

DIRECT TESTIMONY

of

BURMA C. JONES

Accountant
Accounting Department
Financial Analysis Division
Illinois Commerce Commission

Ameren Illinois Company d/b/a Ameren Illinois

Proposed General Increase in Electric Rates
and
Proposed General Increase in Gas Rates

Docket Nos. 11-0279 and 11-0282 (Cons.)

June 29, 2011

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1 **Witness Identification**

2 **Q. Please state your name and business address.**

3

4 A. My name is Burma C. Jones. My business address is 527 East Capitol
5 Avenue, Springfield, Illinois 62701.

6 **Q. By whom are you employed and in what capacity?**

7

8 A. I am currently employed as an Accountant in the Accounting Department
9 of the Financial Analysis Division of the Illinois Commerce Commission
10 (“Commission”).

11 **Q. Please describe your professional background and affiliations.**

12

13 A. I am a licensed Certified Public Accountant with a Bachelor of Arts in
14 Accountancy from Sangamon State University, which is now known as the
15 University of Illinois at Springfield. I joined the Staff of the Illinois
16 Commerce Commission (“Staff”) in October 1999. My prior accounting
17 experience includes five years as the Assistant Controller for a mid-size
18 retail business and two and one-half years on the accounting staff of the
19 Illinois Office of the Comptroller.

20 **Q. Have you previously testified before any regulatory bodies?**

21

22 A. Yes, I have testified on several occasions before the Commission.

23 **Q. What is the purpose of your testimony in this proceeding?**

24

25 A. I have reviewed and analyzed certain portions of Ameren Illinois
26 Company's ("AIC," "Ameren," or "Company") electric and gas filings and
27 the underlying data. The purpose of my testimony is to propose an
28 adjustment to the cost of fuels used by AIC for its own purposes and to
29 make recommendations regarding the Company's proposed Rider TBS –
30 Transportation Banking Service and the Company's proposed changes to
31 Rider S – System Gas Service and Rider PGA – Purchased Gas
32 Adjustment Gas Charge. I also discuss the results of Ameren's analyses
33 and my analysis of the impact on customer rates if the Commission were
34 to approve Ameren's proposal to adopt a single Purchased Gas
35 Adjustment Clause ("PGA") tariff.

36 **Schedule Identification**

37 **Q. Are you sponsoring any schedules as part of ICC Staff Exhibit 6.0?**

38

39 A. Yes. I prepared the following schedule, which shows data as of, or for the

40 test year ending, December 31, 2012:

41 Schedule 6.01 – Company Use of Fuels Adjustment

42 **Attachments**

43 **Q. Have you included any attachments as part of your direct testimony?**

44

45 A. Yes. I have included the following attachment:

46 Attachment A – Staff Analysis of Single PGA Rate vs. Individual Rate per

47 Zone for 2009, 2010, and Jan – Apr 2011

48 **Company Use of Fuels Adjustment**

49 **Q. Please describe Schedule 6.01, Company Use of Fuels Adjustment.**

50

51 A. Schedule 6.01 presents my proposed adjustment to the cost of fuels used

52 by the Company for its own purposes. AIC updated the cost it expects to

53 pay for gas in the test year.¹ My adjustment reflects the updated cost of

54 gas provided by the Company.

55 **Single PGA**

56 **Q. What is Ameren's proposal regarding its PGA tariffs?**

57

¹ AIC responses to Staff Data Request ("DR") MEM 4.01 and MEM 4.02.

58 A. Currently, there is a separate PGA tariff for each of three rate zones,
59 which correspond to the three legacy utilities – Rate Zone I
60 (AmerenCIPS), Rate Zone II (AmerenCILCO), and Rate Zone III
61 (AmerenIP). Ameren proposes to adopt a single PGA tariff covering its
62 service area.²

63 **Q. Did the Company identify any benefits from adopting a single PGA**
64 **rate?**

65
66 A. Yes. Company witness Vonda Seckler discussed benefits for system
67 customers in the gas supply and regulatory areas and for transportation
68 customers in improved operating efficiency.³ My testimony does not
69 address the anticipated operational benefits. Rather, my testimony (1)
70 addresses the effect of the change to a single PGA on customer rates, (2)
71 makes recommendations regarding disposition of over/under recovered
72 balances on the effective date of a single PGA, and (3) recommends
73 language changes to Rider PGA should a single PGA be approved by the
74 Commission.

² Ameren Exhibit 15.0G, pp. 5-6.

³ *Id.*, pp. 7-11.

75 **Q. Do you agree with Ms. Seckler's conclusion that a change to a single**
76 **PGA will not proportionately benefit or disadvantage customers in**
77 **any individual legacy Rate Zone?**

78

79 A. Yes. Based on the information presented in Ameren Ex. 15.4G (2nd Rev.),
80 it appears that the monetary effect on customers of a single PGA tariff
81 would be minimal. The analyses presented in Ameren Ex. 15.4G (2nd
82 Rev.) compare the amounts paid by customers in each individual Rate
83 Zone to the amounts that would have been paid had there been a single
84 PGA rate for two historical time periods – September 2009 to August 2010
85 and November 2008 to August 2010. I prepared a separate analysis,
86 which is provided as Attachment A, based on information in the annual
87 PGA reconciliations for each legacy company for 2009 and 2010 and
88 similar information provided by AIC for each month January through April
89 2011. My analysis resulted in the same conclusion - that the monetary
90 effect on customers of a single PGA tariff would be minimal.

91 **Q. Did you review the effect that implementation of a single PGA would**
92 **have on GDS-4 Rider S customers⁴ in Rate Zone I?**

93

⁴ Non-residential customers whose highest average daily usage is equal to or greater than 1,000 therms per day and who receive gas supply from AIC.

94 A. Yes. I reviewed an analysis prepared by AIC of the impact a Demand
95 Gas Charge (“DGC”) would have on GDS-4 Rider S customers in Rate
96 Zone I.⁵ Currently, there is no demand component in the rates charged to
97 those customers as there is in Rate Zones II and III. However, under a
98 single PGA, all GDS-4 Rider S customers would be subject to a DGC.
99 The analysis compared the total PGA charges to Rate Zone I GDS-4
100 Rider S customers for the period November 2009 through October 2010
101 with what the PGA charges would have been had the customers been
102 subject to a DGC. The analysis indicates that all customers but one would
103 have paid less over the 12-month period.

104 **Q. What is your understanding of how AIC will address the over/under**
105 **recovered balances of each factor⁶ for each legacy utility at the time**
106 **a single PGA is implemented, should it be approved by the**
107 **Commission?**

108
109 A. My understanding is that AIC proposes to freeze the over/under recovered
110 balances for each legacy Rate Zone on the effective date of the single
111 PGA. For a twelve-month period, in addition to the single PGA rate, AIC

⁵ AIC revised response to Staff DR BCJ 3.04.

⁶ CGC (Commodity Gas Charge), NCGC (Non-Commodity Gas Charge), DGC (Demand Gas Charge)

112 will set rates by legacy Rate Zone to credit/charge the over/under
113 recovered balances to the applicable customers. Thus, the PGA charge
114 on a customer's bill will reflect the single PGA rate, plus the rate set to
115 credit or charge the over/under recovered balances. The Company will
116 continue to track the outstanding balances and make a monthly PGA filing
117 for the respective legacy Rate Zone until the balances are reduced to the
118 point that an adjustment would no longer have a measurable impact on
119 customers' bills.

120 **Q. Do you have any recommendations regarding disposition of the**
121 **over/under recovered balances?**

122

123 A. Yes. Within the twelve-month time frame proposed by the Company for
124 disposition of the over/under recovered balances, I recommend that the
125 process continue until the respective rate per therm cannot be set to four
126 decimal places; i.e., is less than .01 cents per therm. At that level, there
127 will be no impact on the single PGA rate for each legacy Rate Zone. The
128 balance remaining when a rate can no longer be set, or at the end of the
129 twelve-month period, should be rolled into the single PGA charge as an
130 "Other Adjustment" on Schedule II of the respective PGA charge.
131 Additionally, if it is necessary to continue the process of over/under

132 recovery longer than two months, beginning in the third month the rates
133 should be calculated at two-month intervals. This permits the Company
134 an opportunity to better gauge the respective over/under recovered
135 balance before the next billing month.

136 **Q. Are you recommending any changes to Rider PGA - Purchase Gas**
137 **Adjustment Gas Charge?**

138

139 A. Yes. If a single PGA is approved by the Commission, there should be
140 language in Rider PGA that describes how the outstanding over/under
141 recovered balances on the effective date of the single PGA will be
142 refunded to or collected from customers. Also, there should be language
143 that addresses the disposition of potential over/under recoveries ("Factor
144 O's") that may be ordered by the Commission, subsequent to
145 implementation of a single PGA, for prior reconciliation periods.

146 **Q. What language do you recommend regarding outstanding over/under**
147 **recovered balances on the effective date of the single PGA?**

148

149 A. I recommend that the following language be inserted in Section A –
150 Applicability of Rider PGA:

151 During the transition period from rate zones to a single rate, a factor
152 will be used to adjust up or down the single PGA rate so that each

153 rate zone will receive or be charged its respective over/under
154 recovered balances existing on the effective date of the single PGA.
155 For a maximum twelve-month period subsequent to the effective date
156 of the single PGA, the Company will separately track and calculate a
157 rate on each outstanding balance until the rate is less than 0.01 cent
158 per therm, at which time the remaining balance will be rolled into the
159 respective single PGA charge as “Another Adjustment” on Schedule
160 II. If it is necessary to continue the process of over/under recovery
161 longer than two months, beginning in the third month the rates shall
162 be calculated at two-month intervals in order to permit the Company
163 an opportunity to better gauge the respective over/under recovered
164 balances before the next billing month.

165 **Q. What language do you recommend regarding the disposition of**
166 **potential Factor O’s that may be ordered by the Commission,**
167 **subsequent to implementation of a single PGA, for prior**
168 **reconciliation periods?**

169

170 **A.** I recommend that the following language also be inserted in Section A –
171 Applicability of Rider PGA:

172 Additional over/under recoveries (“Factor O’s”) ordered by the
173 Commission for PGA reconciliation periods prior to the
174 implementation of a single PGA will be refunded/charged in the same
175 manner described for outstanding over/under recovered balances on
176 the effective date of the single PGA, if within the applicable twelve-
177 month time frame. Subsequent to the twelve-month time frame, the
178 Factor O’s will be included in the calculation of the appropriate single
179 PGA charge.

180 **Q. Do you have any other recommended language changes to Rider**
181 **PGA?**

182

183 A. Yes. Whether or not a single PGA is approved by the Commission,
184 language should be added to Rider PGA to describe the type of costs
185 included in the calculation of the Demand Gas Charge, similar to the
186 language that describes the type of costs included in the calculations of
187 the Commodity Gas Charge and the Non-Commodity Gas Charge. I
188 recommend that the following language be inserted in Section F(c) -
189 Demand Gas Charge of Rider PGA:

190 The Demand Gas Charge calculation shall include all demand or
191 reservation costs paid to gas suppliers and pipelines for gas supplies
192 and transportation capacity, all leased storage costs, and any other
193 fixed costs of gas supply that meet the definition of recoverable gas
194 costs in Section D apportioned to Customers receiving the Demand
195 Gas Charge.⁷

196 **Rider TBS – Transportation Banking Service**

197 **Q. Are you recommending any changes to the language in the**
198 **Company’s proposed Rider TBS – Transportation Banking Service,**
199 **Ameren Exhibit 14.4G?**

200

201 A. It is not clear at this time if any changes are needed to the language in
202 Rider TBS. Staff witness David A. Sackett, who is testifying regarding
203 whether or not Rider TBS should be adopted, has asked the Company to
204 clarify in rebuttal testimony if it proposes that the Banking Service Limit

⁷ AIC response to Staff DR BCJ 4.15.

205 (“BSL”) be fixed between rate proceedings or that it change annually.
206 Rider TBS as filed appears to contemplate a fixed BSL with corresponding
207 fixed charges to transport customers.

208 If a fixed BSL is not the Company’s intent, or if the Commission approves
209 the Company’s transportation banking service such that the BSL and, in
210 conjunction, the rates can fluctuate between rate proceedings, I
211 recommend that the size of the BSL should be deleted from the definition
212 of the BSL, and specific rates in the Rider should be replaced with the
213 formulas for calculating the rates approved by the Commission.

214 **Q. Why do you recommend replacing the specific rates with formulas?**

215

216 A. If specific rates are included in the Rider, the Company must make a 45-
217 day filing to revise Rider TBS each time the rates change. Only an
218 informational filing is necessary to change the rates if Rider TBS does not
219 specifically identify the rates.

220 **Q. Do you have any additional comments regarding Rider TBS?**

221

222 A. Yes. Rider TBS rates and the corresponding base rates established in
223 this proceeding allow for recovery of the total system storage costs
224 approved in the instant rate proceeding. If the transportation banking

225 service approved by the Commission is structured such that the BSL is
226 not fixed between rate proceedings, then Rider TBS rates may change
227 annually, but base rates will not change until the next rate proceeding. It
228 would then be possible for the Company to collect more or less than the
229 total system storage costs approved in the instant rate proceeding. In
230 rebuttal testimony, AIC should address how such an over/under recovery
231 would be flowed back to non-transportation customers.

232 **Unsubscribed Bank Capacity Charge**

233 **Q. Do you have recommendations with respect to the Company's**
234 **proposed addition of an Unsubscribed Bank Capacity Charge**
235 **("UBCC") to Rider S, Ameren Exhibit 14.5G?**

236

237 A. Yes. Although David A. Sackett is the Staff witness who addresses the
238 issue of whether or not the UBCC should be adopted, if it is allowed by
239 the Commission, I recommend that the formula⁸ to calculate the UBCC
240 and language providing for an annual reconciliation be included in Rider
241 S, as follows:

242 Unsubscribed Bank Capacity Charge

243

244 Effective on and after May 1, 2012, the cost of any unsubscribed bank
245 capacity allocated to Rider TBS in the previous rate proceeding will be
246 subject to monthly cost recovery from Rider S Customers on a per

⁸ AIC response to Staff DR BCJ-4.06.

247 Therm basis. Such charge shall be based on the annual estimated
248 Rider S Therms and shall be determined and filed at least once
249 annually with the Commission as an informational filing. Such
250 informational filing along with accompanying supporting information
251 shall be filed with the Commission no later than the 20th of the month
252 preceding the effective date of the new Unsubscribed Bank Capacity
253 Charge. Annually, this filing shall occur during April to become
254 effective May 1. An informational filing with supporting information
255 filed after the 20th of the month, but prior to the effective date, shall be
256 accepted only if it corrects an error or errors from a timely filed
257 informational filing for the same effective date.
258

259 The Unsubscribed Bank Capacity Charge shall be determined in
260 accordance with the following formula:

261 $UBCC = (A - (DR+MR) + RA) / T$
262

263
264 Where:

265
266 UBCC = The Unsubscribed Bank Capacity Charge in Cents per
267 Therm

268
269 A = The dollars allocated to Rider TBS in the most recent rate
270 proceeding

271
272 DR = Projected revenues from Daily Balanced customer banking
273 service charges for the 12-month period beginning May 1 of the
274 current year

275
276 MR = Projected revenues from Monthly Balanced customer
277 banking service charges for the 12-month period beginning May
278 1 of the current year

279
280 RA = The amount over/under recovered during the immediately
281 preceding 12-month period ending April 30

282
283 T = The number of Therms of forecasted usage for the Rider S
284 customers for the months remaining in the period from May 1 to
285 April 30 in which the charge is to be applied.

286
287
288 The applicable Unsubscribed Bank Capacity Charge shall be included
289 in the monthly PGA report submission and shall be applied along with

290 other applicable Rider PGA and Rider S charges billed for service
291 rendered during the Effective Month.

292
293 Annually, beginning in 2013, the Company shall provide a
294 reconciliation to the Manager of Accounting by July 1 that compares
295 UBCC revenue for the prior May through April recovery period with the
296 costs that were to be recovered during the period. If the reconciliation
297 adjustment results in a change of 0.01 cents per therm or greater to
298 the current rate filed effective May 1, the Company shall make an
299 informational filing by July 20th to set a new UBCC rate, effective
300 August 1, for the remaining nine months of the current recovery
301 period.

302 **Q. Why are you recommending the inclusion of language regarding a**
303 **reconciliation and an additional information filing?**

304

305 A. There is neither a provision in Rider S for determining if application of the
306 UBCC has resulted in the recovery of more or less than the amount of the
307 unsubscribed bank capacity costs, nor a provision for how to address
308 such an over/under recovery. A reconciliation would identify any
309 over/under recovery of the unsubscribed bank capacity costs for the
310 preceding May through April recovery period, and an additional
311 informational filing to set a revised UBCC for the current recovery period
312 would allow the Company to refund or charge the over/under recovered
313 amount on a timely basis.

314 **Conclusion**

315 **Q. Does this question end your prepared direct testimony?**

316

317 **A. Yes.**

Staff Analysis of Single PGA Rate vs. Individual
 Rate per Zone for 2009, 2010, and Jan - Apr 2011
 Based on Cost of Gas (CGC) Only

Gas Cost (CGC) per therm per Area

	CIPS	CILCO	IP	
	Rate Zone 1	Rate Zone 2	Rate Zone 3	Composite
2009				
Cost of Gas per 2009 annual reconciliation	\$ 125,861,771	\$ 181,650,490	\$ 280,314,159	\$ 587,826,420
Total number therms per annual reconciliation	191,857,341	279,998,739	441,216,723	913,072,803
Cost per Therm	\$ 0.6560	\$ 0.6488	\$ 0.6353	\$ 0.6438
Single rate vs. individual rate (cents per therm)	\$ (0.0122)	\$ (0.0050)	\$ 0.0085	
% difference from individual rate	-2%	-1%	1%	0%

Gas Cost (CGC) per therm per Area

	Rate Zone 1	Rate Zone 2	Rate Zone 3	Composite
2010				
Cost of Gas per 2010 annual reconciliation	\$ 103,953,284	\$ 148,876,064	\$ 245,743,112	\$ 498,572,460
Total number therms per annual reconciliation	187,821,437	268,544,396	439,141,210	895,507,043
Cost per Therm	\$ 0.5535	\$ 0.5544	\$ 0.5596	\$ 0.5567
Single rate vs. individual rate (cents per therm)	\$ 0.0033	\$ 0.0024	\$ (0.0029)	
% difference from individual rate	1%	0%	-1%	0%

Gas Cost (CGC) per therm per Area

	Rate Zone 1	Rate Zone 2	Rate Zone 3	Composite
Jan - Apr 2011				
Cost of Gas per monthly PGA filings	\$ 53,666,911	\$ 71,428,574	\$ 127,441,312	\$ 252,536,797
Total number therms per AIC response to DR BCJ 6.01	99,220,011	134,174,972	235,554,490	468,949,473
Cost per Therm	\$ 0.5409	\$ 0.5324	\$ 0.5410	\$ 0.5385
Single rate vs. individual rate (cents per therm)	\$ (0.0024)	\$ 0.0062	\$ (0.0025)	
% difference from individual rate	0%	1%	0%	0%

Gas Cost (CGC) per therm per Area

	Rate Zone 1	Rate Zone 2	Rate Zone 3	Composite
2009, 2010, Jan - Apr 2011 Combined				
Cost of Gas	\$ 283,481,966	\$ 401,955,128	\$ 653,498,583	\$ 1,338,935,677
Total number therms	478,898,789	682,718,107	1,115,912,423	2,277,529,319
Cost per Therm	\$ 0.5919	\$ 0.5888	\$ 0.5856	\$ 0.5879
Single rate vs. individual rate (cents per therm)	\$ (0.0041)	\$ (0.0009)	\$ 0.0023	
% difference from individual rate	-1%	0%	0%	0%

Staff Analysis of Single PGA Rate vs. Individual
 Rate per Zone for 2009, 2010 & Jan - Apr 2011
 Based on Cost of Gas (CGC) and Non-Commodity Cost of Gas (NCGC)

Gas Cost (CGC + NCGC) per therm per Area

	CIPS	CILCO	IP	
2009	Rate Zone 1	Rate Zone 2	Rate Zone 3	Composite
Cost of Gas per 2009 annual reconciliation	\$ 145,884,944	\$ 197,388,280	\$ 306,821,642	\$ 650,094,866
Total number therms per 2009 annual reconciliation	191,857,341	279,998,739	441,216,723	913,072,803
Cost per Therm	\$ 0.7604	\$ 0.7050	\$ 0.6954	\$ 0.7120
Single rate vs. individual rate (cents per therm)	\$ (0.0484)	\$ 0.0070	\$ 0.0166	
% difference from individual rate	-7%	1%	2%	0%

Gas Cost (CGC + NCGC) per therm per Area

2010	Rate Zone 1	Rate Zone 2	Rate Zone 3	Composite
Cost of Gas per 2010 annual reconciliation	\$ 127,139,516	\$ 164,572,060	\$ 274,839,524	\$ 566,551,100
Total number therms per 2010 annual reconciliation	187,821,437	268,544,396	439,141,210	895,507,043
Cost per Therm	\$ 0.6769	\$ 0.6128	\$ 0.6259	\$ 0.6327
Single rate vs. individual rate (cents per therm)	\$ (0.0443)	\$ 0.0198	\$ 0.0068	
% difference from individual rate	-7%	3%	1%	0%

Gas Cost (CGC + NCGC) per therm per Area

Jan - Apr 2011	Rate Zone 1	Rate Zone 2	Rate Zone 3	Composite
Cost of Gas per monthly PGA filings	\$ 62,745,283	\$ 77,442,938	\$ 138,076,324	\$ 278,264,545
Total number therms per AIC response to DR BCJ 6.01	99,220,011	134,174,972	235,554,490	468,949,473
Cost per Therm	\$ 0.6324	\$ 0.5772	\$ 0.5862	\$ 0.5934
Single rate vs. individual rate (cents per therm)	\$ 0.0003	\$ 0.0555	\$ 0.0465	
% difference from individual rate	-7%	3%	1%	0%

Gas Cost (CGC + NCGC) per therm per Area

2009, 2010 & Jan - Apr 2011 Combined	Rate Zone 1	Rate Zone 2	Rate Zone 3	Composite
Cost of Gas	\$ 335,769,743	\$ 439,403,278	\$ 719,737,490	\$ 1,494,910,511
Total number therms	478,898,789	682,718,107	1,115,912,423	2,277,529,319
Cost per Therm	\$ 0.7011	\$ 0.6436	\$ 0.6450	\$ 0.6564
Single rate vs. individual rate (cents per therm)	\$ (0.0448)	\$ 0.0128	\$ 0.0114	
% difference from individual rate	-7%	2%	2%	0%

Ameren Illinois Company
 Company Use of Fuels Adjustment
 For the Test Year Ending December 31, 2012
 (In Thousands)

Line No.	Description	RZ-1 (CIPS-E)	RZ-2 (CILCO-E)	RZ-3 (IP-E)	RZ-1 (CIPS-G)	RZ-2 (CILCO-G)	RZ-3 (IP-G)	Total
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
1	Cost of Fuels Adjustment per Staff	\$ 535	\$ 830	\$ 1,566	\$ 249	\$ 386	\$ 729	\$ 4,295
2	Cost of Fuels Adjustment per Company	\$ 1,082	\$ 675	\$ 1,211	\$ 262	\$ 324	\$ 794	\$ 4,348
3	Staff Adjustment to O & M Expenses	\$ (547)	\$ 155	\$ 355	\$ (13)	\$ 62	\$ (65)	\$ (53)

Source:
 Line 1, Col. b,c,d - (ICC Staff Exhibit 6,0, Sch. 6.01. p. 2, line 6)/1,000.
 Line 1, Col. e,f,g - (ICC Staff Exhibit 6,0, Sch. 6.01. p. 2, line 7)/1,000.
 Line 2, Col. b,c,d - AIC Schedule C-2.1.
 Line 2, Col. e,f,g - AIC Schedule C-2.4.

Ameren Illinois Company
 Company Use of Fuels Adjustment
 For the Test Year Ending December 31, 2012

Line No.	Description	RZ-1 (CIPS)		RZ-2 (CILCO)		RZ-3 (IP)	
		Projected Use MWh/Dth (b)	Cost (c)	Projected Use MWh/Dth (d)	Cost (e)	Projected Use MWh/Dth (f)	Cost (g)
1	Projected cost of fuel:						
2	Electric - \$53.24/MWh	10,500	\$ 559,020	15,600	\$ 830,544	33,000	\$ 1,756,920
3	Gas - \$6.30/Dth	35,700	224,910	61,206	385,598	85,341	537,648
4	Total per Rate Zone		<u>\$ 783,930</u>		<u>\$ 1,216,142</u>		<u>\$ 2,294,568</u>
5	Allocation:						
6	Electric - 68.25%		\$ 535,032		\$ 830,017		\$ 1,566,043
7	Gas - 31.75%		\$ 248,898		\$ 386,125		\$ 728,525

Source:

Col. a, b, d, f - AIC response to Staff DR MEM 4.02.

Line 2, Col. c, e, g = Projected Use x \$53.24

Line 3, Col. c, e, g = Projected Use x \$6.30

Line 6 = Line 4 x 68.25%

Line 7 = Line 4 x 31.75%