

**EXH. KJB-24
DOCKETS UE-170033/UG-170034
2017 PSE GENERAL RATE CASE
WITNESS: KATHERINE J. BARNARD**

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

**Docket UE-170033
Docket UG-170034**

**SEVENTH EXHIBIT (NONCONFIDENTIAL) TO THE
PREFILED REBUTTAL TESTIMONY OF**

KATHERINE J. BARNARD

ON BEHALF OF PUGET SOUND ENERGY

AUGUST 9, 2017

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSE TO DATA REQUEST

DATE PREPARED: August 2, 2017

WITNESS: Melissa C. Cheesmand and
Betty A. Erdahl

DOCKETS: UE-170033/UG-170034

RESPONDER: Melissa C. Cheesman and
Betty A. Erdahl

REQUESTER: PSE

TELEPHONE: (360) 664-1283

REQUEST NO. 27:

The Response Testimony of Ms. Betty Erdahl, Exh. BAE-1T, advocates reducing electric rate base by \$35,650,297 and gas rate base by \$47,382.699 as a result of WUTC Staff's adjustment to working capital. In subpart (d) to WUTC Staff's Response to PSE Data Request No. 010, WUTC Staff states that a correction can be made to its proposed adjustment to rate base. Please calculate corrections to any affected exhibits and provide replacement files for the exhibits and supporting workpapers.

RESPONSE:

In order to expedite a response to PSE and the other parties, Staff is providing the following corrected work papers that remove Staff's reduction to electric rate base by \$35,650,297 and gas rate base by \$47,382.699:

170033-Staff-WP-MCC-2,3,4,5,6 Markup
170034-Staff-WP-MCC-7,8,9,10,11 Markup

All changes to the above Excel work papers have been highlighted in orange for easy recognition.

In order to avoid multiple revenue requirement models, the above Excel work papers also include corrections to Depreciation Study adjustment 13.06, as per Mr. McGuire's responses to PSE's Data Requests 17 and 21, and the re-categorization of the accounts in response to PSE Data Request 028 below.

Please see the following attached file for Mr. McGuire's corrected work paper:

170033-Staff-WP-CRM-Depr Study 13.06

The above revisions together change Staff's recommended revenue requirements from negative \$46 million to negative \$35 million for electric operations and from negative \$54 million to negative \$48 million for natural gas operations.

OVERALL REVENUE SUFFICIENCY CALCULATION

PUGET SOUND ENERGY-ELECTRIC
STATEMENT OF OPERATING INCOME AND ADJUSTMENTS
FOR THE TWELVE MONTHS ENDED SEPTEMBER 30, 2016
GENERAL RATE INCREASE

STAFF POSITION

LINE NO.	DESCRIPTION	ACTUAL RESULTS OF OPERATIONS	TOTAL ADJUSTMENTS	ADJUSTED RESULTS OF OPERATIONS	REVENUE DEFICIENCY	AFTER RATE INCREASE	NEW (LESS) CURRENT OTHER SCHEDULE REVENUE	NEW FINAL OVERALL REVENUE REQUIREMENT SUFFICIENCY	Rate Incr	Rate Desc
1	OPERATING REVENUES									
2	SALES TO CUSTOMERS	\$ 2,146,048,308	\$ (177,967,651)	\$ 1,968,080,657	\$ 51,195,740	\$ 2,019,276,398	\$ 86,230,222	\$ (65,034,462)	2.60%	-1.78%
3	SALES FROM RESALE-FIRM/SPECIAL CONTRACT	324,382	(6,914)	317,468	405,143	722,611	(21,000)	427,143		
4	SALES TO OTHER UTILITIES	201,135,742	(179,079,518)	22,046,223		22,046,223				
5	OTHER OPERATING REVENUES	47,841,339	26,133,665	73,975,004		73,975,004				
6	TOTAL OPERATING REVENUES	2,395,339,771	(330,920,418)	2,064,419,353	51,600,883	2,116,020,236	86,208,222	(34,007,339)	2.5%	-1.7%
7	OPERATING REVENUE DEDUCTIONS:									
8										
9										
10	POWER COSTS:									
11	FUEL	235,002,887	(29,985,278)	205,017,509		205,017,509				
12	PURCHASED AND INTERCHANGED	532,346,459	(116,132,681)	416,213,779		416,213,779				
13	WHEELING	113,800,193	(5,005,510)	108,794,683		108,794,683				
14	RESIDENTIAL EXCHANGE	(69,268,220)								
15	TOTAL PRODUCTION EXPENSES	811,881,319	(81,855,348)	730,025,971		730,025,971				
16										
17	OTHER POWER SUPPLY EXPENSES	125,897,437	13,446,113	139,343,550		139,343,550				
18	TRANSMISSION EXPENSE	20,270,050	383,869	20,653,920		20,653,920				
19	DISTRIBUTION EXPENSE	83,336,029	7,924,970	91,260,999		91,260,999				
20	CUSTOMER ACCTS EXPENSES	47,600,166	1,007,241	48,607,407	369,308	48,976,715	541,994	(172,687)		
21	CUSTOMER SERVICE EXPENSES	19,829,127	(17,230,512)	2,598,615		2,598,615				
22	CONSERVATION AMORTIZATION	97,566,975	(97,540,765)	26,210		26,210				
23	ADMIN & GENERAL EXPENSE	114,599,759	1,464,930	116,064,688	103,202	116,167,890	151,458	(48,237)		
24	DEPRECIATION	268,356,985	33,271,859	301,628,844		301,628,844				
25	AMORTIZATION	45,684,975	3,789,697	49,474,672		49,474,672				
26	AMORTIZ OF PROPERTY GAIN/LOSS	20,604,866	(6,969,693)	13,635,174		13,635,174				
27	OTHER OPERATING EXPENSES	(9,997,194)	15,864,858	5,867,664		5,867,664				
28	ASC 815	(64,111,668)								
29	TAXES OTHER THAN INCOME TAXES	230,800,257	(143,978,520)	86,821,737	1,984,415	88,806,152	2,912,319	(922,904)		
30	INCOME TAXES	181,996,915	(140,252,061)	41,744,854	17,200,380	58,945,234	25,243,200	(6,042,830)		
31	DEFERRED INCOME TAXES	1,994,336,799	(272,055,367)	1,722,281,432	19,637,305	1,741,918,737	28,848,971	(9,191,667)		
32	TOTAL OPERATING REV. DEDUCT.									
33										
34	NET OPERATING INCOME	\$ 401,002,972	\$ (88,864,951)	\$ 312,138,021	\$ 31,943,578	\$ 374,081,599	\$ 57,359,251	\$ (25,415,673)		
35										
36	RATE BASE	\$153,204,462	(77,470,417)	\$ 75,734,045		\$ 75,734,045				
37										
38	RATE OF RETURN	7.78%		6.74%		7.37%				
39										
40	RATE BASE:									
41	GROSS UTILITY PLANT IN SERVICE	9,760,401,507	41,249,552	9,801,651,058		9,801,651,058				
42	ACCUM DEPR AND AMORT	(3,743,804,806)	(123,729,292)	(3,867,534,099)		(3,867,534,099)				
43	DEFERRED DEBITS AND CREDITS	253,258,620	6,832,308	260,090,929		260,090,929				
44	DEFERRED TAXES	(1,263,932,468)	31,415,689	(1,232,516,779)		(1,232,516,779)				
45	ALLOWANCE FOR WORKING CAPITAL	227,005,242	(33,238,674)	193,766,567		193,766,567				
46	OTHER	(79,723,633)		(79,723,633)		(79,723,633)				
47	TOTAL RATE BASE	\$ 5,153,204,462	(73,470,417)	\$ 5,079,734,045		\$ 5,079,734,045				
48	Rate of Return									
49	Conversion Factor									
50	Revenue Requirement	\$ (34,265,033)	\$ 85,865,916	\$ 51,600,883	\$ (51,600,883)	\$ 0				

PUGET SOUND ENERGY-ELECTRIC
STATEMENT OF OPERATING INCOME AND ADJUSTMENTS
FOR THE TWELVE MONTHS ENDED SEPTEMBER 30, 2016

LINE NO.	STAFF POSITION	CONTINGENT		CONTINGENT		CONTINGENT		CONTINGENT		CONTINGENT		
		ACTUAL	REVENUES	TEMPERATURE	PASS-THROUGH	FEDERAL	TAX BENEFIT OF	RESULTS OF	& EXPENSES	NORMALIZATION	REVS. & EXPS.	INCOME TAX
		13.01	13.02	13.03	13.04	13.05						
1	OPERATING REVENUES											
2	SALES TO CUSTOMERS	\$ 2,146,048,308	\$ (18,656,298)	\$	\$	\$						
3	SALES FROM RESALE-FIRM/SPECIAL CONTRACT	324,382	147									
4	SALES TO OTHER UTILITIES	201,125,742	(10,225,163)									
5	OTHER OPERATING REVENUES	47,841,339	(28,861,314)									
6	TOTAL OPERATING REVENUES	2,395,339,771	(28,861,314)	33,207,905	(192,824,371)							
7	OPERATING REVENUE DEDUCTIONS:											
8												
9												
10	POWER COSTS:											
11	FUEL	235,002,887										
12	PURCHASED AND INTERCHANGED	532,346,459										
13	WHEELING	113,800,193										
14	RESIDENTIAL EXCHANGE	(69,268,220)										
15	TOTAL PRODUCTION EXPENSES	811,881,319										
16												
17	OTHER POWER SUPPLY EXPENSES	125,897,437										
18	TRANSMISSION EXPENSE	20,270,050										
19	DISTRIBUTION EXPENSE	83,356,029										
20	CUSTOMER ACCTS EXPENSES	47,600,166	(206,560)	237,669	(1,378,054)							
21	CUSTOMER SERVICE EXPENSES	19,829,127			(17,275,568)							
22	CONSERVATION AMORTIZATION	97,566,975			(97,540,765)							
23	ADMIN. & GENERAL EXPENSE	114,599,759	(57,723)	66,416	(426,522)							
24	DEPRECIATION	268,556,985										
25	AMORTIZATION	45,684,975										
26	AMORTIZ OF PROPERTY GAIN/LOSS	20,604,866										
27	OTHER OPERATING EXPENSES	(9,997,194)	17,342,294		365,335							
28	ASC 815	(64,111,668)										
29	TAXES OTHER THAN INCOME TAXES	230,800,257	(1,109,920)	1,277,076	(144,297,723)							
30	INCOME TAXES	800	(15,690,292)	11,069,360	(538,752)							
31	DEFERRED INCOME TAXES	181,996,915										
32	TOTAL OPERATING REV. DEDUCT.	1,994,336,799	277,800	12,650,521	(191,823,831)							
33												
34	NET OPERATING INCOME	\$ 401,002,972	\$ (29,139,114)	\$ 20,557,384	\$ (1,000,540)	\$ (27,023,239)	\$					
35												
36	RATE BASE	\$ 5,153,204,462	\$	\$	\$	\$						
37												
38	RATE OF RETURN	7.78%										
39												
40	RATE BASE:											
41	GROSS UTILITY PLANT IN SERVICE	\$ 9,760,401,507	\$	\$	\$	\$						
42	ACCUM DEPR AND AMORT	(3,743,804,806)										
43	DEFERRED DEBITS AND CREDITS	253,258,620										
44	DEFERRED TAXES	(1,263,932,468)										
45	ALLOWANCE FOR WORKING CAPITAL	227,005,242										
46	OTHER	(79,723,633)										
47	TOTAL RATE BASE	\$ 5,153,204,462	\$	\$	\$	\$						
48	Rate of Return	7.37%										
49	Conversion Factor	61.91%										
50	Revenue Requirement	\$ (34,265,033)	\$ 47,070,619	\$ (33,207,900)	\$ 1,616,249	\$ 43,652,686	\$					

PUGET SOUND ENERGY-ELECTRIC
STATEMENT OF OPERATING INCOME AND ADJUSTMENTS
FOR THE TWELVE MONTHS ENDED SEPTEMBER 30, 2016

LINE NO.	STAFF POSITION	REVISED		CONTESTED		CONTESTED NEW		CONTESTED					
		DEPRECIATION	STUDY	REG. ASSET	COLSTRIP	NORMALIZE	BAD	INCENTIVE	D&O	INSURANCE	INTEREST ON	RATE CASE	DEFERRED GIL ON
1	OPERATING REVENUES												
2	SALES TO CUSTOMERS												
3	SALES FROM RESALE-FIRM/SPECIAL CONTRACT												
4	SALES TO OTHER UTILITIES												
5	OTHER OPERATING REVENUES												
6	TOTAL OPERATING REVENUES												
7													
8	OPERATING REVENUE DEDUCTIONS:												
9	POWER COSTS:												
10	FUEL												
11	PURCHASED AND INTERCHANGED												
12	WHEELING												
13	RESIDENTIAL EXCHANGE												
14	TOTAL PRODUCTION EXPENSES												
15													
16	OTHER POWER SUPPLY EXPENSES												
17	TRANSMISSION EXPENSE												
18	DISTRIBUTION EXPENSE												
19	CUSTOMER ACCTS EXPENSES												
20	CUSTOMER SERVICE EXPENSES												
21	CONSERVATION AMORTIZATION												
22	ADMIN & GENERAL EXPENSE												
23	DEPRECIATION												
24	AMORTIZATION												
25	AMORTIZ OF PROPERTY GAIN/LOSS												
26	OTHER OPERATING EXPENSES												
27	ASC 815												
28	TAXES OTHER THAN INCOME TAXES												
29	INCOME TAXES												
30	DEFERRED INCOME TAXES												
31	TOTAL OPERATING REV. DEDUCT.												
32													
33	NET OPERATING INCOME												
34													
35	RATE BASE												
36													
37	RATE OF RETURN												
38													
39	RATE BASE:												
40	GROSS UTILITY PLANT IN SERVICE												
41	ACCUM DEPR AND AMORT												
42	DEFERRED DEBITS AND CREDITS												
43	DEFERRED TAXES												
44	ALLOWANCE FOR WORKING CAPITAL												
45	OTHER												
46	TOTAL RATE BASE												
47													
48	Rate of Return												
49	Conversion Factor												
50	Revenue Requirement												

PUGET SOUND ENERGY-ELECTRIC
 STATEMENT OF OPERATING INCOME AND ADJUSTMENTS
 FOR THE TWELVE MONTHS ENDED SEPTEMBER 30, 2016

STAFF POSITION

LINE NO.	PROPERTY & LIABILITY INS	PENSION PLAN	WAGE INCREASE	INVESTMENT PLAN	EMPLOYEE INSURANCE	CONTESTED		SOUTH KING	EXCISE TAX AND
						ENVIRONMENTAL REMEDIATION	PAYMENT PROCESSING COSTS		
	13,14	13,15	13,16	13,17	13,18	13,19	13,20	13,21	13,22
1									
2									
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50									

PUGET SOUND ENERGY-ELECTRIC
STATEMENT OF OPERATING INCOME AND ADJUSTMENTS
FOR THE TWELVE MONTHS ENDED SEPTEMBER 30, 2016

LINE NO.	STAFF POSITION	CONTESTED		CONTESTED		CONTESTED		CONTESTED		TOTAL	ADJUSTED RESULTS OF OPERATIONS
		ENERGY IMB 14.08	GOLDENDALE 14.09	MINT FARM 14.10	WHITE RIVER 14.11	RECLASS OF HYDRO 14.12	PRODUCTION 14.13	ADJUSTMENT	ADJUSTMENTS		
1	OPERATING REVENUES										
2	SALES TO CUSTOMERS									\$ (177,967,651)	\$ 1,968,080,657
3	SALES FROM RESALE-FIRM/SPECIAL CONTRACT									(6,914)	317,468
4	SALES TO OTHER UTILITIES									(179,079,518)	22,046,223
5	OTHER OPERATING REVENUES									26,133,665	73,975,004
6	TOTAL OPERATING REVENUES									(330,920,418)	2,064,419,353
7	OPERATING REVENUE DEDUCTIONS:										
8	POWER COSTS:										
9	FUEL										
10	PURCHASED AND INTERCHANGED										
11	WHEELING										
12	RESIDENTIAL EXCHANGE										
13	TOTAL PRODUCTION EXPENSES										
14	OTHER POWER SUPPLY EXPENSES										
15	TRANSMISSION EXPENSE										
16	DISTRIBUTION EXPENSE										
17	CUSTOMER ACCT'S EXPENSES										
18	CUSTOMER SERVICE EXPENSES										
19	CONSERVATION AMORTIZATION										
20	ADMIN & GENERAL EXPENSE										
21	DEPRECIATION										
22	AMORTIZATION										
23	AMORTIZ OF PROPERTY GAIN/LOSS										
24	OTHER OPERATING EXPENSES										
25	ASC 815										
26	TAXES OTHER THAN INCOME TAXES										
27	INCOME TAXES										
28	DEFERRED INCOME TAXES										
29	TOTAL OPERATING REV. DEDUCT.										
30	NET OPERATING INCOME										
31	RATE BASE										
32	RATE OF RETURN										
33	RATE BASE:										
34	GROSS UTILITY PLANT IN SERVICE										
35	ACCUM DEPR AND AMORT										
36	DEFERRED DEBITS AND CREDITS										
37	DEFERRED TAXES										
38	ALLOWANCE FOR WORKING CAPITAL										
39	OTHER										
40	TOTAL RATE BASE										
41	Rate of Return										
42	Conversion Factor										
43	Revenue Requirement										

**REVISED
CONTESTED**

Dockets UE-170033/UG-170034

Page 11 of 45

Adj. 13.05

**PUGET SOUND ENERGY-ELECTRIC
TAX BENEFIT OF PRO FORMA INTEREST
FOR THE TWELVE MONTHS ENDED SEPTEMBER 30, 2016
2017 GENERAL RATE CASE**

		<i>REVISED</i>	
LINE NO.	DESCRIPTION		AMOUNT
1	RATE BASE	\$	<i>5,075,734,045</i>
2			
3	NET RATE BASE		<i>5,075,734,045</i>
4			
5	WEIGHTED AVERAGE COST OF DEBT	2.95%	
6	PROFORMA INTEREST		<i>149,734,154</i>
7			
8	INCREASE (DECREASE) INCOME		<i>(149,734,154)</i>
9			
10	INCREASE (DECREASE) FIT @	35%	<i>(52,406,954)</i>
11	INCREASE (DECREASE) NOI		<i>\$ 52,406,954</i>

Note: Amounts in bold and italics are different from January 13, 2017 original filing.

**REVISED
CONTESTED**

Dockets UE-170033/UG-170034
Page 12 of 45
Adj. 13.06

**PUGET SOUND ENERGY-ELECTRIC
DEPRECIATION STUDY
FOR THE TWELVE MONTHS ENDED SEPTEMBER 30, 2016
2017 GENERAL RATE CASE**

LINE NO. DESCRIPTION	TEST YEAR	RESTATED	ADJUSTMENT
1 403 ELEC. DEPRECIATION EXPENSE	\$ 249,419,038	\$ 286,357,198	\$ 36,938,159
2 403 ELEC. PORTION OF COMMON	15,207,048	13,232,379	(1,974,669)
3 403 DEPR. EXP. ON ASSETS NOT INCLUDED IN STUDY	55,938	55,938	-
4 404 DEPR. EXP. ON ASSETS NOT INCLUDED IN STUDY	29,770,695	29,770,695	-
5 SUBTOTAL DEPRECIATION EXPENSE 403	<u>294,452,719</u>	<u>329,416,210</u>	<u>34,963,491</u>
6			
7 403.1 DEPR. EXP- FAS 143 (RECOVERED IN RATES)	1,352,125	1,739,118	386,994
8 403.1 DEPR. EXP - FAS 143 (NOT RECOVERED IN RATES)	1,476,017	-	(1,476,017)
9 SUBTOTAL DEPRECIATION EXPENSE 403.1	<u>2,828,141</u>	<u>1,739,118</u>	<u>(1,089,023)</u>
10			
11 TOTAL DEPRECIATION EXPENSE	<u>297,280,860</u>	<u>331,155,328</u>	<u>33,874,468</u>
12			
13 AMORTIZATION EXPENSE			
14 411.10 ACCRETION EXP. - ASC 410 (RECOVERED IN RATES)	1,424,661	1,813,989	389,327
15 411.10 ACCRETION EXP. - ASC 410 (NOT RECOVERED IN RATES)	1,148,003	-	(1,148,003)
16 SUBTOTAL ACCRETION EXPENSE 411.10	<u>2,572,664</u>	<u>1,813,989</u>	<u>(758,676)</u>
17			
18 DEPRECIATION EXPENSE 403 ASSOCIATED WITH FLEET	<u>846,819</u>	<u>539,849</u>	<u>(306,970)</u>
19			
20			
21 INCREASE (DECREASE) EXPENSE			<u>32,808,822</u>
22 INCREASE (DECREASE) FIT			<u>(11,483,088)</u>
23 INCREASE (DECREASE) NOI			<u>\$ (21,325,734)</u>
24			
25			
26 ADJUSTMENT TO RATE BASE			
27 ADJUSTMENT TO ACCUM. DEPREC. AT 50% DEPREC. EXP. LINE 21	50%		<u>\$ (16,404,411)</u>
28 DFIT			<u>5,741,544</u>
29			
30 TOTAL ADJUSTMENT TO RATEBASE			<u>\$ (10,662,867)</u>

PUGET SOUND ENERGY-ELECTRIC
 GENERAL RATE INCREASE
 FOR THE TWELVE MONTHS ENDED SEPTEMBER 30, 2016
 GENERAL RATE CASE

LINE NO.	DESCRIPTION	@ 2011 REVENUE REQUIREMENT DEFICIENCY	REVENUE INCREASE	(LESS) CURRENT OTHER SCHEDULE* REVENUE	FINAL OVERALL REVENUE REQUIREMENT SUFFICIENCY
1	RATE BASE	\$ 5,075,734,045			
2	RATE OF RETURN		7.37%		
3					
4	OPERATING INCOME REQUIREMENT	574,081,599			
5					
6	PRO FORMA OPERATING INCOME	342,138,021			
7	OPERATING INCOME DEFICIENCY	31,943,578			
8					
9	CONVERSION FACTOR	0.6190510			
10	REVENUE REQUIREMENT DEFICIENCY	51,600,883			(54,607,359)
11	SALES FROM RESALE-FIRM			(22,000)	427,143
12					
13	REVENUE REQUIREMENT SUFFICIENCY	\$ 51,195,740		86,230,222	\$ (35,034,482)

* Note: Current 2017 revenues related to PSE's PCORC, ERF, and Decoupling that will be folded into base rates.

KJB

REVISED
Puget Sound Energy
STAFF'S ADJUSTMENT TO INVESTOR SUPPLIED WORKING CAPITAL AND RATE BASE
For the Twelve Months Ended September 30, 2016

LINE (a) NO.	Description	Per Exh. BAE-3 ISWC			STAFF STAFF FOOTNOTE
		PSE WP - "5.03 E&G RB - 5.04 E&G WC 17GRC.xlsx" (b) AMA	STAFF ADJUSTMENT (c) = (d) - (b) AMA	REVISED TOTAL AS ADJUSTED BY STAFF (d) AMA	
1	AVERAGE INVESTED CAPITAL				
2	Total Average Invested Capital	7,389,220,147	(0)	7,389,220,147	
3					
4	INVESTMENTS				
5					
6	Electric (Rate Base and Deferrals)				
7					
8	Total Electric (Rate Base and Deferrals)	4,961,861,442	(35,662,222)	4,926,199,220	
9					
10	Gas (Rate Base and Deferrals)				
11					
12	Total Gas (Rate Base and Deferrals)	1,697,061,852	(47,382,699)	1,649,679,153	
13					
14	Total Electric & Gas Investment	6,658,923,294	(83,044,921)	6,575,878,373	
15					
16					
17	Non-Operating				
18					
19	Total Non Operating Investment	425,115,043	40,870,494	465,985,537	
20					(1)
21	Total Average Investments	7,084,038,337	(42,174,427)	7,041,863,910	
22	Rounding				
23	Total Investor Supplied Capital	\$ 305,181,810	\$ 42,174,427	\$ 347,356,237	
24					
25					
26	INVESTED SUPPLIED WORKING CAPITAL				
27					
28	Electric Working Capital	\$ 227,005,242	15,990,937	\$ 242,996,179	
29	Electric Allocation (Line 28 / Line 23)	74.38%		69.96%	
30	Gas Working Capital	\$ 77,640,607	3,733,635	\$ 81,374,243	
31	Gas Allocation (Line 30 / Line 23)	25.44%		23.43%	
32	Non Operating Working Capital	\$ 535,961	22,449,855	\$ 22,985,815	
33	Non-Operating Allocation (Line 32 / Line 23)	0.18%		6.62%	

34 **Footnotes:**

(1) Non-Operating includes accounts that accrue or earn interest, CWIP, Non-utility, and or accounts not allowed for rate making purposes.

35