DE 21-030 Unitil Request for Change in Rates
Testimony of Eckberg
Attachment SRE-1

Qualifications of Stephen R. Eckberg

My name is Stephen R. Eckberg. I am employed as a Utility Analyst with the Regulatory Support Division of the New Hampshire Department of Energy. My business address is 21 S. Fruit Street, Suite 10, Concord, New Hampshire 03301.

I earned a B.S. in Meteorology from the State University of New York at Oswego and an M.S. in Statistics from the University of Southern Maine.

After receiving my M.S. degree, I was employed as an analyst in the Boston office of Hagler Bailly, Inc, a consulting firm working with regulated utilities to perform evaluations of energy efficiency and demand-side management programs. From 2000 through 2003, I was employed at the NH Governor's Office of Energy and Community Services as the Director of the Weatherization Assistance Program. Following that, I was employed at Belknap Merrimack Community Action Agency as the Statewide Program Administrator of the NH Electric Assistance Program (EAP). In that capacity, I presented testimony before the NH Public Utilities Commission (PUC) in dockets related to the design, implementation and management of the EAP. I have also testified before Committees of the New Hampshire General Court on issues related to energy efficiency and low income electric bill assistance. From 2007 – 2014 I was employed as a Utility Analyst with the New Hampshire Office of the Consumer Advocate (OCA). During my tenure with the OCA, I attended rate making and regulatory training at New Mexico State University's Center for Public Utilities.

In my position with the OCA, I entered pre-filed testimony jointly with Kenneth E. Traum, former Assistant Consumer Advocate, in the following dockets:

- DG 08-048 Unitil Corporation and Northern Utilities, Inc. Joint Petition for Approval of Stock Acquisition
- DW 08-070 Lakes Region Water Company Financing & Step Increase

- DW 08-098 Aquarion Water Company of New Hampshire
- DE 09-035 Public Service of New Hampshire Distribution Service Rate Case

I entered (non-joint) pre-filed testimony in the following dockets:

- DT 07-027 Kearsarge Telephone Company, Wilton Telephone Company, Hollis Telephone Company & Merrimack County Telephone Company Petition for Alternative Form of Regulation. Phase II & Phase III.
- DW 08-073 Pennichuck Water Works, Inc. Petition for Rate Increase
- DW 08-070 Lakes Region Water Company Third Step Increase.
- DW 08-065 Hampstead Area Water Company Petition for Rate Increase.
- DE 09-170 2010 Joint Utilities Core Energy Efficiency Programs.
- DW 10-090 Pittsfield Aqueduct Company Petition for Rate Increase.
- DW 10-091 Pennichuck Water Works Petition for Rate Increase.
- DW 10-141 Lakes Region Water Petition for Rate Increase.
- DE 10-188 2011-2012 Joint Electric and Natural Gas Utilities Energy Efficiency Programs.
- DE 11-250 PSNH Installation of a Wet Flue-Gas Desulphurization Scrubber.
- DE 12-262 2013-2014 Joint Electric and Natural Gas Utilities Energy Efficiency Programs.
- DE 12-292 PSNH 2013 Default Energy Service Rate.
- DE 12-262 2014 CORE Energy Efficiency Programs Update Filing.
- DE 13-108 PSNH 2012 Energy Service Reconciliation.
- DG 14-091 Liberty Utilities Special Contract and Lease Agreement with Innovative Natural Gas, LLC dba iNATGAS.

In August 2014, I joined the PUC's Sustainable Energy Division (SED). My responsibilities included grant review and administration, and compliance oversight of New Hampshire's Renewable Portfolio Standard requirements. While employed with SED, I filed testimony in:

- DE 18-140 Liberty Utilities Petition for Approval of a Renewable Natural Gas Supply and Transportation Contract

In October 2019, I joined the PUC's Electric Division. I have filed testimony in:

- DE 17-136 2018-2020 New Hampshire Statewide Energy Efficiency Plan - 2020 Third Year Programs.

- DE 19-197 Development of a Statewide, Multi-Use Online Energy Data Platform (Joint Testimony with Jason Morse).

- DE 20-092 2021 – 2023 Triennial Energy Efficiency Plan.

In July 2021, with the passage of HB2, the New Hampshire Legislature created the Department of Energy, I became an employee of the Regulatory Support Division of the Department of Energy. As an employee of the Department of Energy, I have filed Technical Statements providing information to the PUC in numerous regulatory matters and have also filed testimony in the following dockets:

- DE 21-020 Eversource Energy and Consolidated Communications Joint Petition to Approve Pole Asset Transfer.

- DE 21-104 Northern Utilities Request for Change in Rates.

- DE 21-030 Unitil Request for Change in Rates.

- DE 23-044 Liberty Utilities (Granite State Electric) 2023 Default Service Solicitation.

A list of NH PUC cases where the whole life depreciation method was adopted.

1. Order No. 22,141 (May 13, 1996)(GSEC)(stating "GSEC agrees to maintain its current **whole life** depreciation methodology and to submit a new depreciation study with its next rate case filing")
2. Order No. 22,883 (March 25, 1998)(PWW)(stating "Finally, regarding depreciation, Pennichuck and Staff agree to use the '**whole life**' rather than Pennichuck's proposed 'average remaining life' methodology, for an annual depreciation expense of $1,272,791, which results in an annual composite depreciation rate of 2.44%.")
3. Order No. 24,072 (October 25, 2002)(Concord Electric Co.)(stating "Under section 3.6, UES agrees to file a general base rate case and an updated depreciation study using the **whole life** methodology no later than five years from the issuance of the Commission's final order.")
4. Order No. 24,075 (October 28, 2002)(Northern)(Stating "Staff and the Parties agreed to use of the Broad Group/**Whole Life** depreciation rates with the applicable plant in service balance as of June 30, 2001 plus the annual amortization of the depreciation reserve imbalance over five years to determine the required level of depreciation expense.")
5. Order No. 24,369 (September 2, 2004)(PSNH)(stating "The signatories agreed to adopt Staff's recommendations, both as to the annual deduction from rate base to reflect the declining value of assets over time and as to the corresponding addition to PSNH's annual operating costs as depreciation expenses. Staff recommended that depreciation accrual rates be applied to plant balances as of June 30, 2003. It was Staff's further recommendation to use the **whole life** technique, as opposed to PSNH's proposed use of the remaining life technique, to determine estimated depreciation expense.")
6. Order No. 25,123 (June 28, 2010)(PSNH)(stating "The settlement agreement also notes that the rate increases allowed under the settlement agreement were calculated using Commission-approved **whole-life** depreciation rates, and that the Company should continue to record its depreciation expense using the **whole-life** rates testified to by Staff witness Cunningham.")
7. Order No. 25,352 (April 24, 2012)(Northern)(stating "Pursuant to Section 4.1 of the Settlement Agreement, the Company will use **whole-life** depreciation accrual rates, as presented in supporting schedules and explained in Mr. Cunningham's testimony.")
8. Order No. 26,129 (May 2, 2018)(Northern)(Stating "The Settling Parties agreed that Northern would reflect updated **whole-life** rates for book depreciation purposes (as shown on Exhibit 7 at 315) and that there would be no amortization of the reserve variance. *Id.* at ¶ 3.2."
9. Order No. 26,433 (December 15, 2020)(PSNH)(stating "Section 7 addresses certain cost of service adjustments, including the use of **whole-life** depreciation and the treatment of an accrual for uncollectible expense.").
10. Order No. 26,650 (July 20, 2022) (Northern)(Stating "The Settlement provides that the Company shall use updated **whole-life** rates for book depreciation purposes as reflected in Settlement Agreement 9."
11. Order No. 26,623 (May 3, 2022)(Unitil)(approving Settlement in part)(Settlement Section 11.11stating "The Settlement Parties agree that the Company shall use updated **whole-life** rates for book depreciation purposes…")

mortality data were accumulated. The prediction of future retirement patterns is also necessary in application of the vintage group procedure. However, ELG is much more sensitive to these predictions. ELG may be expected to produce greater fluctuations in depreciation expense from year to year than the broad group procedure.

The Broad Group procedure does not require that an assumption be made concerning the shape of the appropriate survivor curve (see Chapter VI) in the grouping process. However, Vintage Group, as generally applied, and ELG require such a determination. ELG depends upon the survivor curve forecast to determine the subgroups. With the FCC's agreement, the ELG procedure has been widely adopted by telephone companies subject to FCC jurisdiction. Some of the state commissions, however, have disallowed its use for intrastate rate making on both practical and technical grounds. The Vintage Group and Equal Life Group procedures are discussed in more detail in Chapter XII.

Application Techniques

There are two techniques commonly used to determine the depreciation rate to be applied to a utility's plant depreciation categories: Whole Life and Remaining Life.

Whole Life

The Whole Life technique bases the depreciation rate on the estimated average service life of the plant category. Whole life depreciation results in the allocation of a gross plant base over the total life of the investment. However, to the extent that the estimated average service life assigned turns out to be incorrect, (and precision in these estimates cannot reasonably be expected), the Whole Life technique will result in a depreciation reserve imbalance. For example, such over-accrual or under-accrual may remain in the reserve indefinitely unless offset by later overages or underages in the opposite direction. However, when a depreciation reserve excess or deficiency is reasonably certain, the Whole Life technique may be modified to include an adjustment to the accrual rate designed to eliminate the reserve imbalance in the future. For example, a special amortization of the difference may be allowed.

Remaining Life

The Remaining Life technique seeks to recover the undepreciated original cost less future net salvage over its remaining life. With this technique, the gross plant less book depreciation reserve is used as the depreciable cost and the remaining life or future life expectancy is used in the denominator. The formula is:

$$D = \frac{B - U - C'}{E} \quad (11)$$

where D is the depreciation expense or annual accrual
where B is the book cost of the Gross Plant
where U is the book depreciation reserve at start of the year
where C'is the Estimated Future Net Salvage in dollars
where E is the Estimated Average Remaining Life

The following formula is used to arrive at the depreciation rate in percent:

$$\text{depreciation rate } d = \frac{D}{B} \times 100 \quad (12)$$

This rate may also be derived by dealing entirely in percentages as follows:

$$\text{depreciation rate } d = \frac{100 - u - c'}{E} \quad (13)$$

Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty

DE 23-039

Distribution Service Rate Case

NH Department of Energy Data Requests - Set 6

Date Request Received: 8/31/23 | Date of Response: 9/15/23
Request No. DOE 6-2 | Respondent: John Spanos

REQUEST:

Reference Testimony of John J. Spanos, Attachment JJS-2 page 49 of 155 (Bates II-1134 in 4/28/23 filing)

a. The Bates numbering for Attachment JJS-2 page 49 of 155 in the 5/5/23 filing is not readable. What is the correct appropriate Bates numbering for this page?

b. Please provide a schedule comparing depreciation calculated using Whole Life and Remaining Life methodologies, by account.

c. Please provide a schedule similar to Attachment JJS-2, page 49 of 152 using Whole Life method.

d. Please provide the resultant theoretical reserve imbalance, by account, using Whole Life method.

RESPONSE:

a. The correct Bates numbering for this page is Bates II-1144. Attachment JJS-2 ranges from Bates II-1098 through II-1252.

b. Attachment 23-039 DOE 6-2.b sets forth a comparison of the depreciation rates and expense using remaining life and whole life methodologies. Please note the remaining life method takes into consideration reserve variances while the whole life method does not.

c. Attachment 23-039 DOE 6-2.c sets forth the summarized depreciation calculations using the whole life method as of December 31, 2022. The schedule includes the same survivor curve and net salvage percentage by account as well as the original cost by account as of December 31, 2022.

d. Attachment 23-039 DOE 6-2.d sets forth the resulting Calculated Accrued Depreciation (theoretical reserve) vs. Book Reserve imbalance as of December 31, 2022.

LIBERTY UTILITIES (GRANITE STATE ELECTRIC) CORP.

TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, NET SALVAGE PERCENT, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUAL RATES RELATED TO ELECTRIC PLANT AS OF DECEMBER 31, 2022

	ACCOUNT	ORIGINALCOST AS OF DECEMBER 31, 2022	REMAINING LIFE CALCULATED ANNUAL ACCRUAL AMOUNT	REMAINING LIFE CALCULATED ANNUAL ACCRUAL RATE	WHOLE LIFE CALCULATED ANNUAL ACCRUAL AMOUNT	WHOLE LIFE CALCULATED ANNUAL ACCRUAL RATE
	(1)	(2)	(3)	(4)=(3)/(2)	(5)	(6)=(5)/(2)
	ELECTRIC PLANT					
	INTANGIBLE PLANT					
303.00	MISCELLANEOUS INTANGIBLE PLANT - 3 YEAR	2,127,989.37	620,511	29.16	678,651	31.89
303.10	MISCELLANEOUS INTANGIBLE PLANT - 5 YEAR	598,614.89	0	-	89,225	14.91
303.15	MISCELLANEOUS INTANGIBLE PLANT - 7 YEAR	379,186.69	52,913	13.95	54,186	14.29
303.20	MISCELLANEOUS INTANGIBLE PLANT - 10 YEAR	12,016,607.73	653,264	5.44	1,161,024	9.66
303.30	MISCELLANEOUS INTANGIBLE PLANT - 20 YEAR	13,541,670.26	675,607	4.99	677,084	5.00
	TOTAL INTANGIBLE PLANT	**28,664,068.94**	**2,002,295**	**6.99**	**2,660,170**	**9.28**
	DISTRIBUTION PLANT					
361.00	STRUCTURES AND IMPROVEMENTS	1,965,159.96	29,126	1.48	34,459	1.75
362.00	STATION EQUIPMENT	42,392,278.48	697,620	1.65	814,144	1.92
364.00	POLES, TOWERS AND FIXTURES	61,851,833.71	1,760,749	2.85	1,913,696	3.09
365.00	OVERHEAD CONDUCTORS AND DEVICES	87,883,300.64	2,671,569	3.04	2,636,499	3.00
366.00	UNDERGROUND CONDUIT	7,098,394.12	116,384	1.64	120,247	1.69
367.00	UNDERGROUND CONDUCTORS AND DEVICES	20,580,040.54	524,670	2.55	524,379	2.55
368.00	LINE TRANSFORMERS	35,203,650.48	1,345,966	3.82	1,386,672	3.94
369.00	SERVICES	17,220,958.13	544,054	3.16	548,488	3.19
370.00	METERS	6,785,897.88	718,628	10.59	565,774	8.34
371.00	INSTALLATIONS ON CUSTOMERS' PREMISES	1,489,463.54	101,320	6.80	99,347	6.67
373.00	STREET LIGHTING AND SIGNAL SYSTEMS	6,720,615.34	194,185	2.89	254,543	3.79
	TOTAL DISTRIBUTION PLANT	**289,191,592.82**	**8,704,271**	**3.01**	**8,898,248**	**3.08**
	GENERAL PLANT					
390.00	STRUCTURES AND IMPROVEMENTS	13,633,947.78	284,800	2.09	261,840	1.92
391.00	OFFICE FURNITURE AND EQUIPMENT	578,812.92	30,024	5.19	27,502	4.75
391.10	OFFICE FURNITURE AND EQUIPMENT - SOFTWARE AND DESKTOP COMPUTERS	165,300.36	32,087	19.41	18,866	11.41
391.20	OFFICE FURNITURE AND EQUIPMENT - LAPTOP COMPUTERS	240,284.74	64,074	26.67	22,402	9.32
392.00	TRANSPORTATION EQUIPMENT	5,831,875.24	308,377	5.29	330,638	5.67
393.00	STORES EQUIPMENT	512,515.06	27,924	5.45	19,067	3.72
394.00	TOOLS, SHOP AND GARAGE EQUIPMENT	1,491,529.52	56,920	3.82	53,206	3.57
395.00	LABORATORY EQUIPMENT	570,632.69	38,546	6.75	23,847	4.18
396.00	POWER OPERATED EQUIPMENT	1,989,836.90	46,437	2.33	113,659	5.71
397.00	COMMUNICATION EQUIPMENT	1,993,169.25	93,768	4.70	38,801	1.95
397.10	COMMUNICATION EQUIPMENT - SITE SPECIFIC	54,351.75	0	-	1,226	2.26
398.00	MISCELLANEOUS EQUIPMENT	135,147.24	8,457	6.26	9,014	6.67
	TOTAL GENERAL PLANT	**27,197,403.45**	**991,414**	**3.65**	**920,068**	**3.38**

LIBERTY UTILITIES (GRANITE STATE ELECTRIC) CORP.

TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, NET SALVAGE PERCENT, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUAL RATES RELATED TO ELECTRIC PLANT AS OF DECEMBER 31, 2022

	ACCOUNT	ORIGINALCOST AS OF DECEMBER 31, 2022	REMAINING LIFE CALCULATED ANNUAL ACCRUAL AMOUNT	REMAINING LIFE CALCULATED ANNUAL ACCRUAL RATE	WHOLE LIFE CALCULATED ANNUAL ACCRUAL AMOUNT	WHOLE LIFE CALCULATED ANNUAL ACCRUAL RATE
	(1)	(2)	(3)	(4)=(3)/(2)	(5)	(6)=(5)/(2)
	TOTAL DEPRECIABLE PLANT	**345,053,065.21**	**11,697,980**	**3.39**	**12,478,486**	**3.62**
	NONDEPRECIABLE PLANT AND ACCOUNTS NOT STUDIED					
301.00	ORGANIZATION	24,808.42				
360.00	LAND	3,172,947.00				
372.00	LEASED PROPERTY ON CUSTOMERS' PREMISES					
389.00	LAND	1,620,371.60				
	TOTAL NONDEPRECIABLE PLANT AND ACCOUNTS NOT STUDIED	**4,818,127.02**				
	TOTAL ELECTRIC PLANT	**349,871,192.23**				

* ADDITIONS AS OF JANUARY 1, 2023 WILL UTILIZE AN ACCRUAL RATE OF 20.00% BASED ON A 5-SQ IOWA SURVIVOR CURVE AND 0% NET SALVAGE.
** ADDITIONS AS OF JANUARY 1, 2023 WILL UTILIZE AN ACCRUAL RATE OF 5.00% BASED ON A 20-SQ IOWA SURVIVOR CURVE AND 0% NET SALVAGE.

LIBERTY UTILITIES
GRANITE STATE ELECTRIC

TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, NET SALVAGE PERCENT, ORIGINAL COST AND CALCULATED ANNUAL AND ACCRUED DEPRECIATION RELATED TO ELECTRIC PLANT AS OF DECEMBER 31, 2022

	ACCOUNT	SURVIVOR CURVE	NET SALVAGE PERCENT	ORIGINALCOST AS OF DECEMBER 31, 2022	CALCULATED ANNUAL ACCRUAL AMOUNT	CALCULATED ANNUAL ACCRUAL RATE	CALCULATED ACCRUED DEPRECIATION
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
	ELECTRIC PLANT						
	INTANGIBLE PLANT						
303.00	MISCELLANEOUS INTANGIBLE PLANT - 3 YEAR	3-SQ	0	2,127,989.37	678,651	31.89	819,552
303.10	MISCELLANEOUS INTANGIBLE PLANT - 5 YEAR	5-SQ	0	598,614.89	89,225	14.91	554,003
303.15	MISCELLANEOUS INTANGIBLE PLANT - 7 YEAR	7-SQ	0	379,186.69	54,186	14.29	81,256
303.20	MISCELLANEOUS INTANGIBLE PLANT - 10 YEAR	10-SQ	0	12,016,607.73	1,161,024	9.66	9,457,913
303.30	MISCELLANEOUS INTANGIBLE PLANT - 20 YEAR	20-SQ	0	13,541,670.26	677,084	5.00	338,542
	TOTAL INTANGIBLE PLANT			**28,664,068.94**	**2,660,170**	**9.28**	**11,251,266**
	DISTRIBUTION PLANT						
361.00	STRUCTURES AND IMPROVEMENTS	60-R3	(5)	1,965,159.96	34,459	1.75	450,708
362.00	STATION EQUIPMENT	60-R2.5	(15)	42,392,278.48	814,144	1.92	8,548,461
364.00	POLES, TOWERS AND FIXTURES	55-R2.5	(70)	61,851,833.71	1,913,696	3.09	19,829,435
365.00	OVERHEAD CONDUCTORS AND DEVICES	50-R2	(50)	87,883,300.64	2,636,499	3.00	27,223,431
366.00	UNDERGROUND CONDUIT	65-R4	(10)	7,098,394.12	120,247	1.69	2,043,224
367.00	UNDERGROUND CONDUCTORS AND DEVICES	55-R4	(40)	20,580,040.54	524,379	2.55	6,705,507
368.00	LINE TRANSFORMERS	33-L2	(30)	35,203,650.48	1,386,672	3.94	17,410,807
369.00	SERVICES	55-R4	(75)	17,220,958.13	548,488	3.19	6,968,367
370.00	METERS	15-R1	(25)	6,785,897.88	565,774	8.34	2,799,364
371.00	INSTALLATIONS ON CUSTOMERS' PREMISES	15-S3	0	1,489,463.54	99,347	6.67	241,861
373.00	STREET LIGHTING AND SIGNAL SYSTEMS	33-S0.5	(25)	6,720,615.34	254,543	3.79	2,570,548
	TOTAL DISTRIBUTION PLANT			**289,191,592.82**	**8,898,248**	**3.08**	**94,791,713**
	GENERAL PLANT						
390.00	STRUCTURES AND IMPROVEMENTS	60-R4	(15)	13,633,947.78	261,840	1.92	2,613,721
391.00	OFFICE FURNITURE AND EQUIPMENT	20-SQ	0	578,812.92	27,502	4.75	145,402
391.10	OFFICE FURNITURE AND EQUIPMENT - SOFTWARE AND DESKTOP COMPUTERS	5-SQ	0	165,300.36	18,866	11.41	155,867
391.20	OFFICE FURNITURE AND EQUIPMENT - LAPTOP COMPUTERS	5-SQ	0	240,284.74	22,402	9.32	227,260
392.00	TRANSPORTATION EQUIPMENT	15-S2	15	5,831,875.24	330,638	5.67	1,452,509
393.00	STORES EQUIPMENT	25-SQ	0	512,515.06	19,067	3.72	120,631
394.00	TOOLS, SHOP AND GARAGE EQUIPMENT	25-SQ	0	1,491,529.52	53,206	3.57	285,730
395.00	LABORATORY EQUIPMENT	20-SQ	0	570,632.69	23,847	4.18	230,288
396.00	POWER OPERATED EQUIPMENT	14-L2.5	20	1,989,836.90	113,659	5.71	616,657
397.00	COMMUNICATION EQUIPMENT	15-SQ	0	1,993,169.25	38,801	1.95	1,634,531
397.10	COMMUNICATION EQUIPMENT - SITE SPECIFIC	20-SQ	0	54,351.75	1,226	2.26	51,647
398.00	MISCELLANEOUS EQUIPMENT	15-SQ	0	135,147.24	9,014	6.67	63,990
	TOTAL GENERAL PLANT			**27,197,403.45**	**920,068**	**3.38**	**7,598,233**
	TOTAL DEPRECIABLE PLANT			**345,053,065.21**	**12,478,486**	**3.62**	**113,641,212**
	NONDEPRECIABLE PLANT AND ACCOUNTS NOT STUDIED						
301.00	ORGANIZATION			24,808.42			
360.00	LAND			3,172,947.00			
389.00	LAND			1,620,371.60			
	TOTAL NONDEPRECIABLE PLANT AND ACCOUNTS NOT STUDIED			**4,818,127.02**			
	TOTAL ELECTRIC PLANT			**349,871,192.23**			

LIBERTY UTILITIES
GRANITE STATE ELECTRIC

TABLE 2. COMPARISON OF THE CALCULATED ACCRUED DEPRECIATION AND BOOK DEPRECIATION RESERVE AS OF DECEMBER 31, 2022

	ACCOUNT	CALCULATED ACCRUED DEPRECIATION	BOOK RESERVE	RESERVE IMBALANCE
	(1)	(2)	(3)	(4)=(3)-(2)
	ELECTRIC PLANT			
	INTANGIBLE PLANT			
303.00	MISCELLANEOUS INTANGIBLE PLANT - 3 YEAR	819,552	889,074	69,522
303.10	MISCELLANEOUS INTANGIBLE PLANT - 5 YEAR	554,003	598,615	44,612
303.15	MISCELLANEOUS INTANGIBLE PLANT - 7 YEAR	81,256	88,168	6,912
303.20	MISCELLANEOUS INTANGIBLE PLANT - 10 YEAR	9,457,913	10,262,503	804,590
303.30	MISCELLANEOUS INTANGIBLE PLANT - 20 YEAR	338,542	367,341	28,799
	TOTAL INTANGIBLE PLANT	**11,251,266**	**12,205,701**	**954,435**
	DISTRIBUTION PLANT			
361.00	STRUCTURES AND IMPROVEMENTS	450,708	625,669	174,961
362.00	STATION EQU PMENT	8,548,461	12,743,471	4,195,010
364.00	POLES, TOWERS AND FIXTURES	19,829,435	24,821,122	4,991,687
365.00	OVERHEAD CONDUCTORS AND DEVICES	27,223,431	26,293,906	(929,525)
366.00	UNDERGROUND CONDUIT	2,043,224	2,192,653	149,429
367.00	UNDERGROUND CONDUCTORS AND DEVICES	6,705,507	6,680,641	(24,866)
368.00	LINE TRANSFORMERS	17,410,807	17,894,958	484,151
369.00	SERVICES	6,968,367	7,063,200	94,833
370.00	METERS	2,799,364	1,910,146	(889,218)
371.00	INSTALLATIONS ON CUSTOMERS' PREMISES	241,861	216,544	(25,317)
373.00	STREET LIGHTING AND SIGNAL SYSTEMS	2,570,548	3,577,696	1,007,148
	TOTAL DISTRIBUTION PLANT	**94,791,713**	**104,020,006**	**9,228,293**
	GENERAL PLANT			
390.00	STRUCTURES AND IMPROVEMENTS	2,613,721	1,998,829	(614,892)
391.00	OFFICE FURNITURE AND EQU PMENT	145,402	108,613	(36,789)
391.10	OFFICE FURNITURE AND EQU PMENT - SOFTWARE AND DESKTOP COMPUTERS	155,867	133,213	(22,654)
391.20	OFFICE FURNITURE AND EQU PMENT - LAPTOP COMPUTERS	227,260	174,157	(53,103)
392.00	TRANSPORTATION EQUIPMENT	1,452,509	1,633,887	181,378
393.00	STORES EQU PMENT	120,631	82,896	(37,735)
394.00	TOOLS, SHOP AND GARAGE EQUIPMENT	285,730	226,573	(59,157)
395.00	LABORATORY EQUIPMENT	230,288	166,167	(64,121)
396.00	POWER OPERATED EQU PMENT	616,657	1,127,827	511,170
397.00	COMMUNICATION EQUIPMENT	1,634,531	1,234,490	(400,041)
397.10	COMMUNICATION EQUIPMENT - SITE SPEC FIC	51,647	54,352	2,705
398.00	MISCELLANEOUS EQU PMENT	63 990	67 918	3 928
	TOTAL GENERAL PLANT	**7,598,233**	**7,008,922**	**(589,311)**
	TOTAL DEPRECIABLE PLANT	**113,641,212**	**123,234,629**	**9,593,417**
	NONDEPRECIABLE PLANT AND ACCOUNTS NOT STUDIED			
372.00	LEASED PROPERTY ON CUSTOMERS' PREMISES		(23 758)	
	TOTAL NONDEPRECIABLE PLANT AND ACCOUNTS NOT STUDIED		**(23,758)**	
	TOTAL ELECTRIC PLANT		**123,210,871**	