

BEFORE THE ARKANSAS PUBLIC SERVICE COMMISSION

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

DIRECT TESTIMONY AND EXHIBITS OF STEVE W. CHRISS

ON BEHALF OF

WAL-MART STORES ARKANSAS, LLC,

AND

SAM'S WEST, INC.

Filed: August 10, 2015

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1 **Introduction**

2 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND OCCUPATION.**

3 A. My name is Steve W. Chriss. My business address is 2001 SE 10th St., Bentonville,
4 AR 72716-0550. I am employed by Wal-Mart Stores, Inc. as Senior Manager,
5 Energy Regulatory Analysis.

6 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS DOCKET?**

7 A. I am testifying on behalf of Wal-Mart Stores Arkansas, LLC and Sam's West, Inc.
8 ("Walmart").

9 **Q. PLEASE DESCRIBE YOUR EDUCATION AND EXPERIENCE.**

10 A. In 2001, I completed a Master of Science in Agricultural Economics at Louisiana State
11 University. From 2001 to 2003, I was an Analyst and later a Senior Analyst at the
12 Houston office of Econ One Research, Inc., a Los Angeles-based consulting firm. My
13 duties included research and analysis on domestic and international energy and
14 regulatory issues. From 2003 to 2007, I was an Economist and later a Senior Utility
15 Analyst at the Public Utility Commission of Oregon in Salem, Oregon. My duties
16 included appearing as a witness for PUC Staff in electric, natural gas, and
17 telecommunications dockets. I joined the energy department at Walmart in July 2007
18 as Manager, State Rate Proceedings, and was promoted to my current position in June
19 2011. My Witness Qualifications Statement is included herein as Exhibit SWC-1.

1 Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THE ARKANSAS PUBLIC
2 SERVICE COMMISSION ("THE COMMISSION")?

3 A. Yes. I submitted testimony in Docket Nos. 09-008-U, 09-084-U, 10-010-U, and 13-028-
4 U.

5 Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE OTHER STATE
6 REGULATORY COMMISSIONS?

7 A. Yes. I have submitted testimony in over 120 proceedings before 34 other utility
8 regulatory commissions and before the Missouri House Committee on Utilities, the
9 Missouri Senate Veterans' Affairs, Emerging Issues, Pensions, and Urban Affairs
10 Committee, and the Kansas House Standing Committee on Utilities and
11 Telecommunications. My testimony has addressed topics including, but not limited
12 to, cost of service and rate design, revenue requirement, ratemaking policy, qualifying
13 facility rates, telecommunications deregulation, resource certification, energy
14 efficiency/demand side management, fuel cost adjustment mechanisms, decoupling,
15 and the collection of cash earnings on construction work in progress.

16 Q. ARE YOU SPONSORING ANY EXHIBITS WITH YOUR TESTIMONY?

17 A. Yes. I am sponsoring the exhibits listed in the Table of Contents.

18 Q. PLEASE BRIEFLY DESCRIBE WALMART'S OPERATIONS IN ARKANSAS.

19 A. Arkansas is Walmart's home state and our Home Office is located in Bentonville.
20 Additionally, Walmart operates 132 retail units and employs 50,096 associates in

1 Arkansas. In fiscal year ending 2015, Walmart purchased \$4.5 billion worth of goods
2 and services from Arkansas-based suppliers, supporting 41,188 supplier jobs.¹

3 **Q. PLEASE BRIEFLY DESCRIBE WALMART'S OPERATIONS WITHIN THE COMPANY'S**
4 **SERVICE TERRITORY.**

5 A. Walmart has approximately 10 stores and related facilities, as well as a distribution
6 center that take service from Oklahoma Gas and Electric Company ("OG&E" or "the
7 Company"), primarily on the Power and Light Rate Time of Use ("PL-TOU") schedule.

8
9 **Purpose of Testimony and Summary of Recommendations**

10 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

11 A. The purpose of my testimony is to respond to issues related to the Company's Act 310
12 surcharge filing. I respond specifically to issues related to the allocation of the cost
13 included in the Company's proposed rider and the design of the Company's proposed
14 rider rates.

15 **Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS TO THE COMMISSION.**

16 A. My recommendations to the Commission are as follows:

- 17 1) The Commission should impose a time limit on the duration of any Act 310
18 surcharge approved in this docket and a dollar limit on the amount that can
19 be collected through the surcharge. The Commission should also require

¹ <http://corporate.walmart.com/our-story/locations/united-states#/united-states/arkansas>

1 OG&E to file a general rate case prior to any filing for a future increase in any
2 approved surcharge in this docket.

3 2) If the Commission approves the Company's proposed Environmental
4 Compliance Plan ("ECP") rider in this docket, the Commission should approve
5 the Average & Excess ("A&E") production plant allocator using the four
6 monthly coincident peaks for the months of June, July, August, and September
7 ("4CP") (together "A&E 4CP") as a reasonable methodology for the allocation
8 of ECP costs among the customer classes. If the Commission does not approve
9 the A&E 4CP, it should recognize that the issue of production capacity cost
10 allocation is a key driver in the requirement for the Company to file a general
11 rate case.

12 3) If the Commission approves the Company's proposed ECP rider, it should (a)
13 separately calculate and charge the ECP rate on a subclass level and (b) reject
14 the Company's proposal to charge the ECP rider to demand-metered classes
15 on a \$/kWh energy charge and, instead, require the Company to charge the
16 ECP rider to demand-metered classes on a \$/kW demand charge.

17 The fact that an issue is not addressed herein or in related filings should not
18 be construed as an endorsement of any filed position.

19

20 **Environmental Compliance Rider ("ECP")**

21 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S REQUESTS FOR APPROVAL IN**
22 **THIS PROCEEDING?**

1 A. It is unclear exactly what approval OG&E is requesting. The testimony filed by the
2 Company appears to request approval of only the following in this proceeding:

- 3 1) An Arkansas revenue requirement of approximately \$489,934 related to the
4 Company's investments for compliance with Regional Haze NOx emissions
5 limited under the Clean Air Act; and
6 2) The initiation of the ECP rider to recover the \$489,934 revenue requirement
7 pursuant to Ark. Code Ann. §23-4-501 *et seq.*

8 See Direct Testimony of Donald R. Rowlett, page 4, line 21 to line 26.

9 However, based upon OG&E's responses to discovery requests propounded by
10 Walmart and by the Arkansas Valley Energy Consumers ("ARVEC"), it appears that the
11 actual ramifications for customers of the Company's request are as follows:

- 12 1) The Company is likely to defer the filing of a general rate case in Arkansas until
13 2020;
14 2) The Company will implement an ECP rider that will be in place at least until
15 2020; and
16 3) The Company will recover at least \$40,240,997 from Arkansas customers over
17 the period 2015-2020.

18 **Q. PLEASE EXPLAIN.**

19 A. In its data request 2.1 Walmart asked the Company to "[s]pecifically identify the
20 anticipated date when OG&E will file its next general rate case in Arkansas." The
21 Company's response states: "The Company does not have a planned date for a general
22 rate case in Arkansas." See Exhibit SWC-2.

1 In its data request 2.3, Walmart asked the Company to “specifically identify
2 the amounts and time periods for all amounts that OG&E is requesting to recover
3 through the proposed ECP Rider.” The Company’s initial response referred to
4 ARVEC1-2_Att1, which was its response to ARVEC data request 1-2. Among other
5 things, ARVEC1-2_Att1 makes the following statement: “Assumes no rate case to
6 2020.” See Exhibit SWC-3, Summary, Assumptions 2. ARVEC1-2_Att1 also reflects
7 Arkansas jurisdictional revenue requirements for the years 2015, 2016, 2017, 2018,
8 2019 and 2020. See Exhibit SWC-3, Scrub Convert Case with fuel, line 32.

9 Finally, in its amended response to Walmart’s data request 2.3 the Company
10 refers to ARVEC 1-6_Att1, which was its response to data request ARVEC 1-6.
11 ARVEC_Att1 contains Arkansas jurisdictional revenue requirements for the years
12 2015, 2016, 2017, 2018, 2019 and 2020 totaling \$40,240,997. See Exhibit SWC-4.

13 Based upon these data request responses, it appears likely that the Company
14 intends to collect more than \$40 million from its Arkansas customers through the
15 proposed ECP and not to file a general rate case until at least 2020.

16 **Q. DOES THE COMPANY PROPOSE A SUNSET TO THE PROPOSED ECP?**

17 **A.** No. The Company’s testimony contains the following statement:

18 “The interim surcharge rider shall remain in effect until the investments or
19 expenses associated with the interim surcharge can be included in the
20 Company's next general rate filing and included in the Company's base
21 rates.”

22 See Direct Testimony of Donald R. Rowlett, page 7, line 28 to line 30.

1 However, based upon its responses to data requests discussed previously, it
2 appears that OG&E does not intend to file a general rate case until at least 2020, and
3 to place the entire body of compliance costs into rates without a full rate case review.

4 **Q. WHAT IS YOUR UNDERSTANDING OF THE PURPOSE OF THE SURCHARGE ALLOWED**
5 **UNDER ACT 310?**

6 A. While I am not an attorney, it is my understanding that Act 310 surcharges are for the
7 purpose of allowing a utility to recover certain mandated investments and expenses
8 until they can be recovered in a general rate case filing. Counsel for Walmart will
9 provide more information in briefs regarding the applicability and purpose of the
10 provisions of Act 310. OG&E witness Rowlett appears to have the same
11 understanding:

12 “The interim surcharge rider shall remain in effect until the
13 investments or expenses associated with the interim surcharge *can*
14 be included in the Company’s next general rate filing and included
15 in the Company’s base rates.”

16 *Id.*, page 7, line 28 to line 30 (emphasis added).

17 In explaining why the investments and expenses “[c]annot otherwise be
18 recovered in a prompt and timely manner,” as required by Act 310, Mr. Rowlett states:

19 “OG&E does not have a mechanism to collect in a prompt and
20 timely manner the costs requested for recovery in this Docket.
21 There is no current rider provision that allows recovery of the costs
22 of these investments and expenses other than the Act 310
23 provisions being requested. The only other option is the filing of a
24 general rate case, which can take up to ten months after it is filed
25 before any rate relief is implemented. It also requires many months
26 of preparation and it is very time consuming and expensive to
27 prepare and process the filing.”

1 *Id.*, page 6, line 25 to page 7, line 2.

2 While it will certainly take the Company some time to prepare, file and process
3 a general rate case, the Commission should not allow the Company to use Act 310 to
4 justify the deferral of a general rate case until 2020 and the recovery of more than
5 \$40 million from OG&E's Arkansas customers in the interim.

6 **Q. ACT 310 NOTWITHSTANDING, WHAT DO YOU BELIEVE IS THE APPROPRIATE FORUM**
7 **FOR CONSIDERATION OF RECOVERY OF COSTS INCURRED BY THE COMPANY?**

8 A. I believe the appropriate forum for consideration of recovery of costs incurred by the
9 Company is a general rate case, as all costs, benefits, and risks - both those related to
10 any approved plans as well as those interrelated with, or related to the Company's
11 overall business - can be systematically considered. In particular, because the
12 proposed ECP revolves around the addition of or modifications to generation plant,
13 there are other relevant factors that are considered as part of a general rate case that
14 the Company has not proposed for consideration in this docket.

15 **Q. PLEASE EXPLAIN.**

16 A. For example, in a general rate case, the operating income underlying Commission-
17 approved rate levels is set through a comprehensive examination of the Company's
18 test year rate base, rate of return, and capital structure. In contrast, only specific
19 portions of the Company's rate base, and no part of the Company's rate of return or
20 capital structure, are proposed for consideration in this docket, even though all are
21 implicated by the Company's proposals, such as the use of the Company's rate of

1 return in Construction Work in Progress (“CWIP”) or Allowance for Funds Used During
2 Construction (“AFUDC”) calculations.

3 Additionally, factors such as the proposed use of CWIP regulatory treatment
4 and trued-up rider recovery reduce the Company’s business risk and, as part of a
5 general rate case, would be included in consideration of the appropriate authorized
6 ROE. No such consideration will occur in this case under OG&E’s proposal or, as it
7 appears, until at least 2020.

8 Finally, as I will discuss below, a general rate case is where a full cost of service
9 study is performed and cost allocators, such as the production capacity cost allocator,
10 are examined and approved. The allocation of production capacity cost is critical as
11 underlying production costs incurred by the Company are forecast to increase over
12 the next five years. Additionally, as I will discuss below, the passage of Act 725 has
13 created new requirements around production capacity cost allocation that need to be
14 considered by the Commission.

15 **Q. WHEN WAS THE COMPANY’S LAST RATE CASE?**

16 A. The Company’s last rate case, Docket No. 10-067-U, was filed in 2010 and decided in
17 2011. The application in that case indicates that it was based upon “a historical test
18 period...ending December 31, 2009, adjusted for reasonably known and measurable
19 changes through December 31, 2010.” Application, page 3, ¶ 6, Docket No. 10-067-U
20 (filed Sep. 28, 2010).

21 As of the filing of this testimony nearly 6 years have elapsed since the end of
22 the 2009 test year on which OG&E’s current rates are based. As such, a number of

1 factors that determine the Company's rates are due for review. If OG&E is allowed to
2 defer its next general rate case until 2020, the current base rates will have been in
3 place for nearly a decade without a review.

4 **Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION ON THIS ISSUE?**

5 A. The Commission should impose a time limit on the duration of any Act 310 surcharge
6 approved in this docket and a dollar limit on the amount that can be collected through
7 the surcharge. The Commission should also require OG&E to file a general rate case
8 prior to any filing for a future increase in any approved surcharge in this docket. This
9 will accomplish several things:

- 10 1) Allow the Company to collect mandatory investments and expenses while a
11 general rate case filing is prepared and processed;
- 12 2) Provide a timely update of OG&E's current base rates; and
- 13 3) Provide OG&E's Arkansas customers with the comprehensive analysis of a
14 general rate case rather than simply authorizing the collection of additional
15 revenues.

16
17 **Revenue Allocation**

18 **Q. GENERALLY, WHAT IS WALMART'S POSITION ON SETTING RATES BASED ON THE**
19 **UTILITY'S COST OF SERVICE?**

20 A. Walmart advocates that rates be set based on the utility's cost of service for each rate
21 class. This produces equitable rates that reflect cost causation, send proper price
22 signals, and minimize price distortions.

1 Q. WHAT METHODOLOGY DOES THE COMPANY PROPOSE TO ALLOCATE ECP
2 REVENUES?

3 A. The Company states in testimony that it proposes that:

4 "...the revenue requirement from line 6 is allocated to the Arkansas
5 jurisdictional retail customer classes based on the production demand
6 allocator used and approved in the Company's last base rate filing."
7

8 See Direct Testimony of Donald R. Rowlett, page 10, line 10 to line 12.
9

10 However, in a data request response, the Company states that:

11 "The Arkansas Jurisdiction production cost allocator is the same
12 jurisdictional allocator from the settled class cost of service (CCOS) in
13 OG&E's last rate case (10-067-U). However, the *Class* production allocators
14 used in this filing were the "as filed" allocators rather than the settled Class
15 allocators from 10-067-U."
16

17 See Exhibit SWC-5.
18

19 As such, it appears that the Company does **not** propose to use the production demand
20 allocator "used and approved" in their last base rate case.

21 Q. WHAT IS YOUR UNDERSTANDING OF THE PRODUCTION CAPACITY COST
22 ALLOCATION METHODOLOGY TO BE USED IN THE PROPOSED ECP?

23 A. My understanding is that the Company proposes to use the Average & Peak ("A&P")
24 allocator based on the Company's 1 coincident peak ("CP") (together, "A&P CP")
25 allocator, adjusted to "exclude jurisdictions not at issue." See Exhibit DRR-1.
26 Additionally, the Company proposes to use the major class groupings to allocate ECP
27 revenues and set rates as opposed to breaking the allocation down to the subclass
28 level. *Id.*

1 Q. DOES THE COMPANY PROPOSE TO UPDATE THE DATA UNDERLYING THE
2 PRODUCTION CAPACITY COST ALLOCATOR AND SET RATES?

3 A. No. My understanding is that the Company proposes to continue using stale 2009
4 data to calculate the production capacity cost allocator and set rates. As such, the
5 A&P CP (and, admittedly, any production capacity cost allocator that would be
6 approved in this docket unless updated customer data is introduced) is based on stale
7 data that typically requires a rate case to update.

8 Q. DO YOU HAVE CONCERNS WITH THE COMPANY'S PROPOSED ALLOCATION
9 METHODOLOGY?

10 A. Yes. As I will discuss below, the A&P CP allocator has structural and computational
11 flaws that call into question its fairness and viability as a reasonable allocator of
12 production capacity cost. Ultimately, production capacity is a fixed cost, and the A&P
13 CP allocator undercuts the nature of that cost by relying heavily on an energy
14 consumption-based allocation.

15 Q. DO YOU HAVE ADDITIONAL GENERAL CONCERNS WITH THE A&P CP?

16 A. Yes. While I am not an attorney, my understanding is that Arkansas Act 725, passed
17 earlier this year, contains provisions regarding the use of an Average & Excess ("A&E")
18 production plant allocator using the four monthly coincident peaks for the months of
19 June, July, August, and September ("4CP") (together "A&E 4CP"). My understanding
20 is that Act 725 requires the Commission to consider A&E 4CP for general rate cases
21 but does not prohibit its consideration for other ratemaking dockets, such as the
22 instant docket. Counsel for Walmart will provide more information in briefs regarding

1 the potential applicability of Act 725 cost allocation provisions in this docket. As I will
2 discuss below, the A&E 4CP corrects the structural and computational flaws found in
3 the A&P CP allocator and is a reasonable allocator of production capacity cost.

4
5 ***Production Capacity Cost is a Fixed Cost***

6 **Q. WHAT IS YOUR UNDERSTANDING OF THE PURPOSE OF PRODUCTION CAPACITY**
7 **COST ALLOCATION?**

8 A. Production capacity cost allocation is the process of allocating to each customer class
9 the fixed costs of a utility's generation assets. Fixed costs are defined as costs that do
10 not vary with the level of output and must be paid even if there is no output.²

11 **Q. DOES A UTILITY'S FIXED PRODUCTION CAPACITY COSTS CHANGE WITH CHANGES IN**
12 **THE AMOUNT OF ELECTRICITY GENERATED?**

13 A. No. A utility's fixed production capacity costs do not change with changes in the
14 amount of electricity generated. For example, if a baseload unit is not dispatched and
15 produces no energy, the fixed costs are not avoided by the utility or customers.
16 Generation units can be built and operated for different reasons, such as lower fuel
17 costs, peaking needs, or reliability, but the way in which a generation unit is operated
18 does not change the fact that the fixed costs are, in fact, fixed, and should be treated
19 as such in the production capacity cost allocation.

² Pindyck, Robert S. and Daniel L. Rubinfeld, "Microeconomics", 5th ed., 2001, page 206.

1 **Q. IS IT YOUR UNDERSTANDING THAT PRODUCTION CAPACITY IS SIZED TO MEET THE**
2 **MAXIMUM DEMAND IMPOSED ON THE SYSTEM BY THE COMPANY'S CUSTOMERS?**

3 A. Yes. It is my understanding that the timing and size of a utility's production plant
4 capacity additions are made to meet the maximum demand placed on the utility's
5 system by all customer classes, also known as its coincident peak ("CP"). All of a
6 utility's generation units are needed to meet that demand, and removing any of the
7 units from that stack will limit the utility's ability to do so.

8 **Q. WHY IS IT IMPORTANT WHEN ALLOCATING PRODUCTION CAPACITY COST TO**
9 **RECOGNIZE THAT PRODUCTION CAPACITY IS DESIGNED TO MEET SYSTEM PEAK?**

10 A. Basing the allocation of production capacity cost on the utility's system peak ensures
11 that the resulting rates reflect cost causation and minimizes cost responsibility shifts
12 between rate classes. Allocation of fixed production capacity costs on a variable, or
13 energy, basis can introduce shifts in cost responsibility from lower load factor classes
14 to higher load factor classes. Under an energy allocator, two customer classes can
15 have the same level of peak demand in the test year and cause the Company to incur
16 the same amount of fixed cost to meet that demand, but because one class uses more
17 kWh than the other, that class will pay more of the demand cost than the class that
18 uses fewer kWh. Additionally, use of an energy allocator implies that the generation
19 plant to which that allocator is applied has no fixed cost, which is plainly not the case.

20

1 Q. CAN YOU GIVE AN EXAMPLE TO SHOW THAT PRODUCTION CAPACITY COSTS ARE
2 DESIGNED TO MEET SYSTEM PEAK DEMAND RATHER THAN JUST ENERGY NEEDS?

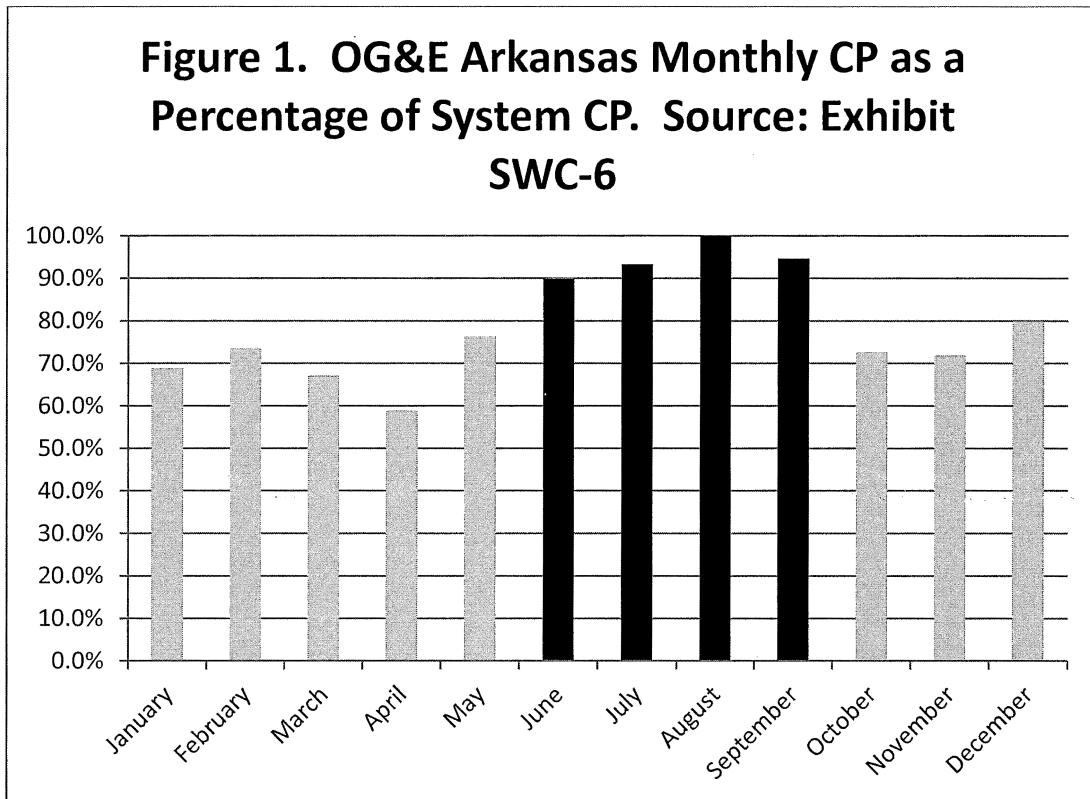
3 A. Yes. If energy needs were the primary driver of production capacity, utilities would
4 simply rely on the generation type with the lowest incremental variable cost, such as
5 wind. That said, wind generation is not necessarily producing when the utility is
6 experiencing its peak demand. For this reason, utilities rely on a combination of
7 generation facilities. Clearly, it is the need to meet peak demand and not simply
8 energy needs that drives the utility's decision to construct and operate generation
9 facilities. Given this, the allocation of the costs of constructing those generation
10 facilities should rely principally on peak demand and not energy usage.

11 Q. IN YOUR EXPERIENCE, IS IT COMMON FOR PRODUCTION CAPACITY COSTS TO BE
12 ALLOCATED ON A CP BASIS?

13 A. Yes. Allocating costs on a CP basis reflects the fact that generation is built to meet
14 system peak. This can range from consideration of a one month peak (1CP) to the
15 peaks of all twelve months (12CP), depending on the specific characteristics of a given
16 utility. Additionally, some jurisdictions use one or more CP or a non-coincident peak
17 ("NCP") for each customer class. For instance, a distinctly summer peaking utility may
18 reflect consideration of the four summer months while a summer/winter peaking
19 utility may consider all 12 monthly peaks. In my experience, a rule of thumb is to
20 identify the month with the highest CP in the year and count that month plus any
21 additional months that have a CP demand within 10 percent of the overall CP demand.

1 Q. BASED ON YOUR ANALYSIS, HOW MANY CP SHOULD BE INCLUDED IN A CP-BASED
2 PRODUCTION COST ALLOCATOR FOR OG&E?

3 A. Based on my analysis of OG&E's monthly peaks, a CP-based production cost allocator
4 should use 4CP, as the CPs for June through September are significantly higher than
5 the CPs for the remaining months. See Figure 1. As such, OG&E's need for generation
6 units is primarily driven by its customers' demand in those four months and not during
7 the rest of the year.



8

9

1 **Q. DOES THE USE OF A CP-BASED PRODUCTION COST ALLOCATOR CORRECTLY REFLECT**
2 **BOTH THE FIXED NATURE OF PRODUCTION COSTS AND THE USE OF ALL**
3 **GENERATION PLANT TO MEET SYSTEM PEAK DEMAND?**

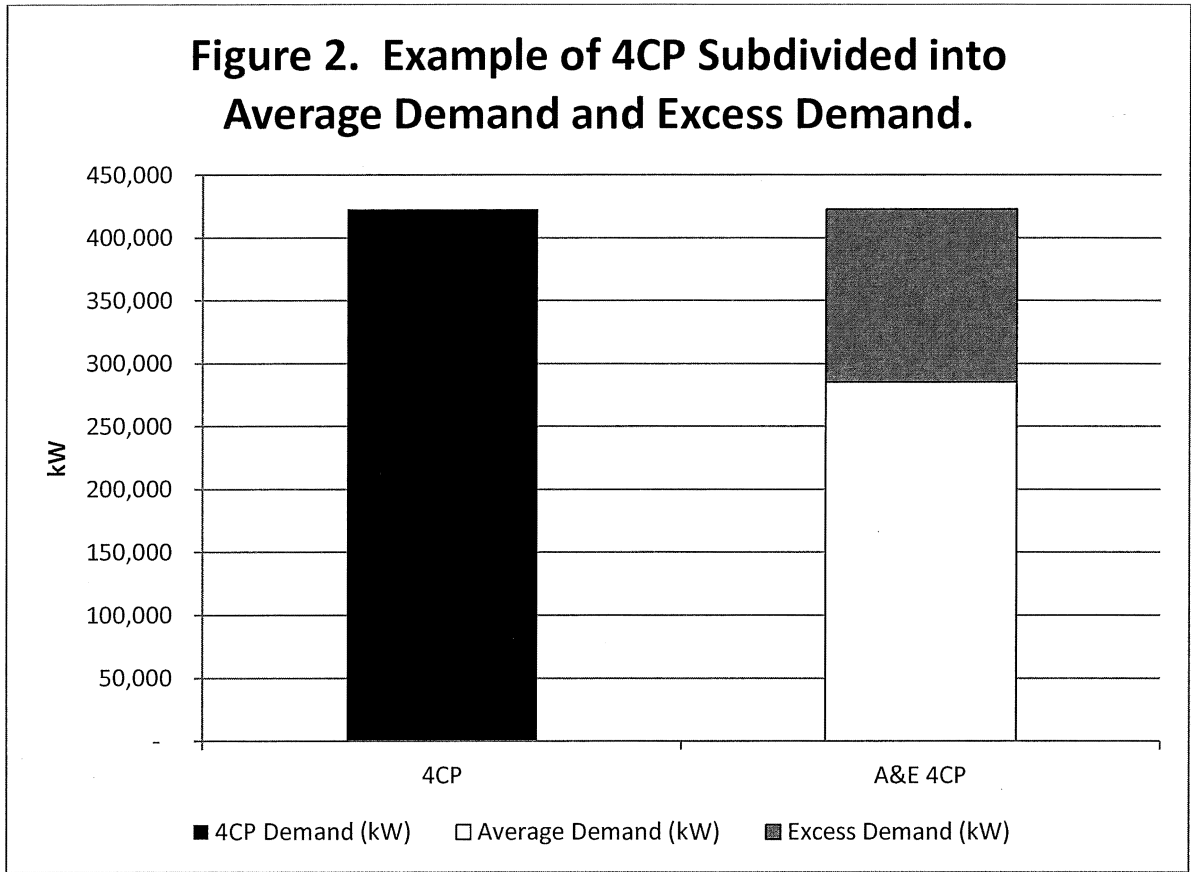
4 A. Yes, and optimally this is the production cost allocator that would result from a
5 Commission decision in this docket. However, I recognize that the provisions of Act
6 725 call for the use of an A&E 4CP production plant allocator using the four monthly
7 coincident peaks for the months of June, July, August, and September and support its
8 use for the purposes of this docket.

9

10 ***The Average & Excess Allocator is a Reasonable Production Capacity Cost Allocator***

11 **Q. WHAT IS AN A&E ALLOCATOR?**

12 A. An A&E allocator is an allocator that recognizes the contribution of each class to
13 average demand, as well as the relative peak demand of each class. The CP or NCP
14 peak demand value, such 1NCP or 4CP, for each class is subdivided into average
15 demand and excess demand. The average demand, or energy portion for each class
16 is weighted by the system load factor. The excess demand portion, which is the
17 difference between the average demand and peak demand for each class, is weighted
18 by 1 minus the system load factor. As system load factor increases, the weighting of
19 the average demand portion of the allocator increases – that is, as the system load
20 factor increases, more weight is given to the energy portion of the allocator. As such,
21 this methodology recognizes that production plants are used to meet peak demand
22 as well as provide energy. See Figure 2.



1

2 **Q. HAVE YOU CALCULATED AN A&E ALLOCATOR USING 4CP?**

3 A. Yes. Exhibit SWC-7 shows the calculation of the A&E 4CP allocator. The resulting
 4 allocation by major class and comparison to OG&E's A&P CP is shown in Table 1 below.
 5 A full comparison at the subclass level can be found in Exhibit SWC-9.

Table 1. A&E 4CP Results vs. OG&E A&P CP Results.

Customer Class	A&E 4CP, AR Jurisdictional SLF	OG&E A&P CP
Residential	32.8238%	31.7101%
General Service	10.9952%	9.3189%
Power and Light	55.4912%	58.3398%
Other	0.6898%	0.6312%
System	100.00%	100.00%

Source: Exhibit SWC-7 and Exhibit SWC-8.

6

7 **Q. DO YOU USE THE SAME SYSTEM LOAD FACTOR FOR THE A&E 4CP CALCULATION AS**
 8 **OG&E DOES FOR THEIR A&P CP CALCULATION?**

1 A. No. I use the Arkansas jurisdictional data to calculate the system load factor for the
2 A&E 4CP calculation. See Exhibit SWC-7, line 16. The use of the jurisdictional load
3 factor appears to be consistent with the language of Act 725 which, as I discuss above,
4 requires the use of the June, July, August, and September peaks. OG&E uses their
5 total system load factor, which includes Oklahoma and federal jurisdictions. See
6 Exhibit SWC-8. The resulting allocation by major class and comparison to OG&E's A&P
7 CP is shown in Table 2 below.

Table 2. A&E 4CP Results, OG&E Total System Load Factor vs. OG&E A&P CP Results.

Customer Class	A&E 4CP, OG&E Total SLF	OG&E A&P CP
Residential	34.0507%	31.7101%
General Service	11.6479%	9.3189%
Power and Light	53.7056%	58.3398%
Other	0.5957%	0.6312%
System	100.00%	100.00%

Source: Exhibit SWC-8 and Exhibit SWC-10.

8

9 **Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION ON THIS ISSUE?**

10 A. If the Commission approves the Company's proposed ECP rider, the Commission
11 should also approve the A&E 4CP as a reasonable methodology for the allocation of
12 ECP costs among the customer classes. If the Commission does not approve the A&E
13 4CP, it should recognize that the issue of production capacity cost allocation is a key
14 driver in the requirement for the Company to file a general rate case.

15

16

1 **ECP Rate Design**

2 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S PROPOSED ECP RATE**
3 **DESIGN?**

4 A. My understanding is that Company's proposes to recover the proposed ECP revenue
5 requirement solely through \$/kWh energy charges assessed to each rate class, even
6 those that are demand metered. See Exhibit DRR-1. It appears that the Company will
7 also assess the same \$/kWh charge to all PL and PL TOU customers. See Direct
8 Testimony of Donald R. Rowlett, page 10, Chart 2.

9 **Q. ARE YOU CONCERNED WITH THE COMPANY'S PROPOSED ECP RATE DESIGN?**

10 A. Yes. The costs proposed to be included in the ECP are related to generation assets
11 and, as such, are properly allocated on the basis of the production demand allocator
12 and charged to demand-metered classes through a \$/kW demand charge rather than
13 through a \$/kWh energy charge as proposed. Additionally, assessing the same \$/kWh
14 charge to all PL and PL TOU customers is inconsistent with both 1) the underlying cost
15 allocation, which is performed at a subclass level prior to being aggregated to the
16 major class level, and 2) with the Company's base rate structure, which includes
17 separate rates for each subclass.

18 **Q. IF ECP RIDER COSTS ARE ALLOCATED USING A PRODUCTION DEMAND ALLOCATOR,**
19 **IS THE RECOVERY OF THOSE COSTS THROUGH AN ENERGY CHARGE CONSISTENT**
20 **WITH THAT ALLOCATION?**

21 A. No. ECP costs should be recovered in a manner that reflects how they are allocated,
22 i.e., costs allocated on the basis of demand should also be recovered on the basis of

1 demand. Recovering demand-related costs through an energy charge violates cost
2 causation principles. Those principles hold that, to the extent possible, costs should
3 be allocated to, and recovered from customers on the same basis (i.e., demand-
4 related costs should be recovered through demand charges and energy-related costs
5 should be recovered through energy charges).

6 **Q. DOES THE RECOVERY OF DEMAND-RELATED COSTS THROUGH AN ENERGY CHARGE**
7 **DISADVANTAGE HIGHER LOAD FACTOR CUSTOMERS?**

8 A. Yes. The shift of distribution demand costs from per kW demand charges to per kWh
9 energy charges results in a shift in demand cost responsibility from lower load factor
10 customers to higher load factor customers, who are more efficiently utilizing
11 Company facilities. In essence, under the Company's proposal two customers can
12 have the same level of demand and cause the utility to incur the same amount of fixed
13 costs, but because one customer uses more kWh than the other, that customer will
14 pay more of the demand cost than the customer that uses fewer kWh. This results in
15 misallocation of cost responsibility as higher load factor customers overpay for the
16 demand-related costs incurred by the Company to serve them and are essentially
17 penalized for more efficiently using the Company's system.

18 **Q. CAN YOU PROVIDE A GENERAL ILLUSTRATION OF A SHIFT IN DEMAND COST**
19 **RESPONSIBILITY?**

20 A. Yes. To provide my illustration, I assume the following:

21 a) A utility has only two customers (Customer 1 and Customer 2), with individual
22 monthly peak demands of 20 kW for a total monthly system load of 40 kW.

1 b) The annual fixed cost revenue requirement or cost to the utility associated
2 with the investment for the 40 kW infrastructure is \$2,000, and the entire cost
3 will be collected each year, so each customer has caused the utility to incur
4 \$1,000 of demand-related or fixed costs.

5 c) Customer 1 has a monthly demand of 20 kW and a load factor of 60 percent
6 and thus consumes 105,120 kWh/year (20 kW * 0.6 * 8760).

7 d) Customer 2 has a monthly demand of 20 kW and load factor of 30 percent and
8 thus consumes 52,560 kWh/year (20kW * 0.3 * 8760).

9 **Q. IF THE DEMAND-RELATED COSTS WERE CHARGED ON A PER KW BASIS, WHAT**
10 **WOULD THE PER KW CHARGE BE?**

11 A. The charge would be \$4.17 per kW-month ($\$2,000 / 40 \text{ kW} / 12 \text{ months}$). Each
12 customer would then pay \$1,000 for the demand-related cost they impose on the
13 system ($20 \text{ kW} * \$4.17/\text{kW} * 12$).

14 **Q. IF THE DEMAND-RELATED COSTS WERE CHARGED ON A PER KWH BASIS, WHAT**
15 **WOULD THE PER KWH CHARGE BE?**

16 A. If the utility were to charge the demand-related costs on a per kWh basis, the energy
17 charge would be 1.2684 cents/kWh (or $\$0.012684/\text{kWh}$). This is calculated as follows:
18 $\$2,000 / 157,680 \text{ kWh}$, using total company sales (i.e., the sum of the two customers'
19 annual kWh usage) as the denominator.

20 **Q. WHAT WOULD EACH CUSTOMER PAY UNDER THE PER KWH CHARGE?**

21 A. Customer 1, who caused the utility to incur \$1,000 in demand-related costs, with a
22 load factor of 60 percent and an annual usage of 105,120 kWh, would pay \$1,333

1 (\$0.012684/kWh * 105,120 kWh). Customer 2, who also caused the utility to incur
2 \$1,000 in demand-related costs, with a load factor of 30 percent and an annual usage
3 of 52,560 kWh, would pay only \$667 ($\$0.012684/\text{kWh} * 52,560$).

4 **Q. IS THIS AN EQUITABLE RESULT?**

5 A. No. Even though each customer caused the utility to incur \$1,000 in fixed costs, the
6 utility will be over-recovering from one customer and under-recovering from the
7 other. Under the per kWh method, the utility would over-recover from Customer 1,
8 the higher load factor customer, by \$333 (i.e. \$1,333 in revenues minus \$1,000 in
9 costs), and under-recover from Customer 2, the lower load factor customer, by \$333
10 (i.e. \$667 in revenues minus \$1,000 in costs).

11 **Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION ON THIS ISSUE?**

12 A. If the Commission approves the Company's proposed ECP rider, it should also (a)
13 separately calculate and charge the ECP rate on a subclass level and (b) reject the
14 Company's proposal to charge the ECP rider to demand-metered classes on a \$/kWh
15 energy charge and, instead, require the Company to charge the ECP rider to demand-
16 metered classes on a \$/kW demand charge.

17 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

18 A. Yes.

Steve W. Chriss

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EXPERIENCE

July 2007 – Present

Wal-Mart Stores, Inc., Bentonville, AR

Senior Manager, Energy Regulatory Analysis (June 2011 – Present)

Manager, State Rate Proceedings (July 2007 – June 2011)

June 2003 – July 2007

Public Utility Commission of Oregon, Salem, OR

Senior Utility Analyst (February 2006 – July 2007)

Economist (June 2003 – February 2006)

January 2003 - May 2003

North Harris College, Houston, TX

Adjunct Instructor, Microeconomics

June 2001 - March 2003

Econ One Research, Inc., Houston, TX

Senior Analyst (October 2002 – March 2003)

Analyst (June 2001 – October 2002)

EDUCATION

2001

Louisiana State University

M.S., Agricultural Economics

1997-1998

University of Florida

Graduate Coursework, Agricultural Education and Communication

1997

Texas A&M University

B.S., Agricultural Development

B.S., Horticulture

TESTIMONY BEFORE REGULATORY COMMISSIONS

2015

Kansas Docket No. 15-WSEE-115-RTS: In the Matter of the Application of Westar Energy, Inc. and Kansas Gas and Electric Company to Make Certain Changes in their Charges for Electric Service.

Michigan Case No. U-17767: In the Matter of the Application of DTE Electric Company for Authority to Increase its Rates, Amend its Rate Schedules and Rules Governing the Distribution and Supply of Electric Energy, and for Miscellaneous Accounting Authority.

Texas Docket No. 43695: Application of Southwestern Public Service Company for Authority to Change Rates.

Kansas Docket No. 15-KCPE-116-RTS: In the Matter of the Application of Kansas City Power & Light Company to Make Certain Changes in its Charges for Electric Service.

**Exhibit SWC-1
Arkansas Docket No. 15-034-U**

Michigan Case No. U-17735: In the Matter of the Application of the Consumers Energy Company for Authority to Increase its Rates for the Generation and Distribution of Electricity and for Other Relief.

Kentucky Public Service Commission Case No. 2014-00396: Application of Kentucky Power Company for a General Adjustment of its Rates for Electric Service; (2) an Order Approving its 2014 Environmental Compliance Plan; (3) an Order Approving its Tariffs and Riders; and (4) an Order Granting All Other Required Approvals and Relief.

Kentucky Public Service Commission Case No. 2014-00371: In the Matter of the Application of Kentucky Utilities Company for an Adjustment of its Electric Rates.

Kentucky Public Service Commission Case No. 2014-00372: In the Matter of the Application of Louisville Gas and Electric Company for an Adjustment of its Electric and Gas Rates.

2014

Ohio Public Utilities Commission Case No. 14-1297-EL-SSO: In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and the Toledo Edison Company for Authority to Provide for a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan.

West Virginia Case No. 14-1152-E-42T: Appalachian Power Company and Wheeling Power Company, Both d/b/a American Electric Power, Joint Application for Rate Increases and Changes in Tariff Provisions.

Oklahoma Corporation Commission Cause No. PUD 201400229: In the Matter of the Application of Oklahoma Gas and Electric Company for Commission Authorization of a Plan to Comply with the Federal Clean Air Act and Cost Recovery; and for Approval of the Mustang Modernization Plan.

Missouri Public Service Commission Case No. ER-2014-0258: In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariff to Increase its Revenues for Electric Service.

Pennsylvania Public Utility Commission Docket No. R-2014-2428742: Pennsylvania Public Utility Commission v. West Penn Power Company.

Pennsylvania Public Utility Commission Docket No. R-2014-2428743: Pennsylvania Public Utility Commission v. Pennsylvania Electric Company.

Pennsylvania Public Utility Commission Docket No. R-2014-2428744: Pennsylvania Public Utility Commission v. Pennsylvania Power Company.

Pennsylvania Public Utility Commission Docket No. R-2014-2428745: Pennsylvania Public Utility Commission v. Metropolitan Edison Company.

Washington Utilities and Transportation Commission Docket No. UE-141368: In the Matter of the Petition of Puget Sound Energy to Update Methodologies Used to Allocate Electric Cost of Service and For Electric Rate Design Purposes.

Washington Utilities and Transportation Commission Docket No. UE-140762: 2014 Pacific Power & Light Company General Rate Case.

West Virginia Public Service Commission Case No. 14-0702-E-42T: Monongahela Power Company and the Potomac Edison Company Rule 42T Tariff Filing to Increase Rates and Charges.

Ohio Public Utilities Commission Case No. 14-841-EL-SSO: In the Matter of the Application of Duke Energy Ohio for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of Case No. 14-841-EL-SSO an Electric Security Plan, Accounting Modifications and Tariffs for Generation Service.

Colorado Public Utilities Commission Docket No. 14AL-0660E: Re: In the Matter of the Advice Letter No. 1672-Electric Filed by Public Service Company of Colorado to Revise its Colorado PUC No. 7-Electric Tariff to Implement a General Rate Schedule Adjustment and Other Rate Changes Effective July 18, 2014.

Maryland Case No. 9355: In the Matter of the Application of Baltimore Gas and Electric Company for Authority to Increase Existing Rates and Charges for Electric and Gas Service.

Mississippi Public Service Commission Docket No. 2014-UN-132: In Re: Notice of Intent of Entergy Mississippi, Inc. to Modernize Rates to Support Economic Development, Power Procurement, and Continued Investment.

Nevada Public Utilities Commission Docket No. 14-05004: Application of Nevada Power Company d/b/a NV Energy for Authority to Increase its Annual Revenue Requirement for General Rates Charged to All Classes of Electric Customers and for Relief Properly Related Thereto.

Utah Public Service Commission Docket No. 14-035-T02: In the Matter of Rocky Mountain Power's Proposed Electric Service Schedule No. 32, Service From Renewable Energy Facilities.

Florida Public Service Commission Docket No. 140002-EG: In Re: Energy Conservation Cost Recovery Clause.

Wisconsin Docket No. 6690-UR-123: Application of Wisconsin Public Service Corporation for Authority to Adjust Electric and Natural Gas Rates.

Connecticut Docket No. 14-05-06: Application of the Connecticut Light and Power Company to Amend its Rate Schedules.

Virginia Corporation Commission Case No. PUE-2014-00026: Application of Appalachian Power Company for a 2014 Biennial Review for the Provision of Generation, Distribution and Transmission Services Pursuant to § 56-585.1 A of the Code of Virginia.

Virginia Corporation Commission Case No. PUE-2014-00033: Application of Virginia Electric and Power Company to Revise its Fuel Factor Pursuant to Va. Code § 56-249.6.

Arizona Corporation Commission Docket No. E-01345A-11-0224 (Four Corners Phase): In the Matter of Arizona Public Service Company for a Hearing to Determine the Fair Value of Utility Property of the Company for Ratemaking Purposes, to Fix and Just and Reasonable Rate of Return Thereon, to Approve Rate Schedules Designed to Develop Such Return.

Minnesota Public Utilities Commission Docket No. E-002/GR-13-868: In the Matter of the Application of Northern States Power Company, for Authority to Increase Rates for Electric Service in Minnesota.

Utah Public Service Commission Docket No. 13-035-184: In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations.

Missouri Public Service Commission Case No. EC-2014-0224: In the Matter of Noranda Aluminum, Inc.'s Request for Revisions to Union Electric Company d/b/a Ameren Missouri's Large Transmission Service Tariff to Decrease its Rate for Electric Service.

Oklahoma Corporation Commission Cause No. PUD 201300217: Application of Public Service Company of Oklahoma to be in Compliance with Order No. 591185 Issued in Cause No. PUD 201100106 Which Requires a Base Rate Case to be Filed by PSO and the Resulting Adjustment in its Rates and Charges and Terms and Conditions of Service for Electric Service in the State of Oklahoma.

Public Utilities Commission of Ohio Case No. 13-2386-EL-SSO: In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to §4928.143, Ohio Rev. Code, in the Form of an Electric Security Plan.
2013

Oklahoma Corporation Commission Cause No. PUD 201300201: Application of Public Service Company of Oklahoma for Commission Authorization of a Standby and Supplemental Service Rate Schedule.

Georgia Public Service Commission Docket No. 36989: Georgia Power's 2013 Rate Case.

Florida Public Service Commission Docket No. 130140-EI: Petition for Rate Increase by Gulf Power Company.

Public Utility Commission of Oregon Docket No. UE 267: In the Matter of PACIFICORP, dba PACIFIC POWER, Transition Adjustment, Five-Year Cost of Service Opt-Out.

Illinois Commerce Commission Docket No. 13-0387: Commonwealth Edison Company Tariff Filing to Present the Illinois Commerce Commission with an Opportunity to Consider Revenue Neutral Tariff Changes Related to Rate Design Authorized by Subsection 16-108.5 of the Public Utilities Act.

Iowa Utilities Board Docket No. RPU-2013-0004: In Re: MidAmerican Energy Company.

South Dakota Public Utilities Commission Docket No. EL12-061: In the Matter of the Application of Black Hills Power, Inc. for Authority to Increase its Electric Rates. (filed with confidential stipulation)

Kansas Corporation Commission Docket No. 13-WSEE-629-RTS: In the Matter of the Applications of Westar Energy, Inc. and Kansas Gas and Electric Company for Approval to Make Certain Changes in their Charges for Electric Service.

Public Utility Commission of Oregon Docket No. UE 263: In the Matter of PACIFICORP, dba PACIFIC POWER, Request for a General Rate Revision.

Arkansas Public Service Commission Docket No. 13-028-U: In the Matter of the Application of Entergy Arkansas, Inc. for Approval of Changes in Rates for Retail Electric Service.

Virginia State Corporation Commission Docket No. PUE-2013-00020: Application of Virginia Electric and Power Company for a 2013 Biennial Review of the Rates, Terms, and Conditions for the Provision of Generation, Distribution, and Transmission Services Pursuant to § 56-585.1 A of the Code of Virginia.

Florida Public Service Commission Docket No. 130040-EI: Petition for Rate Increase by Tampa Electric Company.

South Carolina Public Service Commission Docket No. 2013-59-E: Application of Duke Energy Carolinas, LLC, for Authority to Adjust and Increase Its Electric Rates and Charges.

Public Utility Commission of Oregon Docket No. UE 262: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY, Request for a General Rate Revision.

New Jersey Board of Public Utilities Docket No. ER12111052: In the Matter of the Verified Petition of Jersey Central Power & Light Company For Review and Approval of Increases in and Other Adjustments to Its Rates and Charges For Electric Service, and For Approval of Other Proposed Tariff Revisions in Connection Therewith; and for Approval of an Accelerated Reliability Enhancement Program ("2012 Base Rate Filing")

North Carolina Utilities Commission Docket No. E-7, Sub 1026: In the Matter of the Application of Duke Energy Carolinas, LLC for Adjustment of Rates and Charges Applicable to Electric Service in North Carolina.

Public Utility Commission of Oregon Docket No. UE 264: PACIFICORP, dba PACIFIC POWER, 2014 Transition Adjustment Mechanism.

Public Utilities Commission of California Docket No. 12-12-002: Application of Pacific Gas and Electric Company for 2013 Rate Design Window Proceeding.

Public Utilities Commission of Ohio Docket Nos. 12-426-EL-SSO, 12-427-EL-ATA, 12-428-EL-AAM, 12-429-EL-WVR, and 12-672-EL-RDR: In the Matter of the Application of the Dayton Power and Light Company Approval of its Market Offer.

Minnesota Public Utilities Commission Docket No. E-002/GR-12-961: In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in Minnesota.

North Carolina Utilities Commission Docket E-2, Sub 1023: In the Matter of Application of Progress Energy Carolinas, Inc. For Adjustment of Rates and Charges Applicable to Electric Service in North Carolina.

2012

Public Utility Commission of Texas Docket No. 40443: Application of Southwestern Electric Power Company for Authority to Change Rates and Reconcile Fuel Costs.

South Carolina Public Service Commission Docket No. 2012-218-E: Application of South Carolina Electric & Gas Company for Increases and Adjustments in Electric Rate Schedules and Tariffs and Request for Mid-Period Reduction in Base Rates for Fuel.

Kansas Corporation Commission Docket No. 12-KCPE-764-RTS: In the Matter of the Application of Kansas City Power & Light Company to Make Certain Changes in its Charges for Electric Service.

Kansas Corporation Commission Docket No. 12-GIMX-337-GIV: In the Matter of a General Investigation of Energy-Efficiency Policies for Utility Sponsored Energy Efficiency Programs.

Florida Public Service Commission Docket No. 120015-El: In Re: Petition for Rate Increase by Florida Power & Light Company.

California Public Utilities Commission Docket No. A.11-10-002: Application of San Diego Gas & Electric Company (U 902 E) for Authority to Update Marginal Costs, Cost Allocation, and Electric Rate Design.

Utah Public Service Commission Docket No. 11-035-200: In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations.

Virginia State Corporation Commission Case No. PUE-2012-00051: Application of Appalachian Power Company to Revise its Fuel Factor Pursuant to § 56-249.6 of the Code of Virginia.

Public Utilities Commission of Ohio Case Nos. 11-346-EL-SSO, 11-348-EL-SSO, 11-349-EL-AAM, and 11-350-EL-AAM: In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form on an Electric Security Plan and In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Approval of Certain Accounting Authority.

New Jersey Board of Public Utilities Docket No. ER11080469: In the Matter of the Petition of Atlantic City Electric for Approval of Amendments to Its Tariff to Provide for an Increase in Rates and Charges for Electric Service Pursuant to N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1 and For Other Appropriate Relief.

Public Utility Commission of Texas Docket No. 39896: Application of Entergy Texas, Inc. for Authority to Change Rates and Reconcile Fuel Costs.

Missouri Public Service Commission Case No. EO-2012-0009: In the Matter of KCP&L Greater Missouri Operations Notice of Intent to File an Application for Authority to Establish a Demand-Side Programs Investment Mechanism.

Colorado Public Utilities Commission Docket No. 11AL-947E: In the Matter of Advice Letter No. 1597-Electric Filed by Public Service Company of Colorado to Revise its Colorado PUC No. 7-Electric Tariff to Implement a General Rate Schedule Adjustment and Other Changes Effective December 23, 2011.

Illinois Commerce Commission Docket No. 11-0721: Commonwealth Edison Company Tariffs and Charges Submitted Pursuant to Section 16-108.5 of the Public Utilities Act.

Public Utility Commission of Texas Docket No. 38951: Application of Entergy Texas, Inc. for Approval of Competitive Generation Service tariff (Issues Severed from Docket No. 37744).

California Public Utilities Commission Docket No. A.11-06-007: Southern California Edison's General Rate Case, Phase 2.

2011

Arizona Corporation Commission Docket No. E-01345A-11-0224: In the Matter of Arizona Public Service Company for a Hearing to Determine the Fair Value of Utility Property of the Company for Ratemaking Purposes, to Fix and Just and Reasonable Rate of Return Thereon, to Approve Rate Schedules Designed to Develop Such Return.

Oklahoma Corporation Commission Cause No. PUD 201100087: 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.

South Carolina Public Service Commission Docket No. 2011-271-E: Application of Duke Energy Carolinas, LLC for Authority to Adjust and Increase its Electric Rates and Charges.

Pennsylvania Public Utility Commission Docket No. P-2011-2256365: Petition of PPL Electric Utilities Corporation for Approval to Implement Reconciliation Rider for Default Supply Service.

North Carolina Utilities Commission Docket No. E-7, Sub 989: In the Matter of Application of Duke Energy Carolinas, LLC for Adjustment of Rates and Charges Applicable to Electric Service in North Carolina.

Florida Public Service Commission Docket No. 110138: In Re: Petition for Increase in Rates by Gulf Power Company.

Public Utilities Commission of Nevada Docket No. 11-06006: In the Matter of the Application of Nevada Power Company, filed pursuant to NRS 704.110(3) for authority to increase its annual revenue requirement for general rates charged to all classes of customers to recover the costs of constructing the Harry Allen Combined Cycle plant and other generating, transmission, and distribution plant additions, to reflect changes in the cost of capital, depreciation rates and cost of service, and for relief properly related thereto.

North Carolina Utilities Commission Docket Nos. E-2, Sub 998 and E-7, Sub 986: In the Matter of the Application of Duke Energy Corporation and Progress Energy, Inc., to Engage in a Business Combination Transaction and to Address Regulatory Conditions and Codes of Conduct.

Public Utilities Commission of Ohio Case Nos. 11-346-EL-SSO, 11-348-EL-SSO, 11-349-EL-AAM, and 11-350-EL-AAM: In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form on an Electric Security Plan and In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Approval of Certain Accounting Authority.

Virginia State Corporation Commission Case No. PUE-2011-00037: In the Matter of Appalachian Power Company for a 2011 Biennial Review of the Rates, Terms, and Conditions for the Provision of Generation, Distribution, and Transmission Services Pursuant to § 56-585.1 A of the Code of Virginia.

Illinois Commerce Commission Docket No. 11-0279 and 11-0282 (cons.): Ameren Illinois Company Proposed General Increase in Electric Delivery Service and Ameren Illinois Company Proposed General Increase in Gas Delivery Service.

Virginia State Corporation Commission Case No. PUE-2011-00045: Application of Virginia Electric and Power Company to Revise its Fuel Factor Pursuant to § 56-249.6 of the Code of Virginia.

Utah Public Service Commission Docket No. 10-035-124: In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations.

Maryland Public Utilities Commission Case No. 9249: In the Matter of the Application of Delmarva Power & Light for an Increase in its Retail Rates for the Distribution of Electric Energy.

Minnesota Public Utilities Commission Docket No. E002/GR-10-971: In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy for Authority to Increase Rates for Electric Service in Minnesota.

Michigan Public Service Commission Case No. U-16472: In the Matter of the Detroit Edison Company for Authority to Increase its Rates, Amend its Rate Schedules and Rules Governing the Distribution and Supply of Electric Energy, and for Miscellaneous Accounting Authority.

2010

Public Utilities Commission of Ohio Docket No. 10-2586-EL-SSO: In the Matter of the Application of Duke Energy Ohio for Approval of a Market Rate Offer to Conduct a Competitive Bidding Process for Standard Service Offer Electric Generation Supply, Accounting Modifications, and Tariffs for Generation Service.

Colorado Public Utilities Commission Docket No. 10A-554EG: In the Matter of the Application of Public Service Company of Colorado for Approval of a Number of Strategic Issues Relating to its DSM Plan, Including Long-Term Electric Energy Savings Goals, and Incentives.

Public Service Commission of West Virginia Case No. 10-0699-E-42T: Appalachian Power Company and Wheeling Power Company Rule 42T Application to Increase Electric Rates.

Oklahoma Corporation Commission Cause No. PUD 201000050: Application of Public Service Company of Oklahoma, an Oklahoma Corporation, for an Adjustment in its Rates and Charges and Terms and Conditions of Service for Electric Service in the State of Oklahoma.

Georgia Public Service Commission Docket No. 31958-U: In Re: Georgia Power Company's 2010 Rate Case.

Washington Utilities and Transportation Commission Docket No. UE-100749: 2010 Pacific Power & Light Company General Rate Case.

Colorado Public Utilities Commission Docket No. 10M-254E: In the Matter of Commission Consideration of Black Hills Energy's Plan in Compliance with House Bill 10-1365, "Clean Air-Clean Jobs Act."

Colorado Public Utilities Commission Docket No. 10M-245E: In the Matter of Commission Consideration of Public Service Company of Colorado Plan in Compliance with House Bill 10-1365, "Clean Air-Clean Jobs Act."

Public Service Commission of Utah Docket No. 09-035-15 *Phase II*: In the Matter of the Application of Rocky Mountain Power for Approval of its Proposed Energy Cost Adjustment Mechanism.

Public Utility Commission of Oregon Docket No. UE 217: In the Matter of PACIFICORP, dba PACIFIC POWER Request for a General Rate Revision.

Mississippi Public Service Commission Docket No. 2010-AD-57: In Re: Proposal of the Mississippi Public Service Commission to Possibly Amend Certain Rules of Practice and Procedure.

Indiana Utility Regulatory Commission Cause No. 43374: Verified Petition of Duke Energy Indiana, Inc. Requesting the Indiana Utility Regulatory Commission to Approve an Alternative Regulatory Plan Pursuant to Ind. Code § 8-1-2.5-1, *ET SEQ.*, for the Offering of Energy Efficiency Conservation, Demand Response, and Demand-Side Management Programs and Associated Rate Treatment Including Incentives Pursuant to a Revised Standard Contract Rider No. 66 in Accordance with Ind. Code §§ 8-1-2.5-1 *ET SEQ.* and 8-1-2-42 (a); Authority to Defer Program Costs Associated with its Energy Efficiency Portfolio of Programs; Authority to Implement New and Enhanced Energy Efficiency Programs, Including the Powershare® Program in its Energy Efficiency Portfolio of Programs; and Approval of a Modification of the Fuel Adjustment Clause Earnings and Expense Tests.

Public Utility Commission of Texas Docket No. 37744: Application of Entergy Texas, Inc. for Authority to Change Rates and to Reconcile Fuel Costs.

South Carolina Public Service Commission Docket No. 2009-489-E: Application of South Carolina Electric & Gas Company for Adjustments and Increases in Electric Rate Schedules and Tariffs.

Kentucky Public Service Commission Case No. 2009-00459: In the Matter of General Adjustments in Electric Rates of Kentucky Power Company.

Virginia State Corporation Commission Case No. PUE-2009-00125: For acquisition of natural gas facilities Pursuant to § 56-265.4:5 B of the Virginia Code.

Arkansas Public Service Commission Docket No. 10-010-U: In the Matter of a Notice of Inquiry Into Energy Efficiency.

Connecticut Department of Public Utility Control Docket No. 09-12-05: Application of the Connecticut Light and Power Company to Amend its Rate Schedules.

Arkansas Public Service Commission Docket No. 09-084-U: In the Matter of the Application of Entergy Arkansas, Inc. For Approval of Changes in Rates for Retail Electric Service.

Missouri Public Service Commission Docket No. ER-2010-0036: In the Matter of Union Electric Company d/b/a AmerenUE for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in the Company's Missouri Service Area.

Public Service Commission of Delaware Docket No. 09-414: In the Matter of the Application of Delmarva Power & Light Company for an Increase in Electric Base Rates and Miscellaneous Tariff Charges.

2009

Virginia State Corporation Commission Case No. PUE-2009-00030: In the Matter of Appalachian Power Company for a Statutory Review of the Rates, Terms, and Conditions for the Provision of Generation, Distribution, and Transmission Services Pursuant to § 56-585.1 A of the Code of Virginia.

Public Service Commission of Utah Docket No. 09-035-15 *Phase I*: In the Matter of the Application of Rocky Mountain Power for Approval of its Proposed Energy Cost Adjustment Mechanism.

Public Service Commission of Utah Docket No. 09-035-23: In the Matter of the Application of Rocky Mountain Power for Authority To Increase its Retail Electric Utility Service Rates in Utah and for Approval of Its Proposed Electric Service Schedules and Electric Service Regulations.

Colorado Public Utilities Commission Docket No. 09AL-299E: Re: The Tariff Sheets Filed by Public Service Company of Colorado with Advice Letter No. 1535 – Electric.

Arkansas Public Service Commission Docket No. 09-008-U: In the Matter of the Application of Southwestern Electric Power Company for Approval of a General Change in Rates and Tariffs.

Oklahoma Corporation Commission Docket No. PUD 200800398: 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.

Public Utilities Commission of Nevada Docket No. 08-12002: In the Matter of the Application by Nevada Power Company d/b/a NV Energy, filed pursuant to NRS §704.110(3) and NRS §704.110(4) for authority to increase its annual revenue requirement for general rates charged to all classes of customers, begin to recover the costs of acquiring the Bighorn Power Plant, constructing the Clark Peakers, Environmental

Retrofits and other generating, transmission and distribution plant additions, to reflect changes in cost of service and for relief properly related thereto.

New Mexico Public Regulation Commission Case No. 08-00024-UT: In the Matter of a Rulemaking to Revise NMPRC Rule 17.7.2 NMAC to Implement the Efficient Use of Energy Act.

Indiana Utility Regulatory Commission Cause No. 43580: Investigation by the Indiana Utility Regulatory Commission, of Smart Grid Investments and Smart Grid Information Issues Contained in 111(d) of the Public Utility Regulatory Policies Act of 1978 (16 U.S.C. § 2621(d)), as Amended by the Energy Independence and Security Act of 2007.

Louisiana Public Service Commission Docket No. U-30192 *Phase II (February 2009)*: Ex Parte, Application of Entergy Louisiana, LLC for Approval to Repower Little Gypsy Unit 3 Electric Generating Facility and for Authority to Commence Construction and for Certain Cost Protection and Cost Recovery.

South Carolina Public Service Commission Docket No. 2008-251-E: In the Matter of Progress Energy Carolinas, Inc.'s Application For the Establishment of Procedures to Encourage Investment in Energy Efficient Technologies; Energy Conservation Programs; And Incentives and Cost Recovery for Such Programs.

2008

Colorado Public Utilities Commission Docket No. 08A-366EG: In the Matter of the Application of Public Service Company of Colorado for approval of its electric and natural gas demand-side management (DSM) plan for calendar years 2009 and 2010 and to change its electric and gas DSM cost adjustment rates effective January 1, 2009, and for related waivers and authorizations.

Public Service Commission of Utah Docket No. 07-035-93: In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations, Consisting of a General Rate Increase of Approximately \$161.2 Million Per Year, and for Approval of a New Large Load Surcharge.

Indiana Utility Regulatory Commission Cause No. 43374: Petition of Duke Energy Indiana, Inc. Requesting the Indiana Utility Regulatory Commission Approve an Alternative Regulatory Plan for the Offering of Energy Efficiency, Conservation, Demand Response, and Demand-Side Management.

Public Utilities Commission of Nevada Docket No. 07-12001: In the Matter of the Application of Sierra Pacific Power Company for authority to increase its general rates charged to all classes of electric customers to reflect an increase in annual revenue requirement and for relief properly related thereto.

Louisiana Public Service Commission Docket No. U-30192 *Phase II*: Ex Parte, Application of Entergy Louisiana, LLC for Approval to Repower Little Gypsy Unit 3 Electric Generating Facility and for Authority to Commence Construction and for Certain Cost Protection and Cost Recovery.

Colorado Public Utilities Commission Docket No. 07A-420E: In the Matter of the Application of Public Service Company of Colorado For Authority to Implement and Enhanced Demand Side Management Cost Adjustment Mechanism to Include Current Cost Recovery and Incentives.

2007

Louisiana Public Service Commission Docket No. U-30192: Ex Parte, Application of Entergy Louisiana, LLC for Approval to Repower Little Gypsy Unit 3 Electric Generating Facility and for Authority to Commence Construction and for Certain Cost Protection and Cost Recovery.

Public Utility Commission of Oregon Docket No. UG 173: In the Matter of PUBLIC UTILITY COMMISSION OF OREGON Staff Request to Open an Investigation into the Earnings of Cascade Natural Gas.

2006

Public Utility Commission of Oregon Docket No. UE 180/UE 181/UE 184: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY Request for a General Rate Revision.

Public Utility Commission of Oregon Docket No. UE 179: In the Matter of PACIFICORP, dba PACIFIC POWER AND LIGHT COMPANY Request for a general rate increase in the company's Oregon annual revenues.

Public Utility Commission of Oregon Docket No. UM 1129 *Phase II*: Investigation Related to Electric Utility Purchases From Qualifying Facilities.

2005

Public Utility Commission of Oregon Docket No. UM 1129 *Phase I Compliance*: Investigation Related to Electric Utility Purchases From Qualifying Facilities.

Public Utility Commission of Oregon Docket No. UX 29: In the Matter of QWEST CORPORATION Petition to Exempt from Regulation Qwest's Switched Business Services.

2004

Public Utility Commission of Oregon Docket No. UM 1129 *Phase I*: Investigation Related to Electric Utility Purchases From Qualifying Facilities.

TESTIMONY BEFORE LEGISLATIVE BODIES

2014

Regarding Kansas House Bill 2460: Testimony Before the Kansas House Standing Committee on Utilities and Telecommunications, February 12, 2014.

2012

Regarding Missouri House Bill 1488: Testimony Before the Missouri House Committee on Utilities, February 7, 2012.

2011

Regarding Missouri Senate Bills 50, 321, 359, and 406: Testimony Before the Missouri Senate Veterans' Affairs, Emerging Issues, Pensions, and Urban Affairs Committee, March 9, 2011.

AFFIDAVITS

2015

Supreme Court of Illinois, Docket No. 118129, Commonwealth Edison Company et al., respondents, v. Illinois Commerce Commission et al. (Illinois Competitive Energy Association et al., petitioners). Leave to appeal, Appellate Court, First District.

2011

Colorado Public Utilities Commission Docket No. 11M-951E: In the Matter of the Petition of Public Service Company of Colorado Pursuant to C.R.S. § 40-6-111(1)(d) for Interim Rate Relief Effective on or before January 21, 2012.

ENERGY INDUSTRY PUBLICATIONS AND PRESENTATIONS

Panelist, The Governor's Utah Energy Development Summit 2015, May 21, 2015.

Mock Trial Expert Witness, The Energy Bar Association State Commission Practice and Regulation Committee and Young Lawyers Committee and Environment, Energy and Natural Resources Section of the D.C. Bar, Mastering Your First (or Next) State Public Utility Commission Hearing, February 13, 2014.

Panelist, Customer Panel, Virginia State Bar 29th National Regulatory Conference, Williamsburg, Virginia, May 19, 2011.

Chriss, S. (2006). "Regulatory Incentives and Natural Gas Purchasing – Lessons from the Oregon Natural Gas Procurement Study." Presented at the 19th Annual Western Conference, Center for Research in Regulated Industries Advanced Workshop in Regulation and Competition, Monterey, California, June 29, 2006.

Chriss, S. (2005). "Public Utility Commission of Oregon Natural Gas Procurement Study." Public Utility Commission of Oregon, Salem, OR. Report published in June, 2005. Presented to the Public Utility Commission of Oregon at a special public meeting on August 1, 2005.

Chriss, S. and M. Radler (2003). "Report from Houston: Conference on Energy Deregulation and Restructuring." USAEE Dialogue, Vol. 11, No. 1, March, 2003.

Chriss, S., M. Dwyer, and B. Pulliam (2002). "Impacts of Lifting the Ban on ANS Exports on West Coast Crude Oil Prices: A Reconsideration of the Evidence." Presented at the 22nd USAEE/IAEE North American Conference, Vancouver, BC, Canada, October 6-8, 2002.

Contributed to chapter on power marketing: "Power System Operations and Electricity Markets," Fred I. Denny and David E. Dismukes, authors. Published by CRC Press, June 2002.

Contributed to "Moving to the Front Lines: The Economic Impact of the Independent Power Plant Development in Louisiana," David E. Dismukes, author. Published by the Louisiana State University Center for Energy Studies, October 2001.

Dismukes, D.E., D.V. Mesyanzhinov, E.A. Downer, S. Chriss, and J.M. Burke (2001). "Alaska Natural Gas In-State Demand Study." Anchorage: Alaska Department of Natural Resources.

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

Date Requested: 7/23/2015

Date Required: 8/7/2015

Requested by: Rick D. Chamberlain

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

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

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

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



ACTUALS THRU JUNE 2015

Incremental Annual Impact (with fuel) - Scrub/Convert Case

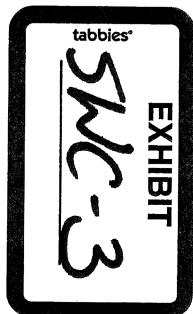
Class	Average Monthly kWh	2015 (Revised) ¹	2016	2017	2018	2019	2020
Residential	1,000	\$ 0.22	\$ 2.66	\$ 1.11	\$ 1.71	\$ 6.73	\$ 0.35
General Service	1,800	\$ 0.39	\$ 4.78	\$ 1.99	\$ 3.06	\$ 12.09	\$ 0.63
Power & Light	130,000	\$ 21.19	\$ 304.39	\$ 114.96	\$ 182.38	\$ 782.15	\$ 44.79

Note 1) e.g. For Residential Class
See tab "Scrub_Convert Case with fuel"
Cell E:46 + E:70

Purpose: This tab shows the incremental customer impact of all environmental projects going through the ECP Rider with the associated fuel impact, assuming OG&E files an application to recover costs in January and June of each year.

Assumptions:

1. kWhs utilized are from the prior settled rate case
2. Assumes no rate case to 2020.
3. Revenue requirement includes cost of Low Nox, ACI, Scrubbers, and Gas Conversion.
4. Return requirements are calculated using an 8.2% tax grossed up rate of return for plant and CWIP per the last settled rate case



Arkansas Estimated Customer Impacts for Environmental Revenue Requirements - Scrub/Convert Case with fuel

	1	2	3	4	5	6
	2015	2016 ¹	2017	2018	2019	2020
Rate Base²						
1 Capital Investment (Plant & CWIP)	\$ 42,852,320	\$ 356,508,806	\$ 519,977,513	\$ 670,812,302	\$ 690,380,556	\$ 690,466,755
2 Accumulated Provision for Depreciation	\$ (661,831)	\$ (6,027,920)	\$ (11,469,159)	\$ (27,541,303)	\$ (59,431,608)	\$ (91,952,306)
3 Regulatory Assets	\$ -	\$ -	\$ -	\$ -	\$ 30,378,344	\$ 24,444,688
4 Total Rate Base	\$ 42,190,489	\$ 350,480,885	\$ 508,508,354	\$ 643,270,999	\$ 661,327,292	\$ 622,959,137
5						
6 Return on Rate Base	\$ 3,459,620	\$ 21,702,800	\$ 37,080,638	\$ 47,586,786	\$ 54,786,064	\$ 52,522,436
Expenses²						
7 O&M Expense	\$ -	\$ 845,067	\$ 860,447	\$ 5,680,333	\$ 13,366,534	\$ 13,876,897
8 Depreciation Expense	\$ 568,759	\$ 4,927,456	\$ 5,441,239	\$ 16,072,143	\$ 31,890,305	\$ 32,520,698
9 Amortization of Regulatory Assets	\$ -	\$ -	\$ -	\$ -	\$ 5,933,656	\$ 5,933,656
10 Property Taxes	\$ 428,523	\$ 1,791,915	\$ 3,565,088	\$ 5,199,775	\$ 6,708,123	\$ 6,903,806
11 Total Expenses	\$ 997,283	\$ 7,564,437	\$ 9,866,774	\$ 26,952,251	\$ 57,898,618	\$ 59,235,057
12 Revenue Requirement @ 100% ***	\$ 4,456,903	\$ 26,139,986	\$ 43,987,638	\$ 67,282,146	\$ 112,904,494	\$ 112,413,366

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

* Allocators per Docket No. 10-067-U settled case *** Revenue Requirement based on semi-annual case filings.

** Other includes pumping and lighting classes.

Allocation of Revenue Requirement³:

Rev Req @ Demand:	Allocator	2015	2016	2017	2018	2019	2020
Arkansas Jurisdiction	10.9927%	\$ 489,934	\$ 2,873,490	\$ 4,835,429	\$ 7,396,125	\$ 12,411,252	\$ 12,357,264
Residential	3.4569%	\$ 154,071	\$ 903,633	\$ 1,520,609	\$ 2,325,877	\$ 3,902,995	\$ 3,886,018
General Service	1.0267%	\$ 45,759	\$ 268,379	\$ 451,621	\$ 690,786	\$ 1,159,190	\$ 1,154,148
Power & Light	6.4361%	\$ 286,851	\$ 1,682,396	\$ 2,831,088	\$ 4,330,346	\$ 7,266,646	\$ 7,235,037
Other	0.0730%	\$ 3,254	\$ 19,082	\$ 32,111	\$ 49,116	\$ 82,420	\$ 82,062

Class	Average Monthly kWh	2015 ⁴	2016	2017	2018	2019	2020
Residential	1,000	\$ 0.22	\$ 1.28	\$ 2.15	\$ 3.28	\$ 5.51	\$ 5.49
General Service	1,800	\$ 0.39	\$ 2.28	\$ 3.84	\$ 5.87	\$ 9.85	\$ 9.81
Power & Light	130,000	\$ 21.19	\$ 124.28	\$ 209.13	\$ 319.88	\$ 536.79	\$ 534.45

Incremental Annual Impact - Scrub/Convert Case⁵

Class	Average Monthly Bill	Average Monthly kWh	2015 (Revised)	2016	2017	2018	2019	2020
Residential	\$ -	1,000	\$ 0.22	\$ 1.06	\$ 0.87	\$ 1.14	\$ 2.23	\$ (0.02)
General Service	\$ -	1,800	\$ 0.39	\$ 1.89	\$ 1.56	\$ 2.03	\$ 3.98	\$ (0.04)
Power & Light	\$ -	130,000	\$ 21.19	\$ 103.09	\$ 84.85	\$ 110.75	\$ 216.91	\$ (2.34)

FUEL ONLY IMPACTS BELOW

Fuel Impacts - Scrub/Convert Case	2015	2016 ⁶	2017	2018	2019	2020
	\$ -	\$ 37,096,560	\$ 42,644,200	\$ 55,843,735	\$ 160,010,601	\$ 168,695,566

Fuel Impacts @ Energy:

Arkansas Jurisdiction	11.461%	\$ -	\$ 4,251,748	\$ 4,887,580	\$ 6,400,418	\$ 18,339,295	\$ 19,334,705
Residential	3.0653%	\$ -	\$ 1,137,121	\$ 1,807,173	\$ 1,711,778	\$ 4,904,805	\$ 5,171,025
General Service	0.9162%	\$ -	\$ 339,879	\$ 390,706	\$ 511,640	\$ 1,466,017	\$ 1,545,589
Power & Light	7.3457%	\$ -	\$ 2,725,002	\$ 3,132,515	\$ 4,102,113	\$ 11,753,899	\$ 12,391,870
Other	0.1341%	\$ -	\$ 49,746	\$ 57,186	\$ 74,886	\$ 214,574	\$ 226,221

Monthly Fuel Impact ¢/kWh @ E	Average Monthly kWh	2016	2017	2018	2019	2020
Residential	1,000	\$ 1.61	\$ 1.85	\$ 2.42	\$ 6.92	\$ 7.30
General Service	1,800	\$ 2.89	\$ 3.32	\$ 4.35	\$ 12.46	\$ 13.14
Power & Light	130,000	\$ 201.30	\$ 231.40	\$ 303.02	\$ 868.26	\$ 915.39

Incremental Annual Fuel Impact - Scrub/Convert Case

Class	Average Monthly Bill	Average Monthly kWh	2015	2016	2017	2018	2019	2020
Residential	\$ -	1,000	\$ -	\$ 1.61	\$ 0.24	\$ 0.57	\$ 4.51	\$ 0.38
General Service	\$ -	1,800	\$ -	\$ 2.89	\$ 0.43	\$ 1.03	\$ 8.11	\$ 0.68
Power & Light	\$ -	130,000	\$ -	\$ 201.30	\$ 30.10	\$ 71.62	\$ 565.24	\$ 47.13

Footnotes

- For supporting revenue requirement workpapers by year and by month for 2016-2020, please see attachment ARVEC 1-2 Att 2.
- Based on year-ending actual numbers. Please note that the total revenue requirement is recovered on a semi-annual basis.
- Calculated multiplying total company revenue requirement by jurisdictional allocators from cell C:32-36.
- Monthly total impact is calculated by dividing cell D:33 (Jurisdictional revenue requirement) by kWh by class (Tab "Arkansas kWh by Class", Cell B:6) and multiplying total by average monthly kWh in cell C:40. Same formula is utilized for each corresponding year.
- Incremental customer impact represents increase per year.
- Fuel cost also includes variable O&M from Air Quality Control Systems ("AQCS") associated with ACI and Scrubbers, assuming dollars are recovered through the ECR. Fuel costs are based on the IRP information in tab "IRP Prod Scrub_Convert" on Line 48 of that tab. Fuel costs assume recovery of water and bag replacement costs through the ECP Rider.

ECP Rider Factor Calculation

	Annual KWH
	<u>Approved 10-067-U</u>
Arkansas Jurisdiction	2,711,023,738
Residential	708,433,198
General Service	211,769,454
Power & Light	1,759,841,146
Other	30,979,940

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

Activated Carbon Injection – Mercury reduction for MATS-Muskogee 4 & 5

ACI	2015 ¹	2016	2017	2018	2019	2020
Rate Base						
Utility Plant	\$ 22,683,754	\$ 24,601,707	\$ 24,601,707	\$ 24,601,707	\$ 24,601,707	\$ 24,601,707

Convert units to natural gas – SO₂ reduction for Regional Haze, Mercury reduction-Mustang 4 & 5

Gas Conversion	2015	2016	2017	2018	2019	2020
Rate Base						
Utility Plant	\$ 4,418,121	\$ 4,418,121	\$ 18,861,732	\$ 76,476,778	\$ 76,476,778	\$ 76,476,778

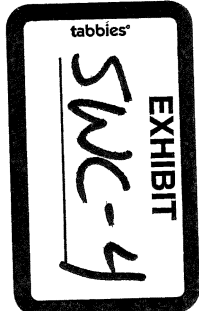
Low NoX	2015	2016	2017	2018	2019	2020
Rate Base						
Utility Plant	\$ 63,569,456	\$ 88,494,402	\$ 99,388,271	\$ 99,388,271	\$ 99,388,271	\$ 99,388,271

Fuel Gas Desulfurization (scrubber) – SO₂ reduction for Regional Haze-Sooner Unit 1 & 2

Scrubbers	2015	2016	2017	2018	2019	2020
Rate Base						
Utility Plant (Sooner Units 1 & 2)	\$ 88,520,152	\$ 238,994,576	\$ 377,125,804	\$ 470,345,547	\$ 489,913,801	\$ 490,000,000
TOTAL PROJECT COST²	\$ 179,191,483	\$ 356,508,806	\$ 519,977,513	\$ 670,812,302	\$ 690,380,556	\$ 690,466,755

Footnotes

¹ Please note that for this application, OG&E only requested total project costs for Low Nox as of April 2015.
² Total project cost is calculated by adding lines 7, 17, 23, and 31.
 Project cost represents CWIP / Plant balance at year-end.
 Please see Revenue Requirement tabs 2016-2020 in this spreadsheet for the revenue requirement calculation by month.



OKLAHOMA GAS AND ELECTRIC COMPANY
LOW NOx REVENUE REQUIREMENT

LINE NO.	DESCRIPTION	2015												TO DATE 2015
		1	2	3	4	5	6	7	8	9	10	11	12	
Rate Base														
1	Utility Plant & CWIP				\$ 42,852,320	\$ 45,358,666	\$ 45,640,299	\$ 48,459,799	\$ 50,358,839	\$ 52,342,652	\$ 54,455,400	\$ 57,322,991	\$ 63,569,456	\$ 63,569,456
2	Accumulated Provision for Depreciation				\$ (661,831)	\$ (712,025)	\$ (762,413)	\$ (813,429)	\$ (865,072)	\$ (917,343)	\$ (970,240)	\$ (1,023,765)	\$ (1,100,465)	\$ (1,100,465)
3	Total Rate Base				\$ 42,190,489	\$ 44,646,641	\$ 44,877,886	\$ 47,646,370	\$ 49,493,767	\$ 51,425,309	\$ 53,485,159	\$ 56,299,226	\$ 62,468,992	\$ 62,468,992
4	Rate of Return				0.683%	0.683%	0.683%	0.683%	0.683%	0.683%	0.683%	0.683%	0.683%	0.683%
5	Return on Rate Base				\$ 288,288	\$ 305,070	\$ 306,651	\$ 325,568	\$ 338,191	\$ 351,389	\$ 365,464	\$ 384,693	\$ 426,851	\$ 3,092,164
Expenses														
6	O&M Expense				\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
7	Depreciation Expense				\$ 47,397	\$ 50,194	\$ 50,389	\$ 51,016	\$ 51,643	\$ 52,270	\$ 52,898	\$ 53,525	\$ 76,699	\$ 486,030
8	Property Taxes				\$ 35,710	\$ 35,710	\$ 35,710	\$ 35,710	\$ 35,710	\$ 35,710	\$ 35,710	\$ 35,710	\$ 35,710	\$ 321,392
9	Total Expenses				\$ -	\$ -	\$ -	\$ 86,726	\$ 87,353	\$ 87,981	\$ 88,608	\$ 89,235	\$ 112,410	\$ 807,423
10	Revenue Requirement @ 100%	\$ -	\$ -	\$ -	\$ 371,394	\$ 371,394	\$ 371,394	\$ 371,394	\$ 371,394	\$ 371,394	\$ 371,394	\$ 371,394	\$ 371,394	\$ 3,342,550
11	AR Jurisdictional Allocation %				10.99%	10.99%	10.99%	10.99%	10.99%	10.99%	10.99%	10.99%	10.99%	10.99%
12	AR Revenue Requirement ¹	\$ -	\$ -	\$ -	\$ 40,826	\$ 40,826	\$ 40,826	\$ 40,826	\$ 40,826	\$ 40,826	\$ 40,826	\$ 40,826	\$ 40,826	\$ 367,437

¹ Please note that the revenue requirement requested in the current application is annualized.

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

Date Requested: 7/15/2015

Date Required: 7/30/2015

Requested by: Rick D. Chamberlain

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

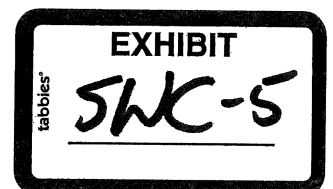
Response*: The Arkansas Jurisdiction production cost allocator is the same jurisdictional allocator from the settled class cost of service (CCOS) in OG&E's last rate case (10-067-U). However, the *Class* production allocators used in this filing were the "as filed" allocators rather than the settled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

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

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

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

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



OG&E Monthly Coincident Peaks

Month	Arkansas Retail CP	Percent of Maximum CP
	(kW)	(%)
	(1)	(2)
		(1) / Max (1)
January	409,384	68.8%
February	437,485	73.5%
March	399,203	67.1%
April	350,131	58.9%
May	453,721	76.3%
June	534,418	89.8%
July	555,057	93.3%
August	594,918	100.0%
September	563,317	94.7%
October	432,315	72.7%
November	427,845	71.9%
December	475,462	79.9%

Source:

Docket 10-067-U, Schedule G-5-(a), Section 3(d)

Calculation of the Average & Excess 4CP Allocator, Arkansas Jurisdictional System Load Factor

Service Level:	Power & Light					General Service			Residential	Athletic Field Lighting	Outdoor Security Lighting	Muni Lighting	Muni Pumping	Muni Pumping	Power & Light TOU					System
	1	2	3	4	5	3	4	5	5	5	5	5	4	5	1	2	3	4	5	
(1) June Peak	-	5,218	38,073	-	92,452	62	-	52,146	174,535	-	-	-	7	128	70,710	18,487	61,664	-	20,936	534,418
(2) July Peak	-	4,994	38,822	283	101,833	50	-	56,399	192,183	-	-	-	7	126	59,118	18,987	61,099	-	21,276	555,057
(3) August Peak	-	5,040	39,004	280	104,306	54	-	65,647	222,480	-	-	-	8	130	57,845	18,580	61,170	-	20,373	594,917
(4) September Peak	-	4,913	35,785	-	123,250	70	-	75,104	154,852	-	-	-	7	140	69,442	20,639	54,256	-	24,849	563,317
(5) Σ (1) - (4) Total	-	20,165	151,694	563	421,841	236	-	249,236	744,050	-	-	-	29	524	257,115	76,693	238,129	-	87,434	2,247,709
(6) (5) / 4 Average	-	5,041	37,924	141	105,460	59	-	62,309	186,013	-	-	-	7	131	64,279	19,173	59,532	-	21,859	561,927
(7) (Ca) / (Cb) 4CP Allocator	0.0%	0.9%	6.7%	0.0%	18.8%	0.0%	0.0%	11.1%	33.1%	0.0%	0.0%	0.0%	0.0%	0.0%	11.4%	3.4%	10.6%	0.0%	3.9%	100.0%
(8) Weather Normalized Energy Sales	-	34,790,563	228,379,517	246,818	522,834,408	586,308	-	234,351,166	804,046,331	1,103,514	21,277,886	9,842,888	66,451	1,666,909	467,150,218	142,945,593	373,691,811	-	138,415,251	2,981,395,632
(9) (b) / (b)0 Average kW	-	3,972	26,071	28	59,684	67	-	26,752	91,786	126	2,429	1,124	8	190	53,328	16,318	42,659	-	15,801	340,342
(10) (Ca) / (Cb) Average Ratio	0.0%	1.2%	7.7%	0.0%	17.5%	0.0%	0.0%	7.0%	27.0%	0.0%	0.7%	0.3%	0.0%	0.1%	15.7%	4.8%	12.5%	0.0%	4.6%	100.0%
(11) (c) - (b) Excess kW	-	1,070	11,853	113	45,776	-	-	35,557	94,226	-	-	-	-	-	10,951	2,855	16,873	-	6,058	225,331
(12) (Ca) / (Cb) Excess Ratio	0.0%	0.5%	5.3%	0.0%	20.3%	0.0%	0.0%	15.8%	41.8%	0.0%	0.0%	0.0%	0.0%	0.0%	4.9%	1.3%	7.5%	0.0%	2.7%	100.0%
(13) (10) x (14) Average Ratio * System LF	-	0.01	0.05	0.00	0.11	0.00	-	0.05	0.16	0.00	0.00	0.00	0.00	0.00	0.09	0.03	0.08	-	0.03	0.61
(14) (12) x (17) Excess Ratio * 1 - System LF	-	0.00	0.02	0.00	0.08	-	-	0.06	0.16	-	-	-	-	-	0.02	0.00	0.03	-	0.01	0.39
(15) (13) + (14) 4CP A&E Allocator	0.0000%	0.8940%	6.7138%	0.0247%	18.6322%	0.0119%	0.0000%	10.9832%	32.8238%	0.0224%	0.4323%	0.2000%	0.0013%	0.0339%	11.4066%	3.4036%	10.5444%	0.0000%	3.8720%	100.0%
(16) System Annual Load Factor		60.6%																		
(17) 1 - Load Factor		39.4%																		
ECP Class																				
Residential		32.8238%																		
General Service		10.9952%																		
Power and Light		55.4912%																		
Other		0.6898%																		

Sources:

Docket 10-067-U, Schedule G-5-(a), Section 3(b)
 Docket 10-067-U, Schedule G-5-(a), Section 3(d)
 O&E Response to WMT 1-6

OKLAHOMA GAS AND ELECTRIC COMPANY
DEVELOPMENT OF 1CP AND AVERAGE DEMAND ALLOCATOR (CAP1SY)
TEST YEAR ENDING DECEMBER 31, 2009
DOCKET NO. 10-067-U

1CP&AVG - PRODUCTION DEMAND ALLOCATION

LN.	RATE CLASSES	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
		CP DEMAND DATA KV COINCIDENT PEAKS (CP) Tab	SYSTEM COINCIDENT PEAK (CP) DEMAND ADJUSTMENTS SYS PEAK ADJ (SYS)A Tab	ADJUSTED DEMAND Col. (b)+(c)	RATE CLASS CP RATIO Ratio of Col.(d)	CP RATIO x COINCIDENT FCTR 47.6962%	CLASS KWH ENERGY-LOSSES (ENR) Tab	ADJUSTMENTS FPL Psa. 326 & 327	ADJUSTED KWH Col. (g)+(h)	RATE CLASS ENERGY RATIO Ratio of Col.(i)	ENERGY RATIO x LOAD FCTR 52.3038%	1CP&AVG. DEMAND ALLOC. "CAP1SY" Col. (l)+(k)	1CP&AVG. ARK RETAIL DEMAND "CAPIAR" Rebase Col. (l) to 100% Ark. Retail	
1	RESIDENTIAL (R-1) S/L-5	222,480	0	222,480	3.9187%	1.8691%	804,046,331	0	804,046,331	3.0910%	1.6167%	3.4858%	31.7101%	
2	TOTAL GENERAL SERVICE (Ln 3 + Ln 4)	65,701	0	65,701	1.1573%	0.5520%	234,937,474	0	234,937,474	0.9032%	0.4724%	1.0244%	9.3189%	
3	GENERAL SERVICE S/L-3	54	0	54	0.0010%	0.0005%	586,308	0	586,308	0.0023%	0.0012%	0.0017%	0.0155%	
4	GENERAL SERVICE S/L-5	65,647	0	65,647	1.1563%	0.5515%	234,351,166	0	234,351,166	0.9009%	0.4712%	1.0227%	9.3034%	
5	TOTAL POWER & LIGHT (Ln 6 + Ln 12)	306,598	0	306,598	5.4003%	2.5758%	1,908,454,179	0	1,908,454,179	7.3366%	3.8373%	6.4131%	58.3398%	
6	TOTAL P&L - NON TOU (Sum Ln 7 thru 11)	148,630	0	148,630	2.6179%	1.2487%	786,251,306	0	786,251,306	3.0225%	1.5809%	2.8296%	25.7408%	
7	P&L - NON TOU S/L-1	0	0	0	0.0000%	0.0000%	0	0	0	0.0000%	0.0000%	0.0000%	0.0000%	
8	P&L - NON TOU S/L-2	5,040	0	5,040	0.0888%	0.0424%	34,790,563	0	34,790,563	0.1337%	0.0699%	0.1123%	1.0216%	
9	P&L - NON TOU S/L-3	39,004	0	39,004	0.6870%	0.3277%	228,379,517	0	228,379,517	0.8780%	0.4592%	0.7869%	7.1584%	
10	P&L - NON TOU S/L-4	280	0	280	0.0049%	0.0023%	246,818	0	246,818	0.0009%	0.0005%	0.0028%	0.0255%	
11	P&L - NON TOU S/L-5	104,306	0	104,306	1.8372%	0.8763%	522,834,408	0	522,834,408	2.0099%	1.0513%	1.9276%	17.5353%	
12	TOTAL P&L - TOU (Sum Ln 13 thru 17)	157,968	0	157,968	2.7824%	1.3271%	1,122,202,873	0	1,122,202,873	4.3141%	2.2564%	3.5835%	32.5990%	
13	P&L - TOU S/L-1	57,845	0	57,845	1.0189%	0.4860%	467,150,218	0	467,150,218	1.7959%	0.9393%	1.4253%	12.9659%	
14	P&L - TOU S/L-2	18,580	0	18,580	0.3273%	0.1561%	142,945,593	0	142,945,593	0.5495%	0.2874%	0.4435%	4.0345%	
15	P&L - TOU S/L-3	61,170	0	61,170	1.0774%	0.5139%	373,691,811	0	373,691,811	1.4366%	0.7514%	1.2653%	11.5104%	
16	P&L - TOU S/L-4	0	0	0	0.0000%	0.0000%	0	0	0	0.0000%	0.0000%	0.0000%	0.0000%	
17	P&L - TOU S/L-5	20,373	0	20,373	0.3588%	0.1711%	138,415,251	0	138,415,251	0.5321%	0.2783%	0.4494%	4.0882%	
18	TOTAL MUNICIPAL PUMPING (Ln 19 + Ln 20)	138	0	138	0.0024%	0.0011%	1,733,360	0	1,733,360	0.0067%	0.0035%	0.0046%	0.0418%	
19	MUNICIPAL PUMPING S/L-4	8	0	8	0.0001%	0.0000%	66,451	0	66,451	0.0003%	0.0002%	0.0002%	0.0018%	
20	MUNICIPAL PUMPING S/L-5	130	0	130	0.0023%	0.0011%	1,666,909	0	1,666,909	0.0064%	0.0033%	0.0044%	0.0400%	
21	TOTAL LIGHTING (Excluding AFL) (Ln 22 + Ln 23)	0	0	0	0.0000%	0.0000%	31,120,774	0	31,120,774	0.1196%	0.0626%	0.0626%	0.5694%	
22	MUNICIPAL LIGHTING S/L-5	0	0	0	0.0000%	0.0000%	9,842,888	0	9,842,888	0.0378%	0.0198%	0.0198%	0.1801%	
23	SECURITY LIGHTING S/L-5	0	0	0	0.0000%	0.0000%	21,277,886	0	21,277,886	0.0818%	0.0428%	0.0428%	0.3893%	
24	ATHLETIC FIELD LIGHTING S/L-5	0	0	0	0.0000%	0.0000%	1,103,514	0	1,103,514	0.0042%	0.0022%	0.0022%	0.0200%	
25	ARKANSAS RETAIL JURIS. (Sum Lns 1, 2, 5, 18, 21, & 24)	594,917	0	594,917	10.4787%	4.9980%	2,981,395,632	0	2,981,395,632	11.4613%	5.9947%	10.9927%	100.0000%	
26	OKLAHOMA RETAIL JURIS.	5,186,946	(377,080)	4,809,866	84.7203%	40.4084%	24,170,501,373	(2,474,860,000)	21,695,641,373	83.4044%	43.6237%	84.0321%		
27	FERC JURIS.	681,945	(409,379)	272,566	4.8010%	2.2898%	1,335,536,872	0	1,335,536,872	5.1343%	2.6854%	4.9752%		
28	TOTAL COMPANY (Sum Lns 25, 26, & 27)	6,463,808	(786,459)	5,677,349	100.0000%	47.6962%	28,487,433,877	(2,474,860,000)	26,012,573,877	100.0000%	52.3038%	100.0000%		
Load Factor = ((Total Co. Adjusted Energy / 8760) / Total Co. Adjusted Demand) =			52.3038%											
Coincident Factor = 1-Load Factor =			47.6962%											

Service Level:	Power & Light					General Service			Residential	Athletic Field	Outdoor Security	Muni	Muni	Muni	Power & Light TOU					System
	1	2	3	4	5	3	4	5	5	5	5	5	4	5	1	2	3	4	5	
	(c1)	(c2)	(c3)	(c4)	(c5)						(c6)									
A&E 4CP	0.0000%	0.8940%	6.7138%	0.0247%	18.6322%	0.0119%	0.0000%	10.9832%	32.8238%	0.0224%	0.4323%	0.2000%	0.0013%	0.0339%	11.4066%	3.4036%	10.5444%	0.0000%	3.8720%	100%
A&P CP	0.0000%	1.0216%	7.1584%	0.0255%	17.5353%	0.0155%	0.0000%	9.3034%	31.7101%	0.0200%	0.3893%	0.1801%	0.0018%	0.0400%	12.9659%	4.0345%	11.5104%	0.0000%	4.0882%	100%

Calculation of the Average & Excess 4CP Allocator, OG&E Total System Load Factor

Service Level:	Power & Light				General Service			Residential	Athletic Field Lighting	Outdoor Security Lighting	Muni Lighting	Muni Pumping	Muni Pumping	Power & Light TOU					System	
	1	2	3	4	5	3	4	5	5	5	5	4	5	1	2	3	4	5		
(1) June Peak	-	5,218	38,073	-	92,452	62	-	52,146	174,535	-	-	-	7	128	70,710	18,487	61,664	-	20,936	534,418
(2) July Peak	-	4,994	38,822	283	101,833	50	-	56,339	192,183	-	-	-	7	126	59,118	18,987	61,039	-	21,276	555,057
(3) August Peak	-	5,040	39,004	280	104,306	54	-	65,647	222,480	-	-	-	8	130	57,845	18,580	61,170	-	20,373	590,917
(4) September Peak	-	4,913	35,795	-	123,250	70	-	75,104	154,852	-	-	-	7	140	69,442	20,630	54,256	-	24,849	563,317
(5) Σ (1) - (4) Total	-	20,165	151,694	563	421,841	236	-	249,236	744,050	-	-	-	29	524	257,115	76,693	238,129	-	87,434	2,247,709
(6) (5) / 4 Average	-	5,041	37,924	141	105,460	59	-	62,309	186,013	-	-	-	7	131	64,279	19,173	59,532	-	21,859	561,927
(7) (6) / (5) 4CP Allocator	0.0%	0.9%	6.7%	0.0%	18.8%	0.0%	0.0%	11.1%	33.1%	0.0%	0.0%	0.0%	0.0%	0.0%	11.4%	3.4%	10.6%	0.0%	3.9%	100.0%
(8) Weather Normalized Energy Sales	-	34,790,563	228,379,517	246,818	522,834,408	586,308	-	234,351,166	804,046,331	1,103,514	21,277,886	9,842,888	66,451	1,666,909	467,150,218	142,945,593	373,691,811	-	138,415,251	2,981,395,632
(9) (8) / #740 Average kW	-	3,972	26,071	28	59,684	67	-	26,752	91,786	126	2,429	1,124	8	190	53,328	16,318	42,659	-	15,801	340,342
(10) (9) / (6) Average Ratio	0.0%	1.2%	7.7%	0.0%	17.5%	0.0%	0.0%	7.9%	27.0%	0.0%	0.7%	0.3%	0.0%	0.1%	15.7%	4.8%	12.5%	0.0%	4.6%	100.0%
(11) (8) - (9) Excess kW	-	1,070	11,853	113	45,776	-	-	35,557	94,226	-	-	-	-	-	10,951	2,855	16,873	-	6,058	225,331
(12) (11) / (6) Excess Ratio	0.0%	0.5%	5.3%	0.0%	20.3%	0.0%	0.0%	15.8%	41.8%	0.0%	0.0%	0.0%	0.0%	0.0%	4.9%	1.3%	7.5%	0.0%	2.7%	100.0%
(13) (10) x (14) Average Ratio * System LF	-	0.01	0.04	0.00	0.09	0.00	-	0.04	0.14	0.00	0.00	0.00	0.00	0.00	0.08	0.03	0.07	-	0.02	0.52
(14) (12) x (13) Excess Ratio * 1 - System LF	-	0.00	0.03	0.00	0.10	-	-	0.08	0.20	-	-	-	-	-	0.02	0.01	0.04	-	0.01	0.48
(15) (13) + (14) 4CP A&E Allocator	0.0000%	0.8368%	6.5154%	0.0282%	18.8617%	0.0103%	0.0000%	11.6376%	34.0507%	0.0194%	0.3733%	0.1727%	0.0012%	0.0292%	10.5134%	3.1121%	10.1274%	0.0000%	3.7105%	100.0%
(16) System Annual Load Factor	52.3%																			
(17) 1 - Load Factor	47.7%																			
FCP Class																				
Residential	34.0507%																			
General Service	11.6479%																			
Power and Light	53.7056%																			
Other	0.5957%																			

Sources:

- Docket 10-067-U, Schedule G-5-(a), Section 3(b)
- Docket 10-067-U, Schedule G-5-(a), Section 3(d)
- OG&E Response to WMT 1-8