ORIGINAL

0000169916

RECEIVED
2016 APR 25 P 1:38
AZ CORP COMMISSION
DOCKET CONTROL

Arizona Corporation Commission
DOCKETED
APR 25 2016
DOCKETED BY

BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

DOUG LITTLE - Chairman
BOB STUMP
BOB BURNS
TOM FORESE
ANDY TOBIN

IN THE MATTER OF THE APPLICATION OF UNS ELECTRIC. INC. FOR THE ESTABLISHMENT OF JUST AND REASONABLE RATES AND CHARGES DESIGNED TO REALIZE A REASONABLE RATE OF RETURN ON THE FAIR VALUE OF THE PROPERTIES OF UNS ELECTRIC, INC. DEVOTED TO ITS OPERATIONS THROUGHOUT THE STATE OF ARIZONA AND FOR RELATED APPROVALS.	DOCKET NO. E-04204A-15-0142 **WAL-MART STORES, INC.'S INITIAL CLOSING BRIEF**

Wal-Mart Stores, Inc. ("Walmart"), hereby files this Initial Closing Brief in this matter.

Walmart has three stores in UNS Electric Inc.'s ("UNSE") service territory, which currently take service on the Large Power Service schedule ("LPS"). UNSE proposes to move these stores to the Large General Service schedule ("LGS") as part of this proceeding. Exh. Walmart-2 at 4 (Hendrix direct).

RATE OF RETURN ON EQUITY AND BASE REVENUE INCREASE

UNSE has agreed to limit its requested non-fuel revenue increase to \$15.1 million, based in part on a return on equity ("ROE") of 9.5%. Exh. UNSE-48; Exh. UNSE-10 at 3-4 (Grant). The Arizona Corporation Commission Utilities Division ("Staff") supports that \$15.1 million non-fuel revenue increase and 9.5% ROE, as does the Residential Utility Consumer Office.

In Company's last general rate case in 2013, the Commission approved an ROE of 9.5%. Decision No. 74235. The trend for vertically integrated electric utilities since 2012 has been decreasing ROEs. Exh. Walmart-1 at 8-9 (Chriss). Walmart supports adoption of a 9.5% ROE, and a $15.1 million increase in non-fuel revenues. Tr. at 782 (Chriss).

REVENUE ALLOCATION

Under UNSE's current rates, the medium and large general service class, the large power service class and the lighting class subsidize the rates of the residential and small general service classes. Hearing Transcript page 2792, lines 1-6[1] (Solganick); Exh. Walmart-4 at 6, Table 1 (Tillman). UNSE's application proposed a revenue allocation to reduce those inter-class subsidies, to make rates more fair and equitable to customers based on the costs to serve them. Tr. 1609:23 – 1610:2 (Dukes). Rates that accurately reflect the proper cost to serve each class send a proper price signal to customers and drive utilization of system resources to be used most efficiently. Tr. 1222:1-7 (Tillman). Subsidies tend to perpetuate themselves by encouraging the inefficient use of system resources. Exh. Walmart-5 at 8 (Tillman). Further, subsidies skew customers' evaluation of alternative supply options and energy efficiency efforts. Exh. Walmart-5 at 8 (Tillman). Thus, the Commission should attempt to eliminate the subsidies between customer classes.

A common method to measure the degree of inter-class subsidy paid or received by a particular customer class is the measurement of unitized rate of return ("UROR"), also known as relative rate of return. Exh. S-5 at 21:1-6 (Solganick); Exh. Walmart-4 at 6:1-11 (Tillman); Tr. at 2795: 19-23. A UROR of less than 1 indicates that a class is receiving a subsidy. Tr. at 2795:24 – 2796:6, 2796:14-17; Exh. Walmart-4 at 6:1-11 (Tillman). A UROR above 1 indicates that a class is paying a subsidy. Tr. at 2796:7-13; Exh. Walmart-4 at 6:1-11 (Tillman).

No party is proposing a revenue allocation that increases the degree of inter-class subsidies inherent in the Company's current rates. Rather, the parties disagreements are over the

---

[1] Citations to the hearing transcript will be in the format "Tr. page number:line number(s)."

degree to which such subsidies should be decreased in this proceeding. Staff recommends that inter-class subsidies by fully eliminated by the Company's next rate case. Tr. 2792:15-25 (Solganick).

Staff's Exhibit S-18 (attached hereto as Appendix A) demonstrates the incremental revenue that would be applicable to each rate class (based on a total $15.1 million base revenue increase) under a variety of scenarios that would decrease the inter-class subsidies to different degrees. Tr. at 2797-2798. The section beginning at line 41 demonstrates that if no movement were made to eliminate the inter-class subsidy, the medium and large general service class would have UROR of 3.51, and the large power class would have a UROR of 6.04. Exh. S-18 at line 44. Staff's proposal is to increase the residential and small general service classes by 50 percent of the amount needed to reach parity in UROR. Exh. S-5 at 24 (Solganick); Exh. S-18 at line 25. Staff's proposal still allocates 24.6% of the incremental base revenue increase to the medium and large general service class, and 3.4% to the large power class, and results in total inter-class subsidies of about $10.8 million. Exh. S-18 at line 30, columns (e), (f); Tr. at 2800 (Solganick). Staff's proposal only moves the UROR for the medium and large general service class slightly, from 3.51 to 3.10, and the UROR for the large power class from 6.04 to 5.34. Exh. S-18 at line 30.

The Company's direct case proposed a revenue allocation that went further to eliminate inter-class subsidies than its rebuttal and rejoinder cases did. Tr. at 1615:21-25 (Dukes); Exh. Walmart-5 at 5 (Tillman). Exhibit S-18 includes Staff's approximation of the Company's rejoinder position on revenue allocation, and indicates that the UROR for the medium and large general service class would be 2.14, and for the large power class the UROR would be 3.73. Exh. S-18 at line 52. The Company's rejoinder position would result in an increase for a typical residential customer of approximately $4.82 per month. Exh. UNSE-33 at 4:23-25 (Jones). The Company's rejoinder proposal would remedy the inter-class subsidy more than the scenario reflected at line 9 (moving the residential class 67% of the way to a UROR of 1.0), but less than the scenario reflected on line 1 (moving the residential class 75% of the way to a UROR of 1.0). Tr. at 2797:22 – 2798:18 (Solganick).

Walmart recommends that the Commission adopt a revenue allocation that moves the residential class 67.7% of the way to a UROR of 1.0 (reflected at line 9 of Exhibit S-18). Such a revenue allocation would result in about $1.25 million less in revenue being recovered from the residential class than the Company's proposed revenue allocation (Exh. S-18, column B, line 50 less column B, line 10), but still limit the revenue increases of the subsidizing classes to about 1%. Exh. S-18 at line 13, columns (e), (f) and (g). In addition, decreasing subsidies to a greater degree in this case makes the complete elimination of the inter-class subsidies in the next rate case a more attainable goal.

ECONOMIC DEVELOPMENT RIDER

UNSE has proposed the implementation of a discount-based economic development program (the "Economic Development Rider" or "EDR") that reduces the electric billing for existing or new customers that add or expand load within the Company's service territory. Any lost non-fuel revenues resulting from discounts provided to customers through the EDR will be borne by UNSE, and UNSE will not seek recovery of any such lost non-fuel revenues in future rate case proceedings. Exh. UNSE-29 at 25 (Dukes). Attracting large, high-load factor customers to UNSE's electric system drives down the cost per unit for all customers, and promotes external economic benefits in the communities where those customers locate. Tr. 1605:4-12 (Dukes). Walmart recommends that the Commission approve the EDR. Exh. Walmart-5 at 9 (Tillman surrebuttal).

ALTERNATIVE GENERATION SERVICE

As part of the settlement agreement of the application of UNS Energy to be acquired by Fortis (approved in Decision No. 74689 (August 12, 2014)), UNSE agreed to propose a "buy-through" tariff available to LPS customers. Decision No. 74689, Exhibit A, Attachment A, Condition No. 31. UNSE has proposed Experimental Rider 14, Alternative Generation Service ("AGS") in this proceeding. UNSE proposes that the AGS would be available for a maximum of 10 MW of peak load, that it be available for no more than four years, and that it would be available only to LPS and LPS-TOU customers with peak demands of 2,500 kW or more. Exh. UNSE-31 at 56-57 (Jones). While UNSE has proposed AGS to satisfy its commitments under the settlement agreement, it does not support implementation of the tariff. Exh. UNSE-31 at 56 (Jones).

An AGS program would not harm other non-AGS customers. Rather, an AGS program would replace the Company's own wholesale market purchases with those of the customers participating in AGS, and shift the risk of the Company's wholesale market purchases from the Company's ratepayers to the AGS customers. Exh. Walmart-2 at 9 (Hendrix). There is ample evidence in Arizona from Arizona Public Service Company's AG-1 program, and in various other jurisdictions from around the country (including in the territory in New York served by Central Hudson which is also owned by Fortis) and the world (including provinces of Alberta and Ontario in Canada, where Fortis operates distribution utilities) that permitting customers to choose their generation service providers is an effective way for customers to manage their electricity needs to better suit their business needs. Exh. Walmart-3 at 6 (Hendrix).

Rather than limiting AGS to only the LPS and LPS-TOU classes, AGS should be available to all commercial and industrial customer classes. UNSE objects to allowing all rate classes to participate, because the Fortis settlement specified only that a buy-through program be proposed for the LPS class. Exh. UNSE-32 at 52 (Jones). Nothing about the Fortis settlement prohibits the Commission from requiring that a buy-through program be available to a broader class of customers, however. Allowing a significant number of customers the opportunity to participate in AGS would attract more generation service providers and create a more robust and vibrant marketplace from which AGS customers could obtain their electric generation service.

Exh. Walmart-2 at 7 (Hendrix).

Further, UNSE simultaneously proposes to shrink the LPS class, by moving ten LPS customers (including Walmart) to the LGS class. Exh. Walmart-3 at 5 (Hendrix). As a result, only 4 customers will remain in the LPS and LPS-TOU classes. *Id.* and Exh. Walmart-2 at 6 (Hendrix); Tr. at 2032:10 – 2033:7 (Jones). Nothing about the operational characteristics of Walmart's three locations in the UNSE service territory will have changed since the time of the Fortis settlement – only the definition (by the Company) of an LPS customer. Given these circumstances, at the very least, AGS should be available to all LPS and LGS customers.

In addition, the program cap should be set at 150 MW, rather than the 10 MW proposed by UNSE. The 10 MW limit is completely arbitrary and not supported by the Company Exh. Walmart-2 at 7 (Hendrix). UNSE's proposed cap, along with the limited number of proposed customers eligible, would severely restrict the number of generation service providers that would be interested in participating in the AGS program. Exh. Walmart-2 at 7 (Hendrix direct). A program cap of 150 MW is appropriate, as the Company is already purchasing 175MW from the wholesale power market. Exh. Walmart-2 at 7 (Hendrix). Allowing 150 MW to participate in AGS would significantly reduce the Company's reliance on the wholesale market and transfer the market risk to customers who are willingly participating in the AGS program, while sheltering UNSE's other ratepayers from market risk and volatility related to the Company's wholesale purchases. Exh. Walmart-2 at 7 (Hendrix). Even after its recent acquisition of Gila River Unit 3 Generating Station, UNSE relies on wholesale market purchases to a greater extent than other Arizona electric utilities. Exh. Walmart-2 at 8 (Hendrix).

Walmart recommends that the threshold for a customer's participation be set at 1,000 kW. This minimum size would ensure that the participant is sufficiently large enough to be a sophisticated user of electricity and not require any consumer protection requirements. Exh. Walmart-2 at 6 (Hendrix). Further, a customer should be allowed to aggregate utility accounts within its corporate family to meet the peak demand threshold. This will allow participating customers to leverage economies of scale to reduce their generation supply costs. Exh. Walmart-2 at 6 (Hendrix).

The Commission should not restrict the AGS program to 4 years. Limiting the term of a buy-through program to 4 years eliminates the ability of customers to purchase long-term contracts, especially for off-site renewable contracts like solar and wind, due to the length of contract term needed by renewable developers to build new projects. Exh. Walmart-2 at 7-8 (Hendrix). Many customers would like to purchase more renewables that the Company's forecasted 5% Utility Scale Renewables of its total resource mix. *Id.* Eliminating the proposed AGS program term will enable customers to purchase large scale off-site renewables if they desire and it fits their business needs. *Id.* And such purchases of additional renewable resources through the AGS program would be at the AGS customer's own choosing and cost, and would not harm any other UNSE customer. *Id.*

UNSE proposes a management fee for the AGS tariff of $0.0040 per kWh. Exh. UNSE-31 at Exhibit CAJ-4, AGS Tariff Original Sheet No. 714-2 (Jones). While UNSE should be allowed to recover the actual just and reasonable costs of providing AGS services, UNSE has not provided any documentation supporting its proposed management fee. Exh. Walmart-2 at 6 (Hendrix). The Commission should approve a cost-based management for the AGS.

CONCLUSION

The Commission should approve an ROE of 9.5%, with an increase in non-fuel revenues of $15.1 million. Based on an approved ROE of 9.5%, the Commission should adopt a revenue allocation in this case that moves the residential class 67.7% of the way to a UROR of 1.0 (with an intention to fully eliminate the inter-class subsidies in the Company's next rate case). Further, the Commission should approve the EDR proposed by UNSE. Finally, the Commission should approve an AGS program of 150 MW that is available to at least all LPS and LGS customers (if not all commercial and industrial customers) with demand of 1,000 kW or greater, and permit aggregation of accounts within a corporate family to meet that threshold. The program should not be limited to a specific duration, and should provide a fair management fee to cover UNSE's costs of providing the program.

Dated this 25th day of April, 2016.

HIENTON & CURRY, P.L.L.C.

By Scott S. Wakefield
Scott S. Wakefield
5045 North 12th Street, Suite 110
Phoenix, Arizona 85014
Attorneys for Wal-Mart Stores, Inc.

ORIGINAL and 13 copies filed this 25th day of April, 2016 with:

Docket Control
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

COPY of the foregoing HAND-DELIVERED this 25th day of April, 2016 to:

Dwight Nodes
Chief Administrative Law Judge
Hearing Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Jane Rodda
Administrative Law Judge
Hearing Division
Arizona Corporation Commission
400 W. Congress
Tucson, AZ 85701-1347
jrodda@azcc.gov

Brian Smith, Chief Counsel
Bridget Humphrey
Legal Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Thomas M. Broderick,
Director Utilities Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

COPY of the foregoing mailed/e-mailed this 25th day of April, 2016 to:

Bradley S. Carroll UNS Electric, Inc. 88 E. Broadway, MS HQE910 PO Box 711 Tucson, AZ 85702 bcarroll@tep.com **Consented to Service by Email**	Robert J. Metli Munger Chadwick PLC 2398 E. Camelback Road, Suite 240 Phoenix, AZ 85016 Attorneys for Nucor rjmetli@mungerchadwick.com **Consented to Service by Email**
Michael W. Patten Jason D. Gellman Snell & Wilmer LLP One Arizona Center 400 E. Van Buren Street Phoenix, AZ 85004 Attorneys for UNSE mpatten@swlaw.com jgellman@swlaw.com jhoward@swlaw.com docket@swlaw.com **Consented to Service by Email**	Lawrence V. Roberson, Jr. PO Box 1448 Tubac, AZ 85646 Attorney for Noble Solutions tubaclawyer@aol.com Court S. Rich Rose Law Group PC 7144 E. Stetson Drive, Suite 300 Scottsdale, AZ 85251 Attorneys for TASC crich@roselawgroup.com **Consented To Service By Email**
Daniel W. Pozefsky, Chief Counsel RUCO 1110 W. Washington, Suite 2200 Phoenix, AZ 85007 dpozefsky@azruco.gov **Consented to Service by Email**	Thomas A. Loquvam Melissa M. Krueger Pinnacle West Capital Corporation PO Box 53999, MS 8695 Phoenix, AZ 85072-3999 Thomas.Loquvam@pinnaclewest.com Melissa.Kruger@pinnaclewest.com **Consented to Service by Email**
Nucor Steel Kingman LLC c/o Doug Adams 3000 W. Old Hwy 66 Kingman, AZ 86413 Eric J. Lacey Stone Mattheis Xenopoulos & Brew, PC 1025 Thomas Jefferson St. NW 8th Floor, West Tower Washington DC 2007-5201 Attorneys for Nucor EJL@smxblaw.com **Consented to Service by Email**	Timothy M. Hogan Arizona Center for Law in the Public Interest 202 E. McDowell Road, Suite 153 Phoenix, AZ 82004 Attorneys for SWEEP thogan@aclpi.org **Consented to Service by Email**

Michael Alan Hiatt
Katie Dittelberger
Earthjustice
633 17th Street, Suite 1600
Denver, CO 80202
mhiatt@earthjustice.org
kdittelberger@earthjustice.org
jtauber@earthjustice.org
Consented To Service By Email

Rick Gilliam
Director of Research and Analysis
The Vote Solar Initiative
1120 Pearl Street, Suite 200
Boulder, CA 80302
[illegible]
Consented to Service by Email

Jill Tauber
Managing Attorney, Clean Energy program
Chinyere A. Osula, Associate Attorney
Earthjustice Washington DC Office
1625 Massachusetts Avenue, NW, Suite 702
Washington DC 20036-2212

Ken Wilson
Western Resource Advocates
2260 Baseline Road, Suite 200
Boulder, CO 80302
[illegible]
Consented to Service by Email

Steve W. Chriss
Senior Manager, Energy Regulatory Analysis
Wal-Mart Stores, Inc.
2011 S.E. 10th Street
Bentonville, AR 72716-0550
Stephen.Chriss@wal-mart.com

Cynthia Zwick
Arizona Community Action Association
2700 N. 3rd Street, Suite 3040
Phoenix, AZ 85004
czwick@azcaa.org
Consented to Service by Email

Gregory Bernosky
Arizona Public Service Company
PO Box 53999, M 9712
Phoenix, AZ 85072-3999
gregory.bernosky@aps.com

Jeff Schlegel
SWEEP Arizona Representative
1168 W. Samalayuca Drive
Tucson, AZ 85704-3224
schlegelj@aol.com

Ellen Zuckerman
SWEEP Senior Associate
4231 E. Cataline Drive
Phoenix, AZ 85018
ezuckerman@swenergy.org

C. Webb Crockett
Patrick J. Black
Fennemore Craig, PC
2394 E. Camelback Road, Suite 600
Phoenix, AZ 85016-3429
Attorneys for AECC
wcrockett@fclaw.com
pblack@fclaw.com
Consented To Service By Email

Meghan H. Grabel
Osborn Maladon, PA
2929 N. Central Avenue, #2100
Phoenix, AZ 85012
Attorneys for AIC
[illegible]
Consented to Service by Email

Gary Yaquinto, President & CEO
Arizona Investment Council
2100 N. Central Avenue
Phoenix, AZ 85004
gyaquinto@arizonaic.org
Consented to Service by Email

Craig A. Marks
Craig A. Marks, PLC
10645 N. Tatum Blvd, Suite 200-676
Phoenix, AZ 85028
Attorney for AURA
Craig.Marks@azbar.org
Consented To Service By Email

Pat Quinn
President and Managing Partner
Arizona Utility Ratepayer Alliance
5521 E. Cholla Street
Scottsdale, AZ 85254
patt.quinn47474@gmail.com

Briana Kobor
Vote Solar
Program Director – DG Regulatory Policy
360 22nd Street, Suite 730
Oakland, CA 94612
[illegible]
Consented to Service by Email

Timothy Sabo
Snell & Wilmer LLP
One Arizona Center
400 East Van Buren Street
Phoenix, AZ 85004
Attorneys for Trico
tsabo@swlaw.com

Vincent Nitido
Trico Electric Cooperative, Inc.
8600 West Tangerine Road
Marana, AZ 85653
vnitido@trico.coop

Robert (Kip) Martin
Coogan & Martin, PC
825 North Grand Avenue, Suite 200
Nogales, AZ 85621
Attorneys for FPAA

Tom Harris, Chairman
Arizona Solar Energy Industries Association
2122 W. Lone Cactus Drive, Suite 2
Phoenix, AZ 85027

Kevin Higgins
Energy Strategies, LLC
215 S. State Street, Suite 200
Salt Lake City, UT 84111
khiggins@energystrat.com

Jay I. Moyes
Jason Moyes
Moyes, Sellers & Hendricks, Ltd.
Viad Corporate Center
1850 N. Central Avenue, Suite 1100
Phoenix, AZ 85004
Attorneys for FFPA
jimoyes@law-msh.com
jasonmoyes@law-msh.com
kes@krsaline.com
Consented To Service By Email

Jeffrey W. Crockett
CROCKETT LAW GROUP PLLC
2198 E. Camelback Road, Suite 305
Phoenix, Arizona 85016-4747
Attorney for Sulphur Springs Valley
Electric Cooperative, Inc.
jeff@jeffcrockettlaw.com
kchapman@ssvec.com
Consented To Service By Email

Kirby Chapman, CPA
Sulphur Springs Valley
Electric Cooperative, Inc.
311 E. Wilcox
Sierra Vista, AZ 85635
kchapman@ssvec.com

Gary D. Hays
Law Office of Garry D. Hays, PC
2198 E. Camelback Road, Suite 305
Phoenix, AZ 85016
Attorney for the Arizona Solar Deployment
Alliance
ghays@lawgdh.com

APPENDIX A

EXHIBIT

S-18

admitted

Exhibit HS-6

LINE		TOTAL (A)	RESIDENTIAL SERVICE (B)	SMALL GENERAL (C)	MEDIUM/LARGE GENERAL (E)	LARGE POWER (F)	LIGHTING (H)
1	**75% of RES SGS to UROR = 1.00**						
2	Incremental Revenue	$15,100,000	$14,487,750	$1,774,875	-$1,013,318	-$139,176	-$10,247
3	Rate of Return on Rate Base	6.23%	3.32%	4.07%	12.67%	21.96%	2.60%
4	UROR	1.00	0.53	0.65	2.03	3.53	0.42
5	% Incr compared to Revenue From Present Sales	10.26%	19.67%	14.91%	-1.89%	-1.89%	-1.89%
6	% of the Total Increase	100.0%	95.9%	11.8%	-6.7%	-0.9%	-0.1%
7							
8							
9	**67.7% of RES SGS to UROR = 1.00**						
10	Incremental Revenue	$15,100,000	$12,884,439	$1,578,456	$555,795	$76,336	$5,620
11	Rate of Return on Rate Base	6.23%	2.36%	3.35%	14.88%	25.72%	3.70%
12	UROR	1.00	0.38	0.54	2.39	4.13	0.59
13	% Incr compared to Revenue From Present Sales	10.26%	17.49%	13.26%	1.04%	1.04%	1.03%
14	% of the Total Increase	100.0%	85.3%	10.5%	3.7%	0.5%	0.0%
15							
16							
17	**60% of RES SGS to UROR = 1.00**						
18	Incremental Revenue	$15,100,000	$11,590,200	$1,419,900	$1,821,341	$250,155	$18,417
19	Rate of Return on Rate Base	6.23%	1.58%	2.77%	16.66%	28.75%	4.60%
20	UROR	1.00	0.25	0.45	2.68	4.62	0.74
21	% Incr compared to Revenue From Present Sales	10.26%	15.74%	11.93%	3.39%	3.39%	3.39%
22	% of the Total Increase	100.0%	76.8%	9.4%	12.1%	1.7%	0.1%
23							
24							
25	**50% of RES SGS to UROR = 1.00**						
26	Incremental Revenue	$15,100,000	$9,658,500	$1,183,250	$3,710,667	$509,647	$37,522
27	Rate of Return on Rate Base	6.23%	0.42%	1.91%	19.33%	33.27%	5.93%
28	UROR	1.00	0.07	0.31	3.10	5.34	0.95
29	% Incr compared to Revenue From Present Sales	10.26%	13.11%	9.94%	6.91%	6.91%	6.91%
30	% of the Total Increase	100.0%	64.0%	7.8%	24.6%	3.4%	0.2%
31							
32							
33	**All UROR equals 1.00**						
34	Incremental Revenue	$15,100,000	$19,317,000	$2,366,500	-$5,583,200	-$1,042,000	$41,700
35	Rate of Return on Rate Base	6.23%	6.23%	6.22%	6.23%	6.23%	6.22%
36	UROR	1.00	1.00	1.00	1.00	1.00	1.00
37	% Incr compared to Revenue From Present Sales	10.26%	26.23%	19.88%	-10.40%	-14.13%	7.68%
38	% of the Total Increase	100.0%	127.9%	15.7%	-37.0%	-6.9%	0.3%
39							
40							
41	**Equal Percentage**						
42	Incremental Revenue	$15,100,000	$7,556,638	$1,221,442	$5,509,497	$756,711	$55,712
43	Rate of Return on Rate Base	6.23%	-0.84%	2.05%	21.86%	37.57%	7.20%
44	UROR	1.00	-0.13	0.33	3.51	6.04	1.16
45	% Incr compared to Revenue From Present Sales	10.26%	10.26%	10.26%	10.26%	10.26%	10.26%
46	% of the Total Increase	100.0%	50.0%	8.1%	36.5%	5.0%	0.4%
47							
48							
49	**UNS allocation from rejoinder - APPROXIMATE**						
50	Incremental Revenue	$15,100,000	$14,136,082	$1,528,313	-$549,020	-$68,000	$52,625
51	Rate of Return on Rate Base	6.23%	3.11%	3.17%	13.32%	23.20%	6.99%
52	UROR	1.00	0.50	0.51	2.14	3.73	1.12
53	% Incr compared to Revenue From Present Sales	10.26%	19.19%	12.84%	-1.02%	-0.92%	9.69%
54	% of the Total Increase	100.0%	93.6%	10.1%	-3.6%	-0.5%	0.3%