

Appendix & Schedules

QUALIFICATIONS OF JOHN DEFEVER

Appendix 1

John Defever, CPA is a regulatory consultant with Larkin & Associates. As such, Mr. Defever is responsible for the review and analysis of regulatory filings and the preparation of testimony, discovery requests, briefs, schedules, exhibits and reports. Mr. Defever also assists with the annual audit of a Michigan Railroad Company. Mr. Defever has been employed with the firm of Larkin and Associates since 2010.

Mr. Defever has performed work in the field of utility regulation on behalf of public service commission staffs, state attorney generals and consumer groups concerning regulatory matters before regulatory agencies in Alaska, California, Connecticut, District of Columbia, Florida, Hawaii, Maryland, Massachusetts, Mississippi, Oregon and Vermont.

Mr. Defever received a Bachelor of Business Administration, Major: Accounting from Eastern Michigan University and an Associate in Applied Science at Schoolcraft College. Mr. Defever is a member of the Michigan Association of Certified Public Accountants and maintains continuing professional education in accounting, auditing, and taxation.

Partial list of utility cases participated in:

Docket No. 10-02-13	Aquarion Water Company of Connecticut Connecticut Department of Utility Control
Docket No. 10-70	Western Massachusetts Electric Company Massachusetts Department of Public Utilities
Docket No. 10-12-02	Yankee Gas Services Company Connecticut Department of Utility Control
Docket No. 11-01	Fitchburg Gas & Electric Light Company Massachusetts Department of Public Utilities
Case No.9267	Washington Gas Light Company Maryland Public Service Commission

QUALIFICATIONS OF JOHN DEFEVER

Case No.9286	Potomac Electric Power Company Maryland Public Service Commission
Docket No. 13-06-08	Connecticut Natural Gas Corporation Connecticut Public Utility Regulatory Authority
Docket No. 13-90	Fitchburg Gas & Electric Light Company Massachusetts Department of Public Utilities
Docket No. 8190	Green Mountain Power Company Before the Vermont Public Service Board
Docket No. 8191	Green Mountain Power Company Alternative Regulation Before the Vermont Public Service Board
Case No.9354	Columbia Gas of Maryland, Inc. Maryland Public Service Commission
Docket No. 13-135	Western Massachusetts Electric Company Massachusetts Department of Public Utilities
Docket No. 14-05-06	Connecticut Light & Power Company Connecticut Public Utilities Regulatory Authority
Docket No. 13-85	Massachusetts Electric Company and Nantucket Electric Company D/B/A/ as National Grid Massachusetts Department of Public Utilities
Case No.9390	Columbia Gas of Maryland, Inc. Maryland Public Service Commission
Docket No. 15-03-01	Connecticut Light & Power Company Connecticut Public Utilities Regulatory Authority
Docket No. 15-03-02	United Illuminating Company Connecticut Public Utilities Regulatory Authority
Docket No. 15-149	Western Massachusetts Electric Company Massachusetts Department of Public Utilities

QUALIFICATIONS OF JOHN DEFEVER

Docket No. 8710	Vermont Gas Systems Inc. Before the Vermont Public Service Board
Docket No. 8698	Vermont Gas Systems Inc. Alternative Regulation Before the Vermont Public Service Board
U-15-091 / U-15-092	College Utilities Corporation Golden Heart Utilities, Inc. Regulatory Commission of Alaska
Docket No.16-06-04	United Illuminating Company Connecticut Public Utilities Regulatory Authority
Docket No. 15-05-42	Southern Connecticut Gas Company Connecticut Public Utilities Regulatory Authority
Docket No. 20160251-EI	Florida Power & Light Company Florida Public Service Commission
Docket No. 20170141-SU	KW Resort Utilities Florida Public Service Commission
Docket No. A.16-09-001	Southern California Edison California Public Utilities Commission
Case No. 18-0409-TF	Vermont Gas Systems, Inc. Vermont Public Utility Commission
Docket No. 17-10-46	Connecticut Light & Power Company Connecticut Public Utilities Regulatory Authority
Docket No. 2017-0105	Hawaii Gas Company Hawaii Public Utilities Commission
Docket No. 18-03-01	Connecticut Light & Power Company Connecticut Public Utilities Regulatory Authority
Docket No. 18-03-02	United Illuminating Company Connecticut Public Utilities Regulatory Authority

QUALIFICATIONS OF JOHN DEFEVER

Docket No. A.17-11-009	Pacific Gas & Electric California Public Utilities Commission
Docket No. 18-05-16	Connecticut Natural Gas Connecticut Public Utilities Regulatory Authority
Docket No. 18-05-10	Yankee Gas Connecticut Public Utilities Regulatory Authority
Docket No. 18-11-12	Connecticut Light & Power Company Connecticut Public Utilities Regulatory Authority
Docket No. 18-07-10	SJW Group and Connecticut Water Service Connecticut Public Utilities Regulatory Authority
Docket No. RPU-2019-0001	Interstate Power and Light Iowa Utilities Board
Docket No. 2018-0388	Kona Water Service Company Hawaii Public Utilities Commission

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE
D/B/A EVERSOURCE ENERGY
DOCKET NO. DE 19-057

EXHIBIT__(L&A-1)
ACCOMPANYING THE DIRECT TESTIMONY OF
JOHN DEFEVER
ON BEHALF OF THE OCA

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Overall Financial Summary

Line No	Description	Rate Year Per PSNH Amount	Rate Year Per OCA Amount	OCA Reference
1	Rate Base, as adjusted	\$ 1,215,667,897	\$ 1,177,430,846	Schedule B
2	Operating Income, as adjusted	\$ 41,944,680	\$ 58,933,672	Schedule C
3	Earned Rate of Return	3.45%	5.01%	L.2 / L.1
4	Requested rate of return / cost of capital	<u>7.62%</u>	<u>6.45%</u>	Schedule D
5	Required Operating Income	\$ 92,590,130	\$ 75,923,096	L.1 X L.4
6	Income Sufficiency / (Deficiency)	\$ (50,645,450)	\$ (16,989,424)	L.2 - L.5
7	Gross Revenue Conversion Factor	<u>1.371422</u>	<u>1.371422</u>	Schedule A-1
8	Revenue (Increase)/Decrease required	<u>(\$69,456,299)</u>	<u>(\$23,299,674)</u>	L. 6 X L.7
9	Uncollectible Adjustment	(456,397)	(153,102)	L. 8 x 0.6571%
10	Total (Increase)/Decrease required	(69,912,696)	(23,452,776)	L.8 + L.9

Gross Revenue Conversion Factor

Line No.	Description	Per PSNH		
		Test Year Ended 12/31/2018	Adjusted Test Year	Test Year Pro Forma
1	Operating Revenue Percentage	100.0000%	100.0000%	100.0000%
2	Less: New Hampshire corporate business tax	<u>7.9000%</u>	<u>7.9000%</u>	<u>7.7000%</u>
3	Operating revenue percentage after state taxes	92.1000%	92.1000%	92.3000%
4	Federal income tax rate	<u>21.0000%</u>	<u>21.0000%</u>	<u>21.0000%</u>
5	Federal income tax	<u>19.3410%</u>	<u>19.3410%</u>	<u>19.3830%</u>
6	Operating income after Federal income tax	<u><u>72.7590%</u></u>	<u><u>72.7590%</u></u>	<u><u>72.9170%</u></u>
7	Gross Revenue Conversion Factor	<u><u>137.440%</u></u>	<u><u>137.440%</u></u>	<u><u>137.142%</u></u>

Adjusted Distribution Rate Base

Line No.	Description	PSNH Rate Year	OCA Rate Year	Reference
1	Rate Year Rate Base	\$ 1,215,667,897	\$ 1,215,667,897	Schedule EHC/TMD-36 (Perm)
2	<u>Adjustments:</u>			
3	Cash Working Capital		\$ 3,429,658	L&A Schedule B-1
4	Plant In Service		\$ (42,228,517)	L&A Schedule B-2
5	Materials & Supplies		\$ (1,705,697)	L&A Schedule B-4
6	Accumulated Depreciation		\$ 2,267,505	L&A Schedule B-3
7	Total Adjustments	<u>\$ -</u>	<u>\$ (38,237,051)</u>	
8	Adjusted Rate Base, per OCA	<u>\$ 1,215,667,897</u>	<u>\$ 1,177,430,846</u>	

Cash Working Capital

		Lead / Lag Study Test Year								
Line No.	Category (A)	(1) Revenue Lag (Days)	(2) Expense Lead (Days)	(3) Net Days (1)-(2)	(4) Annual Distribution Expense (B)	(5) OCA Adj	(6) OCA Annual Distribution Expense	(7) Daily Expense (6/365)	(8) Working Capital Requested (7)*(3) (G)	(9) Lead (Lag) Days Reference
1	O&M Expenses									
2	Payroll	45.79	11.97	33.82	\$ 54,496,899	388,128	54,108,771	148,243	\$ 5,014,093	Page 4
3	Payroll Incentive	45.79	270.00	(224.21)	7,613,826	5,329,678	2,284,148	6,258	\$ (1,403,100)	N/A
4	Employee Benefits	45.79	11.96	33.83	16,022,044	114,109	15,907,935	43,583	\$ 1,474,273	Page 5
5	Regulatory Assessments	45.79	12.10	33.69	4,766,319		4,766,319	13,058	\$ 439,944	Page 6
6	Insurance Expense & Injuries & Damages	45.79	(158.71)	204.50	2,480,664	109,269	2,371,395	6,497	\$ 1,328,630	Page 7
7	Other O&M	45.79	45.95	(0.16)	82,348,437	2,730,366	79,618,072	218,132	\$ (34,839)	Page 8
8	Total Operation and Maintenance				167,728,189		159,056,639		\$ 6,819,001	
9	Taxes:									
10	Local Property	45.79	(25.41)	71.20	47,399,353		47,399,353	129,861	\$ 9,246,483	Page 9
11	Payroll Taxes	45.79	11.98	33.82	5,138,032	58,826	5,079,206	13,916	\$ 470,573	Page 10
12	Federal Income Taxes	45.79	30.01	15.78	6,521,146	(6,192,704)	12,713,850	34,832	\$ 549,660	Page 11
13	NH Profit and Enterprise Taxes	45.79	31.99	13.80	2,772,786		2,772,786	7,597	\$ 104,837	Page 12
14	Total Taxes				61,831,317		67,965,195		\$ 10,371,554	
15	Weighted Net Lag Days								27.64	
16	Percentage								7.57%	
17	Total Distribution Working Capital per OCA								\$ 17,190,555	
18	Total Distribution Working Capital per Company								13,760,897	
19	OCA Adjustment								\$ 3,429,658	

Source:
 Attachment EHC/TMD-2 (Perm)
 Schedule EHC/TMD-1 (Perm)

Public Service Company of New Hampshire d/b/a Eversource Energy
Test Year Ended December 31, 2018

Docket No. DE 19-057
Exhibit__(L&A-1)
Schedule B-2
Page 1 of 1

Plant In Service

<u>Line No.</u>	<u>Description</u>		<u>Rate Year</u>
1	Remove AMR Meters	\$	42,228,517

Source:

Per OCA Witness Paul Alvarez, TS 2-018

Public Service Company of New Hampshire d/b/a Eversource Energy
Test Year Ended December 31, 2018

Docket No. DE 19-057
Exhibit__(L&A-1)
Schedule B-3
Page 1 of 1

Accumulated Depreciation

<u>Line No.</u>	<u>Description</u>	<u>Rate</u>	<u>Year</u>
1	AMR Accumulated Depreciation	\$	2,267,505

Source:

TS 2-018, Per OCA Witness Paul Alvarez recommendation

Public Service Company of New Hampshire d/b/a Eversource Energy
Test Year Ended December 31, 2018

Docket No. DE 19-057
Exhibit__(L&A-1)
Schedule B-4
Page 1 of 1

Materials & Supplies

<u>Line No.</u>	<u>Description</u>	<u>Rate Year</u>	<u>Reference</u>
1	Company Amount	\$ 12,213,448	Schedule EHC/TMD-36 (Perm)
2	OCA Amount	<u>\$ 10,507,751</u>	OCA 8-020
3	OCA Adjustment	<u><u>\$ (1,705,697)</u></u>	

Distribution Operating Income Adjustments

Line No	Description	OCA Rate Year Adjustments	Reference
1	Rate Year Net Operating Income per Company	\$ 41,944,680	Schedule EHC/TMD-1 (Perm)
	<u>Operating and Maintenance Expense Adjustments:</u>		
2	Non-Industry Dues and memberships	\$ 52,475	Schedule C-5
3	Employee benefits	\$ 114,109	Schedule C-6
4	Insurance Expense - EIM/NEIL Credits	\$ 58,915	Schedule C-10
5	Directors & Officers Liability	\$ 50,354	Schedule C-12
6	Payroll Expense	\$ 388,128	Schedule C-1
7	Variable Compensation	\$ 5,329,678	Schedule C-11
8	Vegetation Management - Unpaid bills	\$ 1,213,743	Schedule C-3
9	SERP	\$ 897,287	Schedule C-7
10	Non-SERP	\$ 339,992	Schedule C-8
11	Severance Expense	\$ 57,136	Schedule C-9
12	BOD Costs	\$ 169,733	Schedule C-4
13	Depreciation	\$ 4,535,009	Schedule C-13
14	Amortization of Deferred Assets	\$ 9,467,644	Schedule C-2
	<u>Other Taxes</u>		
15	Payroll Tax	\$ 58,826	Schedule C-15
16	Income Taxes	\$ (6,192,704)	Schedule C-16
17	Interest Synchronization	\$ 448,668	Schedule C-14
18	Operating Income	<u>\$ 58,933,672</u>	

Payroll Expense

Line No.	Description	Rate Year	Reference
1	10 Cybersecurity Unfilled Positions	\$ 71,190	\$7,119 * 10
2	3 Troubleshooter Unfilled Positions	\$ 316,938	\$105,646 * 3
3	Total Unfilled Positions	\$ 388,128	
4	OCA Unfilled Positions Adjustment	\$ 388,128	
5	Average Cyber Security Salary	\$99,671/14=\$7,119	
6	Average Expanded Troubleshooter Salary	\$528,231/5=\$105,646	

Cyber Security employees are Eversource Service Company employees. This amount is 8% of the Labor O&M that is allocated to PSNH.

Source:

 OCA 1-024

Amortization of Deferred Assets

Line No.	Description	(A)	(B)	(C)	(D)	(E)	(F)
		PSNH Total Cost	PSNH Amort Period	PSNH Annual Amort	OCA Amort Period	OCA Annual Amort	OCA ADJ (Col F - Col D)
	(A)	(B)	(C)	(D)	(E)	(F)	
1	Amortization - of Rehab Tax Credit	\$ (34,044)	1	\$ (34,044)	1	(34,044)	\$ -
2	Amortization of Deferred Storm Costs	\$ 77,563,042	5	\$ 15,512,608	10	7,756,304	\$ (7,756,304)
3	Amortization of NH PUC Consultant Costs	\$ 336,630	1	\$ 336,630	10		\$ (336,630)
4	Amortization of Merger Costs	\$ 9,090,203	10	\$ 909,020	10	909,020	\$ -
5	Amortization of Environmental Costs	\$ 9,164,729	4	\$ 2,291,182	10	916,473	\$ (1,374,709)
6	Total Amortization	<u>\$ 96,120,560</u>		<u>\$ 19,015,397</u>		<u>\$ 9,547,753</u>	<u>\$ (9,467,644)</u>

Source

Schedule EHC/TMD-30 (perm)

Public Service Company of New Hampshire d/b/a Eversource Energy
Test Year Ended December 31, 2018

Docket No. DE 19-057
Exhibit__(L&A-1)
Schedule C-3
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Vegetation Management-Unpaid Bills from Consolidated Communications

<u>Line No.</u>	<u>Description</u>	<u>Rate Year</u>
1	Company Amount	\$ 1,213,743
2	OCA Recommended Amount	<u>\$ -</u>
3	OCA Adjustment	<u><u>\$ (1,213,743)</u></u>

Source
Schedule EHC/TMD-20 (Perm) page 2

BOD Costs

<u>Line No.</u>	<u>Description</u>	<u>Rate Year</u>
1	Company Amount	\$ 226,310
2	Percent allocated to shareholders	<u>75%</u>
3	OCA Adjustment	<u><u>\$ (169,733)</u></u>

Source:

OCA 1-066

Non-Industry Membership Dues

Line No.	Description	PSNH Rate Year (a)	OCA Rate Year (b) (Col a x 50%)	OCA Adjustment (c) (Col b - Col a)
1	Business & Industry Assoc	\$ 16,721	\$ 8,361	\$ (8,361)
2	Greater Manchester Chamber of Commerce	\$ 20,050	\$ 10,025	\$ (10,025)
3	Exeter Area Chamber of Commerce	\$ 1,750	\$ 875	\$ (875)
4	Greater Dover Chamber of Commerce	\$ 1,161	\$ 581	\$ (581)
5	Greater Nashua Chamber of Commerce	\$ 20,000	\$ 10,000	\$ (10,000)
6	Greater Keene Chamber of Commerce	\$ 2,815	\$ 1,408	\$ (1,408)
7	Greater Derry Londonderry Chamber of Commerce	\$ 6,575	\$ 3,288	\$ (3,288)
8	New Hampshire High Technology Council	\$ 1,750	\$ 875	\$ (875)
9	NH Grocers Association	\$ 7,000	\$ 3,500	\$ (3,500)
10	Northern Gateway Chamber of Commerce	\$ 1,000	\$ 500	\$ (500)
11	Greater Concord Chamber of Commerce	\$ 1,650	\$ 825	\$ (825)
12	The Chamber Collaborative of Greater Portsm	\$ 2,116	\$ 1,058	\$ (1,058)
13	NH Lodging and Restaurant Association	\$ 14,000	\$ 7,000	\$ (7,000)
14	Charges Under \$1,000	\$ 8,362	\$ 4,181	\$ (4,181)
15	Total	\$ 104,950	\$ 52,475	
16	Total OCA Adjustment			\$ (52,475)

Source:
Attachment EHC/TMD-1 (Perm) Schedule EHC/TMD-11 (Perm)

Benefits

<u>Line No.</u>	<u>Description</u>	<u>OCA</u> <u>Rate Year</u>	<u>Reference</u>
1	OCA Adjustment to Payroll	\$ 388,128	Schedule C-1
2	Benefit Percentage	<u>29.400%</u>	Payroll Tax/Payroll Expense
3	OCA Adjustment	<u>\$ 114,109</u>	

Source:

Schedules EHC/TMD-12, 14 (Perm)

Public Service Company of New Hampshire d/b/a Eversource Energy
Test Year Ended December 31, 2018

Docket No. DE 19-057
Exhibit__(L&A-1)
Schedule C-7
Page 1 of 1

SERP

<u>Line No.</u>	<u>Description</u>	<u>Rate Year</u>
1	Company Amount	\$ 897,287
2	OCA Recommended Amount	<u>\$ -</u>
2	OCA Adjustment	<u><u>\$ (897,287)</u></u>

Source

OCA 1-054

Public Service Company of New Hampshire d/b/a Eversource Energy
Test Year Ended December 31, 2018

Docket No. DE 19-057
Exhibit__(L&A-1)
Schedule C-8
Page 1 of 1

Non-SERP

<u>Line No.</u>	<u>Description</u>	<u>Rate Year</u>
1	Company Amount	\$ 339,992
2	OCA Recommended Amount	<u>\$ -</u>
3	OCA Adjustment	<u><u>\$ (339,992)</u></u>

Source

OCA 8-037

Public Service Company of New Hampshire d/b/a Eversource Energy
Test Year Ended December 31, 2018

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Exhibit__(L&A-1)
Schedule C-9
Page 1 of 1

Severance Expense

<u>Line No.</u>	<u>Description</u>	<u>Rate Year</u>
1	Company Amount	\$ 57,136
2	OCA Recommended Amount	<u>\$ -</u>
3	OCA Adjustment	<u><u>\$ (57,136)</u></u>

Source

OCA 1-068

Insurance Expense - EIM/NEIL Credits

Line No.	Description	OCA Rate Year
1	Average EIM credits	\$ (56,986)
2	Average NEIL credits	\$ (1,929)
3	OCA Adjustment	<u>\$ (58,915)</u>

		2015	2016	2017	2018	Average 2015-2018
4	EIM Credits	(27,721)	(27,922)	(29,391)	(142,910)	(56,986)
5	NEIL Credits	(2,432)	(566)	(804)	(3,913)	(1,929)
		(30,153)	(28,488)	(30,195)	(146,823)	(58,915)

Source

 OCA 8-026

Variable Compensation

<u>Line No.</u>	<u>Description</u>	<u>Rate Year</u>	
1	Amount Per Company	\$ 7,613,826	
2	Percent Related to Financial Goals	<u>70%</u>	OCA 1-029(B)
3	OCA Recommended Shareholder Portion	<u>\$ 5,329,678</u>	Line 1 x Line 2
4	OCA Adjustment	<u><u>\$ (5,329,678)</u></u>	

Source:

Attachment EHC/TMD-1 (Perm) Attachment EHC/TMD-15 (Perm)

D&O Expense

<u>Line No.</u>	<u>Description</u>	<u>Rate Year</u>
1	Company Amount	\$ 67,139
2	Percent allocated to shareholders	<u>75%</u>
3	OCA Adjustment	<u><u>\$ (50,354)</u></u>

Source

OCA 1-005

Public Service Company of New Hampshire d/b/a Eversource Energy
Test Year Ended December 31, 2018

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Exhibit__(L&A-1)
Schedule C-13
Page 1 of 1

Depreciation Expense

<u>Line No.</u>	<u>Description</u>	<u>Rate Year</u>
1	AMR Meter Depreciation Expense	\$ (4,535,009)

Source:

TS 2-018

Per OCA Witness Paul Alvarez

Interest Synchronization

Line No	Description	OCA Rate Year Amount	Reference
1	Rate base, as adjusted	\$ 1,177,430,846	Schedule B
2	Weighted Cost of Debt	<u>1.83%</u>	Schedule D
3	Pro Forma Interest Deduction for Tax Purposes	\$ 21,599,969	L.1 X L.2
4	Interest Deduction, per Company	<u>\$ 23,247,000</u>	WP EHC/TMD-33 (Perm), p.3
5	Increase/(Decrease) in Interest Deduction for Tax Purposes	\$ (1,647,031)	L.3 - L.4
6	Federal and Stated Combined Income Tax Rate	<u>27.241%</u>	Schedule C-16
7	Increase/(Decrease) in Income Tax Expense	<u><u>\$ 448,668</u></u>	-L.5 X L.6

Payroll Tax Expense

Line No.	Description	Per OCA	Reference
1	Reduction to Rate Year Payroll Tax Exp	<u>\$ 58,826</u>	Line 2 * Line 3
<u>Payroll</u>			
2	OCA Adjustment to Payroll	\$ 388,128	L&A C-1
3	Effective Tax Rate Rate Year	15.16%	Line 4/Line 5
4	Rate Year Payroll Tax Expense per Company	\$ 8,259,756	Schedule EHC/TMD-32 (Perm)
5	Rate Year Payroll Expense per Company	\$ 54,496,899	Schedule EHC/TMD-14 (Perm)

Income Tax Expense - Impact of Adjustments

<u>Line No.</u>	<u>Description</u>	<u>Rate Year Amount</u>	<u>OCA Reference</u>
1	Adjustments to Net Operating Income, Excluding Income Taxes	\$ 22,733,029	Schedule C
2	Combined Income Tax Rate	<u>27.2410%</u>	Note (1)
3	Increase in Income Taxes	<u>\$ 6,192,704</u>	

Notes

(1) Combined tax rate includes the state tax rate of 7.9% and the Federal Income Tax Rate of 21% WP EHC/TMD-33 (Perm)

Rate of Return

Per Company Line No	Description	(A) Principal	(B) Fixed Percentage	(C) Cost	(D) Rate of Return
1	Short Term Debt	\$ 71,805,000	3.17%	2.45%	0.08%
2	Long Term Debt	\$ 949,708,000	41.98%	4.37%	1.83%
3	<u>Common Equity</u>	<u>\$ 1,240,847,000</u>	<u>54.85%</u>	<u>10.40%</u>	<u>5.70%</u>
4	Total Capital	\$ 2,262,360,000	100.00%		<u>7.62%</u>
5	Cost of Capital				<u><u>7.62%</u></u>

New Calculation

Line No	Description	Principal	Fixed Percentage	Cost	Rate of Return
6	Short Term Debt	\$ 71,805,000	3.17%	2.45%	0.08%
7	Long Term Debt	\$ 949,708,000	41.98%	4.37%	1.83%
8	<u>Common Equity</u>	<u>\$ 1,240,847,000</u>	<u>54.85%</u>	<u>8.27%</u>	<u>4.54%</u>
9	Total Capital	\$ 2,262,360,000	100.00%		<u>6.45%</u>
10	Cost of Capital				<u><u>6.45%</u></u>

Source:

Company Amounts: Attachment EHC/TMD-1 (Perm) Schedule EHC/TMD-40 (Perm) at bates 292. □
 Line 8 Column C per OCA witness Pradip Chattopadhyay's testimony