251,612,527	28,476,950	110,135,554	3,146,250	12,059,098	21,982,560
NET PENSION BENEFIT ASSET (OBLIGATION)	(31,423,711)	(27,624,349)	(3,799,363)	(12,833,590)	(371,006)	(1,427,710)	(2,477,843)
TOTAL ADDITIONS	567,273,919	519,042,381	48,231,538	213,126,212	6,354,035	24,158,023	44,872,143
DEDUCTIONS TO RATE BASE:							
ASSET RETIREMENT OBLIGATION	(81,168,936)	(74,522,012)	(6,646,924)	(30,332,588)	(819,644)	(3,165,913)	(5,526,306)
CUSTOMER DEPOSITS	(105,589,718)	(94,992,006)	(10,597,712)	(52,697,412)	(1,091,700)	(4,682,884)	(12,588,657)
ACCUMULATED DEFERRED TAXES	(1,219,407,521)	(1,102,749,561)	(116,657,960)	(479,861,492)	(13,955,083)	(53,134,551)	(102,313,743)
REGULATORY LIABILITIES	(869,571,910)	(785,797,268)	(83,774,642)	(343,290,948)	(10,012,091)	(38,098,853)	(73,662,665)
TOTAL DEDUCTIONS	(2,275,738,085)	(2,058,060,847)	(217,677,238)	(906,182,440)	(25,878,518)	(99,082,201)	(194,091,371)
TOTAL RATE BASE	8,009,321,341	7,238,953,217	770,368,124	3,109,319,932	92,354,902	350,807,562	685,567,019
SUMMARY OF RETURN AT PRESENT RATES							
RATE BASE	8,009,321,341	7,238,953,217	770,368,124	3,109,319,932	92,354,902	350,807,562	685,567,019
RETURN	344,941,283	333,157,849	11,783,434	137,295,162	1,992,529	14,035,938	31,051,445
RATE OF RETURN ON RATE BASE	4.30675%	4.60229%	1.52958%	4.41560%	2.15747%	4.00104%	4.52931%
RELATIVE RATE OF RETURN	1.000000	1.000000		0.959435	0.468781	0.869357	0.984142
FUEL	1	1	0	0	0	0	0
PURCHASED POWER	0	0	0	0	0	0	0
O&M (LESS FUEL), INCLUDES REGULATORY ASSET AMORTIZATION	471,835,801	415,309,570	56,526,231	186,602,645	5,386,291	20,729,291	36,539,609
INTEREST OF CUSTOMER DEPOSITS	2,718,667	2,606,796	111,871	1,446,138	29,960	128,510	345,460
DEPRECIATION EXPENSE	529,669,194	482,060,648	47,608,546	208,175,582	6,043,538	23,040,576	45,845,614
MISCELLANEOUS TAXES	226,320	198,956	27,364	92,430	2,672	10,283	17,846
PROPERTY TAXES	87,632,962	79,498,564	8,134,398	34,158,494	984,433	3,754,151	7,157,148
PAYROLL TAXES	14,215,141	12,496,424	1,718,717	5,805,530	167,832	645,853	1,120,902
FEDERAL & STATE INCOME TAX LIABILITY	3,624,818	10,635,319	(7,010,501)	2,704,614	(589,173)	(161,735)	846,590
TOTAL OPERATING EXPENSES	1,109,922,904	1,002,806,278	107,116,626	438,985,433	12,025,554	48,146,928	91,873,169
TOTAL OPERATING REVENUES (COST OF SERVICE)	1,454,864,187	1,335,964,127	118,900,060	576,280,596	14,018,082	62,182,867	122,924,614
LESS: OPERATING REVENUE CREDIT	19,145,325	18,241,473	903,852	13,714,335	163,528	953,082	1,168,264
PRESENT SALES REVENUE	1,435,718,862	1,317,722,655	117,996,208	562,566,260	13,854,554	61,229,784	121,756,350

CMC Recommended Class Cost of Service Study
At OG&E Proposed Revenue Requirement

<u>ACCT(S) / DESCRIPTION</u>	<u>TOTAL COMPANY PRO FORMA</u>	<u>TOTAL OKLA RETAIL JURISDICTION</u>	<u>TOTAL JURISDICTIONS NOT AT ISSUE</u>	<u>RESIDENTIAL STANDARD S/L-5</u>	<u>RESIDENTIAL TOU S/L-5</u>	<u>RESIDENTIAL YPP S/L-5</u>	<u>GENERAL SERVICE STANDARD S/L-5</u>
SUMMARY - EQUALIZED REQUESTED RATE OF RETURN							
RATE BASE	8,009,321,341	7,238,953,217	770,368,124	3,109,319,932	92,354,902	350,807,562	685,567,019
RATE OF RETURN ON RATE BASE	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%
RETURN	631,134,522	570,429,514	60,705,008	245,014,411	7,277,566	27,643,636	54,022,681
O&M (LESS FUEL), INCLUDES REGULATORY ASSET AMORTIZATION	471,835,802	415,309,571	56,526,231	186,602,645	5,386,291	20,729,291	36,539,609
INTEREST ON CUSTOMER DEPOSITS	2,718,667	2,606,796	111,871	1,446,138	29,960	128,510	345,460
DEPRECIATION EXPENSE	529,669,194	482,060,648	47,608,546	208,175,582	6,043,538	23,040,576	45,845,614
TAXES OTHER THAN INCOME TAXES	102,074,423	92,193,944	9,880,479	40,056,454	1,154,938	4,410,286	8,295,896
FED INCOME TAX LIABILITY @ CURRENT ROR	3,624,818	10,635,319	(7,010,501)	2,704,614	(589,173)	(161,735)	846,590
ADDITIONAL FED INCOME TAX LIABILITY	91,876,615	76,171,322	15,705,293	34,581,110	1,696,656	4,368,479	7,374,456
TOTAL OPERATING EXPENSES	1,201,799,519	1,078,977,600	122,821,918	473,566,544	13,722,209	52,515,407	99,247,625
RETURN DEFICIENCY BEFORE INCOME TAXES @ REQUESTED ROR	286,193,238	237,271,664	48,921,574	107,719,248	5,285,038	13,607,698	22,971,236
TOTAL PROPOSED OPERATING REVENUE (COST OF SERVICE)	1,832,934,041	1,649,407,114	183,526,927	718,580,954	20,999,776	80,159,043	153,270,306
LESS: OTHER OPERATING REVENUE	19,145,325	18,241,473	903,852	13,714,335	163,528	953,082	1,168,264
PROPOSED SALES REVENUE @ EQUALIZED ROR	1,813,788,716	1,631,165,641	182,623,075	704,866,619	20,836,248	79,205,961	152,102,042
TOTAL PRESENT OPERATING REVENUE	1,454,864,187	1,335,964,127	118,900,060	576,280,596	14,018,082	62,182,867	122,924,614
LESS: OTHER OPERATING REVENUE	19,145,325	18,241,473	903,852	13,714,335	163,528	953,082	1,168,264
PRESENT SALES REVENUE	1,435,718,862	1,317,722,655	117,996,208	562,566,260	13,854,554	61,229,784	121,756,350
REVENUE DEFICIENCY	378,069,854	313,442,987	64,626,867	142,300,359	6,981,693	17,976,177	30,345,692
PCT INCREASE TOTAL SALES REVENUE	26.33%	23.79%	54.77%	25.29%	50.39%	29.36%	24.92%

CMC Recommended Class Cost of Service Study
At OG&E Proposed Revenue Requirement

ACCT(S) / DESCRIPTION	GENERAL SERVICE	GENERAL SERVICE	OIL & GAS PRODUCTION	OIL & GAS PRODUCTION	OIL & GAS PRODUCTION	OIL & GAS PRODUCTION	PUBLIC SCHOOLS-SM
	TOU S/L-5	YPP S/L-5	STANDARD S/L-3	STANDARD S/L-5	TOU S/L-5	YPP S/L-5	STANDARD S/L-5
SUMMARY OF RATE BASE							
GROSS ELECTRIC PLANT IN SERVICE	122,502,801	83,270,854	35,877,266	57,863,913	5,155,784	2,072,342	18,899,810
LESS: ACCUM PROV FOR DEPR	44,293,331	30,656,244	13,620,763	21,204,618	1,969,576	770,303	6,950,370
CONSTRUCTION WORK IN PROGRESS	0	0	0	0	0	0	0
PLANT HELD FOR FUTURE USE	19,368	13,302	8,093	9,282	952	368	3,682
NET ELECTRIC UTILITY PLANT IN SERVICE	78,228,838	52,627,912	22,264,596	36,668,577	3,187,161	1,302,407	11,953,122
ADDITIONS TO RATE BASE:							
CASH WORKING CAPITAL PREPAYMENTS	(447,227)	(311,400)	(143,208)	(231,623)	(20,247)	(8,249)	(72,682)
MATERIALS AND SUPPLIES	86,842	61,338	31,433	42,491	4,505	1,672	14,209
FUEL INVENTORIES	2,016,172	1,319,927	519,401	934,600	74,565	32,324	295,963
GAS IN STORAGE	871,202	484,155	570,165	754,672	78,317	30,141	101,396
REGULATORY ASSETS	60,687	33,726	39,717	52,570	5,456	2,100	7,063
NET PENSION BENEFIT ASSET (OBLIGATION)	2,119,124	1,466,598	677,857	1,041,459	96,912	38,140	337,700
TOTAL ADDITIONS	(233,308)	(162,450)	(74,708)	(120,832)	(10,562)	(4,303)	(37,916)
TOTAL ADDITIONS	4,473,492	2,891,893	1,620,657	2,473,336	228,946	91,824	645,733
DEDUCTIONS TO RATE BASE:							
ASSET RETIREMENT OBLIGATION	(573,134)	(407,468)	(212,906)	(281,819)	(30,520)	(11,201)	(94,643)
CUSTOMER DEPOSITS	(648,040)	(417,206)	(356,351)	(537,303)	0	(8,424)	0
ACCUMULATED DEFERRED TAXES	(9,700,252)	(6,600,086)	(2,866,743)	(4,591,984)	(412,525)	(164,656)	(1,498,864)
REGULATORY LIABILITIES	(6,955,432)	(4,726,033)	(2,032,219)	(3,284,186)	(292,049)	(117,503)	(1,072,428)
TOTAL DEDUCTIONS	(17,876,858)	(12,150,793)	(5,468,218)	(8,695,291)	(735,093)	(301,784)	(2,665,935)
TOTAL RATE BASE	64,825,472	43,369,013	18,417,035	30,446,622	2,681,014	1,092,447	9,932,920
SUMMARY OF RETURN AT PRESENT RATES							
RATE BASE	64,825,472	43,369,013	18,417,035	30,446,622	2,681,014	1,092,447	9,932,920
RETURN	2,459,351	1,179,117	1,205,776	2,730,433	232,817	98,535	231,639
RATE OF RETURN ON RATE BASE	3.79380%	2.71880%	6.54707%	8.96793%	8.68391%	9.01963%	2.33203%
RELATIVE RATE OF RETURN	0.824329	0.590749	1.422567	1.948580	1.886865	1.959813	0.506711
OPERATING EXPENSES							
FUEL	0	0	0	0	0	0	0
PURCHASED POWER	0	0	0	0	0	0	0
O&M (LESS FUEL), INCLUDES REGULATORY ASSET AMORTIZATION	3,458,728	2,379,761	1,112,260	1,767,915	169,111	65,982	555,141
INTEREST OF CUSTOMER DEPOSITS	17,784	11,449	9,778	14,744	0	232	0
DEPRECIATION EXPENSE	4,289,787	2,979,106	1,262,163	2,094,736	183,446	73,655	673,128
MISCELLANEOUS TAXES	1,680	1,170	538	870	76	31	273
PROPERTY TAXES	686,949	469,399	209,594	326,689	30,240	11,829	106,812
PAYROLL TAXES	105,541	73,487	33,796	54,661	4,778	1,947	17,152
FEDERAL & STATE INCOME TAX LIABILITY	(73,014)	(198,517)	142,041	471,442	39,069	17,097	(57,800)
TOTAL OPERATING EXPENSES	8,487,456	5,715,855	2,770,170	4,731,057	426,721	170,773	1,294,706
TOTAL OPERATING REVENUES (COST OF SERVICE)							
TOTAL OPERATING REVENUES (COST OF SERVICE)	10,946,808	6,894,972	3,975,946	7,461,491	659,538	269,308	1,526,345
LESS: OPERATING REVENUE CREDIT	68,460	48,920	15,339	37,591	1,558	1,646	4,966
PRESENT SALES REVENUE	10,878,348	6,846,052	3,960,607	7,423,900	657,979	267,662	1,521,379

CMC Recommended Class Cost of Service Study
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<u>ACCT(S) / DESCRIPTION</u>	<u>GENERAL SERVICE TOU S/L-5</u>	<u>GENERAL SERVICE YPP S/L-5</u>	<u>OIL & GAS PRODUCTION STANDARD S/L-3</u>	<u>OIL & GAS PRODUCTION STANDARD S/L-5</u>	<u>OIL & GAS PRODUCTION TOU S/L-5</u>	<u>OIL & GAS PRODUCTION YPP S/L-5</u>	<u>PUBLIC SCHOOLS-SM STANDARD S/L-5</u>
SUMMARY - EQUALIZED REQUESTED RATE OF RETURN							
RATE BASE	64,825,472	43,369,013	18,417,035	30,446,622	2,681,014	1,092,447	9,932,920
RATE OF RETURN ON RATE BASE	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%
RETURN	5,108,247	3,417,478	1,451,262	2,399,194	211,264	86,085	782,714
O&M (LESS FUEL), INCLUDES REGULATORY ASSET AMORTIZATION	3,458,728	2,379,761	1,112,260	1,767,915	169,111	65,982	555,141
INTEREST ON CUSTOMER DEPOSITS	17,784	11,449	9,778	14,744	0	232	0
DEPRECIATION EXPENSE	4,289,787	2,979,106	1,262,163	2,094,736	183,446	73,655	673,128
TAXES OTHER THAN INCOME TAXES	794,171	544,056	243,928	382,220	35,095	13,807	124,237
FED INCOME TAX LIABILITY @ CURRENT ROR	(73,014)	(198,517)	142,041	471,442	39,069	17,097	(57,800)
ADDITIONAL FED INCOME TAX LIABILITY	850,375	718,581	78,808	(106,338)	(6,919)	(3,997)	176,912
TOTAL OPERATING EXPENSES	9,337,832	6,434,436	2,848,979	4,624,720	419,802	166,777	1,471,618
RETURN DEFICIENCY BEFORE INCOME TAXES @ REQUESTED ROR	2,648,896	2,238,361	245,486	(331,239)	(21,553)	(12,450)	551,075
TOTAL PROPOSED OPERATING REVENUE (COST OF SERVICE)	14,446,079	9,851,914	4,300,241	7,023,913	631,066	252,861	2,254,332
LESS: OTHER OPERATING REVENUE	68,460	48,920	15,339	37,591	1,558	1,646	4,966
PROPOSED SALES REVENUE @ EQUALIZED ROR	14,377,619	9,802,994	4,284,902	6,986,322	629,507	251,215	2,249,366
TOTAL PRESENT OPERATING REVENUE	10,946,808	6,894,972	3,975,946	7,461,491	659,538	269,308	1,526,345
LESS: OTHER OPERATING REVENUE	68,460	48,920	15,339	37,591	1,558	1,646	4,966
PRESENT SALES REVENUE	10,878,348	6,846,052	3,960,607	7,423,900	657,979	267,662	1,521,379
REVENUE DEFICIENCY	3,499,271	2,956,942	324,295	(437,577)	(28,472)	(16,447)	727,987
PCT INCREASE TOTAL SALES REVENUE	32.17%	43.19%	8.19%	-5.89%	-4.33%	-6.14%	47.85%

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ACCT(S) / DESCRIPTION	PUBLIC SCHOOLS-SM TOU S/L-5	PUBLIC SCHOOLS-SM YPP S/L-5	PUBLIC SCHOOLS-LG STANDARD S/L-3	PUBLIC SCHOOLS-LG STANDARD S/L-4	PUBLIC SCHOOLS-LG STANDARD S/L-5	PUBLIC SCHOOLS-LG TOU S/L-3	PUBLIC SCHOOLS-LG TOU S/L-4
SUMMARY OF RATE BASE							
GROSS ELECTRIC PLANT IN SERVICE	47,684,148	75,455,481	666,133	992,283	22,038,533	4,757,826	6,216,122
LESS: ACCUM PROV FOR DEPR	17,297,387	27,098,232	255,695	354,762	7,906,161	1,838,745	2,333,518
CONSTRUCTION WORK IN PROGRESS	0	0	0	0	0	0	0
PLANT HELD FOR FUTURE USE	10,626	17,150	166	288	4,347	1,159	1,544
NET ELECTRIC UTILITY PLANT IN SERVICE	30,397,387	48,374,400	410,604	637,809	14,136,719	2,920,239	3,884,148
ADDITIONS TO RATE BASE:							
CASH WORKING CAPITAL	(184,026)	(293,768)	(2,763)	(4,249)	(78,925)	(19,614)	(25,425)
PREPAYMENTS	36,386	55,229	621	790	16,937	4,626	5,639
MATERIALS AND SUPPLIES	763,524	1,229,438	9,568	15,973	362,018	66,955	91,782
FUEL INVENTORIES	263,958	436,610	5,045	6,558	149,068	35,943	52,968
GAS IN STORAGE	18,387	30,414	351	457	10,384	2,504	3,690
REGULATORY ASSETS	855,956	1,343,406	12,968	18,646	387,044	93,657	119,487
NET PENSION BENEFIT ASSET (OBLIGATION)	(96,002)	(153,252)	(1,442)	(2,217)	(41,173)	(10,232)	(13,264)
TOTAL ADDITIONS	1,658,183	2,648,077	24,348	35,957	805,354	173,839	234,877
DEDUCTIONS TO RATE BASE:							
ASSET RETIREMENT OBLIGATION	(242,208)	(365,828)	(4,221)	(5,276)	(112,581)	(31,575)	(38,231)
CUSTOMER DEPOSITS	0	0	0	0	0	0	0
ACCUMULATED DEFERRED TAXES	(3,783,703)	(5,978,903)	(53,301)	(78,871)	(1,749,765)	(381,549)	(497,108)
REGULATORY LIABILITIES	(2,705,366)	(4,282,834)	(37,704)	(56,272)	(1,250,289)	(269,145)	(351,961)
TOTAL DEDUCTIONS	(6,731,277)	(10,627,566)	(95,226)	(140,419)	(3,112,635)	(682,269)	(887,300)
TOTAL RATE BASE	25,324,293	40,394,911	339,726	533,347	11,829,438	2,411,810	3,231,725
SUMMARY OF RETURN AT PRESENT RATES							
RATE BASE	25,324,293	40,394,911	339,726	533,347	11,829,438	2,411,810	3,231,725
RETURN	126,349	197,794	847	6,766	499,639	21,305	42,899
RATE OF RETURN ON RATE BASE	0.49892%	0.48965%	0.24943%	1.26859%	4.22370%	0.88335%	1.32744%
RELATIVE RATE OF RETURN	0.108408	0.106393	0.054196	0.275644	0.917737	0.191936	0.288430
FUEL	0	0	0	0	0	0	0
PURCHASED POWER	0	0	0	0	0	0	0
O&M (LESS FUEL), INCLUDES REGULATORY ASSET AMORTIZATION	1,409,929	2,237,928	21,470	32,291	611,910	153,448	197,480
INTEREST OF CUSTOMER DEPOSITS	0	0	0	0	0	0	0
DEPRECIATION EXPENSE	1,647,210	2,615,957	22,513	33,635	756,947	160,077	212,006
MISCELLANEOUS TAXES	691	1,104	10	16	297	74	96
PROPERTY TAXES	270,157	424,301	3,924	5,653	125,342	28,318	36,483
PAYROLL TAXES	43,428	69,326	652	1,003	18,625	4,629	6,000
FEDERAL & STATE INCOME TAX LIABILITY	(296,392)	(473,979)	(4,248)	(4,924)	3,002	(25,251)	(29,228)
TOTAL OPERATING EXPENSES	3,075,023	4,874,636	44,322	67,673	1,516,123	321,295	422,836
TOTAL OPERATING REVENUES (COST OF SERVICE)	3,201,372	5,072,430	45,169	74,439	2,015,762	342,600	465,735
LESS: OPERATING REVENUE CREDIT	14,566	23,038	209	382	5,843	1,361	2,006
PRESENT SALES REVENUE	3,186,806	5,049,392	44,960	74,057	2,009,920	341,239	463,730

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<u>ACCT(S) / DESCRIPTION</u>	<u>PUBLIC SCHOOLS-SM TOU S/L-5</u>	<u>PUBLIC SCHOOLS-SM YPP S/L-5</u>	<u>PUBLIC SCHOOLS-LG STANDARD S/L-3</u>	<u>PUBLIC SCHOOLS-LG STANDARD S/L-4</u>	<u>PUBLIC SCHOOLS-LG STANDARD S/L-5</u>	<u>PUBLIC SCHOOLS-LG TOU S/L-3</u>	<u>PUBLIC SCHOOLS-LG TOU S/L-4</u>
SUMMARY - EQUALIZED REQUESTED RATE OF RETURN							
RATE BASE	25,324,293	40,394,911	339,726	533,347	11,829,438	2,411,810	3,231,725
RATE OF RETURN ON RATE BASE	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%
RETURN	1,995,554	3,183,119	26,770	42,028	932,160	190,051	254,660
O&M (LESS FUEL), INCLUDES REGULATORY ASSET AMORTIZATION	1,409,929	2,237,928	21,470	32,291	611,910	153,448	197,480
INTEREST ON CUSTOMER DEPOSITS	0	0	0	0	0	0	0
DEPRECIATION EXPENSE	1,647,210	2,615,957	22,513	33,635	756,947	160,077	212,006
TAXES OTHER THAN INCOME TAXES	314,277	494,731	4,587	6,671	144,264	33,021	42,578
FED INCOME TAX LIABILITY @ CURRENT ROR	(296,392)	(473,979)	(4,248)	(4,924)	3,002	(25,251)	(29,228)
ADDITIONAL FED INCOME TAX LIABILITY	600,071	958,379	8,322	11,320	138,852	54,173	67,982
TOTAL OPERATING EXPENSES	3,675,094	5,833,015	52,644	78,993	1,654,975	375,468	490,818
RETURN DEFICIENCY BEFORE INCOME TAXES @ REQUESTED ROR	1,869,205	2,985,325	25,923	35,262	432,520	168,746	211,761
TOTAL PROPOSED OPERATING REVENUE (COST OF SERVICE)	5,670,649	9,016,134	79,414	121,021	2,587,135	565,518	745,478
LESS: OTHER OPERATING REVENUE	14,566	23,038	209	382	5,843	1,361	2,006
PROPOSED SALES REVENUE @ EQUALIZED ROR	5,656,083	8,993,096	79,205	120,639	2,581,292	564,157	743,472
TOTAL PRESENT OPERATING REVENUE	3,201,372	5,072,430	45,169	74,439	2,015,762	342,600	465,735
LESS: OTHER OPERATING REVENUE	14,566	23,038	209	382	5,843	1,361	2,006
PRESENT SALES REVENUE	3,186,806	5,049,392	44,960	74,057	2,009,920	341,239	463,730
REVENUE DEFICIENCY	2,469,276	3,943,704	34,245	46,582	571,372	222,919	279,742
PCT INCREASE TOTAL SALES REVENUE	77.48%	78.10%	76.17%	62.90%	28.43%	65.33%	60.32%

CMC Recommended Class Cost of Service Study
At OG&E Proposed Revenue Requirement

ACCT(S)/ DESCRIPTION	PUBLIC	PWR & LGHT	PWR & LGHT	PWR & LGHT	PWR & LGHT	PWR & LGHT	PWR & LGHT	PWR & LGHT	PWR & LGHT	PWR & LGHT
	SCHOOLS-LG	STANDARD	STANDARD	STANDARD	STANDARD	STANDARD	STANDARD	STANDARD	STANDARD	STANDARD
	TOU	S/L-1	S/L-2	S/L-3	S/L-4	S/L-5	S/L-1	S/L-2	S/L-2	S/L-3
	S/L-5									
SUMMARY OF RATE BASE										
GROSS ELECTRIC PLANT IN SERVICE	100,402,671	1,485,664	39,602,249	88,403,450	34,292,181	1,532,300,745	7,209,190	33,886,177	146,531,135	
LESS: ACCUM PROV FOR DEPR	36,278,802	659,249	12,864,690	34,751,389	13,216,180	560,309,460	3,280,857	12,331,441	57,285,953	
CONSTRUCTION WORK IN PROGRESS	0	0	0	0	0	0	0	0	0	
PLANT HELD FOR FUTURE USE	20,322	155	1,744	19,760	7,794	262,528	798	2,135	33,439	
NET ELECTRIC UTILITY PLANT IN SERVICE	64,144,191	826,571	26,739,304	53,671,821	21,083,795	972,253,814	3,929,130	21,556,871	89,278,621	
ADDITIONS TO RATE BASE:										
CASH WORKING CAPITAL	(364,134)	(5,113)	(241,339)	(354,110)	(136,710)	(5,302,944)	(26,442)	(164,595)	(589,711)	
PREPAYMENTS	80,056	2,058	24,991	89,263	33,785	1,238,690	10,566	29,256	147,862	
MATERIALS AND SUPPLIES	1,629,170	14,171	684,633	1,196,828	478,803	24,385,702	65,499	486,083	1,998,034	
FUEL INVENTORIES	713,432	38,591	337,862	1,498,245	517,197	12,893,231	198,505	528,043	2,403,498	
GAS IN STORAGE	49,697	2,688	23,535	104,367	36,028	898,133	13,828	36,783	167,426	
REGULATORY ASSETS	1,788,509	31,680	810,433	1,748,457	671,579	27,034,987	158,071	686,565	2,901,145	
NET PENSION BENEFIT ASSET (OBLIGATION)	(189,960)	(2,667)	(125,901)	(184,731)	(71,319)	(2,766,418)	(13,794)	(85,865)	(307,638)	
TOTAL ADDITIONS	3,706,770	81,408	1,514,214	4,098,318	1,529,362	58,381,382	406,232	1,516,270	6,720,615	
DEDUCTIONS TO RATE BASE:										
ASSET RETIREMENT OBLIGATION	(534,254)	(14,448)	(162,257)	(611,933)	(230,926)	(8,288,241)	(74,188)	(198,620)	(1,013,232)	
CUSTOMER DEPOSITS	0	0	(84,875)	(1,239,628)	(34,114)	(10,820,077)	(226,545)	(236,413)	(578,331)	
ACCUMULATED DEFERRED TAXES	(7,983,183)	(121,652)	(3,125,607)	(7,122,807)	(2,758,136)	(121,953,803)	(576,830)	(2,750,217)	(11,803,737)	
REGULATORY LIABILITIES	(5,693,759)	(83,553)	(2,250,976)	(4,998,140)	(1,939,498)	(86,881,101)	(405,052)	(1,919,567)	(8,284,673)	
TOTAL DEDUCTIONS	(14,211,196)	(219,653)	(5,623,715)	(13,972,508)	(4,962,673)	(227,943,222)	(1,282,616)	(5,104,818)	(21,679,972)	
TOTAL RATE BASE	53,639,765	688,326	22,629,802	43,797,631	17,650,485	802,691,973	3,052,746	17,968,322	74,319,264	
SUMMARY OF RETURN AT PRESENT RATES										
RATE BASE	53,639,765	688,326	22,629,802	43,797,631	17,650,485	802,691,973	3,052,746	17,968,322	74,319,264	
RETURN	1,092,236	49,545	146,675	3,484,002	989,635	42,894,680	2,645,558	1,468,559	5,376,544	
RATE OF RETURN ON RATE BASE	2.03624%	7.19783%	0.64815%	7.95477%	5.60684%	5.34385%	86.66157%	8.17304%	7.23439%	
RELATIVE RATE OF RETURN	0.442441	1.563966	0.140832	1.728437	1.218272	1.161128	18.830085	1.775863	1.571909	
FUEL	0	0	0	0	0	0	0	0	0	
PURCHASED POWER	0	0	0	0	0	0	0	0	0	
O&M (LESS FUEL), INCLUDES REGULATORY ASSET AMORTIZATION	2,832,194	43,895	1,756,640	2,887,799	1,081,130	41,992,360	215,420	1,283,344	5,548,145	
INTEREST OF CUSTOMER DEPOSITS	0	0	2,328	34,019	936	296,927	6,217	6,488	15,870	
DEPRECIATION EXPENSE	3,413,018	50,607	1,336,409	2,973,069	1,161,261	53,277,836	256,770	1,119,530	4,917,800	
MISCELLANEOUS TAXES	1,368	19	907	1,330	514	19,924	99	618	2,216	
PROPERTY TAXES	574,936	9,756	214,661	535,392	206,204	8,818,461	44,827	205,461	886,726	
PAYROLL TAXES	85,932	1,207	56,954	83,567	32,262	1,251,444	6,240	38,843	139,166	
FEDERAL & STATE INCOME TAX LIABILITY	(363,067)	6,747	(254,015)	535,717	82,853	3,090,212	808,685	232,373	737,173	
TOTAL OPERATING EXPENSES	6,544,382	112,230	3,113,883	7,050,893	2,565,159	108,747,165	1,338,260	2,886,657	12,247,097	
TOTAL OPERATING REVENUES (COST OF SERVICE)	7,636,619	161,775	3,260,558	10,534,896	3,554,794	151,641,844	3,983,818	4,355,216	17,623,641	
LESS: OPERATING REVENUE CREDIT	26,466	260	6,601	52,522	14,498	878,004	8,052	8,068	94,648	
PRESENT SALES REVENUE	7,610,153	161,514	3,253,957	10,482,374	3,540,296	150,763,840	3,975,766	4,347,148	17,528,992	

CMC Recommended Class Cost of Service Study
At OG&E Proposed Revenue Requirement

ACCT(S)/ DESCRIPTION	PUBLIC	PWR & LGHT	PWR & LGHT	PWR & LGHT	PWR & LGHT	PWR & LGHT	PWR & LGHT	PWR & LGHT	PWR & LGHT
	SCHOOLS-LG TOU S/L-5	STANDARD S/L-1	STANDARD S/L-2	STANDARD S/L-3	STANDARD S/L-4	STANDARD S/L-5	TOU S/L-1	TOU S/L-2	TOU S/L-3
SUMMARY - EQUALIZED REQUESTED RATE OF RETURN									
RATE BASE	53,639,765	688,326	22,629,802	43,797,631	17,650,485	802,691,973	3,052,746	17,968,322	74,319,264
RATE OF RETURN ON RATE BASE	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%
RETURN	4,226,814	54,240	1,783,228	3,451,253	1,390,858	63,252,128	240,556	1,415,904	5,856,358
O&M (LESS FUEL), INCLUDES REGULATORY ASSET AMORTIZATION	2,832,194	43,895	1,756,640	2,887,799	1,081,130	41,992,360	215,420	1,283,344	5,548,145
INTEREST ON CUSTOMER DEPOSITS	0	0	2,328	34,019	936	296,927	6,217	6,488	15,870
DEPRECIATION EXPENSE	3,413,018	50,607	1,336,409	2,973,069	1,161,261	53,277,836	256,770	1,119,530	4,917,800
TAXES OTHER THAN INCOME TAXES	662,237	10,981	272,521	620,289	238,980	10,089,830	51,167	244,922	1,028,108
FED INCOME TAX LIABILITY @ CURRENT ROR	(363,067)	6,747	(254,015)	535,717	82,853	3,090,212	808,685	232,373	737,173
ADDITIONAL FED INCOME TAX LIABILITY	1,006,293	1,507	525,383	(10,513)	128,805	6,535,351	(772,078)	(16,904)	154,035
TOTAL OPERATING EXPENSES	7,550,676	113,738	3,639,266	7,040,380	2,693,964	115,282,516	566,182	2,869,753	12,401,131
RETURN DEFICIENCY BEFORE INCOME TAXES @ REQUESTED ROR	3,134,577	4,696	1,636,554	(32,749)	401,223	20,357,448	(2,405,002)	(52,655)	479,814
TOTAL PROPOSED OPERATING REVENUE (COST OF SERVICE)	11,777,489	167,978	5,422,494	10,491,633	4,084,822	178,534,644	806,738	4,285,657	18,257,489
LESS: OTHER OPERATING REVENUE	26,466	260	6,601	52,522	14,498	878,004	8,052	8,068	94,648
PROPOSED SALES REVENUE @ EQUALIZED ROR	11,751,023	167,717	5,415,893	10,439,111	4,070,324	177,656,640	798,687	4,277,589	18,162,841
TOTAL PRESENT OPERATING REVENUE	7,636,619	161,775	3,260,558	10,534,896	3,554,794	151,641,844	3,983,818	4,355,216	17,623,641
LESS: OTHER OPERATING REVENUE	26,466	260	6,601	52,522	14,498	878,004	8,052	8,068	94,648
PRESENT SALES REVENUE	7,610,153	161,514	3,253,957	10,482,374	3,540,296	150,763,840	3,975,766	4,347,148	17,528,992
REVENUE DEFICIENCY	4,140,871	6,203	2,161,936	(43,263)	530,028	26,892,799	(3,177,079)	(69,559)	633,849
PCT INCREASE TOTAL SALES REVENUE	54.41%	3.84%	66.44%	-0.41%	14.97%	17.84%	-79.91%	-1.60%	3.62%

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ACCT(S)/ DESCRIPTION	PWR & LGHT	PWR & LGHT	LARGE	LARGE	LARGE	LARGE	LARGE
	TOU S/L-4	TOU S/L-5	PWR & LGHT STANDARD S/L-2	PWR & LGHT TOU S/L-1	PWR & LGHT TOU S/L-2	PWR & LGHT TOU S/L-3	PWR & LGHT TOU S/L-4
SUMMARY OF RATE BASE							
GROSS ELECTRIC PLANT IN SERVICE	51,004,332	1,040,645,140	124,555,038	133,802,249	1,048,967,715	269,795,809	45,456,992
LESS: ACCUM PROV FOR DEPR	19,927,518	387,764,246	53,591,079	59,121,131	435,699,294	105,602,661	17,451,500
CONSTRUCTION WORK IN PROGRESS	0	0	0	0	0	0	0
PLANT HELD FOR FUTURE USE	11,071	198,677	12,266	13,978	95,202	61,910	10,551
NET ELECTRIC UTILITY PLANT IN SERVICE	31,087,885	653,079,571	70,976,224	74,695,097	613,363,622	164,255,059	28,016,042
ADDITIONS TO RATE BASE:							
CASH WORKING CAPITAL	(201,113)	(3,765,806)	(456,631)	(456,732)	(4,195,559)	(1,088,525)	(181,962)
PREPAYMENTS	52,340	914,189	163,068	185,186	1,272,310	277,511	44,782
MATERIALS AND SUPPLIES	691,998	15,901,283	1,295,426	1,290,973	11,917,023	3,648,726	638,812
FUEL INVENTORIES	684,426	10,943,242	2,912,750	3,005,444	21,977,665	4,324,228	749,753
GAS IN STORAGE	47,677	762,299	202,900	209,357	1,530,949	301,223	52,227
REGULATORY ASSETS	1,008,641	19,077,514	2,641,148	2,850,243	22,120,602	5,378,613	891,412
NET PENSION BENEFIT ASSET (OBLIGATION)	(104,916)	(1,964,530)	(238,213)	(238,266)	(2,188,722)	(567,857)	(94,925)
TOTAL ADDITIONS	2,179,054	41,868,191	6,520,447	6,846,206	52,434,268	12,273,918	2,100,100
DEDUCTIONS TO RATE BASE:							
ASSET RETIREMENT OBLIGATION	(359,010)	(6,171,599)	(1,140,992)	(1,300,326)	(8,856,018)	(1,904,223)	(306,007)
CUSTOMER DEPOSITS	(190,369)	(4,066,673)	0	0	(3,820,987)	(511,731)	0
ACCUMULATED DEFERRED TAXES	(4,108,055)	(83,154,538)	(10,197,653)	(10,989,709)	(85,486,737)	(21,750,497)	(3,657,665)
REGULATORY LIABILITIES	(2,883,053)	(58,946,320)	(7,012,290)	(7,524,950)	(59,135,860)	(15,249,779)	(2,570,963)
TOTAL DEDUCTIONS	(7,540,488)	(152,339,130)	(18,350,935)	(19,814,985)	(157,299,603)	(39,416,231)	(6,534,635)
TOTAL RATE BASE	25,726,451	542,608,632	59,145,737	61,726,318	508,498,288	137,112,746	23,581,507
SUMMARY OF RETURN AT PRESENT RATES							
RATE BASE	25,726,451	542,608,632	59,145,737	61,726,318	508,498,288	137,112,746	23,581,507
RETURN	1,212,465	23,307,368	2,179,880	3,605,468	25,352,409	6,700,372	1,046,725
RATE OF RETURN ON RATE BASE	4.71291%	4.29543%	3.68561%	5.84105%	4.98574%	4.88676%	4.43875%
RELATIVE RATE OF RETURN	1.024036	0.933324	0.800820	1.269162	1.083317	1.061810	0.964466
FUEL	0	0	0	0	0	0	0
PURCHASED POWER	0	0	0	0	0	0	0
O&M (LESS FUEL), INCLUDES REGULATORY ASSET AMORTIZATION	1,600,684	30,208,460	4,247,869	3,952,673	34,423,635	8,649,812	1,439,371
INTEREST OF CUSTOMER DEPOSITS	5,224	111,600	0	0	104,856	14,043	0
DEPRECIATION EXPENSE	1,725,073	35,393,154	4,182,726	4,497,303	35,227,628	9,016,799	1,530,624
MISCELLANEOUS TAXES	756	14,149	1,716	1,716	15,764	4,090	684
PROPERTY TAXES	309,180	6,093,672	811,070	885,553	6,677,608	1,639,136	273,620
PAYROLL TAXES	47,461	888,694	107,761	107,784	990,112	256,881	42,941
FEDERAL & STATE INCOME TAX LIABILITY	46,933	262,651	(87,160)	336,160	1,373,028	326,658	22,265
TOTAL OPERATING EXPENSES	3,735,310	72,972,380	9,263,981	9,781,189	78,812,631	19,907,419	3,309,505
TOTAL OPERATING REVENUES (COST OF SERVICE)	4,947,775	96,279,748	11,443,861	13,386,657	104,165,040	26,607,792	4,356,230
LESS: OPERATING REVENUE CREDIT	29,025	493,403	15,502	16,931	131,993	134,284	10,946
PRESENT SALES REVENUE	4,918,749	95,786,345	11,428,358	13,369,726	104,033,047	26,473,508	4,345,284

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<u>ACCT(S) / DESCRIPTION</u>	<u>PWR & LGHT</u> <u>TOU</u> <u>S/L-4</u>	<u>PWR & LGHT</u> <u>TOU</u> <u>S/L-5</u>	<u>LARGE</u> <u>PWR & LGHT</u> <u>STANDARD</u> <u>S/L-2</u>	<u>LARGE</u> <u>PWR & LGHT</u> <u>TOU</u> <u>S/L-1</u>	<u>LARGE</u> <u>PWR & LGHT</u> <u>TOU</u> <u>S/L-2</u>	<u>LARGE</u> <u>PWR & LGHT</u> <u>TOU</u> <u>S/L-3</u>	<u>LARGE</u> <u>PWR & LGHT</u> <u>TOU</u> <u>S/L-4</u>
SUMMARY - EQUALIZED REQUESTED RATE OF RETURN							
RATE BASE	25,726,451	542,608,632	59,145,737	61,726,318	508,498,288	137,112,746	23,581,507
RATE OF RETURN ON RATE BASE	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%
RETURN	2,027,244	42,757,560	4,660,684	4,864,034	40,069,665	10,804,484	1,858,223
O&M (LESS FUEL), INCLUDES REGULATORY ASSET AMORTIZATION	1,600,684	30,208,460	4,247,869	3,952,673	34,423,636	8,649,812	1,439,371
INTEREST ON CUSTOMER DEPOSITS	5,224	111,600	0	0	104,856	14,043	0
DEPRECIATION EXPENSE	1,725,073	35,393,154	4,182,726	4,497,303	35,227,628	9,016,799	1,530,624
TAXES OTHER THAN INCOME TAXES	357,396	6,996,516	920,546	995,054	7,683,484	1,900,107	317,245
FED INCOME TAX LIABILITY @ CURRENT ROR	46,933	262,651	(87,160)	336,160	1,373,028	326,658	22,265
ADDITIONAL FED INCOME TAX LIABILITY	261,569	6,244,095	796,412	404,038	4,724,681	1,317,543	260,515
TOTAL OPERATING EXPENSES	3,996,878	79,216,476	10,060,393	10,185,227	83,537,312	21,224,963	3,570,020
RETURN DEFICIENCY BEFORE INCOME TAXES @ REQUESTED ROR	814,779	19,450,192	2,480,804	1,258,566	14,717,256	4,104,112	811,498
TOTAL PROPOSED OPERATING REVENUE (COST OF SERVICE)	6,024,123	121,974,036	14,721,077	15,049,261	123,606,977	32,029,447	5,428,243
LESS: OTHER OPERATING REVENUE	29,025	493,403	15,502	16,931	131,993	134,284	10,946
PROPOSED SALES REVENUE @ EQUALIZED ROR	5,995,097	121,480,632	14,705,575	15,032,330	123,474,984	31,895,163	5,417,297
TOTAL PRESENT OPERATING REVENUE	4,947,775	96,279,748	11,443,861	13,386,657	104,165,040	26,607,792	4,356,230
LESS: OTHER OPERATING REVENUE	29,025	493,403	15,502	16,931	131,993	134,284	10,946
PRESENT SALES REVENUE	4,918,749	95,786,345	11,428,358	13,369,726	104,033,047	26,473,508	4,345,284
REVENUE DEFICIENCY	1,076,348	25,694,288	3,277,216	1,662,604	19,441,937	5,421,655	1,072,013
PCT INCREASE TOTAL SALES REVENUE	21.88%	26.82%	28.68%	12.44%	18.69%	20.48%	24.67%

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<u>ACCT(S)/ DESCRIPTION</u>	<u>LARGE PWR & LGHT TOU S/L-5</u>	<u>MUNICIPAL PUMPING STANDARD S/L-5</u>	<u>MUNICIPAL PUMPING TOU S/L-5</u>	<u>MUNICIPAL LIGHTING S/L-5</u>	<u>SECURITY LIGHTING S/L-5</u>	<u>LED LIGHTING S/L-5</u>	<u>BACK UP & MAINTENANCE S/L-1</u>
SUMMARY OF RATE BASE							
GROSS ELECTRIC PLANT IN SERVICE	104,356,192	39,571,806	379,546	34,180,124	45,781,723	252,838,897	5,408,852
LESS: ACCUM PROV FOR DEPR	39,524,883	14,764,766	148,789	(34,787)	1,666,478	17,512,028	1,728,443
CONSTRUCTION WORK IN PROGRESS	0	0	0	0	0	0	0
PLANT HELD FOR FUTURE USE	21,284	7,775	78	1,925	3,850	5,093	68
NET ELECTRIC UTILITY PLANT IN SERVICE	64,852,593	24,814,815	230,834	34,216,836	44,119,096	235,331,961	3,680,477
ADDITIONS TO RATE BASE:							
CASH WORKING CAPITAL	(388,818)	(156,185)	(1,563)	(32,613)	(61,596)	(134,428)	(4,623)
PREPAYMENTS	97,325	32,897	381	5,512	11,024	14,600	902
MATERIALS AND SUPPLIES	1,543,737	602,663	5,381	94,672	189,307	257,757	71,532
FUEL INVENTORIES	1,413,496	554,023	7,062	98,748	197,748	261,562	16,899
GAS IN STORAGE	98,463	38,593	492	6,879	13,775	18,220	1,177
REGULATORY ASSETS	1,966,710	733,817	7,454	344,702	507,816	2,251,055	68,960
NET PENSION BENEFIT ASSET (OBLIGATION)	(202,837)	(81,478)	(815)	(17,013)	(32,133)	(70,128)	(2,412)
TOTAL ADDITIONS	4,528,076	1,724,330	18,392	500,886	825,941	2,598,638	152,435
DEDUCTIONS TO RATE BASE:							
ASSET RETIREMENT OBLIGATION	(660,959)	(221,348)	(2,597)	(36,932)	(73,864)	(97,646)	(6,331)
CUSTOMER DEPOSITS	(59,035)	(370)	0	(407)	(94,473)	0	0
ACCUMULATED DEFERRED TAXES	(8,368,036)	(3,158,655)	(29,669)	(2,613,834)	(3,497,620)	(19,359,756)	(557,989)
REGULATORY LIABILITIES	(5,906,645)	(2,242,917)	(21,465)	(1,953,871)	(2,614,511)	(14,471,640)	(308,706)
TOTAL DEDUCTIONS	(14,994,675)	(5,623,290)	(53,731)	(4,605,044)	(6,280,468)	(33,929,043)	(873,026)
TOTAL RATE BASE	54,385,994	20,915,855	195,496	30,112,678	38,664,569	204,001,556	2,959,887
SUMMARY OF RETURN AT PRESENT RATES							
RATE BASE	54,385,994	20,915,855	195,496	30,112,678	38,664,569	204,001,556	2,959,887
RETURN	3,346,306	1,262,629	14,715	2,862,227	4,458,789	6,217,131	35,590
RATE OF RETURN ON RATE BASE	6.15288%	6.03671%	7.52700%	9.50505%	11.53198%	3.04759%	1.20242%
RELATIVE RATE OF RETURN	1.336917	1.311674	1.635490	2.065287	2.505702	0.662189	0.261266
FUEL	0	0	0	0	0	0	0
PURCHASED POWER	0	0	0	0	0	0	0
O&M (LESS FUEL), INCLUDES REGULATORY ASSET AMORTIZATION	3,086,339	1,208,502	11,701	577,228	851,346	3,844,206	135,624
INTEREST OF CUSTOMER DEPOSITS	1,619	10	0	10	2,594	0	0
DEPRECIATION EXPENSE	3,478,491	1,386,283	13,608	736,829	1,052,302	15,083,734	120,116
MISCELLANEOUS TAXES	1,461	587	6	123	231	505	17
PROPERTY TAXES	619,993	229,505	2,107	166,279	223,285	1,225,162	56,055
PAYROLL TAXES	91,757	36,858	369	7,696	14,536	31,724	1,091
FEDERAL & STATE INCOME TAX LIABILITY	350,628	127,045	2,123	518,195	916,952	(718,470)	(27,957)
TOTAL OPERATING EXPENSES	7,630,288	2,988,789	29,914	2,006,360	3,061,246	19,466,861	284,946
TOTAL OPERATING REVENUES (COST OF SERVICE)	10,976,594	4,251,418	44,629	4,868,587	7,520,035	25,683,992	320,536
LESS: OPERATING REVENUE CREDIT	37,299	11,763	118	3,609	27,754	14,414	218
PRESENT SALES REVENUE	10,939,295	4,239,655	44,511	4,864,978	7,492,281	25,669,578	320,319

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<u>ACCT(S)/ DESCRIPTION</u>	<u>LARGE PWR & LGHT TOU S/L-5</u>	<u>MUNICIPAL PUMPING STANDARD S/L-5</u>	<u>MUNICIPAL PUMPING TOU S/L-5</u>	<u>MUNICIPAL LIGHTING S/L-5</u>	<u>SECURITY LIGHTING S/L-5</u>	<u>LED LIGHTING S/L-5</u>	<u>BACK UP & MAINTENANCE S/L-1</u>
SUMMARY - EQUALIZED REQUESTED RATE OF RETURN							
RATE BASE	54,385,994	20,915,855	195,496	30,112,678	38,664,569	204,001,556	2,959,887
RATE OF RETURN ON RATE BASE	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%
RETURN	4,285,616	1,648,169	15,405	2,372,879	3,046,768	16,075,323	233,239
O&M (LESS FUEL), INCLUDES REGULATORY ASSET AMORTIZATION	3,086,339	1,208,502	11,701	577,228	851,346	3,844,206	135,624
INTEREST ON CUSTOMER DEPOSITS	1,619	10	0	10	2,594	0	0
DEPRECIATION EXPENSE	3,478,491	1,386,283	13,608	736,829	1,052,302	15,083,734	120,116
TAXES OTHER THAN INCOME TAXES	713,211	266,950	2,482	174,098	238,053	1,257,390	57,163
FED INCOME TAX LIABILITY @ CURRENT ROR	350,628	127,045	2,123	518,195	916,952	(718,470)	(27,957)
ADDITIONAL FED INCOME TAX LIABILITY	301,547	123,770	222	(157,095)	(453,301)	3,164,775	63,451
TOTAL OPERATING EXPENSES	7,931,835	3,112,559	30,135	1,849,265	2,607,945	22,631,636	348,397
RETURN DEFICIENCY BEFORE INCOME TAXES @ REQUESTED ROR	939,310	385,541	690	(489,348)	(1,412,021)	9,858,192	197,649
TOTAL PROPOSED OPERATING REVENUE (COST OF SERVICE)	12,217,451	4,760,729	45,540	4,222,144	5,654,713	38,706,959	581,636
LESS: OTHER OPERATING REVENUE	37,299	11,763	118	3,609	27,754	14,414	218
PROPOSED SALES REVENUE @ EQUALIZED ROR	12,180,153	4,748,966	45,423	4,218,535	5,626,959	38,692,545	581,418
TOTAL PRESENT OPERATING REVENUE	10,976,594	4,251,418	44,629	4,868,587	7,520,035	25,683,992	320,536
LESS: OTHER OPERATING REVENUE	37,299	11,763	118	3,609	27,754	14,414	218
PRESENT SALES REVENUE	10,939,295	4,239,655	44,511	4,864,978	7,492,281	25,669,578	320,319
REVENUE DEFICIENCY	1,240,857	509,311	912	(646,443)	(1,865,322)	13,022,967	261,100
PCT INCREASE TOTAL SALES REVENUE	11.34%	12.01%	2.05%	-13.29%	-24.90%	50.73%	81.51%

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<u>ACCT(S) / DESCRIPTION</u>	<u>TOTAL COMPANY PRO FORMA</u>	<u>TOTAL OKLA RETAIL JURISDICTION</u>	<u>TOTAL JURISDICTIONS NOT AT ISSUE</u>	<u>RESIDENTIAL STANDARD S/L-5</u>	<u>RESIDENTIAL TOU S/L-5</u>	<u>RESIDENTIAL YPP S/L-5</u>	<u>GENERAL SERVICE STANDARD S/L-5</u>
SUMMARY OF RATE BASE							
GROSS ELECTRIC PLANT IN SERVICE	15,417,660,662	13,923,373,053	1,494,287,608	6,099,604,390	152,004,905	691,994,152	1,321,567,089
LESS: ACCUM PROV FOR DEPR	5,622,718,605	5,087,396,491	535,322,114	2,255,988,221	55,376,157	251,976,058	469,849,857
CONSTRUCTION WORK IN PROGRESS	0	0	0	0	0	0	0
PLANT HELD FOR FUTURE USE	2,099,537	2,027,482	72,055	906,036	22,365	108,743	170,746
NET ELECTRIC UTILITY PLANT IN SERVICE	9,797,041,593	8,838,004,045	959,037,548	3,844,522,205	96,651,113	440,126,836	851,887,978
ADDITIONS TO RATE BASE:							
CASH WORKING CAPITAL	(60,236,091)	(52,922,170)	(7,313,921)	(24,596,413)	(607,517)	(2,800,572)	(4,841,967)
PREPAYMENTS	10,400,353	9,543,867	856,486	3,966,624	92,481	427,395	744,158
MATERIALS AND SUPPLIES	200,241,292	184,267,568	15,973,724	86,636,349	2,236,021	10,104,266	19,409,549
FUEL INVENTORIES	98,020,977	89,579,214	8,441,763	26,513,106	721,434	3,323,499	5,314,403
GAS IN STORAGE	16,840,880	15,390,510	1,450,370	4,555,189	123,949	571,007	913,062
REGULATORY ASSETS	220,796,384	195,555,108	25,241,276	87,295,987	2,159,177	9,887,592	18,070,843
NET PENSION BENEFIT ASSET (OBLIGATION)	(24,364,274)	(21,405,942)	(2,958,332)	(9,948,749)	(245,728)	(1,132,774)	(1,958,477)
TOTAL ADDITIONS	461,699,521	420,008,155	41,691,365	174,422,093	4,479,817	20,380,412	37,651,572
DEDUCTIONS TO RATE BASE:							
ASSET RETIREMENT OBLIGATION	(81,168,936)	(74,466,168)	(6,702,768)	(30,591,436)	(705,683)	(3,269,322)	(5,628,335)
CUSTOMER DEPOSITS	(99,885,522)	(89,860,322)	(10,025,200)	(49,850,578)	(1,032,724)	(4,429,904)	(11,908,589)
ACCUMULATED DEFERRED TAXES	(1,215,890,316)	(1,098,698,574)	(117,191,742)	(479,856,406)	(11,931,248)	(54,346,524)	(103,443,633)
REGULATORY LIABILITIES	(884,705,536)	(798,855,389)	(85,850,147)	(350,185,971)	(8,732,899)	(39,749,931)	(75,980,701)
TOTAL DEDUCTIONS	(2,281,650,310)	(2,061,880,453)	(219,769,857)	(910,484,391)	(22,402,554)	(101,795,681)	(196,961,258)
TOTAL RATE BASE	7,977,090,804	7,196,131,748	780,959,057	3,108,459,907	78,728,375	358,711,568	692,578,292
SUMMARY OF RETURN AT PRESENT RATES							
RATE BASE	7,977,090,804	7,196,131,748	780,959,057	3,108,459,907	78,728,375	358,711,568	692,578,292
RETURN	324,736,773	315,068,634	9,668,140	131,106,206	1,523,669	13,702,020	29,353,510
RATE OF RETURN ON RATE BASE	4.07087%	4.37831%	1.23798%	4.21772%	1.93535%	3.81979%	4.23829%
RELATIVE RATE OF RETURN		1.000000		0.963323	0.442032	0.872435	0.968022
FUEL	1	1	0	0	0	0	0
PURCHASED POWER	0	0	0	0	0	0	0
O&M (LESS FUEL), INCLUDES REGULATORY ASSET AMORTIZATION	472,497,179	415,476,266	57,020,913	187,034,920	4,614,973	21,262,312	37,275,752
INTEREST OF CUSTOMER DEPOSITS	2,718,667	2,606,796	111,871	1,446,138	29,960	128,510	345,460
DEPRECIATION EXPENSE	536,719,081	488,019,446	48,699,635	211,668,004	5,265,245	23,963,106	47,111,774
MISCELLANEOUS TAXES	226,320	198,840	27,480	92,414	2,283	10,522	18,192
PROPERTY TAXES	87,720,601	79,514,301	8,206,300	34,319,871	845,489	3,858,353	7,268,419
PAYROLL TAXES	14,002,403	12,302,218	1,700,184	5,717,650	141,223	651,017	1,125,557
FEDERAL & STATE INCOME TAX LIABILITY	(2,627,597)	5,131,660	(7,759,257)	614,210	(561,295)	(387,371)	182,589
TOTAL OPERATING EXPENSES	1,111,256,654	1,003,249,528	108,007,126	440,893,208	10,337,877	49,486,450	93,327,744
TOTAL OPERATING REVENUES (COST OF SERVICE)	1,435,993,428	1,318,318,162	117,675,266	571,999,414	11,861,546	63,188,470	122,681,255
LESS: OPERATING REVENUE CREDIT	18,954,911	18,051,059	903,852	13,644,262	162,188	944,682	1,153,444
PRESENT SALES REVENUE	1,417,038,517	1,300,267,103	116,771,414	558,355,152	11,699,358	62,243,788	121,527,810

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<u>ACCT(S) / DESCRIPTION</u>	<u>TOTAL COMPANY PRO FORMA</u>	<u>TOTAL OKLA RETAIL JURISDICTION</u>	<u>TOTAL JURISDICTIONS NOT AT ISSUE</u>	<u>RESIDENTIAL STANDARD S/L-5</u>	<u>RESIDENTIAL TOU S/L-5</u>	<u>RESIDENTIAL YPP S/L-5</u>	<u>GENERAL SERVICE STANDARD S/L-5</u>
SUMMARY - EQUALIZED REQUESTED RATE OF RETURN							
RATE BASE	7,977,090,804	7,196,131,748	780,959,057	3,108,459,907	78,728,375	358,711,568	692,578,292
RATE OF RETURN ON RATE BASE	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%
RETURN	628,594,755	567,055,182	61,539,574	244,946,641	6,203,796	28,266,472	54,575,169
O&M (LESS FUEL), INCLUDES REGULATORY ASSET AMORTIZATION	472,497,180	415,476,267	57,020,913	187,034,921	4,614,973	21,262,312	37,275,752
INTEREST ON CUSTOMER DEPOSITS	2,718,667	2,606,796	111,871	1,446,138	29,960	128,510	345,460
DEPRECIATION EXPENSE	536,719,081	488,019,446	48,699,635	211,668,004	5,265,245	23,963,106	47,111,774
TAXES OTHER THAN INCOME TAXES	101,949,323	92,015,359	9,933,965	40,129,935	988,994	4,519,893	8,412,169
FED INCOME TAX LIABILITY @ CURRENT ROR	(2,627,597)	5,131,660	(7,759,257)	614,210	(561,295)	(387,371)	182,589
ADDITIONAL FED INCOME TAX LIABILITY	97,547,528	80,895,241	16,652,286	36,546,195	1,502,461	4,675,626	8,096,909
TOTAL OPERATING EXPENSES	1,208,804,182	1,084,144,770	124,659,413	477,439,403	11,840,338	54,162,075	101,424,654
RETURN DEFICIENCY BEFORE INCOME TAXES @ REQUESTED ROR	303,857,982	251,986,548	51,871,434	113,840,435	4,680,127	14,564,451	25,221,659
TOTAL PROPOSED OPERATING REVENUE (COST OF SERVICE)	1,837,398,938	1,651,199,951	186,198,986	722,386,044	18,044,134	82,428,547	155,999,823
LESS: OTHER OPERATING REVENUE	18,954,911	18,051,059	903,852	13,644,262	162,188	944,682	1,153,444
PROPOSED SALES REVENUE @ EQUALIZED ROR	1,818,444,027	1,633,148,893	185,295,134	708,741,782	17,881,946	81,483,865	154,846,379
TOTAL PRESENT OPERATING REVENUE	1,435,993,428	1,318,318,162	117,675,266	571,999,414	11,861,546	63,188,470	122,681,255
LESS: OTHER OPERATING REVENUE	18,954,911	18,051,059	903,852	13,644,262	162,188	944,682	1,153,444
PRESENT SALES REVENUE	1,417,038,517	1,300,267,103	116,771,414	558,355,152	11,699,358	62,243,788	121,527,810
REVENUE DEFICIENCY	401,405,510	332,881,789	68,523,721	150,386,629	6,182,588	19,240,077	33,318,568
PCT INCREASE TOTAL SALES REVENUE	28.33%	25.60%	58.68%	26.93%	52.85%	30.91%	27.42%

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<u>ACCT(S) / DESCRIPTION</u>	<u>GENERAL SERVICE TOU S/L-5</u>	<u>GENERAL SERVICE YPP S/L-5</u>	<u>OIL & GAS PRODUCTION STANDARD S/L-3</u>	<u>OIL & GAS PRODUCTION STANDARD S/L-5</u>	<u>OIL & GAS PRODUCTION TOU S/L-5</u>	<u>OIL & GAS PRODUCTION YPP S/L-5</u>	<u>PUBLIC SCHOOLS-SM STANDARD S/L-5</u>
SUMMARY OF RATE BASE							
GROSS ELECTRIC PLANT IN SERVICE	121,777,636	84,674,067	36,697,570	57,690,330	5,374,393	2,370,048	19,282,669
LESS: ACCUM PROV FOR DEPR	43,984,569	31,123,416	13,897,196	21,118,212	2,045,492	877,773	7,088,300
CONSTRUCTION WORK IN PROGRESS	0	0	0	0	0	0	0
PLANT HELD FOR FUTURE USE	17,664	12,415	7,571	8,527	916	389	3,439
NET ELECTRIC UTILITY PLANT IN SERVICE	77,810,731	53,563,066	22,807,945	36,580,645	3,329,817	1,492,664	12,197,808
ADDITIONS TO RATE BASE:							
CASH WORKING CAPITAL	(441,526)	(314,316)	(145,845)	(229,348)	(20,985)	(9,387)	(73,720)
PREPAYMENTS	74,216	53,469	27,577	36,510	4,026	1,654	12,481
MATERIALS AND SUPPLIES	1,719,205	1,152,723	453,996	797,740	66,539	31,744	258,518
FUEL INVENTORIES	677,031	382,674	457,758	591,655	64,106	27,054	81,553
GAS IN STORAGE	116,320	65,747	78,647	101,652	11,014	4,648	14,012
REGULATORY ASSETS	1,667,096	1,171,865	527,939	820,525	76,845	33,821	270,286
NET PENSION BENEFIT ASSET (OBLIGATION)	(178,588)	(127,134)	(58,991)	(92,767)	(8,488)	(3,797)	(29,818)
TOTAL ADDITIONS	3,633,755	2,385,027	1,341,081	2,025,966	193,058	85,736	533,312
DEDUCTIONS TO RATE BASE:							
ASSET RETIREMENT OBLIGATION	(568,994)	(412,906)	(217,939)	(281,656)	(31,818)	(12,906)	(96,753)
CUSTOMER DEPOSITS	(613,032)	(394,667)	(337,100)	(508,277)	0	(7,969)	0
ACCUMULATED DEFERRED TAXES	(9,563,615)	(6,655,818)	(2,908,668)	(4,541,278)	(426,630)	(186,815)	(1,516,944)
REGULATORY LIABILITIES	(6,995,897)	(4,862,512)	(2,103,185)	(3,312,882)	(308,022)	(135,958)	(1,107,038)
TOTAL DEDUCTIONS	(17,741,538)	(12,325,904)	(5,566,892)	(8,644,094)	(766,471)	(343,648)	(2,720,735)
TOTAL RATE BASE	63,702,947	43,622,190	18,582,134	29,962,517	2,756,404	1,234,752	10,010,385
SUMMARY OF RETURN AT PRESENT RATES							
RATE BASE	63,702,947	43,622,190	18,582,134	29,962,517	2,756,404	1,234,752	10,010,385
RETURN	2,222,131	1,097,799	1,048,680	2,641,954	232,110	108,908	218,489
RATE OF RETURN ON RATE BASE	3.48827%	2.51661%	5.64348%	8.81753%	8.42076%	8.82025%	2.18262%
RELATIVE RATE OF RETURN	0.796717	0.574790	1.288965	2.013914	1.923291	2.014535	0.498508
OPERATING EXPENSES							
FUEL	0	0	0	0	0	0	0
PURCHASED POWER	0	0	0	0	0	0	0
O&M (LESS FUEL), INCLUDES REGULATORY ASSET AMORTIZATION	3,420,224	2,405,625	1,134,014	1,754,473	175,070	74,825	564,076
INTEREST OF CUSTOMER DEPOSITS	17,784	11,449	9,778	14,744	0	232	0
DEPRECIATION EXPENSE	4,302,895	3,051,218	1,302,150	2,108,589	192,586	84,766	691,849
MISCELLANEOUS TAXES	1,659	1,181	548	862	79	35	277
PROPERTY TAXES	680,387	475,407	213,670	324,693	31,433	13,496	108,647
PAYROLL TAXES	102,636	73,066	33,903	53,314	4,878	2,182	17,137
FEDERAL & STATE INCOME TAX LIABILITY	(136,590)	(229,605)	88,724	448,370	37,737	18,488	(63,423)
TOTAL OPERATING EXPENSES	8,388,995	5,788,340	2,782,788	4,705,045	441,782	194,025	1,318,564
TOTAL OPERATING REVENUES (COST OF SERVICE)							
TOTAL OPERATING REVENUES (COST OF SERVICE)	10,611,126	6,886,139	3,831,468	7,346,999	673,892	302,933	1,537,053
LESS: OPERATING REVENUE CREDIT	66,876	47,940	14,616	36,417	1,446	1,593	4,765
PRESENT SALES REVENUE	10,544,250	6,838,199	3,816,852	7,310,582	672,447	301,340	1,532,288

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<u>ACCT(S) / DESCRIPTION</u>	<u>GENERAL SERVICE TOU S/L-5</u>	<u>GENERAL SERVICE YPP S/L-5</u>	<u>OIL & GAS PRODUCTION STANDARD S/L-3</u>	<u>OIL & GAS PRODUCTION STANDARD S/L-5</u>	<u>OIL & GAS PRODUCTION TOU S/L-5</u>	<u>OIL & GAS PRODUCTION YPP S/L-5</u>	<u>PUBLIC SCHOOLS-SM STANDARD S/L-5</u>
SUMMARY - EQUALIZED REQUESTED RATE OF RETURN							
RATE BASE	63,702,947	43,622,190	18,582,134	29,962,517	2,756,404	1,234,752	10,010,385
RATE OF RETURN ON RATE BASE	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%
RETURN	5,019,792	3,437,429	1,464,272	2,361,046	217,205	97,298	788,818
O&M (LESS FUEL), INCLUDES REGULATORY ASSET AMORTIZATION	3,420,224	2,405,625	1,134,014	1,754,473	175,070	74,825	564,076
INTEREST ON CUSTOMER DEPOSITS	17,784	11,449	9,778	14,744	0	232	0
DEPRECIATION EXPENSE	4,302,895	3,051,218	1,302,150	2,108,589	192,586	84,766	691,849
TAXES OTHER THAN INCOME TAXES	784,682	549,654	248,121	378,869	36,390	15,714	126,061
FED INCOME TAX LIABILITY @ CURRENT ROR	(136,590)	(229,605)	88,724	448,370	37,737	18,488	(63,423)
ADDITIONAL FED INCOME TAX LIABILITY	898,133	751,091	133,418	(90,180)	(4,785)	(3,727)	183,093
TOTAL OPERATING EXPENSES	9,287,128	6,539,431	2,916,205	4,614,865	436,997	190,298	1,501,657
RETURN DEFICIENCY BEFORE INCOME TAXES @ REQUESTED ROR	2,797,661	2,339,629	415,592	(280,908)	(14,905)	(11,610)	570,329
TOTAL PROPOSED OPERATING REVENUE (COST OF SERVICE)	14,306,920	9,976,860	4,380,478	6,975,911	654,202	287,596	2,290,475
LESS: OTHER OPERATING REVENUE	66,876	47,940	14,616	36,417	1,446	1,593	4,765
PROPOSED SALES REVENUE @ EQUALIZED ROR	14,240,044	9,928,919	4,365,862	6,939,495	652,756	286,003	2,285,710
TOTAL PRESENT OPERATING REVENUE	10,611,126	6,886,139	3,831,468	7,346,999	673,892	302,933	1,537,053
LESS: OTHER OPERATING REVENUE	66,876	47,940	14,616	36,417	1,446	1,593	4,765
PRESENT SALES REVENUE	10,544,250	6,838,199	3,816,852	7,310,582	672,447	301,340	1,532,288
REVENUE DEFICIENCY	3,695,794	3,090,721	549,010	(371,087)	(19,691)	(15,337)	753,422
PCT INCREASE TOTAL SALES REVENUE	35.05%	45.20%	14.38%	-5.08%	-2.93%	-5.09%	49.17%

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<u>ACCT(S) / DESCRIPTION</u>	<u>PUBLIC SCHOOLS-SM TOU S/L-5</u>	<u>PUBLIC SCHOOLS-SM YPP S/L-5</u>	<u>PUBLIC SCHOOLS-LG STANDARD S/L-3</u>	<u>PUBLIC SCHOOLS-LG STANDARD S/L-4</u>	<u>PUBLIC SCHOOLS-LG STANDARD S/L-5</u>	<u>PUBLIC SCHOOLS-LG TOU S/L-3</u>	<u>PUBLIC SCHOOLS-LG TOU S/L-4</u>
SUMMARY OF RATE BASE							
GROSS ELECTRIC PLANT IN SERVICE	49,444,977	76,259,177	670,738	1,001,974	22,530,107	4,827,218	6,303,126
LESS: ACCUM PROV FOR DEPR	17,925,424	27,356,216	255,873	357,412	8,053,534	1,855,247	2,355,781
CONSTRUCTION WORK IN PROGRESS	0	0	0	0	0	0	0
PLANT HELD FOR FUTURE USE	10,042	15,769	153	264	4,072	1,076	1,431
NET ELECTRIC UTILITY PLANT IN SERVICE	31,529,595	48,918,730	415,018	644,826	14,480,646	2,973,047	3,948,776
ADDITIONS TO RATE BASE:							
CASH WORKING CAPITAL	(190,069)	(295,718)	(2,776)	(4,290)	(80,471)	(19,826)	(25,717)
PREPAYMENTS	32,689	48,090	532	689	14,944	4,012	4,905
MATERIALS AND SUPPLIES	676,727	1,065,132	8,284	13,830	317,228	58,069	79,592
FUEL INVENTORIES	217,999	346,406	4,019	5,293	120,468	28,524	42,247
GAS IN STORAGE	37,454	59,516	690	909	20,697	4,901	7,258
REGULATORY ASSETS	695,389	1,072,970	9,843	14,746	308,312	70,833	91,801
NET PENSION BENEFIT ASSET (OBLIGATION)	(76,879)	(119,612)	(1,123)	(1,735)	(32,549)	(8,019)	(10,402)
TOTAL ADDITIONS	1,393,309	2,176,784	19,470	29,442	668,629	138,493	189,684
DEDUCTIONS TO RATE BASE:							
ASSET RETIREMENT OBLIGATION	(253,409)	(370,374)	(4,221)	(5,357)	(115,585)	(31,981)	(38,799)
CUSTOMER DEPOSITS	0	0	0	0	0	0	0
ACCUMULATED DEFERRED TAXES	(3,892,746)	(5,993,650)	(53,277)	(79,010)	(1,774,512)	(384,032)	(500,019)
REGULATORY LIABILITIES	(2,838,113)	(4,379,438)	(38,415)	(57,489)	(1,293,200)	(276,298)	(361,094)
TOTAL DEDUCTIONS	(6,984,268)	(10,743,462)	(95,914)	(141,856)	(3,183,297)	(692,310)	(899,911)
TOTAL RATE BASE	25,938,637	40,352,052	338,574	532,412	11,965,978	2,419,230	3,238,549
SUMMARY OF RETURN AT PRESENT RATES							
RATE BASE	25,938,637	40,352,052	338,574	532,412	11,965,978	2,419,230	3,238,549
RETURN	89,545	126,263	426	5,853	483,396	15,913	36,407
RATE OF RETURN ON RATE BASE	0.34522%	0.31290%	0.12587%	1.09939%	4.03975%	0.65777%	1.12418%
RELATIVE RATE OF RETURN	0.078847	0.071467	0.028748	0.251100	0.922675	0.150235	0.256761
FUEL	0	0	0	0	0	0	0
PURCHASED POWER	0	0	0	0	0	0	0
O&M (LESS FUEL), INCLUDES REGULATORY ASSET AMORTIZATION	1,459,194	2,255,662	21,602	32,633	624,734	155,271	199,923
INTEREST OF CUSTOMER DEPOSITS	0	0	0	0	0	0	0
DEPRECIATION EXPENSE	1,722,876	2,669,306	22,906	34,447	780,908	164,190	217,453
MISCELLANEOUS TAXES	714	1,111	10	16	302	74	97
PROPERTY TAXES	279,582	427,415	3,943	5,692	127,790	28,634	36,870
PAYROLL TAXES	44,183	68,742	645	997	18,706	4,609	5,978
FEDERAL & STATE INCOME TAX LIABILITY	(317,341)	(497,866)	(4,381)	(5,225)	(4,472)	(27,170)	(31,523)
TOTAL OPERATING EXPENSES	3,189,209	4,924,371	44,726	68,562	1,547,969	325,608	428,797
TOTAL OPERATING REVENUES (COST OF SERVICE)	3,278,754	5,050,634	45,152	74,415	2,031,365	341,521	465,204
LESS: OPERATING REVENUE CREDIT	14,021	22,210	202	372	5,582	1,323	1,929
PRESENT SALES REVENUE	3,264,733	5,028,424	44,950	74,043	2,025,782	340,198	463,275

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<u>ACCT(S) / DESCRIPTION</u>	<u>PUBLIC SCHOOLS-SM TOU S/L-5</u>	<u>PUBLIC SCHOOLS-SM YPP S/L-5</u>	<u>PUBLIC SCHOOLS-LG STANDARD S/L-3</u>	<u>PUBLIC SCHOOLS-LG STANDARD S/L-4</u>	<u>PUBLIC SCHOOLS-LG STANDARD S/L-5</u>	<u>PUBLIC SCHOOLS-LG TOU S/L-3</u>	<u>PUBLIC SCHOOLS-LG TOU S/L-4</u>
SUMMARY - EQUALIZED REQUESTED RATE OF RETURN							
RATE BASE	25,938,637	40,352,052	338,574	532,412	11,965,978	2,419,230	3,238,549
RATE OF RETURN ON RATE BASE	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%
RETURN	2,043,965	3,179,742	26,680	41,954	942,919	190,635	255,198
O&M (LESS FUEL), INCLUDES REGULATORY ASSET AMORTIZATION	1,459,194	2,255,662	21,602	32,633	624,734	155,271	199,923
INTEREST ON CUSTOMER DEPOSITS	0	0	0	0	0	0	0
DEPRECIATION EXPENSE	1,722,876	2,669,306	22,906	34,447	780,908	164,190	217,453
TAXES OTHER THAN INCOME TAXES	324,480	497,268	4,599	6,706	146,798	33,317	42,944
FED INCOME TAX LIABILITY @ CURRENT ROR	(317,341)	(497,866)	(4,381)	(5,225)	(4,472)	(27,170)	(31,523)
ADDITIONAL FED INCOME TAX LIABILITY	627,427	980,258	8,428	11,589	147,521	56,091	70,238
TOTAL OPERATING EXPENSES	3,816,636	5,904,629	53,154	80,151	1,695,489	381,699	499,036
RETURN DEFICIENCY BEFORE INCOME TAXES @ REQUESTED ROR	1,954,420	3,053,478	26,253	36,101	459,523	174,722	218,791
TOTAL PROPOSED OPERATING REVENUE (COST OF SERVICE)	5,860,601	9,084,370	79,833	122,105	2,638,408	572,334	754,233
LESS: OTHER OPERATING REVENUE	14,021	22,210	202	372	5,582	1,323	1,929
PROPOSED SALES REVENUE @ EQUALIZED ROR	5,846,580	9,062,161	79,631	121,733	2,632,826	571,011	752,304
TOTAL PRESENT OPERATING REVENUE	3,278,754	5,050,634	45,152	74,415	2,031,365	341,521	465,204
LESS: OTHER OPERATING REVENUE	14,021	22,210	202	372	5,582	1,323	1,929
PRESENT SALES REVENUE	3,264,733	5,028,424	44,950	74,043	2,025,782	340,198	463,275
REVENUE DEFICIENCY	2,581,847	4,033,737	34,682	47,690	607,044	230,813	289,029
PCT INCREASE TOTAL SALES REVENUE	79.08%	80.22%	77.16%	64.41%	29.97%	67.85%	62.39%

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ACCT(S) / DESCRIPTION	PUBLIC	PWR & LGHT	PWR & LGHT	PWR & LGHT	PWR & LGHT	PWR & LGHT	PWR & LGHT	PWR & LGHT	PWR & LGHT	PWR & LGHT
	SCHOOLS-LG TOU S/L-5	STANDARD S/L-1	STANDARD S/L-2	STANDARD S/L-3	STANDARD S/L-4	STANDARD S/L-5	TOU S/L-1	TOU S/L-2	TOU S/L-3	TOU S/L-3
SUMMARY OF RATE BASE										
GROSS ELECTRIC PLANT IN SERVICE	103,558,530	1,522,142	43,471,808	90,406,838	37,256,456	1,554,191,629	7,180,993	45,390,488	152,674,663	
LESS: ACCUM PROV FOR DEPR	37,271,351	666,854	13,965,125	35,325,561	14,272,351	565,636,603	3,228,865	15,019,436	59,319,198	
CONSTRUCTION WORK IN PROGRESS	0	0	0	0	0	0	0	0	0	
PLANT HELD FOR FUTURE USE	19,212	158	1,934	18,574	7,776	245,503	787	2,192	32,006	
NET ELECTRIC UTILITY PLANT IN SERVICE	66,306,391	855,446	29,508,618	55,099,851	22,991,881	988,800,529	3,952,916	30,373,243	93,387,471	
ADDITIONS TO RATE BASE:										
CASH WORKING CAPITAL	(374,740)	(5,201)	(266,497)	(360,782)	(148,102)	(5,357,099)	(25,974)	(255,627)	(612,400)	
PREPAYMENTS	71,279	1,784	23,873	78,020	31,436	1,080,281	8,889	26,604	131,730	
MATERIALS AND SUPPLIES	1,439,204	12,342	641,513	1,044,998	444,335	21,205,387	55,598	636,133	1,777,788	
FUEL INVENTORIES	583,323	30,779	293,769	1,200,855	441,585	10,267,305	153,697	425,509	1,963,458	
GAS IN STORAGE	100,220	5,288	50,472	206,318	75,868	1,764,015	26,406	73,106	337,340	
REGULATORY ASSETS	1,427,592	21,584	744,959	1,318,011	541,133	21,070,597	102,887	753,055	2,229,872	
NET PENSION BENEFIT ASSET (OBLIGATION)	(151,575)	(2,104)	(107,793)	(145,929)	(59,904)	(2,166,838)	(10,506)	(103,396)	(247,703)	
TOTAL ADDITIONS	3,095,303	64,472	1,380,297	3,341,490	1,326,351	47,863,648	310,997	1,555,384	5,580,084	
DEDUCTIONS TO RATE BASE:										
ASSET RETIREMENT OBLIGATION	(553,897)	(14,692)	(179,952)	(625,163)	(251,056)	(8,416,650)	(73,214)	(203,896)	(1,055,034)	
CUSTOMER DEPOSITS	0	0	(80,290)	(1,172,660)	(32,271)	(10,235,552)	(214,307)	(223,642)	(547,088)	
ACCUMULATED DEFERRED TAXES	(8,168,790)	(123,549)	(3,403,824)	(7,225,710)	(2,972,634)	(122,697,595)	(569,759)	(3,606,072)	(12,199,983)	
REGULATORY LIABILITIES	(5,941,690)	(86,626)	(2,499,868)	(5,171,769)	(2,131,989)	(89,160,686)	(408,301)	(2,608,343)	(8,733,914)	
TOTAL DEDUCTIONS	(14,664,377)	(224,866)	(6,163,933)	(14,195,303)	(5,387,949)	(230,510,483)	(1,265,581)	(6,641,953)	(22,536,019)	
TOTAL RATE BASE	54,737,318	695,052	24,724,982	44,246,039	18,930,283	806,153,694	2,998,332	25,286,674	76,431,537	
SUMMARY OF RETURN AT PRESENT RATES										
RATE BASE	54,737,318	695,052	24,724,982	44,246,039	18,930,283	806,153,694	2,998,332	25,286,674	76,431,537	
RETURN	1,036,149	47,687	209,108	3,658,800	1,208,894	41,547,512	2,607,996	755,741	5,608,769	
RATE OF RETURN ON RATE BASE	1.89295%	6.86096%	0.84574%	8.26921%	6.38603%	5.15380%	86.98158%	2.98869%	7.33829%	
RELATIVE RATE OF RETURN	0.432347	1.567036	0.193165	1.888679	1.458562	1.177121	19.866494	0.682614	1.676057	
FUEL	0	0	0	0	0	0	0	0	0	
PURCHASED POWER	0	0	0	0	0	0	0	0	0	
O&M (LESS FUEL), INCLUDES REGULATORY ASSET AMORTIZATION	2,918,682	44,625	1,940,486	2,942,408	1,172,238	42,464,378	211,957	1,911,433	5,724,743	
INTEREST OF CUSTOMER DEPOSITS	0	0	2,328	34,019	936	296,927	6,217	6,488	15,870	
DEPRECIATION EXPENSE	3,553,723	52,136	1,468,183	3,071,522	1,275,082	54,496,603	256,845	1,508,324	5,178,335	
MISCELLANEOUS TAXES	1,408	20	1,001	1,356	556	20,128	98	960	2,301	
PROPERTY TAXES	591,501	9,934	234,830	545,583	223,299	8,916,348	44,423	258,004	920,676	
PAYROLL TAXES	87,112	1,209	61,950	83,867	34,428	1,245,304	6,038	59,423	142,358	
FEDERAL & STATE INCOME TAX LIABILITY	(397,701)	6,035	(262,765)	584,229	135,513	2,581,844	797,240	(94,773)	780,791	
TOTAL OPERATING EXPENSES	6,754,724	113,959	3,446,013	7,262,984	2,842,052	110,021,533	1,322,818	3,649,859	12,765,074	
TOTAL OPERATING REVENUES (COST OF SERVICE)	7,790,873	161,646	3,655,121	10,921,784	4,050,945	151,569,045	3,930,814	4,405,600	18,373,843	
LESS: OPERATING REVENUE CREDIT	25,430	219	6,041	50,545	13,774	855,000	7,612	7,327	91,380	
PRESENT SALES REVENUE	7,765,443	161,427	3,649,080	10,871,239	4,037,171	150,714,045	3,923,202	4,398,273	18,282,463	

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<u>ACCT(S) / DESCRIPTION</u>	<u>PUBLIC SCHOOLS-LG TOU S/L-5</u>	<u>PWR & LGHT STANDARD S/L-1</u>	<u>PWR & LGHT STANDARD S/L-2</u>	<u>PWR & LGHT STANDARD S/L-3</u>	<u>PWR & LGHT STANDARD S/L-4</u>	<u>PWR & LGHT STANDARD S/L-5</u>	<u>PWR & LGHT TOU S/L-1</u>	<u>PWR & LGHT TOU S/L-2</u>	<u>PWR & LGHT TOU S/L-3</u>
SUMMARY - EQUALIZED REQUESTED RATE OF RETURN									
RATE BASE	54,737,318	695,052	24,724,982	44,246,039	18,930,283	806,153,694	2,998,332	25,286,674	76,431,537
RATE OF RETURN ON RATE BASE	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%
RETURN	4,313,301	54,770	1,948,329	3,486,588	1,491,706	63,524,911	236,269	1,992,590	6,022,805
O&M (LESS FUEL), INCLUDES REGULATORY ASSET AMORTIZATION	2,918,682	44,625	1,940,486	2,942,408	1,172,238	42,464,379	211,957	1,911,433	5,724,743
INTEREST ON CUSTOMER DEPOSITS	0	0	2,328	34,019	936	296,927	6,217	6,488	15,870
DEPRECIATION EXPENSE	3,553,723	52,136	1,468,183	3,071,522	1,275,082	54,496,603	256,845	1,508,324	5,178,335
TAXES OTHER THAN INCOME TAXES	680,021	11,163	297,781	630,805	258,283	10,181,780	50,558	318,388	1,065,334
FED INCOME TAX LIABILITY @ CURRENT ROR	(397,701)	6,035	(262,765)	584,229	135,513	2,581,844	797,240	(94,773)	780,791
ADDITIONAL FED INCOME TAX LIABILITY	1,052,064	2,274	558,342	(55,285)	90,791	7,055,405	(761,396)	397,066	132,918
TOTAL OPERATING EXPENSES	7,806,789	116,233	4,004,355	7,207,698	2,932,843	117,076,938	561,422	4,046,924	12,897,992
RETURN DEFICIENCY BEFORE INCOME TAXES @ REQUESTED ROR	3,277,152	7,083	1,739,221	(172,212)	282,813	21,977,400	(2,371,728)	1,236,849	414,036
TOTAL PROPOSED OPERATING REVENUE (COST OF SERVICE)	12,120,089	171,003	5,952,684	10,694,286	4,424,550	180,601,849	797,690	6,039,514	18,920,797
LESS: OTHER OPERATING REVENUE	25,430	219	6,041	50,545	13,774	855,000	7,612	7,327	91,380
PROPOSED SALES REVENUE @ EQUALIZED ROR	12,094,659	170,784	5,946,642	10,643,742	4,410,775	179,746,849	790,079	6,032,187	18,829,417
TOTAL PRESENT OPERATING REVENUE	7,790,873	161,646	3,655,121	10,921,784	4,050,945	151,569,045	3,930,814	4,405,600	18,373,843
LESS: OTHER OPERATING REVENUE	25,430	219	6,041	50,545	13,774	855,000	7,612	7,327	91,380
PRESENT SALES REVENUE	7,765,443	161,427	3,649,080	10,871,239	4,037,171	150,714,045	3,923,202	4,398,273	18,282,463
REVENUE DEFICIENCY	4,329,216	9,357	2,297,563	(227,497)	373,604	29,032,804	(3,133,123)	1,633,914	546,954
PCT INCREASE TOTAL SALES REVENUE	55.75%	5.80%	62.96%	-2.09%	9.25%	19.26%	-79.86%	37.15%	2.99%

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<u>ACCT(S) / DESCRIPTION</u>	<u>PWR & LGHT TOU S/L-4</u>	<u>PWR & LGHT TOU S/L-5</u>	<u>LARGE PWR & LGHT STANDARD S/L-2</u>	<u>LARGE PWR & LGHT TOU S/L-1</u>	<u>LARGE PWR & LGHT TOU S/L-2</u>	<u>LARGE PWR & LGHT TOU S/L-3</u>	<u>LARGE PWR & LGHT TOU S/L-4</u>
SUMMARY OF RATE BASE							
GROSS ELECTRIC PLANT IN SERVICE	53,809,200	1,048,504,398	127,317,050	136,994,177	1,001,144,951	246,664,062	33,002,252
LESS: ACCUM PROV FOR DEPR	20,880,876	388,539,032	54,076,845	59,716,971	409,607,355	95,451,689	12,593,536
CONSTRUCTION WORK IN PROGRESS	0	0	0	0	0	0	0
PLANT HELD FOR FUTURE USE	10,760	184,421	12,462	14,201	89,886	52,985	7,026
NET ELECTRIC UTILITY PLANT IN SERVICE	32,939,084	660,149,787	73,252,667	77,291,407	591,627,482	151,265,357	20,415,743
ADDITIONS TO RATE BASE:							
CASH WORKING CAPITAL	(211,475)	(3,782,659)	(464,345)	(464,674)	(4,022,319)	(997,356)	(131,768)
PREPAYMENTS	47,215	790,876	141,306	160,380	1,025,914	213,905	27,828
MATERIALS AND SUPPLIES	623,350	13,715,838	1,126,521	1,125,014	9,748,764	2,879,015	395,997
FUEL INVENTORIES	567,149	8,634,276	2,321,627	2,395,535	15,768,635	3,225,380	426,881
GAS IN STORAGE	97,441	1,483,446	398,876	411,574	2,709,192	554,149	73,342
REGULATORY ASSETS	780,399	14,543,237	1,840,105	1,941,889	14,871,493	3,615,390	480,234
NET PENSION BENEFIT ASSET (OBLIGATION)	(85,537)	(1,530,009)	(187,818)	(187,951)	(1,626,946)	(403,410)	(53,298)
TOTAL ADDITIONS	1,818,542	33,855,004	5,176,272	5,381,767	38,474,732	9,087,074	1,219,216
DEDUCTIONS TO RATE BASE:							
ASSET RETIREMENT OBLIGATION	(378,572)	(6,225,901)	(1,159,255)	(1,321,024)	(8,361,537)	(1,713,476)	(222,159)
CUSTOMER DEPOSITS	(180,085)	(3,846,982)	0	0	(3,614,569)	(484,086)	0
ACCUMULATED DEFERRED TAXES	(4,299,266)	(83,109,397)	(10,338,114)	(11,158,327)	(80,882,063)	(19,716,832)	(2,634,165)
REGULATORY LIABILITIES	(3,077,498)	(60,091,234)	(7,253,099)	(7,796,459)	(57,115,439)	(14,109,706)	(1,888,564)
TOTAL DEDUCTIONS	(7,935,420)	(153,273,513)	(18,750,468)	(20,275,810)	(149,973,607)	(36,024,101)	(4,744,889)
TOTAL RATE BASE	26,822,206	540,731,278	59,678,472	62,397,364	480,128,607	124,328,330	16,890,070
SUMMARY OF RETURN AT PRESENT RATES							
RATE BASE	26,822,206	540,731,278	59,678,472	62,397,364	480,128,607	124,328,330	16,890,070
RETURN	1,426,064	21,801,150	2,031,869	3,438,289	20,125,638	6,637,498	880,426
RATE OF RETURN ON RATE BASE	5.31673%	4.03179%	3.40469%	5.51031%	4.19172%	5.33868%	5.21268%
RELATIVE RATE OF RETURN	1.214334	0.920856	0.777628	1.258549	0.957384	1.219350	1.190571
FUEL	0	0	0	0	0	0	0
PURCHASED POWER	0	0	0	0	0	0	0
O&M (LESS FUEL), INCLUDES REGULATORY ASSET AMORTIZATION	1,684,507	30,367,042	4,309,737	4,020,840	32,915,662	7,912,142	1,043,021
INTEREST OF CUSTOMER DEPOSITS	5,224	111,600	0	0	104,856	14,043	0
DEPRECIATION EXPENSE	1,839,057	35,997,997	4,299,869	4,632,470	33,804,372	8,334,011	1,124,513
MISCELLANEOUS TAXES	795	14,212	1,745	1,746	15,113	3,747	495
PROPERTY TAXES	325,068	6,120,346	825,207	902,106	6,331,326	1,489,155	197,960
PAYROLL TAXES	49,159	879,312	107,941	108,017	935,023	231,844	30,631
FEDERAL & STATE INCOME TAX LIABILITY	99,932	(215,917)	(143,973)	271,253	54,788	471,978	57,286
TOTAL OPERATING EXPENSES	4,003,742	73,274,592	9,400,526	9,936,433	74,161,140	18,456,919	2,453,906
TOTAL OPERATING REVENUES (COST OF SERVICE)	5,429,806	95,075,742	11,432,395	13,374,722	94,286,778	25,094,417	3,334,331
LESS: OPERATING REVENUE CREDIT	28,060	477,398	12,493	13,645	109,004	129,584	10,253
PRESENT SALES REVENUE	5,401,746	94,598,343	11,419,901	13,361,077	94,177,774	24,964,833	3,324,078

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<u>ACCT(S) / DESCRIPTION</u>	<u>PWR & LGHT</u> <u>TOU</u> <u>S/L-4</u>	<u>PWR & LGHT</u> <u>TOU</u> <u>S/L-5</u>	<u>LARGE</u> <u>PWR & LGHT</u> <u>STANDARD</u> <u>S/L-2</u>	<u>LARGE</u> <u>PWR & LGHT</u> <u>TOU</u> <u>S/L-1</u>	<u>LARGE</u> <u>PWR & LGHT</u> <u>TOU</u> <u>S/L-2</u>	<u>LARGE</u> <u>PWR & LGHT</u> <u>TOU</u> <u>S/L-3</u>	<u>LARGE</u> <u>PWR & LGHT</u> <u>TOU</u> <u>S/L-4</u>
SUMMARY - EQUALIZED REQUESTED RATE OF RETURN							
RATE BASE	26,822,206	540,731,278	59,678,472	62,397,364	480,128,607	124,328,330	16,890,070
RATE OF RETURN ON RATE BASE	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%
RETURN	2,113,590	42,609,625	4,702,664	4,916,912	37,834,134	9,797,072	1,330,938
O&M (LESS FUEL), INCLUDES REGULATORY ASSET AMORTIZATION	1,684,507	30,367,042	4,309,738	4,020,840	32,915,662	7,912,142	1,043,021
INTEREST ON CUSTOMER DEPOSITS	5,224	111,600	0	0	104,856	14,043	0
DEPRECIATION EXPENSE	1,839,057	35,997,997	4,299,869	4,632,470	33,804,372	8,334,011	1,124,513
TAXES OTHER THAN INCOME TAXES	375,022	7,013,870	934,892	1,011,870	7,281,462	1,724,746	229,086
FED INCOME TAX LIABILITY @ CURRENT ROR	99,932	(215,917)	(143,973)	271,253	54,788	471,978	57,286
ADDITIONAL FED INCOME TAX LIABILITY	220,717	6,680,145	857,405	474,683	5,684,959	1,014,318	144,628
TOTAL OPERATING EXPENSES	4,224,459	79,954,737	10,257,931	10,411,116	79,846,099	19,471,238	2,598,533
RETURN DEFICIENCY BEFORE INCOME TAXES @ REQUESTED ROR	687,526	20,808,475	2,670,795	1,478,624	17,708,497	3,159,575	450,512
TOTAL PROPOSED OPERATING REVENUE (COST OF SERVICE)	6,338,048	122,564,361	14,960,595	15,328,028	117,680,233	29,268,310	3,929,471
LESS: OTHER OPERATING REVENUE	28,060	477,398	12,493	13,645	109,004	129,584	10,253
PROPOSED SALES REVENUE @ EQUALIZED ROR	6,309,989	122,086,963	14,948,101	15,314,384	117,571,229	29,138,726	3,919,218
TOTAL PRESENT OPERATING REVENUE	5,429,806	95,075,742	11,432,395	13,374,722	94,286,778	25,094,417	3,334,331
LESS: OTHER OPERATING REVENUE	28,060	477,398	12,493	13,645	109,004	129,584	10,253
PRESENT SALES REVENUE	5,401,746	94,598,343	11,419,901	13,361,077	94,177,774	24,964,833	3,324,078
REVENUE DEFICIENCY	908,243	27,488,620	3,528,200	1,953,306	23,393,455	4,173,893	595,140
PCT INCREASE TOTAL SALES REVENUE	16.81%	29.06%	30.90%	14.62%	24.84%	16.72%	17.90%

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<u>ACCT(S) / DESCRIPTION</u>	<u>LARGE PWR & LGHT TOU S/L-5</u>	<u>MUNICIPAL PUMPING STANDARD S/L-5</u>	<u>MUNICIPAL PUMPING TOU S/L-5</u>	<u>MUNICIPAL LIGHTING S/L-5</u>	<u>SECURITY LIGHTING S/L-5</u>	<u>LED LIGHTING S/L-5</u>	<u>BACK UP & MAINTENANCE S/L-1</u>
SUMMARY OF RATE BASE							
GROSS ELECTRIC PLANT IN SERVICE	99,261,216	40,026,357	389,961	35,042,053	46,867,689	259,086,169	5,535,405
LESS: ACCUM PROV FOR DEPR	37,338,801	14,890,300	152,297	(6,111,487)	(5,633,874)	47,954,742	1,749,330
CONSTRUCTION WORK IN PROGRESS	0	0	0	0	0	0	0
PLANT HELD FOR FUTURE USE	18,626	7,221	74	1,769	3,540	4,682	69
NET ELECTRIC UTILITY PLANT IN SERVICE	61,941,041	25,143,278	237,738	41,155,309	52,505,103	211,136,108	3,786,145
ADDITIONS TO RATE BASE:							
CASH WORKING CAPITAL	(368,655)	(157,225)	(1,594)	(32,674)	(61,744)	(112,889)	(5,908)
PREPAYMENTS	79,262	28,586	337	4,804	9,608	12,723	778
MATERIALS AND SUPPLIES	1,257,350	521,497	4,747	82,228	164,425	218,872	61,141
FUEL INVENTORIES	1,056,176	440,212	5,587	78,711	157,618	208,491	13,429
GAS IN STORAGE	181,460	75,632	960	13,523	27,080	35,821	2,307
REGULATORY ASSETS	1,398,497	571,505	5,642	323,991	460,908	2,198,628	67,628
NET PENSION BENEFIT ASSET (OBLIGATION)	(149,113)	(63,595)	(645)	(13,216)	(24,974)	(45,661)	(2,390)
TOTAL ADDITIONS	3,454,978	1,416,613	15,035	457,368	732,921	2,515,984	136,985
DEDUCTIONS TO RATE BASE:							
ASSET RETIREMENT OBLIGATION	(628,166)	(224,189)	(2,679)	(37,500)	(75,000)	(99,270)	(6,412)
CUSTOMER DEPOSITS	(55,846)	(350)	0	(385)	(89,370)	0	0
ACCUMULATED DEFERRED TAXES	(7,895,341)	(3,169,299)	(30,260)	(2,656,968)	(3,550,166)	(19,669,209)	(566,422)
REGULATORY LIABILITIES	(5,684,593)	(2,295,409)	(22,313)	(2,026,808)	(2,708,164)	(15,004,209)	(319,667)
TOTAL DEDUCTIONS	(14,263,946)	(5,689,248)	(55,252)	(4,721,661)	(6,422,700)	(34,772,688)	(892,501)
TOTAL RATE BASE	51,132,073	20,870,644	197,521	36,891,016	46,815,324	178,879,404	3,030,629
SUMMARY OF RETURN AT PRESENT RATES							
RATE BASE	51,132,073	20,870,644	197,521	36,891,016	46,815,324	178,879,404	3,030,629
RETURN	3,244,662	1,221,256	14,105	2,924,255	4,529,144	6,075,394	24,951
RATE OF RETURN ON RATE BASE	6.34565%	5.85155%	7.14078%	7.92674%	9.67449%	3.39636%	0.82331%
RELATIVE RATE OF RETURN	1.449339	1.336487	1.630946	1.810458	2.209643	0.775726	0.188042
FUEL	0	0	0	0	0	0	0
PURCHASED POWER	0	0	0	0	0	0	0
O&M (LESS FUEL), INCLUDES REGULATORY ASSET AMORTIZATION	2,928,470	1,218,422	11,973	576,911	851,782	3,694,554	144,969
INTEREST OF CUSTOMER DEPOSITS	1,619	10	0	10	2,594	0	0
DEPRECIATION EXPENSE	3,342,531	1,415,697	14,098	742,791	1,063,614	15,068,853	124,552
MISCELLANEOUS TAXES	1,385	591	6	123	232	424	22
PROPERTY TAXES	587,681	231,404	2,164	169,949	227,851	1,252,668	57,024
PAYROLL TAXES	85,697	36,548	371	7,595	14,353	26,242	1,373
FEDERAL & STATE INCOME TAX LIABILITY	359,401	113,592	1,893	446,553	829,355	(436,326)	(32,426)
TOTAL OPERATING EXPENSES	7,306,784	3,016,265	30,504	1,943,932	2,989,782	19,606,416	295,513
TOTAL OPERATING REVENUES (COST OF SERVICE)	10,551,446	4,237,521	44,609	4,868,187	7,518,926	25,681,810	320,465
LESS: OPERATING REVENUE CREDIT	35,089	10,973	109	3,350	26,998	12,732	176
PRESENT SALES REVENUE	10,516,357	4,226,548	44,500	4,864,837	7,491,929	25,669,078	320,289

CMC Alternative Class Cost of Service Study
At OG&E Proposed Revenue Requirement

<u>ACCT(S) / DESCRIPTION</u>	<u>LARGE PWR & LGT TOU S/L-5</u>	<u>MUNICIPAL PUMPING STANDARD S/L-5</u>	<u>MUNICIPAL PUMPING TOU S/L-5</u>	<u>MUNICIPAL LIGHTING S/L-5</u>	<u>SECURITY LIGHTING S/L-5</u>	<u>LED LIGHTING S/L-5</u>	<u>BACK UP & MAINTENANCE S/L-1</u>
SUMMARY - EQUALIZED REQUESTED RATE OF RETURN							
RATE BASE	51,132,073	20,870,644	197,521	36,891,016	46,815,324	178,879,404	3,030,629
RATE OF RETURN ON RATE BASE	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%	7.88000%
RETURN	4,029,207	1,644,607	15,565	2,907,012	3,689,048	14,095,697	238,814
O&M (LESS FUEL), INCLUDES REGULATORY ASSET AMORTIZATION	2,928,470	1,218,422	11,973	576,911	851,782	3,694,554	144,969
INTEREST ON CUSTOMER DEPOSITS	1,619	10	0	10	2,594	0	0
DEPRECIATION EXPENSE	3,342,531	1,415,697	14,098	742,791	1,063,614	15,068,853	124,552
TAXES OTHER THAN INCOME TAXES	674,763	268,543	2,540	177,667	242,436	1,279,334	58,419
FED INCOME TAX LIABILITY @ CURRENT ROR	359,401	113,592	1,893	446,553	829,355	(436,326)	(32,426)
ADDITIONAL FED INCOME TAX LIABILITY	251,863	135,908	469	(5,535)	(269,696)	2,574,758	68,656
TOTAL OPERATING EXPENSES	7,558,647	3,152,173	30,973	1,938,396	2,720,086	22,181,173	364,169
RETURN DEFICIENCY BEFORE INCOME TAXES @ REQUESTED ROR	784,546	423,351	1,460	(17,243)	(840,097)	8,020,303	213,862
TOTAL PROPOSED OPERATING REVENUE (COST OF SERVICE)	11,587,854	4,796,780	46,538	4,845,408	6,409,133	36,276,870	602,983
LESS: OTHER OPERATING REVENUE	35,089	10,973	109	3,350	26,998	12,732	176
PROPOSED SALES REVENUE @ EQUALIZED ROR	11,552,765	4,785,807	46,429	4,842,059	6,382,136	36,264,138	602,807
TOTAL PRESENT OPERATING REVENUE	10,551,446	4,237,521	44,609	4,868,187	7,518,926	25,681,810	320,465
LESS: OTHER OPERATING REVENUE	35,089	10,973	109	3,350	26,998	12,732	176
PRESENT SALES REVENUE	10,516,357	4,226,548	44,500	4,864,837	7,491,929	25,669,078	320,289
REVENUE DEFICIENCY	1,036,408	559,259	1,929	(22,778)	(1,109,793)	10,595,060	282,518
PCT INCREASE TOTAL SALES REVENUE	9.86%	13.23%	4.33%	-0.47%	-14.81%	41.28%	88.21%

CMC Recommended Revenue Allocation
At CMC Proposed Class Cost of Service Study and OG&E Proposed Revenue Requirement

	CMC COSS At Equalized ROR			Pass 1		Allocate Shortfall Pro Rata	Pass 2		Pass 3		CMC Revenue Allocation	
	Current Base Rate Revenue	Base Rate Increase		Max Rate Inc. 34.1% Min Rate Inc. 0%			Proposed Inc.		Max Rate Inc. 34.1%		Allocate Shortfall Pro Rata	Base Rate Increase
		Base Rate Increase	Total Base Revenue	Base Rate Increase		Base Rate Increase		Base Rate Increase		Base Rate Increase		
RESIDENTIAL STANDARD	\$576,280,596	\$142,300,359	24.69%	\$718,580,954	\$142,300,359	24.69%	\$4,461,867	\$146,762,226	25.47%	\$0	\$146,762,226	25.47%
TOU	\$14,018,082	\$6,981,693	49.80%	\$20,999,776	\$4,440,032	31.67%	\$0	\$4,440,032	31.67%	\$0	\$4,440,032	31.67%
VPP	\$62,182,867	\$17,976,177	28.91%	\$80,159,043	\$17,976,177	28.91%	\$497,730	\$18,473,906	29.71%	\$0	\$18,473,906	29.71%
GENERAL SVC STANDARD	\$122,924,614	\$30,345,692	24.69%	\$153,270,306	\$30,345,692	24.69%	\$951,698	\$31,297,390	25.46%	\$0	\$31,297,390	25.46%
TOU	\$10,946,808	\$3,499,271	31.97%	\$14,446,079	\$3,467,249	31.67%	\$0	\$3,467,249	31.67%	\$0	\$3,467,249	31.67%
VPP	\$6,894,972	\$2,956,942	42.89%	\$9,851,914	\$2,183,886	31.67%	\$0	\$2,183,886	31.67%	\$0	\$2,183,886	31.67%
OIL & GAS PROD STANDARD S/L-3	\$3,975,946	\$324,295	8.16%	\$4,300,241	\$324,295	8.16%	\$26,701	\$350,996	8.83%	\$0	\$350,996	8.83%
S/L-5	\$7,461,491	(\$437,577)	-5.86%	\$7,023,913	\$0	0.00%	\$0	\$0	0.00%	\$0	\$0	0.00%
TOU S/L-5	\$659,538	(\$28,472)	-4.32%	\$631,066	\$0	0.00%	\$0	\$0	0.00%	\$0	\$0	0.00%
VPP S/L-5	\$269,308	(\$16,447)	-6.11%	\$252,861	\$0	0.00%	\$0	\$0	0.00%	\$0	\$0	0.00%
PUBLIC SCHOOLS SM-STANDARD S/L-5	\$1,526,345	\$727,987	47.69%	\$2,254,332	\$483,449	31.67%	\$0	\$483,449	31.67%	\$0	\$483,449	31.67%
SM-TOU	\$3,201,372	\$2,469,276	77.13%	\$5,670,649	\$1,013,990	31.67%	\$0	\$1,013,990	31.67%	\$0	\$1,013,990	31.67%
SM-VPP	\$5,072,430	\$3,943,704	77.75%	\$9,016,134	\$1,606,622	31.67%	\$0	\$1,606,622	31.67%	\$0	\$1,606,622	31.67%
PUBLIC SCHOOLS LG-STANDARD S/L-3	\$45,169	\$34,245	75.82%	\$79,414	\$14,307	31.67%	\$0	\$14,307	31.67%	\$0	\$14,307	31.67%
S/L-4	\$74,439	\$46,582	62.58%	\$121,021	\$23,578	31.67%	\$0	\$23,578	31.67%	\$0	\$23,578	31.67%
S/L-5	\$2,015,762	\$571,372	28.35%	\$2,587,135	\$571,372	28.35%	\$16,064	\$587,436	29.14%	\$0	\$587,436	29.14%
PUBLIC SCHOOLS LG-TOU S/L-3	\$342,600	\$222,919	65.07%	\$565,518	\$108,514	31.67%	\$0	\$108,514	31.67%	\$0	\$108,514	31.67%
S/L-4	\$465,735	\$279,742	60.06%	\$745,478	\$147,515	31.67%	\$0	\$147,515	31.67%	\$0	\$147,515	31.67%
S/L-5	\$7,636,619	\$4,140,871	54.22%	\$11,777,489	\$2,418,793	31.67%	\$0	\$2,418,793	31.67%	\$0	\$2,418,793	31.67%
PWR & LGHT STANDARD S/L-1	\$161,775	\$6,203	3.83%	\$167,978	\$6,203	3.83%	\$1,043	\$7,246	4.48%	\$0	\$7,246	4.48%
S/L-2	\$3,260,558	\$2,161,936	66.31%	\$5,422,494	\$1,032,736	31.67%	\$0	\$1,032,736	31.67%	\$0	\$1,032,736	31.67%
S/L-3	\$10,534,896	(\$43,263)	-0.41%	\$10,491,633	\$0	0.00%	\$0	\$0	0.00%	\$0	\$0	0.00%
S/L-4	\$3,554,794	\$530,028	14.91%	\$4,084,822	\$530,028	14.91%	\$25,364	\$555,391	15.62%	\$0	\$555,391	15.62%
S/L-5	\$151,641,844	\$26,892,799	17.73%	\$178,534,644	\$26,892,799	17.73%	\$1,108,571	\$28,001,370	18.47%	\$0	\$28,001,370	18.47%
PWR & LGHT TOU S/L-1	\$3,983,818	(\$3,177,079)	-79.75%	\$806,738	\$0	0.00%	\$0	\$0	0.00%	\$0	\$0	0.00%
S/L-2	\$4,355,216	(\$69,559)	-1.60%	\$4,285,657	\$0	0.00%	\$0	\$0	0.00%	\$0	\$0	0.00%
S/L-3	\$17,623,641	\$633,849	3.60%	\$18,257,489	\$633,849	3.60%	\$113,366	\$747,214	4.24%	\$0	\$747,214	4.24%
S/L-4	\$4,947,775	\$1,076,348	21.75%	\$6,024,123	\$1,076,348	21.75%	\$37,405	\$1,113,753	22.51%	\$0	\$1,113,753	22.51%
S/L-5	\$96,279,748	\$25,694,288	26.69%	\$121,974,036	\$25,694,288	26.69%	\$757,370	\$26,451,658	27.47%	\$0	\$26,451,658	27.47%
LRG. PWR & LGHT STANDARD S/L-2	\$11,443,861	\$3,277,216	28.64%	\$14,721,077	\$3,277,216	28.64%	\$91,407	\$3,368,624	29.44%	\$0	\$3,368,624	29.44%
LRG. PWR & LGHT TOU S/L-1	\$13,386,657	\$1,662,604	12.42%	\$15,049,261	\$1,662,604	12.42%	\$93,445	\$1,756,049	13.12%	\$0	\$1,756,049	13.12%
S/L-2	\$104,165,040	\$19,441,937	18.66%	\$123,606,977	\$19,441,937	18.66%	\$767,510	\$20,209,447	19.40%	\$0	\$20,209,447	19.40%
S/L-3	\$26,607,792	\$5,421,655	20.38%	\$32,029,447	\$5,421,655	20.38%	\$198,880	\$5,620,535	21.12%	\$0	\$5,620,535	21.12%
S/L-4	\$4,356,230	\$1,072,013	24.61%	\$5,428,243	\$1,072,013	24.61%	\$33,705	\$1,105,718	25.38%	\$0	\$1,105,718	25.38%
S/L-5	\$10,976,594	\$1,240,857	11.30%	\$12,217,451	\$1,240,857	11.30%	\$75,862	\$1,316,719	12.00%	\$0	\$1,316,719	12.00%
MUNICIPAL PUMPING	\$4,251,418	\$509,311	11.98%	\$4,760,729	\$509,311	11.98%	\$29,561	\$538,871	12.68%	\$0	\$538,871	12.68%
MUNICIPAL PUMPING - TOU	\$44,629	\$912	2.04%	\$45,540	\$912	2.04%	\$283	\$1,194	2.68%	\$0	\$1,194	2.68%
MUNICIPAL LIGHTING	\$4,868,587	(\$646,443)	-13.28%	\$4,222,144	\$0	0.00%	\$0	\$0	0.00%	\$0	\$0	0.00%
SECURITY LIGHTING	\$7,520,035	(\$1,865,322)	-24.80%	\$5,654,713	\$0	0.00%	\$0	\$0	0.00%	\$0	\$0	0.00%
LED LIGHTING	\$25,683,992	\$13,022,967	50.70%	\$38,706,959	\$8,135,047	31.67%	\$0	\$8,135,047	31.67%	\$0	\$8,135,047	31.67%
BACK UP & MAINTENANCE	\$320,536	\$261,100	81.46%	\$581,636	\$101,525	31.67%	\$0	\$101,525	31.67%	\$0	\$101,525	31.67%
OKLA RETAIL JURISDICTION	\$1,335,964,127	\$313,442,987	23.46%	\$1,649,407,114	\$304,155,155	22.77%	\$9,287,832	\$313,442,987	23.46%	\$0	\$313,442,987	23.46%

Max Rate Increase 135% of System Average 31.67% Surplus/(Shortfall) (\$9,287,832)

Surplus/(Shortfall) \$0