

Request for waiver of certain PUC 1604.01 Full Rate Case Filing Requirements

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| 1. Internal Financial Statements | The Company does not have monthly financial statements prior to the test year. The Company began operations during the test year; therefore the audited financial statements for the year will be annualized. |
| 2. Annual Reports to Stockholders | The Company does not prepare Annual Reports to Stockholders. |
| 3. Federal Income Taxes | The Company does not file a federal income tax return as it is incorporated with the parent company in a consolidated tax return. |
| 5. Charitable Contributions | The Company did not make any charitable contributions during the test year. |
| 6. Advertising | The Company did not incur any advertising expense. |
| 7. Cost of Service Study | The Company has never had a cost of service study performed. |
| 9. Chart of Accounts | The Company utilizes the PUC uniform system of accounts. |
| 10. SEC 10K and 10Q | The Company does not prepare the SEC 10K and 10Q. |
| 12. Depreciation Study | The Company has not had a depreciation study performed. |
| 15. Officer and Executive Incentive Plans | The Company does not have any officer or executive incentive plan. |
| 18. Non-Utility Operations | The Company has no non-utility operations. |
| 19. Balance Sheets and Income Statements | The Company does not have financial statements prior to the test year as it began operations during the test year. |
| 20. Quarterly Income Statements | The Company does not have quarterly income statements for the period prior to the test year. |

21. Quarterly Sales Volumes

The Company does not have quarterly sales volumes prior to the test year as it began operations during the test year, however each system has filed annual reports to the commission under previous ownership.

22. Projected Need for Capital

The Company does not project a need for external capital for the 2 year period following the test year at this time.

24. Short-Term Debt

The Company has no short-term debt.