

**REDACTED**

**State of New Hampshire  
Before the  
Public Utilities Commission**

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| <b>ORIGINAL</b>                |
| NHPUC(SEC) LSF DG 00-207-14    |
| Exhibit No. <u>5</u>           |
| Witness _____                  |
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**Pre-filed Direct Testimony of:  
Mark G. Savoie and William R. Luthern**

**on behalf of:**

**EnergyNorth Natural Gas, Inc.**

**Agreements with AES Londonderry, LLC**

**Docket No. DG 00-\_\_\_**

**July 3, 2000**

1 **Background Information Regarding Mark G. Savoie**

2 **Q. Mr. Savoie, please state your full name and business address.**

3 A. My name is Mark G. Savoie. My business address is 1260 Elm Street, Manchester,  
4 New Hampshire.

5 **Q. Please state your position with EnergyNorth Natural Gas, Inc. (“ENGI” or the**  
6 **“Company”).**

7 A. I am the Manager of Regulatory Affairs.

8 **Q. How long have you been employed by EnergyNorth, Inc. or its affiliates and**  
9 **their predecessors and in what capacities?**

10 A. In September 1985, I was hired as an Accountant by Concord Natural Gas  
11 Corporation. In February 1986, I was promoted to the position of Tax/SEC  
12 Accountant for EnergyNorth, Inc. I assumed the position of Rate Analyst in April  
13 1996 and was promoted to Manager of Regulatory Affairs in December 1998.

14 **Q. What do your responsibilities as Manager of Regulatory Affairs include?**

15 A. I am primarily responsible for the budgeting of and analytical functions related to  
16 revenue and the cost of gas; preparing, coordinating, assisting and testifying in  
17 matters before the New Hampshire Public Utilities Commission; monitoring,  
18 proposing and explaining issues related to pricing and service options; developing  
19 detailed cost of service adjustments in support of the Company's rate cases; and  
20 the overall administration of rates, tariffs and cost studies.

21 **Q. What were your prior responsibilities at the Company?**

1 A. My prior responsibilities included insuring tax compliance, preparation of  
2 Securities and Exchange Commission filings, tax and securities law research,  
3 financial statement preparation, accounting for depreciation and contributions in  
4 aid of construction, maintaining the general ledger, and managing audits.

5 **Q. Please describe your business experience prior to your employment with**  
6 **EnergyNorth.**

7 A. My business experience from December 1978 to September 1985 consisted of  
8 employment as a Staff and Senior Staff Accountant at several New Hampshire  
9 public accounting firms. My duties included planning and conducting audits,  
10 internal control review, tax compliance, financial statement preparation and  
11 supervision of professional and clerical staff.

12 **Q. Please describe your relevant educational background.**

13 A. I received a Bachelor of Science degree in Accounting in 1980 and a Master of  
14 Business Administration in 1995, both at New Hampshire College. I have  
15 attended several seminars related to the gas industry including the American Gas  
16 Association Gas Rate Fundamentals Course held at the University of Wisconsin  
17 School of Business in Madison, Wisconsin.

18 **Q. Do you have any professional licenses?**

19 A. Yes, I am licensed in the State of New Hampshire as a Certified Public  
20 Accountant.

21 **Q. Have you previously testified before the New Hampshire Public Utilities**  
22 **Commission?**

1 A. Yes, I have testified on numerous occasions on a variety of matters before the  
2 Commission.

3 **Background Information Regarding William R. Luthern**

4 **Q. Mr. Luthern, please state your full name and business address.**

5 A. My name is William R. Luthern. My business address is One Beacon Street,  
6 Boston, Massachusetts.

7 **Q. By whom are you employed and in what capacity?**

8 A. I am Vice President of Gas Resources for Boston Gas Company, Essex Gas  
9 Company and Colonial Gas Company, the three gas subsidiaries of Eastern  
10 Enterprises ("Eastern"). I am responsible for the planning, and acquisition of the gas  
11 supply resources for all three subsidiaries. I am also responsible for all state, federal  
12 and Canadian regulatory matters relating to gas supply, planning and acquisition.

13 **Q. Please outline your professional experience.**

14 A. I joined Boston Gas in 1962 and served in various engineering and gas supply  
15 positions prior to being appointed Manager of Gas Supply in 1981. I was appointed  
16 Assistant Vice President in 1986 and assumed my present position in October 1996.  
17 I am presently responsible for all planning and acquisition activities pertaining to the  
18 natural gas supply of Eastern's gas subsidiaries, including the management and  
19 restructuring of the corporate natural gas supply portfolio (which includes pipeline  
20 supplies, underground storage facilities and local resources in the form of liquefied  
21 natural gas and propane/air facilities) in a competitive environment.

1 I am a member of several gas industry organizations including the New England Gas  
2 Association, the American Gas Association and the Guild of Gas Managers. I serve  
3 on the Board of Directors of Associated Gas Distributors, an organization of local  
4 gas distribution companies which provide natural gas service to more than 16  
5 million residential, commercial and industrial customers in 19 states plus the District  
6 of Columbia, and have served as Chairman of the Algonquin Customer Group. In  
7 1996 I was appointed by Massachusetts Governor William F. Weld to serve on a  
8 special commission to study the feasibility of bulk natural gas storage methods for  
9 Massachusetts.

10 **Q. Have you previously testified in regulatory proceedings?**

11 A. Yes, I have testified in a number of proceedings before the Massachusetts  
12 Department of Telecommunications and Energy, the Federal Energy Regulatory  
13 Commission and the Canadian National Energy Board. I have also submitted  
14 prefiled testimony to this Commission in DG 99-193, the EnergyNorth/Eastern  
15 Enterprises/KeySpan Corporation merger proceeding, but did not provide live  
16 testimony in that case.

17 **Q. What has your involvement been with regard to the relationship between ENGI**  
18 **and AES Londonderry, LLC ("AES")?**

19 A. I took over the AES project after Kenneth Margossian left EnergyNorth, Inc. Mr.  
20 Margossian had been EnergyNorth's Executive Vice-President, and was principally  
21 responsible for negotiations with AES and for overseeing the AES project. Mr.  
22 Margossian left EnergyNorth after announcement of the merger with Eastern

1 Enterprises. As part of the integration planning for the two companies, it was  
2 decided not to replace Mr. Margossian prior to the closing of the merger transaction.  
3 Because I oversee projects like the AES project for Boston Gas and the other gas  
4 utility subsidiaries of Eastern Enterprises, I was asked to take over responsibility for  
5 this project as well. Since that time, I have overseen most aspects of the project and  
6 have been closely involved in the negotiations with AES.

7 **Summary of Scope of Testimony**

8 **Q. Gentlemen, what is the purpose of your testimony?**

9 A. The purpose of our testimony is (1) to describe ENGI's plans to construct an  
10 approximately 2.8 mile long pipeline from the Tennessee Gas Pipeline Company  
11 ("Tennessee") take station in Londonderry to a proposed 720 megawatt electric  
12 generating facility being developed by AES, (2) discuss the terms of the  
13 relationship between ENGI and AES, and (3) summarize the financial analysis  
14 supporting the decision to make the investment.

15 **Q. What is ENGI seeking in this proceeding?**

16 A. ENGI is seeking approval of a Gas Transportation Agreement ("Transportation  
17 Agreement"), which was entered into by ENGI and AES on April 20, 2000. (The  
18 agreement is attached to the Petition in this case as Appendix 1.) The  
19 Transportation Agreement is a special contract because it calls for ENGI to  
20 provide transportation service to AES on terms and conditions that are different  
21 from those in ENGI's currently effective tariff. ENGI has also entered into a  
22 Natural Gas Firm Peaking Agreement ("Peaking Agreement") with AES, which is

1 an integral part of the transaction. (The Peaking Agreement is attached to the  
2 Petition as Appendix 2.) The Peaking Agreement, in and of itself, is more in the  
3 nature of a gas supply agreement, but because it is a critical component of the  
4 overall transaction between ENGI and AES, the Company believes that the  
5 Commission will also need to review and approve the terms of the Peaking  
6 Agreement in this proceeding.

7 **Overview of AES Project**

8 **Q. Mr. Luthern, please provide an overview of the AES project to which ENGI**  
9 **proposes to provide service and the lateral that ENGI proposes to construct**  
10 **for that purpose.**

11 A. I am aware that all three Commissioners and Chief Engineer Michael Cannata  
12 participated in the New Hampshire Site Evaluation Committee ("SEC")  
13 proceeding involving the AES Londonderry project, SEC Docket No. 98-02.  
14 Nevertheless, in order to provide a complete record before this Commission, I  
15 think it would be useful to provide some background regarding the two  
16 agreements reached by ENGI and AES.

17 On May 25, 1999, the SEC issued a detailed order (the "SEC Order," a  
18 copy of which is included with this testimony as Attachment MGS/WRL-1)  
19 conditionally approving AES's plans for a 720 MW combined-cycle, gas-fired  
20 electric generating facility in Londonderry. The SEC found that the facility met  
21 the statutory criteria set forth in RSA 162-H, specifically the need to address "the  
22 present and predicted growth in electric power demands in the State of New

1 A. Rather than provide a restatement of the terms of the agreements in the form of  
2 testimony, we thought it would be helpful to provide a summary of each  
3 agreement in a form that presents the more significant terms grouped together by  
4 subject matter. We have included these summaries with this testimony as  
5 Attachment MGS/WRL-3 and Attachment MGS/WRL-4.

6 **Q. Why do you believe that the Transportation Agreement and Peaking**  
7 **Agreement are in the public interest?**

8 A. In addition to providing support to AES in its efforts to complete construction of  
9 the project that it proposed to the SEC and which the SEC found to be consistent  
10 with the State's energy policy, the agreements with AES provide significant  
11 benefits to ENGI's customers.

12 Under the Transportation Agreement, AES will pay rates that are  
13 sufficient to enable ENGI to recover all of the cost associated with construction of  
14 the project and the ongoing costs of operation plus a return on the capital  
15 investment. As the financial analysis set forth in Attachment MGS/WRL-5  
16 shows, the demand charge alone will be sufficient to contribute net revenues  
17 above ENGI's overall allowed rate of return, which means that on an overall basis  
18 the project will effectively reduce ENGI's revenue requirement from its remaining  
19 customers relative to what it otherwise would have been. In addition to the  
20 demand charge, AES will also pay a commodity charge for each decatherm of  
21 gas delivered above in each contract year. The analysis applied a  
22 twenty year depreciable life for the investment, rather than the approximately



1 thirty-eight year life (2.66% per year) currently used for distribution mains, in  
2 order to track the twenty year term of the Transportation Agreement and ensure  
3 that the all project costs would be recovered over the life of the contract. In  
4 considering whether the anticipated revenues from AES would be sufficient to  
5 cover the costs of the project, the Company included annual operating expenses  
6 such as property taxes, maintenance and the like.

7 The project was treated as a traditional main extension and analyzed the  
8 project's ability to pay for itself in accordance with the method utilized by ENGI  
9 in Docket DR 97-057 (the Hitchiner Manufacturing special contract proceeding)  
10 and as previously recommended by the Commission staff. Attachment  
11 MGS/WRL-5 shows that beginning in 2010, Year 10 of the project, the project  
12 has an aggregate surplus on a present value basis.

13 We should also note that, although the pipeline is initially being planned  
14 as a dedicated line to serve AES, there are provisions in the Transportation  
15 Agreement that would allow ENGI to tap into the line to serve other customers  
16 under specific conditions. The cost of any additional facilities needed to serve  
17 customers other than AES from the pipeline are not included in the charges under  
18 the Transportation Agreement.

19 Perhaps, the most important benefit that ENGI's customers will receive  
20 from the AES relationship is the additional gas supply that will become available  
21 under the Peaking Agreement. The Peaking Agreement is expected to provide

1 significant gas cost savings because it will provide ENGI with considerable  
2 flexibility in managing its peaking resources.

3 **Q. Mr. Luthern, please explain why you believe the Peaking Agreement will**  
4 **provide significant benefits to ENGI.**

5 A. The Peaking Agreement has an extremely low demand charge compared with  
6 other available resources. As a result, this supply should be particularly  
7 economical during warmer than average winters. The monthly demand charge  
8 under the Peaking Agreement is \$ \_\_\_\_\_, which is equal to \$ \_\_\_\_\_ per MMBtu,  
9 multiplied by 1/12 of the Annual Contract Quantity, or \_\_\_\_\_ MMBtu. The  
10 demand charge increases annually by an inflation rate after the first year of the  
11 contract. In addition, the commodity charge during most of the contract term is  
12 based on the hourly clearing price for energy at ISO New England. Thus, based  
13 on the scheduling of gas taken under the Peaking Agreement, it may be possible  
14 to have gas delivered to ENGI at below market prices because the pricing  
15 mechanism in the contract provides ENGI with considerable flexibility to  
16 maximize its purchases during times when the cost of gas is at its lowest under the  
17 agreement and avoid purchases during periods when the cost of gas would be  
18 highest. During the period before the AES facility is able to utilize gas itself, the  
19 commodity charge for gas will be limited to AES's cost of natural gas at Dracut,  
20 Massachusetts, plus any variable charges incurred by AES for transportation of  
21 the gas from Dracut. It is also important to note that the Peaking Agreement gives  
22 ENGI hourly flexibility in ordering gas. This will add to ENGI's ability to

1 optimize its use of gas under the agreement and minimize the cost of this supply  
2 for its customers.

3 **Q. Are there other factors that the Commission should consider in considering**  
4 **the terms of the agreements with AES?**

5 A. As we mentioned earlier, AES has repeatedly made clear that bypass of ENGI's  
6 system was a viable option for them. The fact that AES did all of the preliminary  
7 right of way work and much of the design and engineering work necessary to  
8 construct and operate the pipeline without ENGI plainly demonstrated AES's  
9 intention and ability to proceed without ENGI if necessary. Ultimately, ENGI  
10 was able to reach agreement on the terms of an overall relationship that was  
11 acceptable to AES and would ensure that the rest of ENGI's customers received  
12 significant benefits from the addition of AES to ENGI's system. We believe this  
13 outcome is good for ENGI's customers and for AES at the same time.

14 It is also worth noting that the increase in size in Tennessee's pipeline in  
15 order to transport the gas required by AES will also improve the deliverability of  
16 gas to ENGI on the Tennessee system by providing an opportunity for ENGI to  
17 access additional capacity on the Concord lateral when AES is not taking either  
18 its full daily or hourly maximum quantity and because the increased size of  
19 Tennessee's pipeline will contribute to improved delivery pressures on the lateral.

20 **Effect of Peaking Agreement on Resource Planning**

21 **Q. Will the existence of the Peaking Agreement result in any changes in the**  
22 **Company's long range gas supply plan?**

1 A. Yes, it will. The AES peaking supplies will be reflected in the Company's long  
2 range gas supply plan.

3 **Project Schedule and Budget**

4 **Q. Mr. Luthern, Please provide an overview of the construction schedule and**  
5 **expected in service date for the pipeline.**

6 A. As is provided in Section 2.1 of the Transportation Agreement, construction of the  
7 pipeline is expected to begin by April 1, 2001. The target date for completion of  
8 the project is September 30, 2001.

9 **Q. Mr. Savoie, what is the budget for the pipeline project and what amounts**  
10 **have been spent to date?**

11 A. The total capital budget for the project is \$ . The costs to date total  
12 approximately \$25,000, which consists of consulting expenses of approximately  
13 \$15,500 and legal expenses of approximately \$9,500.

14 **Accounting Treatment of Project Expenditures**

15 **Q. Mr. Savoie, please describe the proposed accounting treatment of amounts**  
16 **expended and to be expended in planning and constructing the pipeline.**

17 A. All incremental project costs, including consulting, legal, engineering and other  
18 related costs, will be capitalized and included in rate base. The revenues from the  
19 project will then be booked entirely above the line. The anticipated revenue from  
20 AES is more than sufficient to cover both the investment and related expenses.  
21 As was discussed earlier, the financial analysis utilizes a twenty year depreciable  
22 life, rather than thirty-eight years. Because the Company has structured this

1 transaction utilizing a shorter than normal depreciation schedule for this  
2 investment, ENGI requests that the Commission expressly authorize the use of the  
3 shorter depreciation schedule in its final order. If a Form E-25 is required for this  
4 purpose, the Company will prepare one and submit it promptly. However, given  
5 that the request for approval of a shorter then normal depreciable life is for a new  
6 investment, rather than an existing one, a Form E-25 did not seem appropriate in  
7 this case.

8 **Q. How will ongoing costs related to the pipeline be treated?**

9 A. Ongoing costs related to the pipeline (e.g., taxes and maintenance) will be  
10 included in the Company's overall cost of service. The rate that is being charged  
11 to AES is designed to cover these costs, and that is one of the reasons that the rate  
12 includes an annual inflator.

13 **Differences Between ENGI Tariff and Agreements With AES**

14 **Q. Will AES be subject to any environmental remediation charges, energy  
15 efficiency surcharges or other surcharges?**

16 A. No, it will not. The Company negotiated the best financial terms possible with  
17 AES. AES was plainly in a position to bypass ENGI altogether if it so chose, and  
18 therefore it was not possible to impose significant additional costs on them such  
19 as the environmental surcharge.

20 ENGI's total annual weather-adjusted firm throughput (i.e., sales and  
21 transportation together) is approximately 130 million therms. The AES load is  
22 expected to be approximately three times this amount. Plainly, it would have

1           been grossly uneconomical and unfair to require AES to pay additional  
2           volumetric surcharges. Had ENGI sought to impose these charges, AES would  
3           simply have proceeded with bypassing ENGI's system.

4   **Q.   Mr. Savoie, will any of the terms of the Company's tariff apply to AES, or**  
5   **are all terms contained in the Transportation Agreement?**

6   **A.**   Section 5.5 of the Transportation Agreement provides that billing and payment  
7           will be governed by ENGI's tariff. Those provisions are set out in the third  
8           paragraph on Page 47 of the tariff, which applies to LV-90 firm transportation  
9           customers.

10           Other than the billing and collection provisions, all of the terms and  
11           conditions of the relationship between ENGI and AES are set forth in the two  
12           contracts, and therefore the tariff does not govern the parties' relationship. In  
13           particular, as is discussed above, the rates established by the Transportation  
14           Agreement were designed to cover all of the costs of extending ENGI's system to  
15           the AES plant on North Wentworth Drive. Therefore, the contribution in aid of  
16           construction rules in Section 7 of the tariff were inapplicable. Instead, the  
17           Company applied the ten year payback analysis that the Staff has previously  
18           recommended be applied for major system expansions. The agreement also  
19           addresses issues such as metering, access to customer premises and curtailment.  
20           In addition to those places where the Transportation Agreement provisions differ  
21           from provisions in the tariff, many of the provisions of ENGI's tariff are simply

1 inapplicable to the relationship with AES, given the nature of the service being  
2 provided and the size and design of the facilities and service being provided.

3 **Conclusion**

4 **Q. What is the timeframe that ENGI is requesting for PUC review and approval**  
5 **of the contracts with AES?**

6 A. Consistent with the schedule set forth in the Transportation Agreement, the  
7 Company is requesting that the Commission issue its order by October 1, 2000.  
8 Although the Commission is not bound by the schedule that ENGI and AES have  
9 agreed to, this date was chosen in order to accommodate the needs of AES's  
10 project schedule.

11 **Q. Does that conclude your testimony?**

12 A. Yes it does.

ORIGINAL

NHPUC(SEC) DSF DG 00-145 -

Exhibit No. 9

Witness

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**State of New Hampshire  
Before the  
Public Utilities Commission**

**Pre-filed Supplemental Testimony of:  
Leo Silvestrini**

**on behalf of:**

**EnergyNorth Natural Gas, Inc.**

**Agreements with AES Londonderry, LLC**

**Docket No. DG 00-145**

**January 12, 2001**



1 **Background Information Regarding Leo Silvestrini**

2 **Q. Mr. Silvestrini, please state your full name and business address.**

3 A. My name is A. Leo Silvestrini. My business address is One Beacon Street,  
4 Boston, Massachusetts.

5 **Q. Please state your position with KeySpan Energy Delivery New England**  
6 **(“KeySpan” or the “Company”).**

7 A. I am the Director of Rates and Regulatory Affairs.

8 **Q. How long have you been employed by KeySpan or its affiliates and in what**  
9 **capacities?**

10 A. I was hired by Boston Gas Company in October 1978 as an economic analyst in  
11 the Rate Department. In October 1980 I was promoted to Manager of Rates and  
12 Revenue Analysis. I was further promoted in February 1985 to the position of  
13 Director of Rates and Economic Analysis. Over the next seven years I held a  
14 similar position in Market Planning and Development, Corporate Strategic  
15 Planning and Gas Resource Planning. In December of 2000 I was named to my  
16 current position, Director of Rates and Regulatory Affairs.

17 **Q. What do your responsibilities as Director of Rates and Regulatory Affairs**  
18 **include?**

19 A. I am primarily responsible for the forecasting and analytical functions related to  
20 the demand for natural gas, revenues and gas costs; preparing, coordinating,  
21 supervising and testifying in rates and forecasting matters before state regulatory  
22 commissions; and supervising the design, implementation and administration of  
23 the Company’s rates, tariffs and cost studies.

1 **Q. Please describe your relevant educational background.**

2 A. I received a Bachelor of Arts Degree in History in 1973 from the State University  
3 of New York at Albany and a Master of Arts Degree in Economics from Tufts  
4 University in 1976. I have also received a certificate from the Northeastern  
5 University School of Business Management for the completion of the  
6 Management Development Program in 1987.

7 **Q. Have you previously testified in regulatory proceedings?**

8 A. Yes, I have testified in a number of regulatory proceedings before the  
9 Massachusetts Department of Telecommunications and Energy in rate matters  
10 including marginal cost allocation studies, rate design, cost of gas adjustment  
11 clause proposals, the rates, cost of service and financial analysis associated with  
12 special contract. I have also testified before the Massachusetts Energy Facilities  
13 Siting Board on demand forecasts, resource requirements and financial analysis. I  
14 am also responsible for the Company's current rate redesign case and periodic  
15 cost of gas filings before the New Hampshire Public Utilities Commission.

16 **Q. What has been your involvement with regard to the project with AES  
17 Londonderry, LLC ("AES")?**

18 A. I have reviewed the testimony, attachments and data responses prepared and  
19 submitted by Mark Savoie, analyzed the results of those documents and schedules  
20 and provided updates and modifications to them as required since Mr. Savoie's  
21 departure from the Company.

1 **Q. Given your background and experience and your knowledge and**  
2 **understanding of those documents, are you prepared to adopt Mr. Savoie's**  
3 **testimony, attachments and responses as your own?**

4 A Yes, I am.

5 **Q. Do you have any amendments or updates to those documents, attachments**  
6 **and responses that you would like to make at this time?**

7 A. Yes, I would like to submit the attached four page Attachment ALS-1, that  
8 updates the previously submitted MGS/WRL-5, the financial analysis supporting  
9 the favorable economics of the Transportation Agreement.

10 **Q What updates does Attachment ALS-1 provide?**

11 A. Attachment ALS-1 makes the following updates. (1) The initial investment is  
12 updated to reflect the latest engineering estimates on the costs of the project,  
13 as presented in the testimony of Anthony J. DiGiovanni. (2) The  
14 book life of the asset is increased to 38 years (2.63% per year), consistent with the  
15 discussions we have had with the Commission staff and the Office of the  
16 Consumer Advocate. (3) The property tax calculation is revised to reflect the  
17 changes presented in response to Data Request OCA 1-3. (4) The margin  
18 calculation is revised to reflect the escalation clause in the Transportation  
19 Agreement. (5) The contract is assumed to be renewed after year 20. (6) The  
20 estimated financial benefits to customers of the Peaking Agreement, as presented  
21 in the response to Data Request Staff 1-25 are added to the benefits of the  
22 Transportation Agreement to provide a complete cost/benefit analysis.

23 **Q. What does Page 2 of 4 of Attachment ALS-1 provide?**

1 A. Page 2 of 4 of Attachment ALS-1 provides a break-even calculation showing that  
2 an initial investment would provide a rate of return that  
3 approximates the Company's allowed rate of return of 9.83%.

4 **Q. What does Page 3 of 4 of Attachment ALS-1 provide?**

5 A. Page 3 of 4 responds to a request of Steven Frink, on behalf of the Commission's  
6 Finance Department, to provide a similar breakeven calculation that includes the  
7 benefits to customers from the Peaking Agreement. It shows that an initial  
8 investment of would provide a return of 9.9%.

9 **Q. What does Page 4 of 4 show?**

10 A. Page 4 of 4 presents the results of the financial analysis when the benefit of the  
11 Peaking Agreement is as presented in the Company's supplemental response to  
12 Data Request Staff 1-25, which updated the value of the peaking supply for  
13 market prices as of October 2000.

14 **Q. Do these updates show that the Transportation Agreement and Peaking**  
15 **Agreements are in the public interest?**

16 A. Yes. Despite the updated engineering estimates which increase the anticipated  
17 cost of the project, the results of the financial analysis presented in ALS-1 show  
18 that the demand charges alone are still sufficient to contribute net revenues above  
19 the Company's allowed rate of return. When the estimated benefits of the  
20 Peaking Agreement are added to anticipated benefits of the Transportation  
21 Agreement, the results show significant reductions in overall costs to customers.

22 **Q. Does that conclude your testimony?**

23 A. Yes, it does.

COST/BENEFIT ANALYSIS

AES FINANCIAL Model

| ISCAL_YEA | END YEAR<br>RATE BASE | AVERAGE<br>RATE BASE | TOTAL<br>RETURN | TAX<br>DEPREC. | BOOK<br>DEPREC. | DEFERRED<br>TAX | BOOK<br>TAXABLE<br>INCOME | BOOK<br>INCOME TAX<br>EXPENSE | PROPERTY<br>TAX | ADDITIONAL<br>OPERATING<br>EXPENSES | REVENUE<br>REQUIRE. | MARGINS | ANNUAL<br>SURPLUS<br>(DEFICIT) | RATE OF<br>RETURN | PV OF<br>ANNUAL<br>SURPLUS<br>(DEFICIT) | AGGREGATE<br>SURPLUS<br>(DEFICIT) | Cash Flow | WITH PEAKING BENEFIT |                            |                   |  |  |
|-----------|-----------------------|----------------------|-----------------|----------------|-----------------|-----------------|---------------------------|-------------------------------|-----------------|-------------------------------------|---------------------|---------|--------------------------------|-------------------|---|-----------------------------------|-----------|----------------------|----------------------------|-------------------|--|--|
|           |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           | PEAKING<br>BENEFIT   | TOTAL<br>ANNUAL<br>BENEFIT | RATE OF<br>RETURN |  |  |
| 2000      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2001      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2002      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2003      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2004      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2005      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2006      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2007      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2008      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2009      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2010      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2011      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2012      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2013      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2014      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2015      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2016      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2017      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2018      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2019      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2020      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2021      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2022      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2023      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2024      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2025      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2026      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2027      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2028      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2029      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2030      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2031      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2032      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2033      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2034      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2035      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2036      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2037      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2038      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2039      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |
| 2040      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |  |

AVERAGE

ASSUMPTION Initial Capital Cost

Book Life (years)

Peaking Benefit

Average Rate Base Calculated over 12 months.

Contract is renewed after year 20.

(Assumes Normal Forecasted Winter 1999/2000 - Staff 1-25)

COST/BENEFIT ANALYSIS

AES FINANCIAL Model

| ISCAL YEA | END YEAR<br>RATE BASE | AVERAGE<br>RATE BASE | TOTAL<br>RETURN | TAX<br>DEPREC. | BOOK<br>DEPREC. | DEFERRED<br>TAX | BOOK<br>TAXABLE<br>INCOME | BOOK<br>INCOME TAX<br>EXPENSE | PROPERTY<br>TAX | ADDITIONAL<br>OPERATING<br>EXPENSES | REVENUE<br>REQUIRE. | MARGINS | ANNUAL<br>SURPLUS<br>(DEFICIT) | RATE OF<br>RETURN | PV OF<br>ANNUAL<br>SURPLUS<br>(DEFICIT) | AGGREGATE<br>SURPLUS<br>(DEFICIT) | Cash Flow | WITH PEAKING BENEFIT |                            |                   |  |
|-----------|-----------------------|----------------------|-----------------|----------------|-----------------|-----------------|---------------------------|-------------------------------|-----------------|-------------------------------------|---------------------|---------|--------------------------------|-------------------|---|-----------------------------------|-----------|----------------------|----------------------------|-------------------|--|
|           |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           | PEAKING<br>BENEFIT   | TOTAL<br>ANNUAL<br>BENEFIT | RATE OF<br>RETURN |  |
| 2000      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2001      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2002      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2003      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2004      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2005      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2006      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2007      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2008      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2009      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2010      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2011      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2012      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2013      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2014      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2015      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2016      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2017      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2018      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2019      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2020      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2021      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2022      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2023      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2024      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2025      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2026      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2027      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2028      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2029      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2030      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2031      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2032      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2033      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2034      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2035      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2036      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2037      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2038      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2039      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2040      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |

AVERAGE

SUMPTION Initial Capital Cost

Book Life (years)

Peaking Benefit

(Assumes Normal Forecasted Winter 1999/2000 - Staff 1-25)

Average Rate Base Calculated over 12 months.

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COST/BENEFIT ANALYSIS

AES FINANCIAL Model

| ISCAL YEA | END YEAR<br>RATE BASE | AVERAGE<br>RATE BASE | TOTAL<br>RETURN | TAX<br>DEPREC. | BOOK<br>DEPREC. | DEFERRED<br>TAX | BOOK<br>TAXABLE<br>INCOME | BOOK<br>INCOME TAX<br>EXPENSE | PROPERTY<br>TAX | ADDITIONAL<br>OPERATING<br>EXPENSES | REVENUE<br>REQUIRE. | MARGINS | ANNUAL<br>SURPLUS<br>(DEFICIT) | RATE OF<br>RETURN | PV OF<br>ANNUAL<br>SURPLUS<br>(DEFICIT) | AGGREGATE<br>SURPLUS<br>(DEFICIT) | Cash Flow | WITH PEAKING BENEFIT |                            |                   |  |
|-----------|-----------------------|----------------------|-----------------|----------------|-----------------|-----------------|---------------------------|-------------------------------|-----------------|-------------------------------------|---------------------|---------|--------------------------------|-------------------|---|-----------------------------------|-----------|----------------------|----------------------------|-------------------|--|
|           |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           | PEAKING<br>BENEFIT   | TOTAL<br>ANNUAL<br>BENEFIT | RATE OF<br>RETURN |  |
| 2000      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2001      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2002      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2003      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2004      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2005      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2006      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2007      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2008      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2009      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2010      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2011      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2012      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2013      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2014      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2015      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2016      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2017      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2018      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2019      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2020      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2021      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2022      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2023      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2024      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2025      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2026      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2027      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2028      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2029      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2030      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2031      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2032      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2033      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2034      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2035      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2036      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2037      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2038      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2039      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |
| 2040      |                       |                      |                 |                |                 |                 |                           |                               |                 |                                     |                     |         |                                |                   |   |                                   |           |                      |                            |                   |  |

AVERAGE

SUMPTION Initial Capital Cost  
Book Life (years)  
Peaking Benefit (Assumes Normal Forecasted Winter 1999/2000 - Staff 1-25)  
Average Rate Base Calculated over 12 months.  
Contract is renewed after year 20.

COST/BENEFIT ANALYSIS

AES FINANCIAL Model

| ISCAL YEAR | END YEAR  | AVERAGE   | DEBT     | COMMON | TOTAL  | TAX     | BOOK    | DEFERRED | BOOK    | BOOK       | ADDITIONAL | REVENUE   | ANNUAL   | RATE OF | PV OF     | ANNUAL    | AGGREGATE | Cash Flow | WITH PEAKING BENEFIT |         |        |         |
|------------|-----------|-----------|----------|--------|--------|---------|---------|----------|---------|------------|------------|-----------|----------|---------|-----------|-----------|-----------|-----------|----------------------|---------|--------|---------|
|            | RATE BASE | RATE BASE | INTEREST | RETURN | RETURN | DEPREC. | DEPREC. | TAX      | TAXABLE | INCOME TAX | PROPERTY   | OPERATING | REQUIRE. | MARGINS | (DEFICIT) | RATE OF   | SURPLUS   |           | SURPLUS              | PEAKING | TOTAL  | RATE OF |
|            |           |           |          |        |        |         |         |          | INCOME  | EXPENSE    | TAX        | EXPENSES  |          |         |           | (DEFICIT) | (DEFICIT) |           | BENEFIT              | ANNUAL  | RETURN |         |
| 2000       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2001       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2002       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2003       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2004       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2005       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2006       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2007       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2008       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2009       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2010       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2011       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2012       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2013       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2014       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2015       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2016       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2017       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2018       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2019       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2020       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2021       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2022       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2023       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2024       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2025       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2026       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2027       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2028       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2029       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2030       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2031       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2032       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2033       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2034       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2035       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2036       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2037       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2038       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2039       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| 2040       |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |
| AVERAGE    |           |           |          |        |        |         |         |          |         |            |            |           |          |         |           |           |           |           |                      |         |        |         |

ASSUMPTION Initial Capital Cost  
Book Life (years)  
Peaking Benefit  
Average Rate Base Calculated over 12 months.  
Contract is renewed after year 20

(Assumes Normal Forecasted Winter 1999/2000 - Revised Staff 1-25)