

Meeting Agenda

- Status of the 2024 Audit Plan
- Internal Audit Overview
- Audit Plan Development
- Review 2025 audit plan
- Additional discussion and questions

2024 Audit Plan

- Vendor Payments drafting report
- Human Resource Policy Compliance
 - Employee recognition policy (management leave recognition) report published
 - Hiring practices *co-sourcing*
- Inventory drafting report
- Payroll Processing emerging risk
 - Continuous monitoring / follow-up work
- Small and Attractive Assets field work
- Overtime
- Customer Billing and Adjustments (included in external audit)
- System Access Roles and Responsibilities (included in external audit)
- Purchase Cards (P-Card) (included in external audit)

Internal Audit Overview

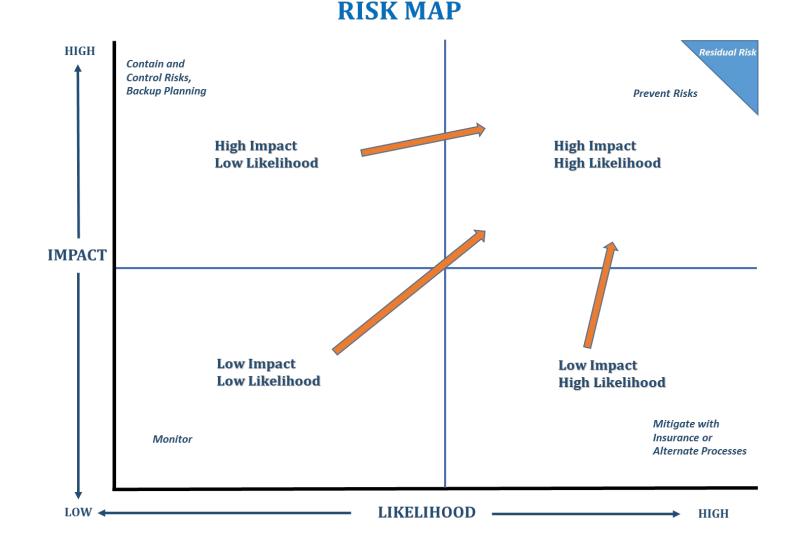
- Internal Audit department operates under:
 - Internal Audit Charter
 - Red Book Standards "International Professional Practices Framework"
 - In 2025 adopting "Global Internal Audit Standards"
 - Structured into five domains that together incorporate 15 principles and 53 Standards
 - One of the most significant changes is the need for internal audit functions to align with the strategic objectives of the organization.
 - SAO BARS Manual and RCWs
- Ensure that Internal Audit Activities
 - Consistent with organizational goals
 - Within the risk appetite and risk tolerance set by the Commission and District Management
- Evaluation of internal controls for adequacy, effectiveness, and efficiencies

New Standards Overview

- Domain I: Purpose of Internal Auditing provides a unified description of the profession.
- Domain II: Ethics and Professionalism incorporates the profession's Code of Ethics and Standards on practitioner conduct, including Standards on due professional care.
- Domain III: Governing the Internal Audit Function clarifies the board's role and responsibilities in supporting an
 effective internal audit function and addresses how the CAE can support the board in carrying out its responsibilities.
- Domain IV: Managing the Internal Audit Function clarifies the CAE role and responsibilities for effectively managing an internal audit function.
- Domain V: Performing Internal Audit Services codifies requirements and considerations to help internal auditors
 perform internal audit engagements with consistency and quality

Internal Audit Plan Development

- Risk Based Audit Approach
- Annual audit plan development
 - Risk assessments
 - Analytical Procedures
 - Review work performed by others



2025 Audit Plan

- Third Party Risk
- Contribution in aid of Construction
- Customer billing and adjustments
- Compensation
- Payroll Processing
- Energy Supply Management
- Enterprise Resource Planning
- System Access Roles and Responsibilities

2025 Audit Plan – continued

- Statutory Expenditure Review & Other Requests
 - Weekly voucher review
 - Bi-weekly payroll review
 - Policy review
- Washington State Auditor's Office
 - 2021 and 2022 compliance audit
 - 2023 compliance audit is scheduled for November 2024
- Deferred Compensation Plan Audit
 - Engagement will be conducted by MossAdams
- Follow-up: Monitor Audit Recommendations

Moving Forward

- Washington State Auditor's Office
 - 2021 and 2022 compliance audit
- Internal Audit Program Development
 - Audit Charter Updates new standards will be applicable beginning of 2024
 - Improve audit department framework
- Deferred Compensation Plan Audit
- Co-sourcing Audit Engagements
 - Relying on the work of others

Thank You



POWER UNBUNDLING PROPOSAL

Presented by:

Julio Aguirre - Program Manager -Rates & Pricing

Lisa Stites – Lead Financial Analyst

Craig Kunz – Senior Manager Net Power Reporting

November 12th, 2024



Powering our way of life

Agenda

- 1. Problem Statement
- 2. Proposed Power Unbundling Mechanism
- 3. Benefits of the Proposed Mechanism
- 4. Power Supply CAR Example
- 5. Next Steps
- 6. Q&As

1. Problem Statement

1. Problem Statement

- For many years, the Commission has considered the implementation of a cost recovery mechanism that would allow for the recovery of incremental power costs above and beyond those from the Priest Rapids Project ("PRP")
- The current solution is the Estimated Unmet District Load Cost Recovery Adjustment Clause (EUDL CRAC, Rate Rider No. 18)
- However, the EUDL CRAC:
 - It is confusing to customers and other impacted stakeholders
 - It was developed only as a temporary solution
 - It does not show clearly how Core Customers will preserve their preferential access to PRP's low-cost power

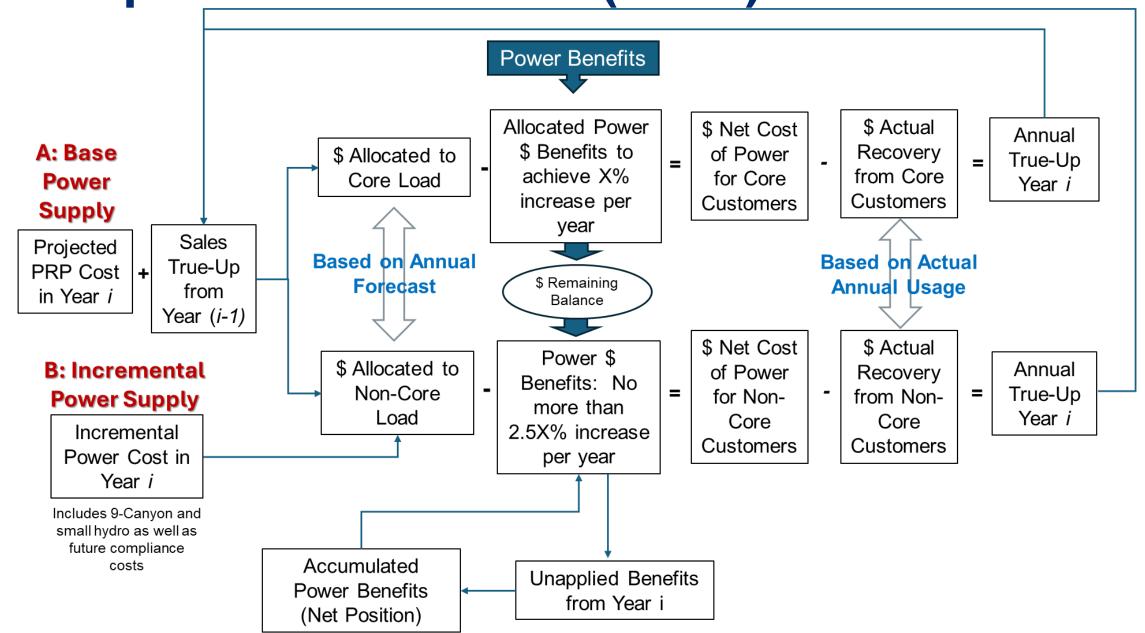
1. Problem Statement (cont.)

- Grant PUD's accounting process for PRP and the Retail Electric System presents certain challenges for the calculation of revenue requirements in the Cost-of-Service Study:
 - Cost of financing (i.e., Debt) embedded in PRP market prices (inc. those charged to retail customers)
 - Financing transactions between Electric System and PRP
 - PRP's contractual and financial obligations with external entities
 - Power costs cannot be easily identified in customers bills
- Grant PUD Staff estimates that this mechanism could be implemented (at the earliest) in CY2026, when significant new generation resources will be required to meet the growing retail load

2. Proposed Power Unbundling Mechanism

- Staff proposes the "unbundling" of all power generation costs paid by retail customers and the creation a separate billing mechanism to track, allocate, bill, and recover these costs
- This mechanism (and tariff) shall also include any and all incremental (over PRP) generation costs (formerly addressed through the EUDL CRAC), and be called: <u>Power Supply Cost Adjustment Rider ("CAR")</u>
 - A. Base Power Supply Costs (i.e., Annual PRP costs)
 - B. Incremental Power Supply Costs (i.e., Any additional cost incurred to produce or procure energy to serve the retail load
- In concept, this mechanism should work as a traditional *Fuel and Purchased Power Cost Adjustment Clause*, where power costs are essentially passed-through and recovered from retail customers (i.e., from core and non-core)

2. Proposed Mechanism (cont.)



2. Proposed Mechanism (cont.)

Power Benefits for Allocation:



Benefits to Share: Derived from ownership of Priest Rapids Project. Core customers first in line to receive benefits. Used to mitigate rising costs of power and control pace of rate increases. **EUDL Dollars**: Based on PRP market value determined by annual auction. Limited to

Reasonable Portion Proceeds.

Slice Sales Net Revenue: Net of both sales revenue and buy-back costs. Subject to contract terms and periodic renewals.

Slice True Ups: May be positive or negative based on annual system conditions and operations. **Other Trading Revenue**: Represents net revenue of trading operations outside of slice contracts.

3. Benefits of the Proposed Mechanism



Preserves and protects preferential access to PRP power for all core customers



More timely recovery (or refund) of power costs to/from customers



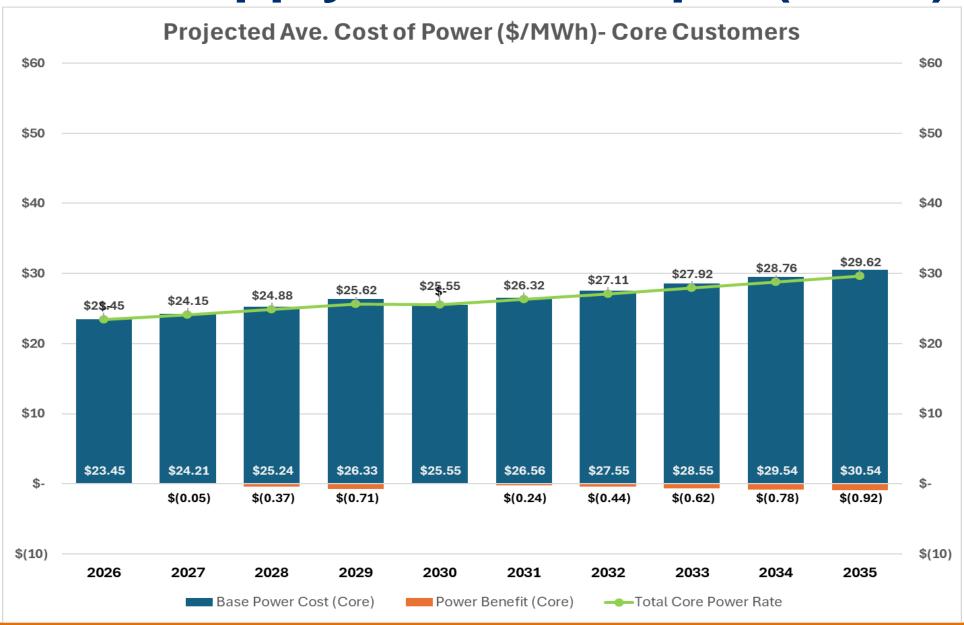
Better matching of costs and benefits associated with power costs and other compliance requirements (inc. partial true-up)

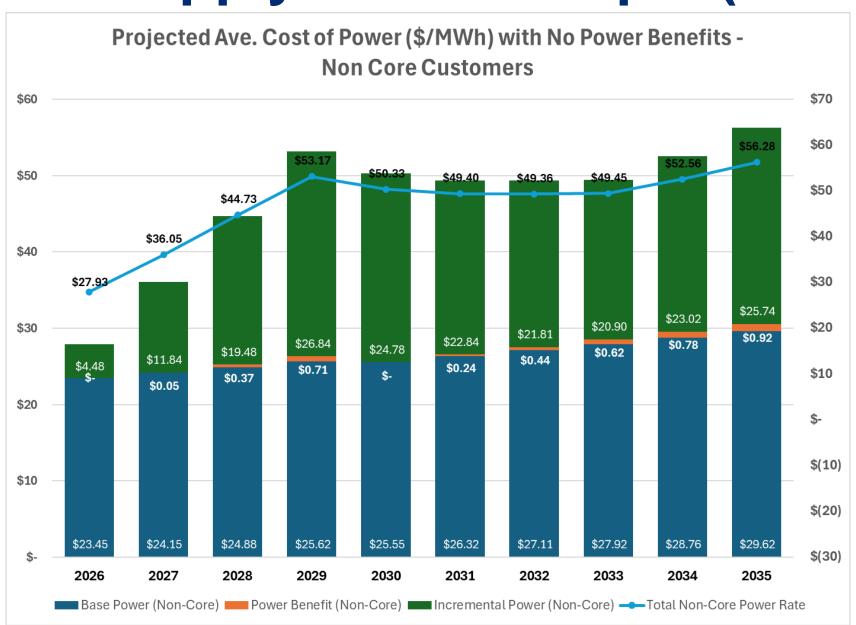


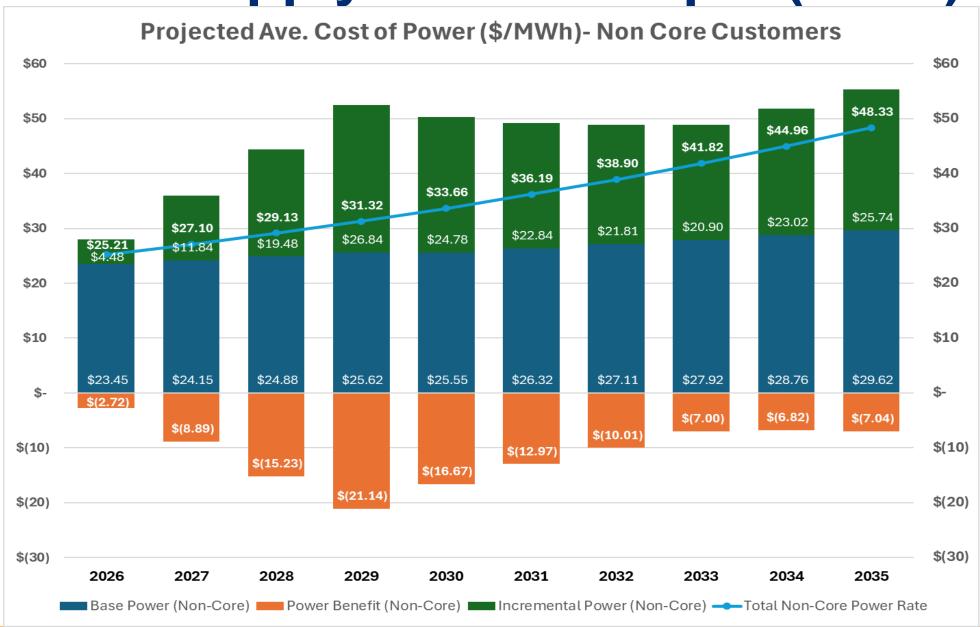
More transparency around power costs charged to retail customers. Provides more granularity regarding the different functional cost components

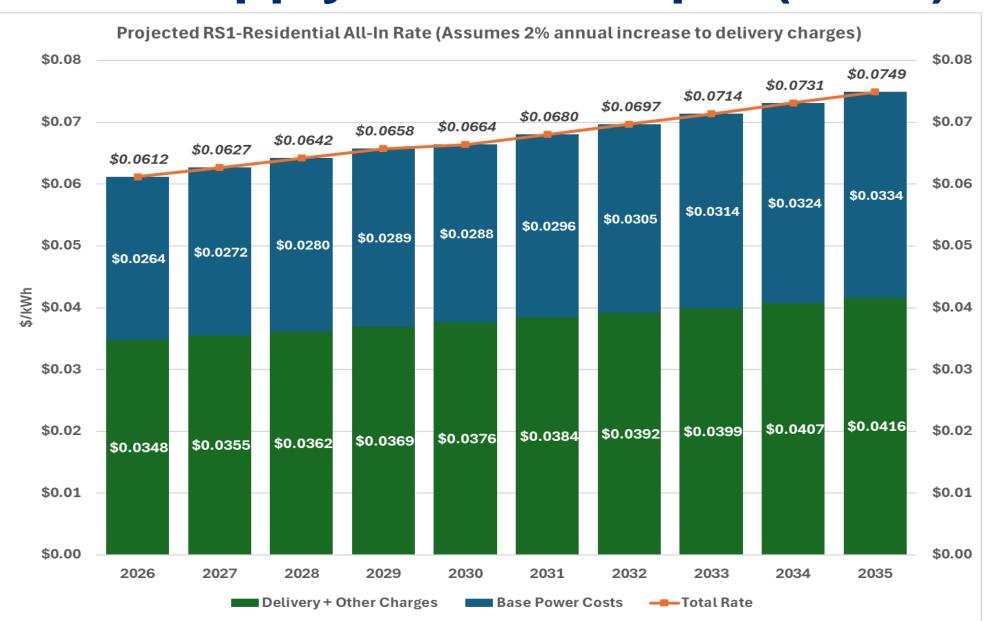
4. Power Supply CAR Example

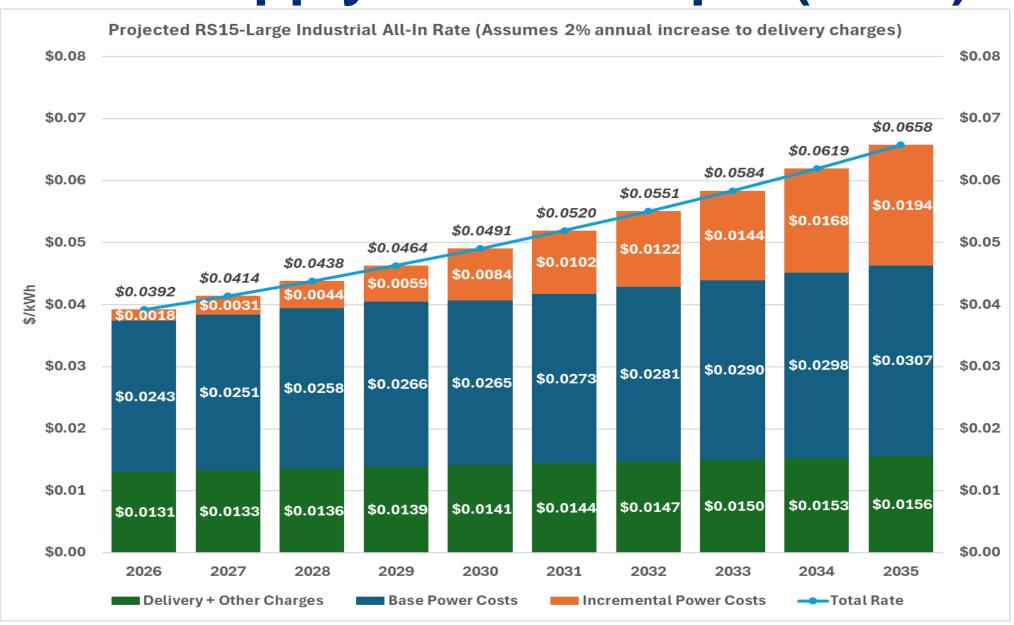
- Main Assumptions
 - Period analyzed: 2026-2035 (10 years)
 - Average annual increase to PRP costs of 3.00%
 - Average annual increase to Core Power Costs of 3.00%
 - Average annual increase to Non-Core Power Costs (Base + Incremental) of 2.5X Core increase, i.e., 7.5%.
 - Load and cost projections as of 9/2024.
 - Annual increase to delivery charges of 2.0%

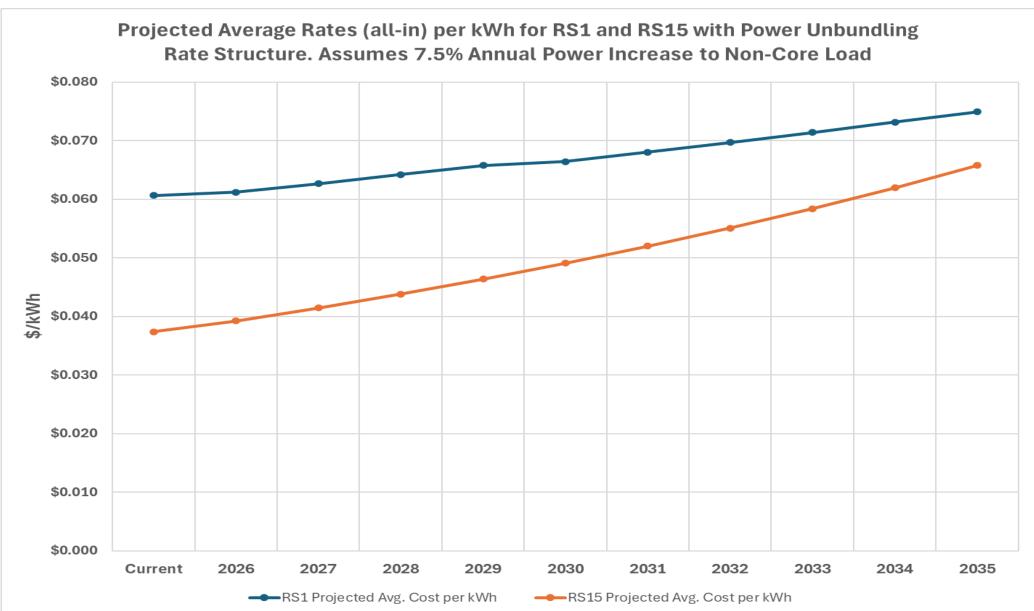












5. Next Steps

- Presentation of unbundling rate proposal before the Board Q4 2024 (Nov. 12th, 2024)
- Commission's Approval of Rate Making Policy Q4 2024
- Regulatory Approval Q1 2025
- First projected Power Supply CAR for 2026 Q3 2025
- Final tariff and rates approval Q4 2025
- Implementation Q1 2026



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Appendix

Calculation of Core Customer Power Rate

<u>Formula</u>	PRP Power Cost	<u>Units</u>	<u>2026</u>	<u>2027</u>	
а	PRP Production Cost	\$	219,531,952	226,617,142	
b	PRP Generation *	MWh	9,361,863	9,361,863	
c = a/b	PRP Power Rate	\$/MWh	23.45	24.21	
	Benefits to Share		<u>Year</u>	Year 2	
d	EUDL Dollars	\$		257,749,642	
e	Purchased Power Costs	\$	183,168,079	178,813,890	
f	Net Slice Revenue	\$	92,066,238	59,933,082	
g	Slice True-Ups	\$	0	0	
h	Other Net Market Rev	\$	0	0	
i	Benefits Bank	\$	0	170,282,178	For example,
j = d-e+f+g+h+i	Total Benefits to Share	\$	185,252,280	309,151,012	set max annual increase to 3%
	Target Base Rate		Year 1	Year 2	
k	Target Base Rate	\$/MWh	23.45	24.15	
	Benefit Required to Meet Target Core Rate		Year 1	Year 2	
l = c-k	Req'd Reduction from PRP Production Cost	\$/MWh	0.00	0.05	
m	Core + Non-Core Load	MWh	8,262,452	8,619,732	
n = I*m	Benefit Use Required for Reduction	\$	0	459,657	
o= j-n	Benefits Remaining	\$	185,252,280	308,691,355	

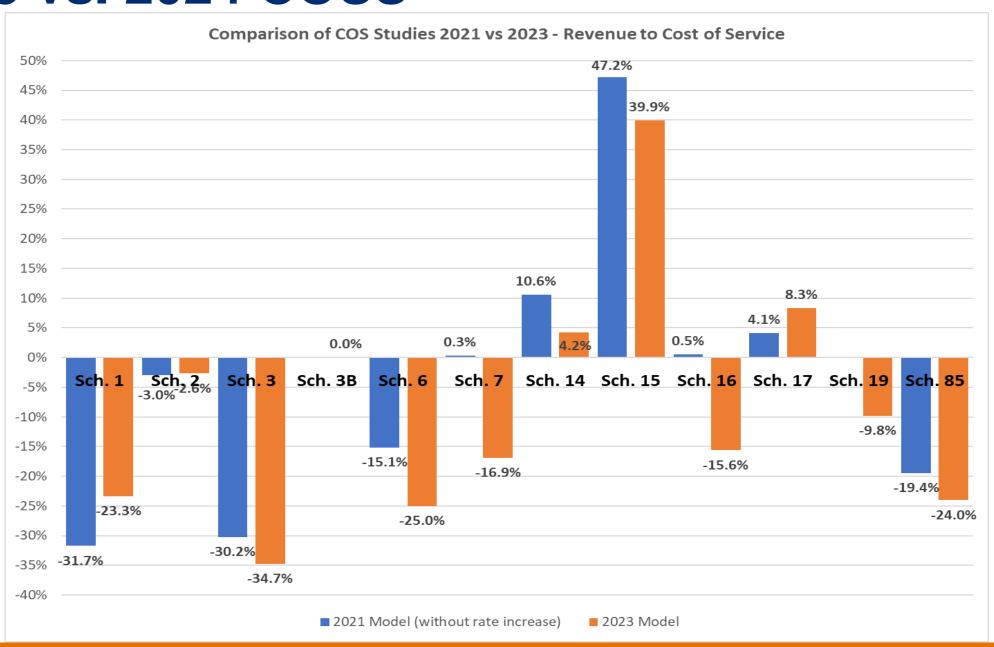
^{*} less Canadian Entitlement and Encroachment

Calculation of Core Customer Power Rate (cont.)

<u>Formula</u>	Non-Core Incremental Power Cost	<u>Units</u>	Year 1	Year 2	
р	Remaining PRP Production Cost **	\$	11,094,061	2,803,644	
q	Net Cost of New Assets	\$	9,508,252	61,681,355	
r	Cost of Nine Canyon and Small Hydro	\$	4,051,208	4,009,375	
S	Other Future Compliance Costs	\$	0	0	
t = p+q+r+s	Incremental Power Cost	\$	24,653,522	68,494,374	
u	Non-Core Load	MWh	5,500,696	5,837,530	For example,
v = t/u	Incremental Power Rate	\$/MWh	4.48	11.73	set max annual increase to 7.5%
	Target Non-Core Rate		Year 1	Year 2	
w	Target Non-Core Rate	\$/MWh	25.21	27.10	
	Benefit Required to Meet Target Non-Core Rate		<u>Year 1</u>	Year 2	
x = k+v	Base + Incremental Rate	\$/MWh	27.93	35.89	
y = x-w	Req'd Reduction from Core + Incremental	\$/MWh	2.72	8.79	
Z	Non-Core Load	MWh	5,500,696	5,837,530	
aa = y*z	Benefit Use Required for Reduction	\$	14,970,102	51,291,693	
bb = o-aa	Benefits Remaining, to Bank	\$	170,282,178	257,399,662	
	Core Customers:		Year 1	Year 2	
k	Base Rate		23.45	24.15	Base Rate is PRP Power Rate + Benefit
	Non-Core Customers:		Year 1	Year 2	
k	Base Rate		23.45	24.15	
v-y	Adjusted Incremental Rate		1.76	2.95	Adjusted Incremental Rate is
w	Total Non-Core Rate		25.21	27.10	Incremental Power Rate + Benefit Share

^{**} after recovery in Core Rate and from Conversion & Exchange (6.69%)

2023 vs. 2024 COSS



Appendix (cont.)

Grant PUD retail schedules:

Rate Schedule	Basic Charge	Flat Energy Charge	Block Energy Charge	Demand Charge	Power Factor Adj.
1. Residential Service	\checkmark	\checkmark			
2. General Service	\checkmark		\checkmark		
3. Irrigation Service	\checkmark	\checkmark		√*	
3B. Agricultural Service (tbd)	\checkmark		√	\checkmark	
6. Street Lighting Service	√				
7. Large General Service	\checkmark		\checkmark	\checkmark	√
14. Industrial Service	\checkmark		√	\checkmark	\checkmark
15. Large Industrial Service	\checkmark		\checkmark	\checkmark	√
16. Ag. Food Processing Service	\checkmark		\checkmark	\checkmark	\checkmark
17. Evolving Industry	\checkmark	\checkmark		\checkmark	\checkmark
19. Electric Vehicle Charging (Commercial)	\checkmark	\checkmark		√	V
85. Ag. Food Processing Boiler	\checkmark		√	\checkmark	√

Rates & Pricing Workshop Alternatives for Implementation of 2025 Revenue Increase

Presented by:

Julio Aguirre, Rates and Pricing, Program Manager

November 12th, 2024



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Agenda

- 1. Background
- 2. Review of Alternatives for the Class Cost Allocation in 2025
- 3. Comparison of Scenarios to Cost-of-Service Study
- 4. Q&A
- 5. Next Steps

1. Background

1. Background

- Pursuant to RCW 54.16.040, Grant PUD is authorized to regulate and control the use, distribution, rates, service, charges, and price of electric energy
- Staff would like the Commission to consider alternative class cost allocations among the retail rate schedules for a potential revenue increase effective in 2025 as part of the 2025 Budget Process
- Last rate increase applied to retail rate schedules was approved with an effective date of April 1, 2024, as part of Resolution No. 9041
- Revenue increase is necessary to continue mitigating increasing operational costs resulting from inflationary effects as well as to maintain a strong long term financial position and acceptable financial metrics

2. Review of Class Cost Allocation for 2025

2. Review of Class Cost Allocation for 2025

- Staff has considered three potential alternatives for a revenue increase in 2025:
 - 1. Across-the-board increase/pro rata allocation
 - 2. Partial movement towards most recent Cost of Service Study
 - 3. Adjusted Across-the-board increase
- Staff is assuming 3 potential scenarios: 2%, 2.5% and 3% overall retail revenue increase in 2025. Preliminary 2025 budget assumes a 2% increase to retail revenue.
- Staff's scenarios are not final and are presented for discussion purposes only

Alternative 1: Across-the-board increase/pro rata allocation

1. Provides an equitable increase for all customer classes, where all classes' revenue requirement are increased by the same percentage amount (i.e., 2%, 2.5% or 3%)

Alternative 2: Partial movement towards most recent COSS

Proposed rate increases comply with current parameters set in Resolution No. 9039 as follows:

- I. Non-Core Classes: Rate increase proposed for the "non-core" rate classes (excluding RS15) capped at 2X the system average
 - a) RS6, RS16, RS19 and RS85 are currently below cost-of-service, which warrants a higher-than-average rate increase
 - b) RS14 and RS17, above but close to cost-of-service, therefore, can increase their margin contributions
- II. Core Classes: Equitable rate increase proposed for "core" rate classes& RS15, set at 0.83X the system average
 - a) RS1, RS2 and RS3 set below system average to maintain rate affordability
 - b) RS15 set equal to core classes to avoid higher deviation from cost-of-service

III. Special Cases:

- a) RS3b: New rate, set initially at a level that is more favorable than RS2
- b) RS7: Proposed increase higher than system average to align relative economics with other schedules and move gradually towards cost-of-service

Alternative 3: Adjusted Across-the-board increase

- 1. Similar to Alternative 1 (either 2,%, 2.5% or 3%)
- 2. Includes an upward and equal adjustment to all rate schedules to allow for a below cost-of-service rate for newly created RS3b Agricultural Service
- 3. Adjustment is necessary to offer a more advantageous rate to Agricultural Service (initially 9% below cost of service or ~10% below proposed average RS2 rate)

Alternative 1: Pro rata Allocation @ 2.0% overall retail increase

	Pro	posed Increase		2.00%								
Revenue		posed Revenue		_		Monthly \$		Monthly \$	Bill	Monthly \$	% Revenue Increase	X times system ave. increase
\$ 51,520,910	\$	52,551,328	\$	1,030,418	\$	103.09	\$	2.06	\$	105.15	2.00%	1.00
\$ 27,393,844	\$	27,941,721	\$	547,877	\$	296.01	\$	5.92	\$	301.93	2.00%	1.00
\$ 30,265,512	\$	30,870,823	\$	605,310	\$	510.08	\$	10.20	\$	520.28	2.00%	1.00
\$ 1,178,606	\$	1,202,178	\$	23,572	\$	732.96			\$	747.62	2.00%	1.00
\$ 1,134,775	\$	1,157,471	\$	22,696		N/A		N/A		N/A	2.00%	1.00
\$ 12,851,600	\$	13,108,632	\$	257,032	\$	6,490.71	\$	129.81	\$	6,620.52	2.00%	1.00
\$ 9,727,308	\$	9,921,854	\$	194,546	\$	90,067.67	\$	1,801.35	\$	91,869.02	2.00%	1.00
\$ 99,973,545	\$	101,973,016	\$	1,999,471	\$	1,041,391.10	\$	20,827.82	\$	1,062,218.92	2.00%	1.00
\$ 9,786,318	\$	9,982,044	\$	195,726	\$	81,552.65	\$	1,631.05	\$	83,183.70	2.00%	1.00
\$ 10,385,759	\$	10,593,474	\$	207,715	\$	36,061.66	\$	721.23	\$	36,782.90	2.00%	1.00
\$ 201,200	\$	205,224	\$	4,024	\$	3,353.33	\$	67.07	\$	3,420.40	2.00%	1.00
\$ 16,020	\$	16,340	\$	320	\$	1,334.97	\$	26.70	\$	1,361.67	2.00%	1.00
\$ 254,435,398	\$	259,524,106	\$	5,088,708							2.00%	1.00
\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	Requirement (2021) \$ 51,520,910 \$ 27,393,844 \$ 30,265,512 \$ 1,178,606 \$ 1,134,775 \$ 12,851,600 \$ 9,727,308 \$ 99,973,545 \$ 9,786,318 \$ 10,385,759 \$ 201,200 \$ 16,020	Baseline (Current) Revenue Requirement (2021) Prop \$ 51,520,910 \$ \$ 27,393,844 \$ \$ 30,265,512 \$ \$ 1,178,606 \$ \$ 1,134,775 \$ \$ 12,851,600 \$ \$ 9,727,308 \$ \$ 99,973,545 \$ \$ 99,973,545 \$ \$ 10,385,759 \$ \$ 201,200 \$ \$ 16,020 \$	Revenue Proposed Revenue \$ 51,520,910 \$ 52,551,328 \$ 27,393,844 \$ 27,941,721 \$ 30,265,512 \$ 30,870,823 \$ 1,178,606 \$ 1,202,178 \$ 1,34,775 \$ 1,157,471 \$ 9,727,308 \$ 9,921,854 \$ 99,973,545 \$ 101,973,016 \$ 9,786,318 \$ 9,982,044 \$ 201,200 \$ 205,224 \$ 16,020 \$ 16,340	Baseline (Current) Revenue Proposed Revenue \$ 51,520,910 \$ 52,551,328 \$ 27,393,844 \$ 27,941,721 \$ 30,265,512 \$ 30,870,823 \$ 1,178,606 \$ 1,202,178 \$ 12,851,600 \$ 13,108,632 \$ 9,727,308 \$ 9,921,854 \$ 99,973,545 \$ 101,973,016 \$ 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Alternative 2: Partial movement towards most recent COSS @ 2.0% overall retail increase

Alternative 2		Pro	posed Increase		2.00%						
Rate Class	seline (Current) Revenue Juirement (2021)	Proj	posed Revenue	1	Revenue Increase	Current Ave. Monthly \$ I/Revenue per Customer	roposed Ave. Monthly \$ Bill/Revenue Increase	Bill	oposed Ave. Monthly \$ /Revenue per Customer	% Revenue Increase	X times system ave. increase
Residential (Sch. 1)	\$ 51,520,910	\$	52,379,588	\$	858,678	\$ 103.09	\$ 1.72	\$	104.80	1.67%	0.83
General Service (Sch. 2)	\$ 27,393,844	\$	27,850,407	\$	456,562	\$ 296.01	\$ 4.93	\$	300.94	1.67%	0.83
Irrigation (Sch. 3)	\$ 30,265,512	\$	30,769,936	\$	504,423	\$ 510.08	\$ 8.50	\$	518.58	1.67%	0.83
Agriculture (Sch. 3b)	\$ 1,178,606	\$	1,072,532	\$	(106,075)	\$ 732.96	\$ (65.97)	\$	667.00	-9.00%	-4.50
Street Lights (Sch. 6)	\$ 1,134,775	\$	1,180,166	\$	45,391	N/A	N/A		N/A	4.00%	2.00
Large General Service (Sch. 7)	\$ 12,851,600	\$	13,310,444	\$	458,844	\$ 6,490.71	\$ 231.74	\$	6,722.45	3.57%	1.79
Industrial (Sch. 14)	\$ 9,727,308	\$	10,116,400	\$	389,092	\$ 90,067.67	\$ 3,602.71	\$	93,670.37	4.00%	2.00
Large Industrial (Sch. 15)	\$ 99,973,545	\$	101,639,764	\$	1,666,219	\$ 1,041,391.10	\$ 17,356.45	\$	1,058,747.55	1.67%	0.83
Agricultural Processing (Sch. 16)	\$ 9,786,318	\$	10,177,771	\$	391,453	\$ 81,552.65	\$ 3,262.11	\$	84,814.76	4.00%	2.00
Evolving Industry (Sch. 17)	\$ 10,385,759	\$	10,801,189	\$	415,430	\$ 36,061.66	\$ 1,442.47	\$	37,504.13	4.00%	2.00
Electric Charging (Sch. 19)	\$ 201,200	\$	209,248	\$	8,048	\$ 3,353.33	\$ 134.13	\$	3,487.47	4.00%	2.00
Agricultural Boiler (Sch. 85)	\$ 16,020	\$	16,660	\$	641	\$ 1,334.97	\$ 53.40	\$	1,388.37	4.00%	2.00
Total Retail	\$ 254,435,398	\$	259,524,106	\$	5,088,708					2.00%	1.00

Alternative 3: Adjusted Pro rata Allocation @ 2% overall retail increase

Alternative 3 (Adjusted)		Pro	posed Increase	2.00%						
Rate Class	seline (Current) Revenue juirement (2021)	Pro	posed Revenue	Revenue Increase	Current Ave. Monthly \$ ill/Revenue per Customer	oposed Ave. Monthly \$ ill/Revenue Increase	Bill	oposed Ave. Monthly \$ /Revenue per Customer	% Revenue Increase	X times system ave. increase
Residential (Sch. 1)	\$ 51,520,910	\$	52,577,703	\$ 1,056,793	\$ 103.09	\$ 2.11	\$	105.20	2.05%	1.03
General Service (Sch. 2)	\$ 27,393,844	\$	27,955,745	\$ 561,900	\$ 296.01	\$ 6.07	\$	302.08	2.05%	1.03
Irrigation (Sch. 3)	\$ 30,265,512	\$	30,886,316	\$ 620,804	\$ 510.08	\$ 10.46	\$	520.54	2.05%	1.03
Agriculture (Sch. 3b)	\$ 1,178,606	\$	1,072,532	\$ (106,075)	\$ 732.96		\$	667.00	-9.00%	-4.50
Street Lights (Sch. 6)	\$ 1,134,775	\$	1,158,051	\$ 23,276	N/A	N/A		N/A	2.05%	1.03
Large General Service (Sch. 7)	\$ 12,851,600	\$	13,115,210	\$ 263,611	\$ 6,490.71	\$ 133.14	\$	6,623.84	2.05%	1.03
Industrial (Sch. 14)	\$ 9,727,308	\$	9,926,834	\$ 199,526	\$ 90,067.67	\$ 1,847.46	\$	91,915.13	2.05%	1.03
Large Industrial (Sch. 15)	\$ 99,973,545	\$	102,024,194	\$ 2,050,649	\$ 1,041,391.10	\$ 21,360.93	\$	1,062,752.03	2.05%	1.03
Agricultural Processing (Sch. 16)	\$ 9,786,318	\$	9,987,054	\$ 200,736	\$ 81,552.65	\$ 1,672.80	\$	83,225.45	2.05%	1.03
Evolving Industry (Sch. 17)	\$ 10,385,759	\$	10,598,791	\$ 213,032	\$ 36,061.66	\$ 739.69	\$	36,801.36	2.05%	1.03
Electric Charging (Sch. 19)	\$ 201,200	\$	205,327	\$ 4,127	\$ 3,353.33	\$ 68.78	\$	3,422.12	2.05%	1.03
Agricultural Boiler (Sch. 85)	\$ 16,020	\$	16,348	\$ 329	\$ 1,334.97	\$ 27.38	\$	1,362.35	2.05%	1.03
Total Retail	\$ 254,435,398	\$	259,524,106	\$ 5,088,708					2.00%	1.00

• Alternative: Pro rata Allocation @ 2.5% overall retail increase

Alternative 1		Pro	posed Increase	2.50%							
Rate Class	seline (Current) Revenue quirement (2021)	Pro	posed Revenue	Revenue Increase	Current Ave. Monthly \$ II/Revenue per Customer	I Bi	oposed Ave. Monthly \$ ill/Revenue Increase	Bill	oposed Ave. Monthly \$ I/Revenue per Customer	% Revenue Increase	X times system ave. increase
Residential (Sch. 1)	\$ 51,520,910	\$	52,808,933	\$ 1,288,023	\$ 103.09	\$	2.58	\$	105.66	2.50%	1.00
General Service (Sch. 2)	\$ 27,393,844	\$	28,078,691	\$ 684,846	\$ 296.01	\$	7.40	\$	303.41	2.50%	1.00
Irrigation (Sch. 3)	\$ 30,265,512	\$	31,022,150	\$ 756,638	\$ 510.08	\$	12.75	\$	522.83	2.50%	1.00
Agriculture (Sch. 3b)	\$ 1,178,606	\$	1,208,071	\$ 29,465	\$ 732.96			\$	751.29	2.50%	1.00
Street Lights (Sch. 6)	\$ 1,134,775	\$	1,163,144	\$ 28,369	N/A		N/A		N/A	2.50%	1.00
Large General Service (Sch. 7)	\$ 12,851,600	\$	13,172,890	\$ 321,290	\$ 6,490.71	\$	162.27	\$	6,652.97	2.50%	1.00
Industrial (Sch. 14)	\$ 9,727,308	\$	9,970,491	\$ 243,183	\$ 90,067.67	\$	2,251.69	\$	92,319.36	2.50%	1.00
Large Industrial (Sch. 15)	\$ 99,973,545	\$	102,472,884	\$ 2,499,339	\$ 1,041,391.10	\$	26,034.78	\$	1,067,425.87	2.50%	1.00
Agricultural Processing (Sch. 16)	\$ 9,786,318	\$	10,030,976	\$ 244,658	\$ 81,552.65	\$	2,038.82	\$	83,591.47	2.50%	1.00
Evolving Industry (Sch. 17)	\$ 10,385,759	\$	10,645,403	\$ 259,644	\$ 36,061.66	\$	901.54	\$	36,963.20	2.50%	1.00
Electric Charging (Sch. 19)	\$ 201,200	\$	206,230	\$ 5,030	\$ 3,353.33	\$	83.83	\$	3,437.17	2.50%	1.00
Agricultural Boiler (Sch. 85)	\$ 16,020	\$	16,420	\$ 400	\$ 1,334.97	\$	33.37	\$	1,368.34	2.50%	1.00
Total Retail	\$ 254,435,398	\$	260,796,283	\$ 6,360,885						2.50%	1.00
											'

Alternative 2: Partial movement towards most recent COSS @ 2.5% overall retail increase

Alternative 2		Pro	posed Increase	2.50%						
Rate Class	seline (Current) Revenue juirement (2021)	Proj	posed Revenue	Revenue Increase	Current Ave. Monthly \$ II/Revenue per Customer	roposed Ave. Monthly \$ Bill/Revenue Increase	Bill	roposed Ave. Monthly \$ II/Revenue per Customer	% Revenue Increase	X times system ave. increase
Residential (Sch. 1)	\$ 51,520,910	\$	52,594,262	\$ 1,073,352	\$ 103.09	\$ 2.15	\$	105.23	2.08%	0.83
General Service (Sch. 2)	\$ 27,393,844	\$	27,964,549	\$ 570,705	\$ 296.01	\$ 6.17	\$	302.18	2.08%	0.83
Irrigation (Sch. 3)	\$ 30,265,512	\$	30,896,044	\$ 630,531	\$ 510.08	\$ 10.63	\$	520.71	2.08%	0.83
Agriculture (Sch. 3b)	\$ 1,178,606	\$	1,072,532	\$ (106,075)	\$ 732.96	\$ (65.97)	\$	667.00	-9.00%	-3.60
Street Lights (Sch. 6)	\$ 1,134,775	\$	1,191,514	\$ 56,739	N/A	N/A		N/A	5.00%	2.00
Large General Service (Sch. 7)	\$ 12,851,600	\$	13,398,621	\$ 547,021	\$ 6,490.71	\$ 276.27	\$	6,766.98	4.26%	1.70
Industrial (Sch. 14)	\$ 9,727,308	\$	10,213,674	\$ 486,365	\$ 90,067.67	\$ 4,503.38	\$	94,571.05	5.00%	2.00
Large Industrial (Sch. 15)	\$ 99,973,545	\$	102,056,327	\$ 2,082,781	\$ 1,041,391.10	\$ 21,695.64	\$	1,063,086.74	2.08%	0.83
Agricultural Processing (Sch. 16)	\$ 9,786,318	\$	10,275,634	\$ 489,316	\$ 81,552.65	\$ 4,077.63	\$	85,630.28	5.00%	2.00
Evolving Industry (Sch. 17)	\$ 10,385,759	\$	10,905,047	\$ 519,288	\$ 36,061.66	\$ 1,803.08	\$	37,864.75	5.00%	2.00
Electric Charging (Sch. 19)	\$ 201,200	\$	211,260	\$ 10,060	\$ 3,353.33	\$ 167.67	\$	3,521.00	5.00%	2.00
Agricultural Boiler (Sch. 85)	\$ 16,020	\$	16,821	\$ 801	\$ 1,334.97	\$ 66.75	\$	1,401.72	5.00%	2.00
Total Retail	\$ 254,435,398	\$	260,796,283	\$ 6,360,885					2.50%	1.00

Alternative 3: Adjusted Pro rata Allocation @ 2.5% overall retail increase

Alternative 3 (Adjusted)		Pro	posed Increase	2.50%						
Rate Class	seline (Current) Revenue quirement (2021)	Pro	posed Revenue	Revenue Increase	Current Ave. Monthly \$ II/Revenue per Customer	oposed Ave. Monthly \$ ill/Revenue Increase	Bill	roposed Ave. Monthly \$ I/Revenue per Customer	% Revenue Increase	X times system ave. increase
Residential (Sch. 1)	\$ 51,520,910	\$	52,836,506	\$ 1,315,596	\$ 103.09	\$ 2.63	\$	105.72	2.55%	1.02
General Service (Sch. 2)	\$ 27,393,844	\$	28,093,351	\$ 699,507	\$ 296.01	\$ 7.56	\$	303.57	2.55%	1.02
Irrigation (Sch. 3)	\$ 30,265,512	\$	31,038,348	\$ 772,835	\$ 510.08	\$ 13.02	\$	523.10	2.55%	1.02
Agriculture (Sch. 3b)	\$ 1,178,606	\$	1,072,532	\$ (106,075)	\$ 732.96		\$	667.00	-9.00%	-3.60
Street Lights (Sch. 6)	\$ 1,134,775	\$	1,163,752	\$ 28,977	N/A	N/A		N/A	2.55%	1.02
Large General Service (Sch. 7)	\$ 12,851,600	\$	13,179,767	\$ 328,168	\$ 6,490.71	\$ 165.74	\$	6,656.45	2.55%	1.02
Industrial (Sch. 14)	\$ 9,727,308	\$	9,975,697	\$ 248,389	\$ 90,067.67	\$ 2,299.89	\$	92,367.56	2.55%	1.02
Large Industrial (Sch. 15)	\$ 99,973,545	\$	102,526,388	\$ 2,552,843	\$ 1,041,391.10	\$ 26,592.11	\$	1,067,983.21	2.55%	1.02
Agricultural Processing (Sch. 16)	\$ 9,786,318	\$	10,036,214	\$ 249,895	\$ 81,552.65	\$ 2,082.46	\$	83,635.11	2.55%	1.02
Evolving Industry (Sch. 17)	\$ 10,385,759	\$	10,650,961	\$ 265,202	\$ 36,061.66	\$ 920.84	\$	36,982.50	2.55%	1.02
Electric Charging (Sch. 19)	\$ 201,200	\$	206,338	\$ 5,138	\$ 3,353.33	\$ 85.63	\$	3,438.96	2.55%	1.02
Agricultural Boiler (Sch. 85)	\$ 16,020	\$	16,429	\$ 409	\$ 1,334.97	\$ 34.09	\$	1,369.06	2.55%	1.02
Total Retail	\$ 254,435,398	\$	260,796,281	\$ 6,360,884					2.50%	1.00

• Alternative 1: Pro rata Allocation @ 3% overall retail increase

Alternative 1		Pro	posed Increase	3.00%							
Rate Class	seline (Current) Revenue uirement (2021)		posed Revenue	Revenue Increase	Bill	Current Ave. Monthly \$ II/Revenue per Customer	roposed Ave. Monthly \$ Bill/Revenue Increase	Bill/	roposed Ave. Monthly \$ II/Revenue per Customer	% Revenue Increase	X times system ave. increase
Residential (Sch. 1)	\$ 51,520,910	\$	53,066,537	\$ 1,545,627	\$	103.09	\$ 3.09	\$	106.18	3.00%	1.00
General Service (Sch. 2)	\$ 27,393,844	\$	28,215,660	\$ 821,815	\$	296.01	\$ 8.88	\$	304.89	3.00%	1.00
Irrigation (Sch. 3)	\$ 30,265,512	\$	31,173,478	\$ 907,965	\$	510.08	\$ 15.30	\$	525.38	3.00%	1.00
Agriculture (Sch. 3b)	\$ 1,178,606	\$	1,213,964	\$ 35,358	\$	732.96		\$	754.95	3.00%	1.00
Street Lights (Sch. 6)	\$ 1,134,775	\$	1,168,818	\$ 34,043		N/A	N/A		N/A	3.00%	1.00
Large General Service (Sch. 7)	\$ 12,851,600	\$	13,237,148	\$ 385,548	\$	6,490.71	\$ 194.72	\$	6,685.43	3.00%	1.00
Industrial (Sch. 14)	\$ 9,727,308	\$	10,019,127	\$ 291,819	\$	90,067.67	\$ 2,702.03	\$	92,769.70	3.00%	1.00
Large Industrial (Sch. 15)	\$ 99,973,545	\$	102,972,752	\$ 2,999,206	\$	1,041,391.10	\$ 31,241.73	\$	1,072,632.83	3.00%	1.00
Agricultural Processing (Sch. 16)	\$ 9,786,318	\$	10,079,908	\$ 293,590	\$	81,552.65	\$ 2,446.58	\$	83,999.23	3.00%	1.00
Evolving Industry (Sch. 17)	\$ 10,385,759	\$	10,697,332	\$ 311,573	\$	36,061.66	\$ 1,081.85	\$	37,143.51	3.00%	1.00
Electric Charging (Sch. 19)	\$ 201,200	\$	207,236	\$ 6,036	\$	3,353.33	\$ 100.60	\$	3,453.93	3.00%	1.00
Agricultural Boiler (Sch. 85)	\$ 16,020	\$	16,500	\$ 481	\$	1,334.97	\$ 40.05	\$	1,375.02	3.00%	1.00
Total Retail	\$ 254,435,398	\$	262,068,460	\$ 7,633,062				1		3.00%	1.00

Alternative 2: Partial movement towards most recent COSS @ 3% overall retail increase

Alternative 2		Pro	posed Increase	3.00%						
Rate Class	seline (Current) Revenue uirement (2021)	Pro	pposed Revenue	Revenue Increase		Current Ave. Monthly \$ ill/Revenue per Customer	oposed Ave. Monthly \$ Bill/Revenue Increase	oposed Ave. Monthly \$ //Revenue per Customer	% Revenue Increase	X times system ave. increase
Residential (Sch. 1)	\$ 51,520,910	\$	52,808,933	\$ 1,288,023	\$	103.09	\$ 2.58	\$ 105.66	2.50%	0.83
General Service (Sch. 2)	\$ 27,393,844	\$	28,078,691	\$ 684,846	\$	296.01	\$ 7.40	\$ 303.41	2.50%	0.83
Irrigation (Sch. 3)	\$ 30,265,512	\$	31,022,150	\$ 756,638	\$	510.08	\$ 12.75	\$ 522.83	2.50%	0.83
Agriculture (Sch. 3b)	\$ 1,178,606	\$	1,072,532	\$ (106,075)	\$	732.96	\$ (65.97)	\$ 667.00	-9.00%	-3.00
Street Lights (Sch. 6)	\$ 1,134,775	\$	1,202,862	\$ 68,087		N/A	N/A	N/A	6.00%	2.00
Large General Service (Sch. 7)	\$ 12,851,600	\$	13,486,808	\$ 635,208	\$	6,490.71	\$ 320.81	\$ 6,811.52	4.94%	1.65
Industrial (Sch. 14)	\$ 9,727,308	\$	10,310,947	\$ 583,638	\$	90,067.67	\$ 5,404.06	\$ 95,471.73	6.00%	2.00
Large Industrial (Sch. 15)	\$ 99,973,545	\$	102,472,884	\$ 2,499,339	\$	1,041,391.10	\$ 26,034.78	\$ 1,067,425.87	2.50%	0.83
Agricultural Processing (Sch. 16)	\$ 9,786,318	\$	10,373,497	\$ 587,179	\$	81,552.65	\$ 4,893.16	\$ 86,445.81	6.00%	2.00
Evolving Industry (Sch. 17)	\$ 10,385,759	\$	11,008,905	\$ 623,146	\$	36,061.66	\$ 2,163.70	\$ 38,225.36	6.00%	2.00
Electric Charging (Sch. 19)	\$ 201,200	\$	213,272	\$ 12,072	\$	3,353.33	\$ 201.20	\$ 3,554.53	6.00%	2.00
Agricultural Boiler (Sch. 85)	\$ 16,020	\$	16,981	\$ 961	\$	1,334.97	\$ 80.10	\$ 1,415.07	6.00%	2.00
Total Retail	\$ 254,435,398	\$	262,068,460	\$ 7,633,062	L				3.00%	1.00

Alternative 3: Adjusted Pro rata Allocation @ 3% overall retail increase

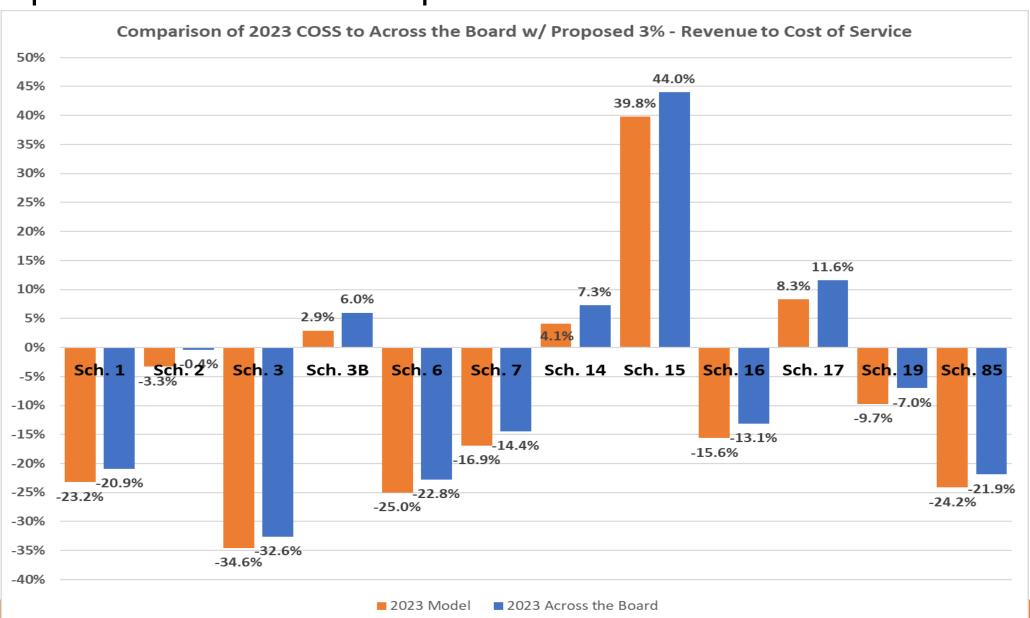
Alternative 3 (Adjusted)		Pro	posed Increase	3.00%						
Rate Class	aseline (Current) Revenue quirement (2021)	Pro	posed Revenue	 Revenue Increase	Current Ave. Monthly \$ ill/Revenue per Customer	roposed Ave. Monthly \$ Bill/Revenue Increase	Bill	oposed Ave. Monthly \$ I/Revenue per Customer	% Revenue Increase	X times system ave. increase
Residential (Sch. 1)	\$ 51,520,910	\$	53,095,309	\$ 1,574,399	\$ 103.09	\$ 3.15	\$	106.24	3.06%	1.02
General Service (Sch. 2)	\$ 27,393,844	\$	28,230,958	\$ 837,114	\$ 296.01	\$ 9.05	\$	305.05	3.06%	1.02
Irrigation (Sch. 3)	\$ 30,265,512	\$	31,190,380	\$ 924,867	\$ 510.08	\$ 15.59	\$	525.67	3.06%	1.02
Agriculture (Sch. 3b)	\$ 1,178,606	\$	1,072,532	\$ (106,075)	\$ 732.96		\$	667.00	-9.00%	-3.00
Street Lights (Sch. 6)	\$ 1,134,775	\$	1,169,452	\$ 34,677	N/A	N/A		N/A	3.06%	1.02
Large General Service (Sch. 7)	\$ 12,851,600	\$	13,244,325	\$ 392,725	\$ 6,490.71	\$ 198.35	\$	6,689.05	3.06%	1.02
Industrial (Sch. 14)	\$ 9,727,308	\$	10,024,560	\$ 297,251	\$ 90,067.67	\$ 2,752.33	\$	92,820.00	3.06%	1.02
Large Industrial (Sch. 15)	\$ 99,973,545	\$	103,028,582	\$ 3,055,037	\$ 1,041,391.10	\$ 31,823.30	\$	1,073,214.40	3.06%	1.02
Agricultural Processing (Sch. 16)	\$ 9,786,318	\$	10,085,373	\$ 299,055	\$ 81,552.65	\$ 2,492.12	\$	84,044.77	3.06%	1.02
Evolving Industry (Sch. 17)	\$ 10,385,759	\$	10,703,132	\$ 317,373	\$ 36,061.66	\$ 1,101.99	\$	37,163.65	3.06%	1.02
Electric Charging (Sch. 19)	\$ 201,200	\$	207,348	\$ 6,148	\$ 3,353.33	\$ 102.47	\$	3,455.81	3.06%	1.02
Agricultural Boiler (Sch. 85)	\$ 16,020	\$	16,509	\$ 490	\$ 1,334.97	\$ 40.79	\$	1,375.76	3.06%	1.02
Total Retail	\$ 254,435,398	\$	262,068,459	\$ 7,633,061					3.00%	1.00
	 		<u> </u>							

Comparison of Overall Retail Increase Alternatives

	1	Alternative '	1	1	Alternative 2	2	A	Alternative 3	3
_	Acr	oss-the-bo	pard	Par	tial Moven	ent	Adjusted	l Across-th	ne-board
	2.00%	2.50%	3.00%	2.00%	2.50%	3.00%	2.00%	2.50%	3.00%
Rate Class				%	Rate Increa	se			
Residential (Sch. 1)	2.00%	2.50%	3.00%	1.67%	2.08%	2.50%	2.05%	2.55%	3.06%
General Service (Sch. 2)	2.00%	2.50%	3.00%	1.67%	2.08%	2.50%	2.05%	2.55%	3.06%
Irrigation (Sch. 3)	2.00%	2.50%	3.00%	1.67%	2.08%	2.50%	2.05%	2.55%	3.06%
Agriculture (Sch. 3b)	2.00%	2.50%	3.00%	-9.00%	-9.00%	-9.00%	-9.00%	-9.00%	-9.00%
Street Lights (Sch. 6)	2.00%	2.50%	3.00%	4.00%	5.00%	6.00%	2.05%	2.55%	3.06%
Large General Service (Sch. 7)	2.00%	2.50%	3.00%	3.57%	4.26%	4.94%	2.05%	2.55%	3.06%
Industrial (Sch. 14)	2.00%	2.50%	3.00%	4.00%	5.00%	6.00%	2.05%	2.55%	3.06%
Large Industrial (Sch. 15)	2.00%	2.50%	3.00%	1.67%	2.08%	2.50%	2.05%	2.55%	3.06%
Agricultural Processing (Sch. 16)	2.00%	2.50%	3.00%	4.00%	5.00%	6.00%	2.05%	2.55%	3.06%
Evolving Industry (Sch. 17)	2.00%	2.50%	3.00%	4.00%	5.00%	6.00%	2.05%	2.55%	3.06%
Electric Charging (Sch. 19)	2.00%	2.50%	3.00%	4.00%	5.00%	6.00%	2.05%	2.55%	3.06%
Agricultural Boiler (Sch. 85)	2.00%	2.50%	3.00%	4.00%	5.00%	6.00%	2.05%	2.55%	3.06%
Total Retail Increase	2.00%	2.50%	3.00%	2.00%	2.50%	3.00%	2.00%	2.50%	3.00%

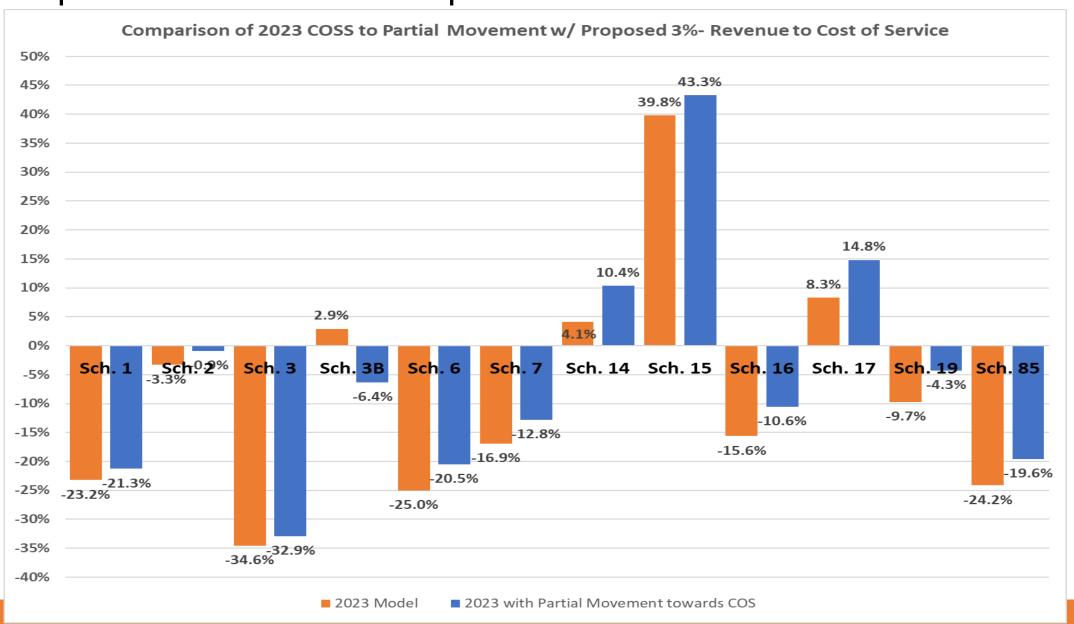
3. Comparison of Scenarios to COSS

Comparison to COSS to Proposed Alternative 1



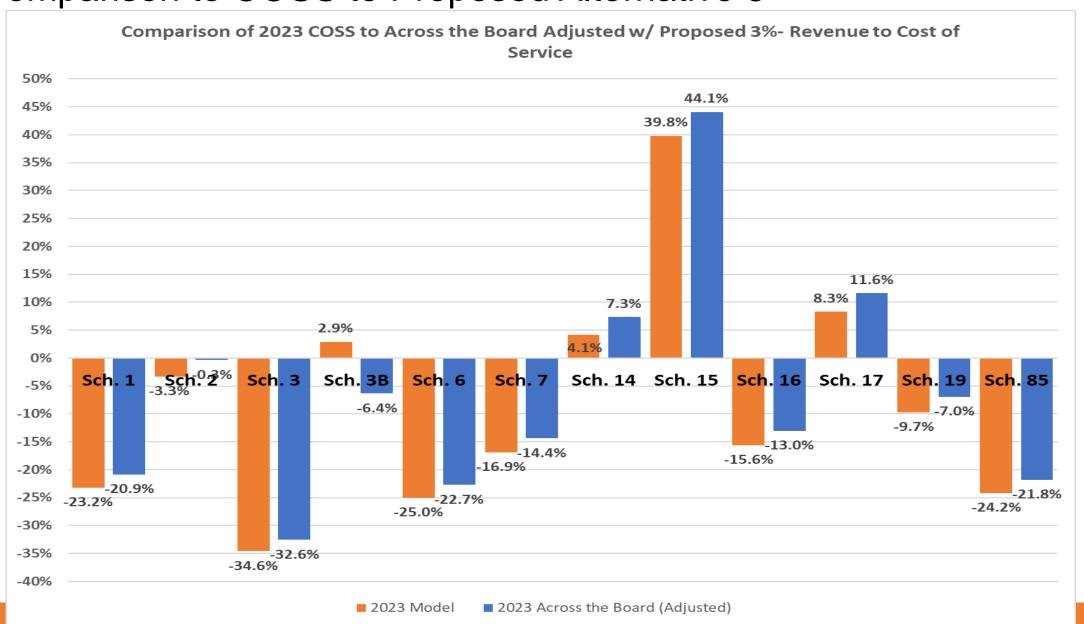
3. Comparison of Scenarios to COSS (cont.)

Comparison to COSS to Proposed Alternative 2



3. Comparison of Scenarios to COSS (cont.)

Comparison to COSS to Proposed Alternative 3



4. Q&A

5. Next Steps

5. Next Steps

- Final approval of 2025 Annual Budget.
- Upon approval, R&P will present final recommendation for class cost allocation

 R&P will then prepare and present revised tariffs and final packet for Commission's review before the end of the year

Proposed implementation date: April 1, 2025.

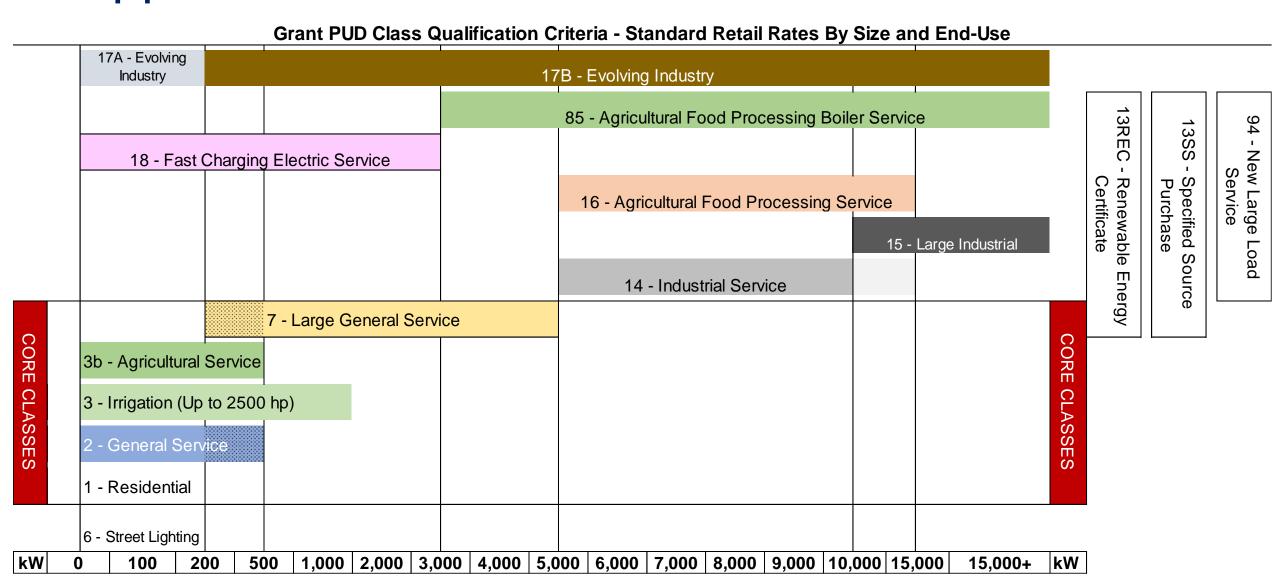
 Next retail rate review process most likely will be guided by new rate making policy replacing Resolution No. 9039.



Thank you!

Appendix

Appendix





Commission Presentation

Large Power Solutions

Baxter Gillette

November 12, 2024



Powering our way of life

Update on Rate Schedule 17 (RS17)

- RS17 purpose and process refresher
- Evolving Industry (EI) candidate update
- Concentration risk, threshold, and load activity and / or industry¹
- Business risk Porter's Five Forces
- Regulatory risk
- RS17 rate analysis, review, and findings
- Next steps

Rate Schedule 17 (RS17) Refresher

RS17 Evolving Industry Assessment Team

Name	Role
Ty Ehrman	Executive Sponsor*
Andy Wendell	Large Power Solutions
Julio Aguirre Carmona	Rates and Pricing
Baxter Gillette	Update Manager*
Paul Dietz	Business Intelligence and Market Analytics*
Cary West	Customer Service
Angelina Johnson	Finance / Accounting
Jesus Lopez	Engineering

^{*} Not required per the Customer Service Policy

Evolving Industry (EI) Update

- Identify new industries or energy load activities
- Assess industries or energy load activities for:
 - Concentration Risk
 - Business Risk
 - Regulatory Risk
- Classify industries or energy load activities that meet the Concentration Risk as EI if they also exhibit Business or Regulatory Risk
- Remove existing EI customers from RS17 if they no longer exhibit high Business or Regulatory Risk
- Determine the incremental costs associated with providing electric power to El
- Update RS17 as needed

Candidate AssessmentEvolving Industry (EI)

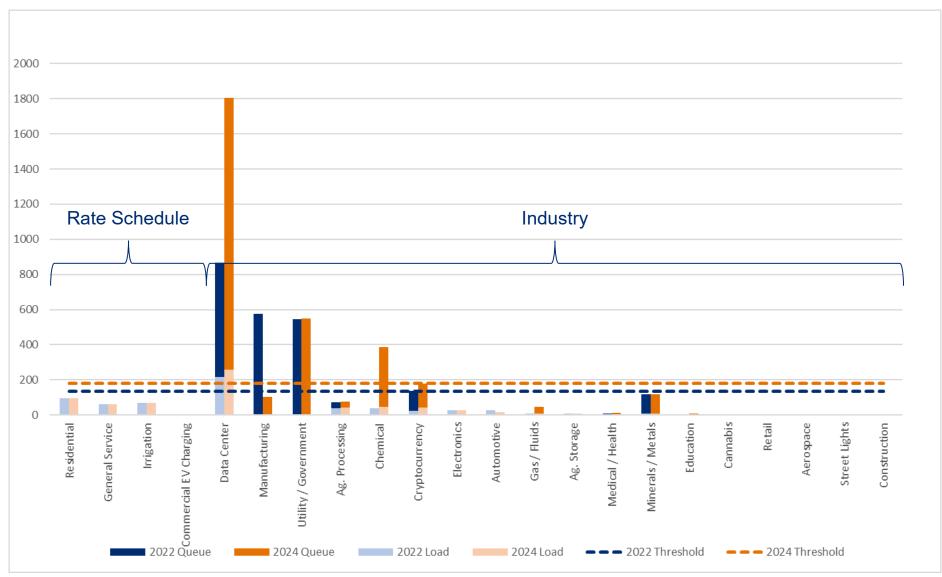
Potential New Industries

- None identified for particular reasons
- Candidates
 - Not explicitly a request in for a specific industry
 - Hydrogen Production (potentially now under Utility/Government)
 - Electrified Fleet Transportation (commercial charging stations under RS19), but we could see applications for trucking and industrial-sized loads
 - Currently very small, but potential for large growth
 - Electrofuels (Hydrogen, "Green" Aviation Fuel)
 - Difficult to assess; no data in terms of how they operate
 - · Have a regulatory tailwind

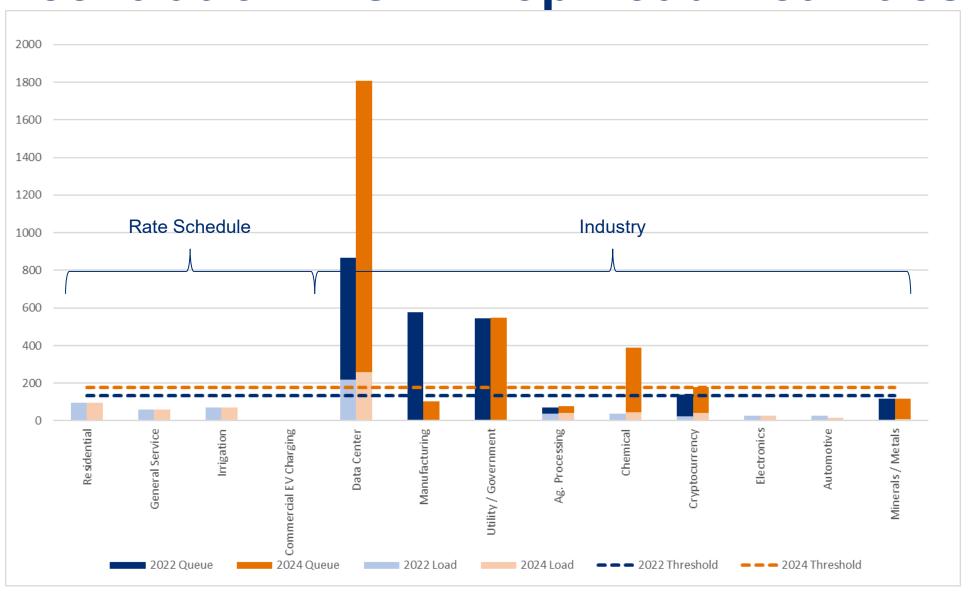
03

Concentration Risk, threshold, and load activity and / or industry¹ Is the El Material?

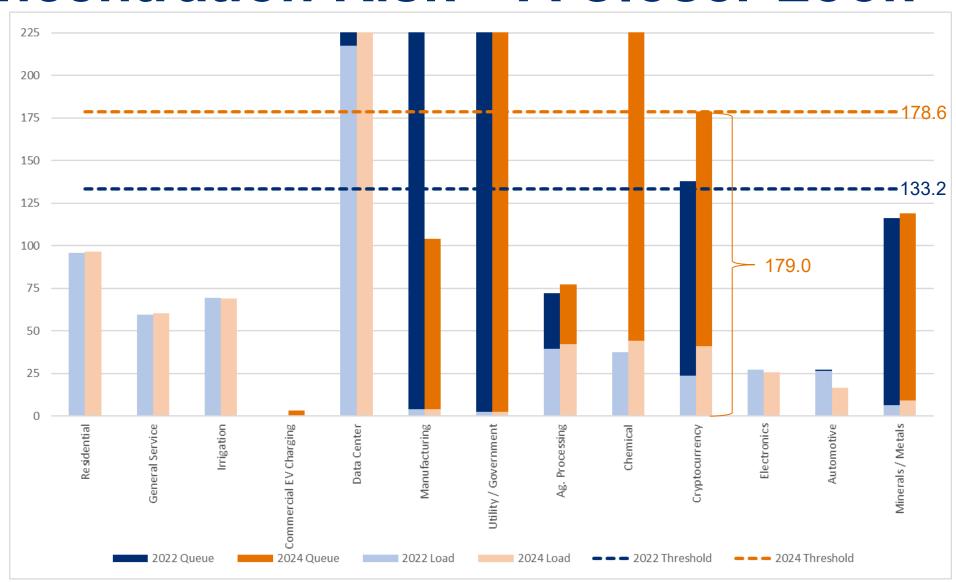
Concentration Risk – All Load Activities



Concentration Risk – Top Load Activities



Concentration Risk – A Closer Look



Data Centers and Utility/Government

- Data Centers continue to be a growth industry
 - Augmented by Al growth
 - Servers and storage outstripping network growth
 - 2024 to 2029 revenue Compound Annual Growth Rate projections are 11.5% in the U.S.¹
- Utility/Government are the Ports
 - Ports are seeking businesses and loads, but the loads will not be Utility or Governmental in nature
 - No basis for analysis
 - Hydrogen production has been mentioned, but no specific requests or load characteristics have been identified

Manufacturing Overview

- Manufacturing definition is broad
- Grant has already assigned many manufacturing subsectors into their own industries
- Drivers of change:
 - Chemical: Battery anode material (343 MVA) reclassified from general manufacturing
 - Solar Panel manufacturing (from 410 MVA in 2022 to 80 MVA in 2024)

National Institute of Standards and Technology, US Dept. of Commerce. Manuf. Subsectors

- 1. Computer and electronic products
- 2. Chemical products
- 3. Food and beverage and tobacco products
- 4. Petroleum and coal products
- 5. Motor vehicles, bodies, trailers and parts
- 6. Fabricated metal products
- 7. Machinery
- 8. Other transportation equipment
- 9. Miscellaneous manufacturing
- 10. Primary metals
- 11. Plastics and rubber products
- 12. Elect. equip., appliances, and components
- 13. Paper products
- 14. Non-metallic mineral products
- 15. Printing and related support activities
- 16. Furniture and related support activities
- 17. Textile mills and textile production mills
- 18. Apparel and leather and allied products
- 19. Wood Products

Grant Industrial Classifications

- 1. Aerospace
- 2. Ag. Processing
- 3. Ag. Storage
- 4. Automotive
- 5. Cannabis
- 6. Chemical
- 7. Construction
- 8. Cryptocurrency
- 9. Data Center
- Education
- 11. Electronics
- 12. Gas / Fluids
- 13. Manufacturing
- 14. Medical / Health
- 15. Minerals / Metals
- 16. Retail
- 17. Utility / Government

O4 Business Risk Porter's Five Forces

Porter's Five Forces

THREAT OF SUBSTITUTE PRODUCTS

- Number of substitute products available
- Buyer propensity to substitute
- Relative price performance of substitute
- Perceived level of product differentiation
- Switching costs

BARGAINING POWER OF BUYERS

- Number and size of customers
- Size of each customer order
- Difference between competitors
- Price sensitivity
- Buyer's ability to substitute
- Buyer's information availability
- Switching costs



BARGAINING POWER OF SUPPLIERS

- Number and size of suppliers
- Uniqueness of each supplier's product
- Company's or industry's ability to substitute

THREAT OF NEW ENTRANTS

- Barriers to entry
- Economies of scale
- Brand loyalty
- Capital requirements
- Cumulative experience
- Access to distribution channels
- Switching costs
- Government policies

Porter's Five Forces - Chemical

Although the global chemical industry is largely mature,

there are some sub-sectors that are growing.

THREAT OF SUBSTITUTE PRODUCTS

- Substitutes readily available for most commoditized products
- Niche products or IP protected processes can ward competition
- Range of quality and price depending on the product
- Switching costs vary

BARGAINING POWER OF BUYERS

- Global markets and open trade
- Customers are price sensitive to commoditized chemicals
- Specialty, synthetics and coatings growing versus organic and inorganic chemicals contracting in 2023¹
- Information availability strong for most chemicals

RIVALRY AMONG **EXISTING COMPETITORS** U.S. revenues flat. Asia growing, Europe shrinking¹ Global M&A activity is fairly steady across time1 More competitors globally Reshoring

BARGAINING POWER OF SUPPLIERS

- U.S. labor force and wages falling in aggregate
- U.S. productivity increasing <1% per vear²
- Digitization and automation of plants^{2,3}
- Substitutability varies with subsector

THREAT OF NEW ENTRANTS

- Generally capital intensive
- Economies of scale in most sectors
- Switching costs highest in nonportable, high capital plants
- Supply chain risks
- Energy transformation tailwind³
- Strategic and security concerns
- Tariff and subsidy policies

Porter's Five Forces - Cryptocurrencies

Cryptocurrencies are converging with traditional financial activities and computing loads, but face persistent, high regulatory risk.

THREAT OF SUBSTITUTE PRODUCTS

- Competing currencies and algorithms
- Precious metals and fiat currencies
- Central Bank Digital Currencies (CBDCs)
- Banks' and companies' tokens
- Proof of Work versus Proof of Stake

BARGAINING POWER OF BUYERS

- Bitcoin (BTC) Futures on Chicago Mercantile Exchange(CME) and Intercontinental Exchange (ICE)
- Exchange Traded Funds (ETFs)
 - 12 snot BTC
 - 8 spot Ethereum (ETH)
- El Salvador BTC legal tender
- 52% annualized volatility; S&P 12%
- Over 54 million BTC wallets
- High Concentration persists

RIVALRY AMONG EXISTING COMPETITORS

- POW Miners in pure competition
- Mining pools concentrated
- No brand loyalty to miners
- Brand loyalty to currencies
- Barriers to exit are low
- Dynamic across segments (e.g. DePIN, AI, RWA, DApps)

BARGAINING POWER OF SUPPLIERS

- Machine turnover (efficiency and difficulty) slowing over last 5 years
- · Mining rig dynamic pricing
- BTC halving drove older rigs out of the market or to transmission constrained areas
- High mobility
- Marginal cost economics

THREAT OF NEW ENTRANTS

- Low barriers to entry for new coins/tokens and applications
- Stranded and site-generated energy
- Artificial Intelligence (AI) margins
- CBDCs and Bank Stablecoins
- Global Regulation
- U.S. Regulation
- Local Regulation

Regulatory Risk Are regulations mature?

Cryptocurrency Regulatory Risk

- Global Legislation and Regulation
 - In a 60-country survey, legal in 33, partially banned in 17, generally banned in 10¹
 - EU Markets in Crypto Assets (MiCA) being implemented through December 2024
 - Does not cover CBDC, insurance, crypto financial instruments, Non-Fungible Tokens (NFTs)
 - European Central Bank "The distributional consequences of Bitcoin"²
 - Federal Reserve "Unique Implementation of Permanent Primary Deficits?"
 - Financial Action Task Force (FATF) focus on Anti-Money Laundering (AML) and Know Your Customer (KYC)
 - Scamming and Stealing down, Ransomware and Darknet growing in 2023⁴
 - International Monetary Fund (IMF) working paper \$0.047 to \$0.089 per kWh global tax⁵
 - Venezuela and Iran ban mining due to energy shortages
- US Legislation and Regulation
 - Marked-to-Market taxation for high-net-worth individuals
 - Biden administration budget proposed 30% tax on electricity cost used by miners
 - Lummis-Gillibrand crypto bill— Responsible Financial Innovation Act still proposed, not passed
 - FBI NexFundAl Token
 — Wash trades, pump & dump, 18 people and companies charged
- State and Local Regulations
 - Most local action around noise and impacts to health and property values
 - State fuel source restrictions

RS17 Update Team Findings

- Cryptocurrency mining currently meets the Evolving Industry (EI) criteria for business risk (marginally) and regulatory risk (definitely) and should be retained as EI
- No other industries or energy load activities were identified for EI criteria analysis
- Enforce EI attestations per CSP section 9.8
 - Customer will need to attest that they are not an Evolving Industry
 - Customers with load profiles that are similar to other EI loads shall be placed into the EI
 until the customer can provide assurances to Grant PUD that it is not
 - Customers who misrepresent their industry or load activity shall be pursued subject to section 2.15, Revenue Protection and Power Diversion, and the EI sections 9.6 through 9.10 of the Customer Service Policy

Rate Schedule 17 (RS17) Assessment Rate inputs

How the Elements Stack Up

Element	Туре	Input / Formula (in cents per kWh)		
Cost to Serve	Direct	Α		
Transmission Acceleration Adder	Risk	В		
Distribution Adder	Risk	С		
Departure Liquidation Cost Adder	Risk	D		
Supply Adder	Risk	E		
Additional Assessment (X%)	Add. Assessment	F=X*(A+B+C+D+E)		
Proposed Target Rate	Total	=sum(A:F)		

Risk Elements Assessment

- Transmission Acceleration Adder the need to construct transmission facilities earlier than would have been needed but for the El loads
- Distribution Adder the potential cost of incremental damage or accelerated consumption of distribution assets and distribution costs due to the EI load characteristics above those covered in cost of service or policies for direct recovery
- Departure Liquidation Cost Adder -- the ability of a customer to either move to another utility, or to cease operations without consequence
 - Departure Risk probability of departure driven by the differential between retail rates in different parts of the US
 - Liquidation Cost the potential cost of unwinding hedges associated with serving EI customers when one departs Grant PUD's system
- Supply Adder the potential costs associated with a broad range of current and future costs that can include wholesale power commodity costs, new resource costs, impact of ratcheting load on the Power Sales Agreement cost obligation, I937 obligations, CETA, carbon, changes in future Columbia River water allocations or uses, etc.
 - State Renewable Compliance Adder

Next Steps

- Commission feedback
- Complete incremental risk assessment and calculate costs of incremental risks
- Cost of service and additional assessment
- Revisit allocation between demand and energy in rate design
- Submit revised rate schedule
- Present resolution draft

Thank You!

Appendix 1: 2024 Concentration Risk

Industries	/ Energy Load Activities, July	2023 - June 2024 Loa	ds			
		July 2023 - June 2024 MWa	Queue Request	Total	Percent Concentration	Avg. No. of Service Agreements
Rate 1	Residential	96.5	0.0	96.5	2.7%	41,69
Rate 2	General Service	60.3	0.0	60.3	1.7%	7,53
Rate 3	Irrigation	68.9	0.0	68.9	1.9%	4,84
Rate 6	Street Lights	0.5	0.0	0.5	0.0%	11
Rate 19	Commercial EV Charging	0.2	3.0	3.2	0.1%	
Rate 85	Ag Food Process Boiler	0.0	0.0	0.0	0.0%	
	Aerospace	1.6	0.0	1.6	0.0%	
	Ag. Processing	42.2	35.0	77.2	2.2%	6
_	Ag. Storage	6.8	0.0	6.8	0.2%	1
94	Automotive	16.5	0.0	16.5	0.5%	
17,	Cannabis	1.4	1.2	2.6	0.1%	1
16,	Chemical	44.3	343.0	387.3	10.8%	
.5,	Construction	0.5	0.0	0.5	0.0%	
4, 1	Cryptocurrency	41.0	138.0	179.0	5.0%	2
7, 1	Data Center	258.1	1548.0	1806.1	50.6%	2
es	Education	2.1	4.4	6.5	0.2%	1
ln p	Electronics	25.5	0.0	25.5	0.7%	
che	Gas / Fluids	9.9	37.0	46.9	1.3%	
Rate Schedules 7, 14, 15, 16, 17, 94	Manufacturing	3.9	100.0	103.9	2.9%	
Rat	Medical / Health	6.0	6.0	12.0	0.3%	
	Minerals / Metals	9.2	110.0	119.2	3.3%	
	Retail	2.1	0.0	2.1	0.1%	1
	Utility / Government	2.5	547.0	549.5	15.4%	2
	Total	700.0	2872.6	3572.6	100%	54,43
		Concentrati	on Risk Threshold:	178.6		

Appendix 2: 2022 Concentration Risk

ndustrie	s / Energy Load Activities, Jul	y 2021 - June 2022 Loa	ds			
		July 2021 - June 2022 MWa	Queue Request	Total	Percent Concentration	Avg. No. of Service Agreements
Rate 1	Residential	95.7	0.0	95.7	3.6%	39,035
Rate 2	General Service	59.4	0.0	59.4	2.2%	7,20
ate 3	Irrigation	69.2	0.0	69.2	2.6%	4,87
ate 6	Street Lights	0.5	0.0	0.5	0.0%	10
ate 85	Ag Food Process Boiler	0.0	0.0	0.0	0.0%	
	Aerospace	1.4	2.0	3.4	0.1%	
	Ag. Processing	39.6	32.5	72.1	2.7%	5
	Ag. Storage	6.4	0.0	6.4	0.2%	1
94	Automotive	26.4	1.0	27.4	1.0%	
17,	Cannabis	0.9	0.0	0.9	0.0%	
16,	Chemical	37.4	0.0	37.4	1.4%	
.57	Construction	0.2	0.0	0.2	0.0%	
4,	Cryptocurrency	23.9	114.0	137.9	5.2%	2
7, 1	Data Center	217.5	648.0	865.5	32.5%	1
es	Education	1.8	2.4	4.2	0.2%	1
Rate Schedules 7, 14, 15, 16, 17, 94	Electronics	27.4	0.0	27.4	1.0%	
che	Gas / Fluids	7.4	0.0	7.4	0.3%	
e S	Manufacturing	3.9	573.0	576.9	21.7%	
Rat	Medical / Health	4.9	2.0	6.9	0.3%	
	Minerals / Metals	6.3	110.0	116.3	4.4%	
	Retail	2.3	3.0	5.3	0.2%	1
	Utility / Government	2.4	541.0	543.4	20.4%	1
	Total	634.9	2028.9	2663.8	100%	51,41
		Concentrati	on Risk Threshold:	133.2		

Customer Service Policy Update

— and Related Fee and Deposit Schedules

November 12, 2024

Cary West | Senior Manager Customer Solutions

Christopher Buchmann | Customer Programs Supervisor

Bob Kakaley | Customer Service Engineering Supervisor



Powering our way of life.

Agenda

Customer Service Policy Update

- Overview
- Highlighted Changes | Energy Services
- Highlighted Changes | Customer Engineering

Customer Service Deposit Schedule

Highlighted Changes | Customer Solutions

Customer Service Fee Schedule

Highlighted Changes | Customer Solutions



Overview

Customer Service Policy

- Customer Service Policy and Fee Schedule were last updated September 2023
- Has been recently reviewed and updated (as proposed) by cross-departmental stakeholders including:

Accounting, Customer Solutions, Enterprise Risk, Internal Audit, Finance, Large Power Solutions, Power Delivery (Customer Engineering), Rates and Treasury

 Corresponding Commission Resolution is drafted to adopt the proposed changes with an effective date of December 1, 2024.

Customer Service Policy Update Energy Services

Energy Services Related

Customer Service Policy

 Modified Interconnection of Customer-Owned Net Metering Systems (Section 5.6)

• Increased the Net Metering Application Fee for New Installation.

Fee Schedule - from \$300 to \$700

 Added a Net Metering Application Fee for Modification of Existing Facilities.

Fee Schedule - \$300

Energy Services Related, cont.

Customer Service Policy

• Modified *Eligibility for Special Low-Income Rate Discounts* (Section 6.19)

 Renaming "Low-Income" households to "Income-Qualified" households.

 Removing qualification requirement for Disabled and Senior Citizens for discount eligibility to all Income-Qualified households.

 In doing so, advances compliance with CETA requirements on Energy Burden for qualifying customers.

Impact of Expanded Discounts to Income-Qualified Households

CETA Compliance

Total Low-Income Customers in Grant County (per Commerce/Census Data) 4781
60% Customers by 2030 CETA Requirement 60% 2869

	Disabled	Senior		Other	Total	
Current Discount Program (20%)	Customers	Customers	-	Low-Income	Month	Annualized
Accounts (July, 2024)	253	543			796	
Discounts Applied (July, 2024)	\$ 3,278	\$ 7,067	\$	9)	\$ 10,345	\$ 124,140
Average Discount/Bill	\$ 12.96	\$ 13.01	\$	-	\$ 13.00	A 16 3 1

Additional Discount or Credits Needed to meet CETA Requirement for 2030:

Add'l Baseline Low-Income Household Discounts
Add'l Support Needed to Meet 6% Energy Burden Requirement (TBD)

Other	Total	
Low-Income	Month	Annualized
2,073	\$ 26,949	\$ 323,388
1,037	\$ 13,481	\$ 161,772

^{*} Estimated - We currently don't know what the Energy Burden is for our Low-Income Customers.

Our current 20% Discount will not be enough support to meet the requirement for all low-income customers.

\$ 485,160

- An estimated 11% of households (4,781) in Grant County meet the criteria to be Income-Qualified
- Grant PUD has over 42,200 active residential meters as of 9/30/24

Customer Service Policy Updates Customer Engineering

Customer Engineering Related

Customer Service Policy

- Underground Line Extensions (Section 4.2)
 - Added pull rope requirement
 - Ownership of secondary service wire
 - Clarity on irrigation service ownership
- Construction Temporary Service (Section 4.3.3)
 - Eighteen-month requirement

Customer Engineering Related, cont.

Customer Service Policy

- Service Requirements by Rate Class (Section 4.4)
 - Clarity on irrigation service's secondary service work
- Line Extension Fees (Section 4.5.1)
 - Simple service fee clarification
- Extensions to Residential/Comm Subdivisions (Sec 4.11)
 - Added subdivision information
- Manufactured Home/Mobile Home Parks (Section 4.12)
 - Added ownership of conduit and secondary wire

Customer Deposits Update Customer Solutions

Customer Solutions

Customer Deposit Schedule

Increase Tier 1 Deposit for Rate Schedule 1 – Residential Service to \$200 from \$150.

• Represents 2 months of average residential bills which aligns with arrearages subject to disconnection for nonpayment (typically 2 months past due).

Removal of Tier 2 Deposit for Rate Schedule 1 – Residential Service of for 350% of actual or estimated monthly bill for the past 12 months.

 Removes complexity of manual calculation and no longer necessary with more timely remote disconnections for nonpayment following the District's deployment of advanced meters.

Updates minimum deposits for Landlords and Rate Schedule 2 – Small General Service to \$200 per Service Agreement (was previously \$150).

Customer Fee Schedule Update Customer Solutions

Customer Solutions

Customer Fee
Schedule
Page 1 of 3
(no changes)



Resolution ####

Exhibit C

Effective 11/1/2024

CUSTOMER SERVICE POLICIES FEE SCHEDULE

Fees shown on the Fee Schedule are set by the Grant PUD Commission and are subject to change at the discretion of the Commission.

Customer Service Policy Section	Item	Fee
2.14	Revenue Protection and Power Diversion Fees	Actual Damages
2.14 B	Meter Resealing Fee	\$100.00
4.5.1 A	Line Extension Fee	Actual Fee per Design
	If the Design cost is \$20,000 or greater, a true-up provision applies pursuant to a Time and Materials Contract.	A 25% discount, up to a maximum \$2,500 discount, is available to Residential Customers on Rate Schedule 1, excluding plat developers.
	If actual costs are above the Design cost, the Customer will be billed for the difference. If the actual costs are below the Design cost, the Customer will receive an account credit for the difference.	A 25% discount, up to a maximum \$10,000 discount, is available to Irrigation Customers on Rate Schedule 3.
4.5.1 B	Underground Simple Service Fee (if moped and fiber handhole are already installed)	Electric - \$850.00 Fiber - \$400.00
	Overhead Simple Service Extension Fee (if transformer is already on pole and pole is within 100' of new meter base/mast)	Electric - \$450.00 Fiber - \$430.00
4.5.1 D	Overhead Temporary Service	\$380.00
	Underground Temporary Service	\$340.00
5.3.5	False Call Fee	\$215.00
5.4.7	Meter Obstruction Fee	Basic Charge

Customer Solutions

Customer Fee
Schedule
Page 2 of 3
(Changes to Net Metering)



Resolution ####

Exhibit C

Effective 12/1/2024

CUSTOMER SERVICE POLICIES FEE SCHEDULE

Fees shown on the Fee Schedule are set by the Grant PUD Commission and are subject to change at the discretion of the Commission.

Customer Service Policy Section	Item	Fee
5.6.1	Net Metering Application Fee for New Installation	\$700.00
	Net Metering Application Fee for Modification of Facilities	\$300.00
6.1	Manual Meter Read	Installation Cost - \$250.00 Meter Read - \$65.00 per month
6.8	Return Check Fee	\$25.00
6.10	Late Payment Charge	Refer to CS110042-POL
6.11	Account Service Charge	\$15.00
6.12	After-Hours Fee (Call Center)	\$250.00
	After-Hours Fee (On-Site) (Combined fees apply when both call-outs are applicable)	\$450.00
6.17.1	Disconnect Fee	\$50.00
6.18	Door Tag Fee	\$50.00

Customer Solutions

Customer Fee Schedule Page 3 of 3 (no changes)



Resolution ####

Exhibit C

Effective 12/1/2024

CUSTOMER SERVICE POLICIES FEE SCHEDULE

Fees shown on the Fee Schedule are set by the Grant PUD Commission and are subject to change at the discretion of the Commission.

Customer Service Policy Section	Item	Fee				
8.1	Application Fee	New Demand Load Request				
		0.5 MW to 2 MW	\$2,500			
		Up to 10 MW	\$6,500			
		Up to 20 MW	\$15,000			
		Up to 40 MW	\$52,000			
		Over 40 MW (*requires different process)	\$21,000			
01000			NEW TOWNS			
8.5	Redundant Capacity Charge	Monthly charge of	\$0.85 per kV			

Thank You

