# **BEFORE THE**

# WASHINGTON UTILITIES & TRANSPORTATION COMMISSION

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# GENERAL RATE APPLICATION

OF

### NORTHWEST NATURAL GAS COMPANY

December 31, 2018

Direct Exhibit of Kevin S. McVay

**REVENUE REQUIREMENT** 

Exh. KSM-3

### NW Natural

Washington Rate Case

### Test Year Based on Twelve Months Ended September 30, 2018

Line No.		System Test Year Results	Washington Test Year Results
		(a)	(b)
Opera	ating Revenues		
1 Sale	e of Gas	\$665,326,649	\$67,314,413
2 Trai	nsportation	19,869,300	2,370,981
3 Mis	cellaneous Revenues	2,191,735	(2,048,364)
4 To	tal Operating Revenues	687,387,683	67,637,030
Opera	ating Revenue Deductions		
	Purchased	277,028,949	25,772,083
	ollectible Accrual for Gas Sales	525,404	58,166
7 Oth	er Operating & Maintenance Expenses	166,944,399	17,639,305
8 To	tal Operating & Maintenance Expense	444,498,752	43,469,553
9 Fed	eral Income Tax	16,459,355	1,360,922
10 Ore	gon Excise Tax	6,482,574	0
11 Pro	perty Taxes	21,280,809	1,268,490
12 Oth	er Taxes	27,628,043	3,687,322
13 Dep	reciation & Amortization	82,584,431	9,434,311
14 To	tal Operating Revenue Deductions	598,933,963	59,220,599
15 N	let Operating Revenues	\$88,453,720	\$8,416,431
16 To	tal Rate Base	\$1,300,658,040	\$162,928,776
17 Rate	e of Return	6.80%	5.17%
18 Ret	urn on Common Equity	8.63%	5.33%

### NW Natural

Washington Quarterly Results of Operations Report Operations and Maintenance Expense: Allocation of System Amounts Twelve Months Ended September 30, 2018

		System	Washington	Oregon
Natural Gas Stor	-			
-	und Storage Expense			
81)	eration 6 Wells Expense	291,774	30,403	261,371
81	•	73,078	7,615	65,463
820		2,626,828	272,282	2,354,546
82		2,020,828	2,138	18,849
02		20,507	2,150	10,043
	aintenance			
83	•	237,434	24,741	212,693
834	<b>3</b> 1 1 11	232,439	24,220	208,219
	Total Underground Storage Expense	3,482,540	361,399	3,121,142
Other Sto	rage Expense			
Ор	eration			
84	0 Supervision and Engineering	172,057	17,928	154,129
	Total Other Storage Expense	172,057	17,928	154,129
Liquified I	Natural Gas Expense			
•	eration			
84	4 Supervision and Engineering	1,892,077	197,154	1,694,922
84	5 LNG Fuel Expense - Credit Liquef Costs	(100,562)	(10,479)	(90,083)
	aintenance	=		
84		1,117,824	116,477	1,001,347
	Total Liquified Natural Gas Expense	2,909,339	303,153	2,606,186
	Total Natural Gas Storage	6,563,936	682,480	5,881,456
Transmission Exp	pense			
Ор	eration			
85	6 Mains Expense	1,998,785	136,387	1,862,398
Ма	aintenance			
86	3 Maintenance of Mains	166,376	18,635	147,741
	Total Transmission Expense	2,165,161	155,022	2,010,139
Distribution Expe				
•	eration			
87		3,497,212	302,733	3,194,479
87		12,875,979	1,505,786	11,370,192
87	•	199,446	20,985	178,461
87		504,447	43,949	460,498
87		6,022,667	670,318	5,352,349
87	9 Customer Installation Expense	11,036,726	1,229,188	9,807,538
88	0 Other Expense	1,778,614	182,681	1,595,933
88	1 Rents	224,751	31,096	193,654
	hintenance			
88		7,357,254	345,666	7,011,588
88		3,229,685	167,431	3,062,254
88		1,499,234	136,348	1,362,886
89:		201,538	14,444	187,093
893		689,871	51,255	638,616
89	3 Meters and House Regulators	2,834,505	282,484	2,552,021

### NW Natural Washington Quarterly Results of Operations Report Operations and Maintenance Expense: Allocation of System Amounts Twelve Months Ended September 30, 2018

		System	Washington	Oregon
894	Other Equipment	70,468	2,286	68,182
	Total Distribution Expense	52,022,395	4,986,651	47,035,744
Customer Account	s Expense			
Oper	ration			
901	Supervision	1,718,146	191,745	1,526,401
902	Meter Reading Expenses	890,734	99,320	791,413
903	Customer Records and Collection Expense	18,222,749	2,023,144	16,199,606
904	Uncollectible Accounts	525,404	58,166	467,238
	Total Customer Accounts Expense	21,357,033	2,372,375	18,984,658
Customer Service	and Informational			
Oper	ration			
907	Supervision	2,697	304	2,393
908	Customer Assistance Expense	2,330,246	278,562	2,051,684
909	Customer Information Expense	3,040,743	339,347	2,701,396
910	Miscellaneous Customer Service Expense	247,276	27,867	219,409
	Total Customer Service and Informational	5,620,961	646,080	4,974,881
Sales Expense				
Oper	ration			
911	Supervision	162,705	18,158	144,547
912	Demonstration and Selling Expense	3,675,850	407,174	3,268,676
913	Advertising	452,073	50,451	401,622
916	Miscellaneous Sales Expense	0	0	0
	Total Sales Expense	4,290,629	475,783	3,814,845
Administrative and	d General Expense			
Oper	ration			
921	Office Supplies and Expense	62,735,083	7,368,438	55,366,644
922	Administrative Expenses Transferred - Credit	(20,271,976)	(2,526,442)	(17,745,534)
924	Property Insurance Premium	3,182,476	356,756	2,825,721
925	Injuries and Damages	267,745	30,014	237,731
926	Employee Pensions and Benefits	4,898,086	1,826,246	3,071,841
928	Regulatory Commission Expense	0	0	0
930	Miscellaneous General Expense	3,226,983	361,745	2,865,238
931	Rents	4,775,372	529,184	4,246,188
Mair	ntenance			
935	Maintenance of General Plant	3,990,022	433,138	3,556,884
	Total Administrative and General Expense	62,803,791	8,379,079	54,424,712
	Total Operations and Maintenance Expense	154,823,906	17,697,471	137,126,436
	Percent of Total		11.43%	88.57%

Note: O&M above excludes amounts that are not intended to be recoverable in ratemaking.

O&M based on Regulatory application of Pension related costs in O&M (costs map to Non-Operating for GAAP). O&M above varies from Test Year Result for System due to exclusions above and SRRM environmental offset.

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cation Factors - All in Washington %'s	Oregon	Washington
Customers-all	88.840%	11.160
Customers-Residential	88.730%	11.270
Customers-Commercial	89.880%	10.120
Customers-Industrial	91.610%	8.390
Customers-The Dalles	74.850%	25.150
3-factor	88.790%	11.210
firm volumes	89.580%	10.420
sales volumes	90.120%	9.880
sendout volumes	91.640%	8.360
sales/sendout volumes	90.880%	9.120
Customers Portland/Vancouver	84.710%	15.290
Customers Portland/Vancouver 80%	87.770%	12.230
Customers Portland/Vancouver Commercial	84.990%	15.010
Payroll	89.257%	10.743
Admin Transfer	86.974%	13.026
Employee Cost	88.792%	11.208
Regulatory	70.000%	30.000
Telemetering	87.234%	12.766
Direct-Wa	0.000%	100.000
Direct-Or	100.000%	0.000
Gross plant direct assign	88.420%	11.580
Transmission	98.860%	1.140
Depreciation	88.378%	11.622
Rate Base	87.481%	12.519

### NW Natural Test Year Based on Twelve Months Ended September 30, 2018 Test Period Actuals Tax Adjustment

	Washington	
Line No.	-	Amount(a)
1	Utility Income before Interest and Taxes	\$9,777,353
2	Interest on Historic Average Rate Base	4,122,098
3	Pre-Tax Net Income	5,655,255
4	Permanent Differences	874,268
5	Pre Tax Income Adjusted for Permanents	6,529,523
6	Tax Rate	21.00%
7	Federal Income Tax Before Credits	\$1,371,200
8	Federal Tax Credits	(10,277)
9	Federal Income Tax	\$1,360,922

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#### NW Natural

Washington Rate Case

Test Year Based on Twelve Months Ended September 30, 2018

Rate Base - System & Washington														
	September 2017	October 2017	November 2017	December 2017	January 2018	February 2018	March 2018	April 2018	May 2018	June 2018	July 2018	August 2018	September 2018	13 Month AMA
System														
Gross Plant														
Intangible Software	102,343,776	102,795,439	103,900,996	105,175,574	105,211,287	105,976,732	105,934,961	105,959,178	105,958,907	106,339,619	106,349,582	106,337,338	110,918,040	105,547,543
Intangible Other	84,795	84,795	84,795	84,795	84,795	84,795	84,795	84,795	84,795	84,795	84,795	84,795	84,795	84,795
Production	675,198	675,198	675,198	675,198	675,198	675,198	675,198	675,198	675,198	675,198	675,198	675,198	675,198	675,198
Transmission	165,102,348	165,326,950	165,348,542	166,587,143	166,646,960	166,671,736	167,823,514	167,860,782	168,195,225	168,592,916	168,666,086	168,694,327	169,634,549	167,315,21
Distribution	2,132,874,662	2,140,000,757	2,148,386,972	2,161,775,493	2,168,079,145	2,171,328,431	2,183,114,102	2,187,035,912	2,194,049,822	2,203,962,401	2,209,442,463	2,217,186,171	2,226,387,112	2,180,332,71
General	130,867,940	127,364,704	130,898,990	132,305,812	133,613,204	133,598,610	133,842,412	133,918,068	134,888,661	140,035,829	141,966,472	142,119,016	142,319,755	135,095,46
Land	10,767,907	10,767,907	10,767,907	10,767,907	10,767,907	10,767,907	10,767,907	10,767,907	10,767,907	10,767,907	10,767,907	10,767,907	10,767,907	10,767,90
Structures	60,074,932	60,079,512	60,090,509	60,375,857	60,383,178	60,385,021	60,386,850	60,388,633	60,379,001	60,437,191	60,438,125	60,450,494	60,497,322	60,340,04
Storage and storage transmission	312,776,312	316,309,651	316,695,313	314,220,159	314,242,931	318,058,925	318,088,443	318,113,158	318,098,137	320,408,990	320,417,502	320,416,360	321,048,969	317,665,18
CNG and LNG Refueling	3,790,768	3,790,768	3,790,768	3,790,768	3,790,768	3,790,768	3,790,768	3,790,768	3,790,768	3,790,768	3,790,768	3,790,768	3,790,768	3,790,76
Total Gross Plant	2,919,358,638	2,927,195,682	2,940,639,990	2,955,758,707	2,963,495,374	2,971,338,124	2,984,508,953	2,988,594,399	2,996,888,423	3,015,095,615	3,022,598,900	3,030,522,375	3,046,124,415	2,981,614,83
Reserve														
Intangible Software	(62,524,338)	(62,759,202)	(62,996,864)	(63,238,775)	(63,483,064)	(63,728,791)	(63,975,818)	(64,222,814)	(64,469,852)	(64,717,574)	(64,965,998)	(65,214,417)	(65,471,040)	(63,980,90
Intangible Other	(, ,,		(,,,	-				(= .,==,== .,	(= .,,	-	-			())
Production	(691,036)	(691,036)	(691,036)	(691,036)	(691,036)	(691,036)	(691,036)	(691,036)	(691,036)	(691,036)	(691,036)	(691,036)	(691,036)	(691,03
Transmission	(35,198,591)	(35,611,864)	(36,025,882)	(36,441,032)	(36,857,901)	(37,276,169)	(37,694,607)	(38,115,049)	(38,535,522)	(38,957,364)	(39,379,388)	(39,801,543)	(40,224,172)	(37,700,64
Distribution	(990,378,350)	(994,028,245)	(997,877,669)	(1,001,460,546)	(1,004,738,482)	(1,008,257,483)	(1,011,729,124)	(1,015,259,308)	(1,019,060,727)	(1,022,176,197)	(1,025,018,669)	(1,028,199,175)	(1,032,025,125)	(1,011,583,94
General	(54,185,255)	(50,853,849)	(51,621,897)	(52,414,707)	(53,254,300)	(53,744,783)	(54,350,554)	(55,166,223)	(55,624,931)	(56,459,606)	(57,355,537)	(58,254,319)	(59,042,689)	(54,642,89
Land	(437,351)	(437,351)	(437,351)	(437,351)	(437,351)	(437,351)	(437,351)	(437,351)	(437,351)	(437,351)	(437,351)	(437,351)	(437,351)	(437,35
Structures	(10,343,507)	(10,441,221)	(10,538,947)	(10,636,914)	(10,735,124)	(10,833,342)	(10,931,563)	(11,029,786)	(11,128,004)	(11,226,261)	(11,324,566)	(11,422,883)	(11,521,248)	(10,931,74
Storage and storage transmission	(136,434,080)	(137,060,613)	(137,688,204)	(135,042,844)	(135,668,643)	(136,299,148)	(136,931,900)	(137,565,119)	(138,197,975)	(138,833,128)	(139,469,792)	(140,106,458)	(140,744,215)	(137,621,08
CNG and LNG Refueling	(2,123,804)	(2,126,448)	(2,129,093)	(2,131,737)	(2,134,382)	(2,137,026)	(2,139,671)	(2,142,315)	(2,144,959)	(2,147,604)	(2,150,248)	(2,152,893)	(2,155,537)	(2,139,67
Total Reserve	(1,292,316,311)	(1,294,009,829)	(1,300,006,941)	(1,302,494,942)	(1,308,000,282)	(1,313,405,130)	(1,318,881,623)	(1,324,629,001)	(1,330,290,357)	(1,335,646,120)	(1,340,792,586)	(1,346,280,073)	(1,352,312,413)	(1,319,729,27
Storage Gas	14,141,902	14,139,824	14,137,732	18,488,587	18,486,971	18,484,666	18,482,827	18,480,562	18,478,826	18,478,349	18,501,807	18,500,225	18,498,669	17,581,72
Customer Advances	(4,053,177)	(4,111,811)	(3,901,898)	(3,965,149)	(4,041,490)	(4,107,884)	(4,087,078)	(4,163,334)	(4,268,622)	(4,367,025)	(4,494,194)	(4,608,550)	(4,686,796)	(4,207,25
Leasehold Improvements	311,030	289,990	273,289	280,355	257,040	233,207	209,374	201,172	177,426	156,587	134,747	112,135	89,428	210,46
Gas Reserves	64,227,541	63,343,617	62,401,478	61,474,178	60,379,281	59,429,948	58,399,198	57,435,595	56,459,266	55,566,517	54,392,699	53,257,966	52,190,434	58,395,72
Deferred Taxes	(430,947,126)	(431,135,548)	(431,323,970)	(431,512,392)	(431,700,814)	(431,889,236)	(432,077,658)	(432,266,079)	(432,454,501)	(432,642,923)	(432,831,345)	(433,019,767)	(433,208,189)	(432,077,65
Subtotal Rate Base	1,270,722,497	1,275,711,926	1,282,219,679	1,298,029,344	1,298,876,079	1,300,083,694	1,306,553,993	1,303,653,312	1,304,990,460	1,316,641,000	1,317,510,030	1,318,484,311	1,326,695,548	1,301,788,57
Average Rate Base	·													1,301,788,57
Average Rate Dase														1,301,708,5

Average Rate Base Average Deferred Taxes Ending Deferred Taxes Total Rate Base 1,301,788,571 432,077,658 (433,208,189) \$1,300,658,040

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### NW Natural

Washington Rate Case

Test Year Based on Twelve Months Ended September 30, 2018

Rate Base - System & Washington														
	September 2017	October 2017	November 2017	December 2017	January 2018	February 2018	March 2018	April 2018	May 2018	June 2018	July 2018	August 2018	September 2018	13 Month AMA
Washington														
Gross Plant														
Intangible Software	11,421,565	11,471,971	11,595,351	11,737,594	11,741,580	11,827,003	11,822,342	11,825,044	11,825,014	11,867,501	11,868,613	11,867,247	12,378,453	11,779,106
Intangible Other	447	447	447	447	447	447	447	447	447	447	447	447	447	44
Production	-	-	-	-	-	-	-	-	-	-	-	-	-	
Transmission	1,114,674	1,114,674	1,114,674	1,114,674	1,115,001	1,115,001	1,115,001	1,115,001	1,115,001	1,115,001	1,115,001	1,115,001	1,115,001	1,114,90
Distribution	260,330,717	261,778,867	264,513,478	267,685,383	268,646,497	269,005,469	271,664,674	272,703,899	274,534,759	277,930,132	277,960,738	279,877,160	281,297,949	271,426,28
General	14,670,296	14,277,583	14,673,777	14,831,481	14,978,040	14,976,404	15,003,734	15,012,215	15,121,019	15,698,016	15,914,442	15,931,542	15,954,044	15,144,20
Land	1,971,164	1,971,164	1,971,164	1,971,164	1,971,164	1,971,164	1,971,164	1,971,164	1,971,164	1,971,164	1,971,164	1,971,164	1,971,164	1,971,16
Structures	5,469,156	5,469,573	5,470,574	5,496,552	5,497,218	5,497,386	5,497,553	5,497,715	5,496,838	5,502,136	5,502,221	5,503,347	5,507,610	5,493,29
Storage and storage transmission	29,152,692	29,520,866	29,561,052	29,303,141	29,305,513	29,703,140	29,706,216	29,708,791	29,707,226	29,948,017	29,948,904	29,948,785	30,014,703	29,662,11
CNG and LNG Refueling	424,945	424,945	424,945	424,945	424,945	424,945	424,945	424,945	424,945	424,945	424,945	424,945	424,945	424,94
Total Gross Plant	324,555,656	326,030,090	329,325,462	332,565,382	333,680,407	334,520,960	337,206,076	338,259,222	340,196,414	344,457,360	344,706,475	346,639,637	348,664,317	337,016,45
Seserve														
Intangible Software	(6,977,716)	(7,003,927)	(7,030,450)	(7,057,447)	(7,084,710)	(7,112,133)	(7,139,701)	(7,167,266)	(7,194,836)	(7,222,481)	(7,250,205)	(7,277,929)	(7,306,568)	(7,140,26
Intangible Other	(0,577,710)	(7,003,527)	(7,030,430)	(7,057,447)	(7,084,710)	(7,112,133)	(7,133,701)	(7,107,200)	(7,194,830)	(7,222,401)	(7,230,203)	(7,277,525)	(7,300,308)	(7,140,20
Production		_		_						_		_	_	
Transmission	(142,343)	(144,247)	(146,152)	(148,056)	(149,960)	(151,865)	(153,770)	(155,675)	(157,580)	(159,484)	(161,389)	(163,294)	(165,199)	(153,77
Distribution	(105,955,041)	(106,374,361)	(106,868,265)	(107,403,156)	(107,922,696)	(108,475,865)	(109,032,956)	(109,570,211)	(110,067,678)	(110,578,630)	(110,734,782)	(111,277,218)	(111,862,300)	(108,934,54
General	(6,074,167)	(5,700,716)	(5,786,815)	(5,875,689)	(5,969,807)	(6,024,790)	(6,092,697)	(6,184,134)	(6,235,555)	(6,329,122)	(6,429,556)	(6,530,309)	(6,618,685)	(108,934,94
Land	(80,061)	(80,061)	(80,061)	(80,061)	(80,061)	(80,061)	(80,061)	(80,061)	(80,061)	(80,061)	(0,429,550) (80,061)	(80,061)	(80,061)	(0,123,40
Structures	(941,662)	(950,557)	(959,454)	(968,373)	(977,314)	(986,256)	(995,197)	(1,004,140)	(1,013,081)	(1,022,026)	(1,030,976)	(1,039,927)	(1,048,882)	(995,21
Storage and storage transmission	(13,152,931)	(13,210,765)	(13,268,710)	(12,985,613)	(13,043,371)	(13,101,619)	(13,160,102)	(13,218,633)	(13,277,126)	(13,335,859)	(13,394,749)	(13,453,639)	(13,512,643)	(13,231,91
CNG and LNG Refueling	(15,152,951) (238.078)	(238,375)	(238.671)	(238,968)	(239,264)	(239,561)	(239,857)	(13,218,655) (240,154)	(13,277,128) (240,450)	(13,353,859) (240,746)	(13,394,749) (241,043)	(13,453,659) (241,339)	(13,512,643) (241,636)	(13,231,91
CNG and LNG Reideling	(238,078)	(238,375)	(238,671)	(238,968)	(239,264)	(239,561)	(239,857)	(240,154)	(240,450)	(240,746)	(241,043)	(241,339)	(241,636)	(239,85
Total Reserve	(133,561,999)	(133,703,010)	(134,378,578)	(134,757,363)	(135,467,183)	(136,172,150)	(136,894,341)	(137,620,273)	(138,266,366)	(138,968,410)	(139,322,761)	(140,063,716)	(140,835,974)	(136,901,095
Storage Gas	1,473,586	1,473,370	1,473,152	1,926,511	1,926,342	1,926,102	1,925,911	1,925,675	1,925,494	1,925,444	1,927,888	1,927,723	1,927,561	1,832,01
Customer Advances	(621,337)	(653,473)	(657,716)	(668,837)	(683,153)	(696,246)	(698,518)	(713,866)	(735,487)	(765,624)	(795,604)	(818,449)	(847,226)	(718,43
Leasehold Improvements	34,866	32,508	30,636	31,428	28,814	26,142	23,471	22,551	19,889	17,553	15,105	12,570	10,025	23,59
Gas Reserves	-	-	-	-	-	-	-	-	-	-	-	-	-	
Deferred Taxes	(39,553,664)	(39,451,172)	(39,348,679)	(39,246,187)	(39,143,695)	(39,041,202)	(38,938,710)	(38,836,217)	(38,733,725)	(38,631,233)	(38,528,740)	(38,426,248)	(38,323,756)	(38,938,71
Subtotal Rate Base	152,327,109	153,728,313	156,444,277	159,850,934	160,341,533	160,563,607	162,623,889	163,037,092	164,406,219	168,035,091	168,002,364	169,271,519	170,594,947	162,313,82
Average Rate Base Average Deferred Taxes														162,313,82 38,938,71
Average Deferred Taxes														(20,222,7

Ending Deferred Taxes Total Rate Base

TOLAT NALE DASE

162,313,822 38,938,710 (38,323,756) \$162,928,776

### NW Natural

Test Year Based on Twelve Months Ended September 30, 2018 Cost of Capital and Revenue Sensitive Calculations

No.Total CapitalAverage Cost(a)(b)Cost of Capital49.50%1Long Term Debt49.50%2Short Term Debt1.00%3Common Stock49.50%			Percent of		Line
Cost of Capital 49.50% 5.066%   1 Long Term Debt 49.50% 5.066%   2 Short Term Debt 1.00% 2.186%	Cost				No.
1 Long Term Debt 49.50% 5.066%   2 Short Term Debt 1.00% 2.186%	(c)	(b)	(a)		
<b>2</b> Short Term Debt 1.00% 2.186%			-	Cost of Capital	-
<b>2</b> Short Term Debt 1.00% 2.186%	2.508%	5.066%	49.50%	Long Term Debt	1
<b>3 Common Stock</b> 49.50% 10.300%	0.022%	2.186%	1.00%		2
	5.099%	10.300%	49.50%	Common Stock	3
4 Total 100.00%	7.629%	_	100.00%	Total	4
Revenue Sensitive Costs			-	Revenue Sensitive Costs	-
<b>5 Gas Sales</b> 96.079%			96.079%	Gas Sales	5
6 Transportation 3.560%			3.560%	Transportation	6
<b>7 Other</b> 0.361%			0.361%	Other	7
8 Subtotal 100.000%			100.000%	Subtotal	8
<b>9 O &amp; M - Uncollectible</b> 0.106%			0.106%	O & M - Uncollectible	9
<b>10 WA Utility Tax</b> 3.852%			3.852%	WA Utility Tax	10
<b>11 WUTC Fee</b> 0.200%			0.200%	WUTC Fee	11
12Total Rev Sensitive Costs Incl Tax4.158%			4.158%	Total Rev Sensitive Costs Incl Tax	12
13 Federal Taxable Income 95.842%			95.842%	Federal Taxable Income	13
14Federal Income Tax20.127%			20.127%	Federal Income Tax	14
15Total Income Taxes20.127%			20.127%	Total Income Taxes	15
16Total Rev Sensitive Costs Incl Tax24.284%			24.284%	Total Rev Sensitive Costs Incl Tax	16
17 Utility Operating Income 75.716%			75.716%	Utility Operating Income	17
18 Net-to-gross factor 132.073%			132.073%	Net-to-gross factor	18
<b>19 Interest Coordination Factor</b> 2.530%			2.530%	Interest Coordination Factor	19
20 Federal tax rate 21.000%			21.000%	Federal tax rate	20
21 Uncollectible Accounts 0.106%			0.106%	Uncollectible Accounts	21