RECEIVED

2020 SEP 30 PM 4:58

UTILITIES COMMISSION

Michael C. Creamer (ISB No. 4030) Preston N. Carter (ISB No. 8462) Givens Pursley LLP 601 W. Bannock St. Boise, ID 83702

Telephone: (208) 388-1200 Facsimile: (208) 388-1300 mcc@givenspursley.com

prestoncarter@givenspursley.com

Attorneys for SUEZ Water Idaho Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF SUEZ WATER IDAHO INC. FOR AUTHORITY TO INCREASE ITS RATES AND CHARGES FOR WATER SERVICE IN THE STATE OF IDAHO Case No. SUZ-W-20-02

DIRECT TESTIMONY OF JAMES CAGLE
SEPTEMBER 2020

- 1 Q. Please state your name and business address.
- 2 A. My name is James C. Cagle, and my business address is 461 From Rd,
- 3 Suite 400, Paramus, New Jersey 07652.
- 4 Q. By whom are you employed and in what capacity?
- 5 A. I am the Vice President, Rates and Regulatory Affairs for SUEZ Water
- 6 Management & Services Inc. ("SWM&S").
- 7 Q. What are your job responsibilities?
- 8 A. I am primarily responsible for the management and direction of rate case
- 9 filings for SUEZ Water Inc.'s ("SUEZ") regulated utilities. I am also
- 10 responsible for oversight of certain rate related compliance and reporting
- requirements as prescribed by the various regulatory Commissions having
- 12 jurisdiction over the SUEZ regulated utilities.
- 13 Q. Please outline your educational and professional qualifications.
- 14 A. I received a Bachelor of Accountancy degree from the University of
- Oklahoma in 1987. I was initially employed by SUEZ Water M&S (previously
- United Water M&S) as Director, Regulatory Business in October of 2007
- and have held my current position since March 2010. Previous to that, I
- 18 was employed by Atmos Energy Corporation, a natural gas utility operating
- then in twelve states, as Manager, Rates and Revenue Requirements.
- 20 Q. Have you previously testified before the Idaho Public Service
- 21 Commission ("Commission" or "IPUC") or other regulatory
- 22 commissions?

1	A.	I have not previously provided testimony before the IPUC. I have provided
2		testimony before several other state commissions on various regulatory
3		issues.

Q. What is the purpose of your testimony in this proceeding?

- The purpose of my testimony is to support the request of SUEZ Water Idaho
 Inc. (SWID) for an increase in its base rates for water service. Specifically,
 I am supporting the Company's position regarding the allocation of shared
 assets included in intercompany fees from SWM&S as well as the
 calculation of pro-forma interest costs and capital structure.
- 10 Q. What Exhibits are you sponsoring?

4

- 11 A. I am sponsoring the following Exhibits:
- 12 Exhibit 2, Schedule 1 M&S Shared Services Allocation, Shared Assets
- 13 Exhibit 2, Schedule 2 Composite Debt Rate calculation
- 14 Exhibit 2, Schedule 3 Allocation of Amortization of Additional Debt Costs
- 15 Q. Please explain the current shared services allocation methodology.
- 16 A. In 2017, the Company implemented an updated shared services allocation 17 methodology the goal of which was to make allocations of SWM&S shared 18 services costs simpler and more transparent. Such costs are allocated 19 based upon a three-factor formula based upon the simple average of 20 revenues, total assets and labor costs. The calculation of the factors are 21 refined whereby by each department within SWM&S allocates costs to the 22 areas of the affiliates which it serves. For example, if a department works 23 solely for regulated companies like SWID, then 100% of that department's

accumulated expense would go to the regulated segment and allocated to each of the regulated companies based upon the same three factor formula calculated to include only the regulated companies. The opposite is also true. If a department works 100% for non-regulated businesses then 100% of that department's accumulated costs would be charged to the non-regulated segment. Other departments that work for the benefit of some or all businesses would be allocated according to their relative three factor formula.

A.

Q. Are there any other changes in addition to these departmental charges?

A. Yes. Previously there were many expenses that were paid by SWM&S and either allocated or charged directly based upon certain formulas. These expenses include general liability and property insurance, outside IT support, audit fees and actuarial fees. These corporate assumption expenses were previously not included in M&S fees but included in other accounts. With the new allocations, these expenses are included in M&S fees. Additionally, in conjunction with the sale of 20% of SUEZ Water Resources LLC ("SWR") to PGGM, the Shared Services organization was restructured.

Q. How were shared assets previously recorded vs. now?

Previous to the 2017 update, capital expenditures generally related to investments in Information Technology hardware and software, as well as other assets related to the corporate office, would have been allocated on

a one-time basis to each operating company and reflected as assets on the
operating company's balance sheet. As such, the allocated cost of the
assets increased the operating company's rate base and have been
recovered in rates through depreciation expense and return.

With the updated methodology, capital expenditures, generally related to information technology such as the PeopleSoft accounting software upgrade and Powerplan asset accounting software etc., are now recorded on the SWM&S balance sheet and the depreciation expense on these assets is allocated to the operating companies based upon the three-factor formula as a part of SWM&S charges. The carrying costs associated with assets are calculated recovered from the utility customers who receive the benefit of the assets through depreciation and return as a part of rate case filings and are calculated utilizing the capital structure, debt and equity rates included in the filing.

Q. How has the overall level M&S Costs changed since the change in methodology?

Since 2018, the overall allocation of SWM&S costs to SWID have decreased from approximately \$4.6M in 2018 (of which \$362K was depreciation on shared assets) to approximately \$3.6M for the 12 months ended June 30, 2020 (of which \$412K was depreciation on shared assets).

A.

Q. Please explain the shared asset adjustment shown on Exhibit 2, Schedule 1.

As discussed above, previously, capital expenditures, generally related to investments in Information Technology hardware and software, as well as other assets related to the corporate office would have been allocated on a one-time basis to each operating company and reflected on the operating company's balance sheet. As such, the allocated cost of the assets increased the operating company's rate base and have been recovered in rates through depreciation expense and return. With the updated methodology, the asset appropriately remains on SWM&S's balance sheet and a portion of the costs are allocated to the operating companies and recovered through depreciation and return.

The adjustment reflects a calculation of the cost of shared assets whereby the balance of the assets, less accumulated depreciation and deferred income taxes, are calculated and the appropriate portion, based upon the three-factor formula, is projected as of March 31, 2021 for SWID. The difference between the calculated amount and the SWM&S shared Services expense included in the 12 months ended June 30, 2020 is the adjustment.

18 Q. What cost of debt is submitted in this filing?

A.

A.

As shown on Exhibit 2, Schedule 2 page 1 of 2, line 20, the cost of debt is 4.23% and reflects SWR's intent to redeem a \$35M issuance from 2010 which is now available for an optional redemption at par. The redemption decreases the debt costs from the June 30, 2020 by 0.02%.

The necessary accounting treatment of the Additional Debt Costs
shown on lines 30 through 48 of Exhibit 2, Schedule 2, Page 1 of 2 is
discussed in Company Witness Zerhouni's testimony. Exhibit 2, Schedule
2, Page 2 of 2 is the calculation of the allocation of debt costs (including the
aforementioned redemption). The amount is utilized in the calculation of
the interest adjustment made in the income tax calculation on Exhibit 10,
Schedule 4, Note [B] as sponsored by Company Witness Njuguna.

8 Q. Please describe Exhibit 2, Schedule 3 and its purpose.

A.

- 9 A. Exhibit 2, Schedule 3 calculates the amount of the amortization of additional
 10 debt costs allocated through interest expense for the 12 months ended
 11 6/30/2020. The amount is utilized in the calculation of the interest
 12 adjustment made in the income tax calculation on Exhibit 10, Schedule 4,
 13 Note [B] and includes the unamortized debt costs from the debt redemption
 14 described above.
- 15 Q. What is the impact of the allocation of the additional debt costs to 16 SWID and the other SWR subsidiaries?
 - As described in Company Witness Zerhouni's testimony, the additional debt costs and their amortization is basically a matter of geography. The interest costs recorded to SWID for accounting purposes, including the amortization of additional debt costs, in total will remain largely unchanged. For ratemaking purposes, the utilization of the calculation of the composite debt cost rate as calculated on Exhibit 2, Schedule 2, page 1 of 2 will continue to be utilized and therefore will have no impact on SWID customers.

- 1 Q. Does this conclude your direct testimony?
- 2 A. Yes.

Michael C. Creamer (ISB No. 4030) Preston N. Carter (ISB No. 8462) Givens Pursley LLP 601 W. Bannock St. Boise, ID 83702 Telephone: (208) 388-1200

Facsimile: (208) 388-1300 mcc@givenspursley.com

prestoncarter@givenspursley.com

Attorneys for SUEZ Water Idaho Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF SUEZ WATER IDAHO INC. FOR AUTHORITY TO INCREASE ITS RATES AND CHARGES FOR WATER SERVICE IN THE STATE OF IDAHO

Case No. SUZ-W-20-02

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION EXHIBIT 2 TO ACCOMPANY THE DIRECT TESTIMONY OF JAMES CAGLE

Suez Water Idaho M&S Shared Services Allocation Shared Assets 3/31/2021

	3/31/2021			Allocated Depr Exp	
Line		Shared	Shared	three months	
No.	Description	Services 305	Services 987	ended June 2020	Total
	1 Plant in Service	\$ 19,243,505	\$ 37,714,611		
	2 Accumulted Depreciation	7,849,259	16,746,136		
	3 ADIT	607,628	4,027,711		
	4 Net Rate Base	10,786,618	16,940,765		
	5 Allocation Factor to Idaho	6.34%	8.09%		
	6 Allocation to Idaho	683,558	1,370,393		
	7 Pre-Tax ROR (1)	9.37%	9.37%		
	8 Return, Interest, and Income Taxes	64,049	128,406		
	9 Shared Services 305 Depreciation Expense	146,508 [2]	334,794 [2]	91,341	
	10 Total M&S Assets	\$210,557	\$463,200	\$91,341	\$765,098
	11 Allocated to SWID for the 12 months ended 6/30/2020			,	412,056
	12 Adjustment				\$353,043
	(1) Calculation of Proposed Pre-tax Rate of Return:				
		Capital	Cost	Weighted	
		Structure	Rates	Cost Rates	Pre-tax
	Debt	46.89%	4.26%	2.00%	2.00%
	Equity	53.11%	10.20%	5.42% 7.41%	7.37% 9.37%
		100.00%		7.41%	9.37%

^[2] Calculated for the 9 months ended 3/31/2020

SUEZ WATER RESOURCES Actual COMPOSITE COST RATE OF DEBT Pro-forma as of October 31,2020

	[1]	[2]	[3]	[4]	[5] Unamortized	[6]	[7]	[8] Annual	[9] Amortization of	[10]	[11]	[12]
				[a]	Net Discount,	Net	Stated	Interest	Net Discount	Annual	Effective	Weighted
Line	Description	Issue	Maturity	Amount	Premium and	Proceeds	Interest	Expense	Premium and	Cost	Cost	Embedded
#	of Debt	Date	Date	Outstanding	Expense	(C.4+/-C.5)	Rate	(C.4xC.7)	Expense	(C.8+C.9)	Rate	Cost Rate
1 Med	lium Term Note Series A 1998	Feb-98	Feb-23	25,000,000	218,727	24,781,273	6.97%	1,742,500	97,212	1,839,712	7.42%	0.17%
	R SENIOR NOTES 2015 SERIES A	Aug-15	Aug-30	75,000,000	294,777	74,705,223	3.80%	2,850,000	29,977	2,879,977	3.86%	0.26%
	R SENIOR NOTES 2015 SERIES B	Aug-15	Aug-31	75,000,000	304,457	74,695,543	3.60%	2,700,000	28,104	2,728,104	3.65%	0.25%
	R SENIOR NOTES 2015 SERIES C	Aug-15	Aug-35	125,000,000	555,952	124,444,048	4.09%	5,112,500	37,480	5,149,980	4.14%	0.47%
	Exempt-Dauphin 92 TEF Series A	Jun-92	Jun-24	10,000,000	72,340	9,927,660	6.90%	690,000	18,480	708,480	7.14%	0.06%
	ior Note Series 2010	Jan-10	Jan-25	45,000,000	377,400	44,622,600	4.92%	2,214,000	88,800	2,302,800	5.16%	0.21%
	ior Note Series B fium Term Note Mutual of Omaha A	Nov-07 Oct-08	Nov-28 Oct-29	15,000,000 7,500,000	58,782 22,042	14,941,218 7,477,958	6.13% 6.54%	919,500 490,500	7,272 2,472	926,772	6.20% 6.59%	0.08%
	dium Term Note Mutual of Omaha B	Dec-08	Dec-29	7,500,000	22,454	7,477,546	6.59%	494,250	2,472	492,972 496,722	6.64%	0.04% 0.05%
	-Exempt-NY Series 2010A (1)	Sep-10	Sep-40	0,000,000	22,434	7,477,540	4.88%	434,230	2,472	490,722	0.00%	0.00%
	ior Note Series 2011	Dec-11	Dec-27	20,000,000	379,604	19,620,396	4.10%	820,000	52,968	872,968	4.45%	0.08%
12 Priva	ate Placement Note Series A	Apr-11	Apr-21	35,000,000	8,657	34,991,343	4.38%	1,533,000	8,657	1,541,657	4.41%	0.14%
13 Priva	ate Placement Note Series B	Apr-11	Apr-26	40,000,000	383,010	39,616,990	4.68%	1,872,000	70,704	1,942,704	4.90%	0.18%
14 Sen	ior Note 2018 Series C	Jan-18	Jan-33	65,000,000	296,333	64,703,667	3.30%	2,145,000	24,190	2,169,190	3.35%	0.20%
	ior Note 2018 Series D	Jan-18	Jan-48	65,000,000	329,595	64,670,405	3.77%	2,450,500	12,095	2,462,595	3.81%	0.22%
	ior Note 2017 Series A	Dec-17	Dec-32	70,000,000	327,302	69,672,698	3.30%	2,310,000	26,902	2,336,902	3.35%	0.21%
	ior Note 2017 Series B	Dec-17	Dec-47	75,000,000	391,514	74,608,486	3.77%	2,827,500	14,412	2,841,912	3.81%	0.26%
	ior Notes Series A 2019	Nov-19	Nov-34 Nov-49	150,000,000 55,000,000	569,969	149,430,031	2.94%	4,410,000	40,712	4,450,712	2.98%	0.40%
	ior Notes Series B 2019 ior Notes Series D 2019	Nov-19 Nov-19	Nov-49 Nov-59	40,000,000	216,452 158,777	54,783,548	3.39% 3.49%	1,864,500	7,464	1,871,964	3.42%	0.17%
	ior Notes Series C 2019	Feb-20	Feb-50	30,000,000	109,399	39,841,223 29,890,601	3.49%	1,396,000 1,026,000	4,071 3,740	1,400,071 1,029,740	3.51% 3.45%	0.13%
	th Jersey Water District	n/a	Jul-24	71,109	0	71,109	6.30%	4,480	3,740	4,480	6.30%	0.09%
	ior Note 2012 Series A	Oct-12	Oct-27	10,000,000	237,956	9,762,044	3.47%	347,000	34,392	381,392	3.91%	0.03%
	ior Note 2012 Series B	Oct-12	Oct-32	30,000,000	919,712	29,080,288	3.91%	1,173,000	77,172	1,250,172	4.30%	0.11%
25 Seni	ior Note	Jan-95	Jan-25	12,000,000	16,803	11,983,197	8.98%	1,077,600	4,032	1,081,632	9.03%	0.10%
26 SWF	R		Jun-22	25,000,000	0	25,000,000	7.90%	1,975,000	-	1,975,000	7.90%	0.18%
27 Tota	al Long-Term Debt			1,107,071,109	6,272,014	1,100,799,095		44,444,830	693,780	45,138,610		4.10%
28 Addi	itional Debt Costs				15,646,840				1,422,440	1,422,440	0.13%	0.13%
29 Tota	als		-		22,268,690				2,087,678	46,532,507		4.23%
			_									
	Fo be redeemed in October 2020. Remaining unamortized debt costs on (1)											
(Z) F	ternaming unamortized debt costs on (1)											
Addi	itional Debt Costs											
	mortized Costs Associated With Retired				23,868				5,616	5,616	0.001%	
M	ledium Term Note (\$10M@8.84%)											
31 Pren	mium on Retirement of Medium Term Note				93,891				22,092	22,092	0.00%	
	nium on Retirement of Prudential Capital											
	9.57%)				1,193,472				340,992	340,992	0.03%	
	mium on Amortized \$25MM 4.392%, \$20MM	4.318%			40.004				40.004	40.004		
	\$20MM 4.319% mortized Costs Associated With Retired 06/1.	/2002			18,301				10,981	10,981	0.00%	
	cksonville Debt (\$12M @ 6.75%)	12002			39,463				24,924	24,924	0.00%	
	OFA SUEZ Water PA 2007 - Retired 12/13/17				729,806				37,104	37,104	0.00%	
	Vater Resource Dev Rev ID 2005 - Retired 12	/14/17 2005			1,032,516				52,488	52,488	0.00%	
37 EDA	Fixed Rate Bonds - Retired 01/25/18				2,595,103				150,441	150,441	0.01%	
38 EDA	Fixed Rate Bonds 1996 - Retired 01/25/18				1,716,136				99,486	99,486	0.01%	
	Premium retired bonds 2018				2,242,500				130,000	130,000	0.01%	
	Premium retired bonds 2018								0	0	0.00%	
	Fixed Rate Bonds - Retired 08/31/15				497,469				42,048	42,048	0.00%	
	Fixed Rate Bonds - Retired 08/31/15				1,494,906				126,324	126,324	0.01%	
	Exempt-Boise 2001 TEF - Retired 08/31/15				1,476,438				124,776	124,776	0.01%	
	Exempt-DE 2002 TEF - Retired 08/31/15 Exempt NY (NR) 2002 TEF - Retired 08/31/1	5			923,054 687,536				78,000 58,092	78,000 58,092	0.01% 0.01%	
	Amortization for PREFSTK3&6 100 TBR	•			750				58,092 750	58,092 750	0.01%	
	A Associated costs uncommitted				165,012				49,504	49,504	0.00%	
	Exempt-NY Series 2010A - Unamortized Deb	ot Costs (2)			716,618				36,132	36,132	0.00%	
		3.6	· -	_	15,646,840				1,389,749		0.13%	
								-		-		

Amortization of the overal amount over 11 years.

15,646,840 /11 = 1,422,440

SUEZ Water Resources LLC Allocation of Additional Debt Costs to Utility Divisions As of October 31, 2020

11 year	Annual	Amortization	133,810	71,271	1,001	82,832	6,031	2,565	157,020	124,258	13,531	568,084	243,077	7,840	4,589	2,078	4,453	\$1,422,440
	Allocation to	Utility Divisions	\$1,471,907.81	783,984.57	11,010.45	911,147.19	99'336'26	28,209.80	1,727,219.57	1,366,840.50	148,837.99	6,248,925.07	2,673,850.07	86,244.58	50,475.72	22,863.45	48,987	\$15,646,840
	Allocation	Factor	9.41%	5.01%	0.07%	5.82%	0.42%	0.18%	11.04%	8.74%	0.95%	39.94%	17.09%	0.55%	0.32%	0.15%	0.31%	100.00%
	Five Year Avg.		\$188,297,449	100,293,167	1,408,539	116,560,759	8,486,269	3,608,808	220,958,839	174,856,454	19,040,469	799,409,206	342,058,889	11,033,051	6,457,231	2,924,863	6,266,793	\$2,001,660,785
			10.38%	5.47%	0.05%	5.82%	0.50%	0.16%	10.46%	8.50%	0.94%	40.97%	15.39%	0.53%	0.37%	0.12%	0.35%	100.00%
		12/31/2019	\$238,558,794	125,680,223	1,179,340	133,812,272	11,497,457	3,622,955	240,461,585	195,315,664	21,639,510	941,778,827	353,902,912	12,111,158	8,398,153	2,766,249	8,092,486	\$2,298,817,584
			8.50%	4.85%	%90.0	5.78%	0.48%	0.16%	10.40%	8.36%	%86.0	41.17%	16.88%	%65.0	0.35%	0.14%	0.31%	
		12/31/2018	\$204,878,832	104,610,608	1,329,913	124,673,352	10,264,070	3,346,114	224,424,544	180,330,732	21,218,588	888,023,529	363,981,997	12,704,935	7,482,861	3,024,461	6,597,191	\$2,156,891,726
			86.6	5.14%	0.07%	6.13%	0.40%	0.20%	11.59%	9.03%	1.03%	36.52%	18.40%	0.73%	0.32%	0.15%	0.32%	%00.001
		12/31/2017	\$186,432,132	95,880,090	1,342,939	114,387,982	7,397,823	3,676,186	216,388,396	168,638,687	19,134,193	681,680,721	343,396,983	13,645,155	5,892,945	2,860,146	5,893,011	\$1,866,647,388
			8.89%	4.83%	%60.0	2.69%	0.37%	0.20%	11.35%	8.76%	0.90%	40.37%	17.17%	0.64%	0.31%	0.16%	0.29%	100.00%
		12/31/2016	\$166,264,540	90,353,618	1,672,802	106,331,139	6,910,376	3,744,177	212,278,085	163,820,339	16,763,743	755,001,295	321,182,927	11,879,820	5,719,107	2,920,166	5,378,778	\$1,870,220,912
			8.01%	4.68%	0.08%	5.71%	0.35%	0.20%	11.63%	9.15%	0.91%	40.24%	18.06%	0.27%	0.26%	0.17%	0.30%	100.00%
As of October 31, 2020		12/31/2015	\$145,352,950	84,941,294	1,517,700	103,599,052	6,361,619	3,654,608	211,241,587	166,176,846	16,446,310	730,561,657	327,829,625	4,824,187	4,793,089	3,053,293	5,372,500	\$1,815,726,317
As of October 31, 2020			00002 SWPA	00027 SWDE	00029 SWBE	00044 SWNJ	00046 SWON	00049 SWSC	00055 SWWC	00060 SWID	00061 SWRI	00100 SWNJ	00200 SWNY	00720 SWNJ	00765 SWNJ	UNWS 07700	UNWS 08700	

Remaining total amortization period (rounded)

Note: The historic amounts above represent total capitalization less Investment in associated companies and utility money pool receivable.

\$1,422,440

Total Amortization

Case No. SUZ-W-20-02 Exhibit No. 2 Schedule 2 J.Cagle Page 2 of 2

SUEZ Water Idaho Allocation of Amortization of Additional Debt Costs

o lionacolic	200		7/04/0040	0,000,000,000	0,00,00,0	0100/10/01	0400,000,000	0100,101,01	0000/10/1	0000,00,0	0000, 50,0	000000000	2000 100 1	000000000000000000000000000000000000000
			1/31/2019	8/31/2019	9/30/2019	9/30/2013 10/31/2013 11/30/2013 12/31/2013	11/30/2019	12/31/2019	1/31/2020	0707/67/7	3/31/2020	4/30/2020	2/31/2020	6/30/2020
00002	9991	SWPA	9.493%	9.493%	9.493%	9.493%	9.493%	9.493%	10.377%	10.377%	10.377%	10.377%	10.314%	10.314%
00027	9992	SWDE	4.847%	4.847%	4.847%	4.847%	4.847%	4.847%	5.467%	5.467%	5.467%	5.467%	5.564%	5.564%
62000	8666	SWBE	0.062%	0.062%	0.062%	0.062%	0.062%	0.062%	0.051%	0.051%	0.051%	0.051%	0.056%	0.056%
00044	9884	SWTR	5.777%	5.777%	5.777%	5.777%	5.777%	5.777%	5.821%	5.821%	5.821%	5.821%	5.562%	5.562%
00046	9951	SWON	0.476%	0.476%	0.476%	0.476%	0.476%	0.476%	0.500%	0.500%	0.500%	0.500%	0.511%	0.511%
00049	9950	SWSC	0.155%	0.155%	0.155%	0.155%	0.155%	0.155%	0.158%	0.158%	0.158%	0.158%	0.143%	0.143%
99000	9053	SWWC	8.220%	8.220%	8.220%	8.220%	8.220%	8.220%	8.325%	8.325%	8.325%	8.325%	8.296%	8.296%
99000	9022	SWWC	2.180%	2.180%	2.180%	2.180%	2.180%	2.180%	2.135%	2.135%	2.135%	2.135%	2.173%	2.173%
09000	0966	SWID	8.356%	8.356%	8.356%	8.356%	8.356%	8.356%	8.496%	8.496%	8.496%	8.496%	8.271%	8.271%
00061	9952	SWRI	0.983%	0.983%	0.983%	0.983%	0.983%	0.983%	0.941%	0.941%	0.941%	0.941%	0.904%	0.904%
00100	9940	SWNJ	41.147%	41.147%	41.147%	41.147%	41.147%	41.147%	40.968%	40.968%	40.968%	40.968%	40.358%	40.358%
00200	8963	SWNY	16.865%	16.865%	16.865%	16.865%	16.865%	16.865%	15.395%	15.395%	15.395%	15.395%	16.459%	16.459%
00720	9941	CNWS	0.589%	0.589%	0.589%	0.589%	0.589%	0.589%	0.527%	0.527%	0.527%	0.527%	0.491%	0.491%
00765	9666	SWNJ	0.347%	0.347%	0.347%	0.347%	0.347%	0.347%	0.365%	0.365%	0.365%	0.365%	0.418%	0.418%
07700	9942	SWNJ	0.140%	0.140%	0.140%	0.140%	0.140%	0.140%	0.120%	0.120%	0.120%	0.120%	0.114%	0.114%
00780	2666	SWNJ	0.306%	0.306%	0.306%	0.306%	0.306%	0.306%	0.352%	0.352%	0.352%	0.352%	0.367%	0.367%
00301	2551	SWOI	0.001%	0.001%	0.001%	0.001%	0.001%	0.001%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
00302	1014	SWOI	0.058%	0.058%	0.058%	0.058%	0.058%	0.058%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
			100 000%	100 000%	100 000%	100 000%	100 000%	100 000%	100 000%	100 000%	100 000%	100 000%	100 000%	100 000%

Total Additional Debt Costs to Amortize \$ (129,615) \$ (113,114) \$ (113,114) \$ (113,114) \$ (113,114) \$ (113,114) \$ (113,114) \$ (112,739) \$ (112,739) \$ (112,739) \$ (112,739) \$ (112,739) \$ (112,739)

Allocation to Idaho \$ (10,830) \$ (9,51) \$ (9,451) \$ (9,451) \$ (9,451) \$ (9,451) \$ (9,451) \$ (9,579) \$ (9,579) \$ (9,579) \$ (9,579) \$ (9,579) \$ (9,579) \$ (9,579) \$ (9,579) \$

Note: the allocation factors are based upon the relative % of Total Net Capitalization