BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO

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RE: IN THE MATTER OF ADVICE LETTER NO. 1672-ELECTRIC FILED BY PUBLIC SERVICE COMPANY OF COLORADO TO REVISE ITS COLORADO PUC NO. 7-ELECTRIC TARIFF TO IMPLEMENT A GENERAL RATE SCHEDULE ADJUSTMENT AND OTHER OTHER CHANGES EFFECTIVE JULY 18, 2014.	)	**PROCEEDING NO. 14AL-0660E**
IN THE MATTER OF THE APPLICATION OF PUBLIC SERVICE COMPANY OF COLORADO FOR APPROVAL OF ITS ARAPAHOE DECOMMISSIONING AND DISMANTLING PLAN.	)	**PROCEEDING NO. 14A-0680E**

REBUTTAL TESTIMONY AND ATTACHMENT

OF

DANE A. WATSON, PE, CDP

ON BEHALF OF

PUBLIC SERVICE COMPANY OF COLORADO

December 17, 2014

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO

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SUMMARY OF REBUTTAL TESTIMONY OF DANE A. WATSON

Mr. Dane A. Watson, who is the Managing Partner of the Alliance Consulting Group ("Alliance"), provided Direct Testimony and Attachments in this case on behalf of Public Service Company of Colorado ("Public Service" or the "Company") as part of the Company's original filing on June 17, 2014. Mr. Watson sponsored and provided support for a Depreciation Rate Study of Public Service's electric and common utility plant depreciable assets for use in this case ("Depreciation Study") and the recommended depreciation rates reflected in that study were adopted by Public Service and incorporated as part if its proposed depreciation rate changes in this case.

Mr. Watson's Direct and Rebuttal Testimonies in this case demonstrate that Alliance Consulting Group's depreciation study is thorough, providing the only analysis

in the record that reasonably projects future expectations for all the asset lives and net salvage and uses industry-accepted, mainstream depreciation methodologies. The analysis performed results in depreciation rates that are representative of Public Service's own historical retirement experience, more recent retirement trends, and the expectations of the Company's operations and engineering personnel.

As explained by Mr. Watson in his Rebuttal Testimony, in contrast to Mr. Watson's comprehensive approach, Mr. Jacob Pous submitted Answer Testimony on behalf of Colorado Energy Consumers and Federal Executive Agencies ("CEC/FEA") that simply targets interim retirements for two accounts due to a correction that was filed; reduces the life of the one account where a decrease in life is proposed - Transmission Account 353 – Station Equipment; challenges General Plant Account 391.2 – Computer Hardware that has been using approved amortization accounting to propose a one-year life increase; adjusts net salvage for asset accounts 353, 390 and 392 (and subaccounts); and finally suggests that the requested reserve "true-up" for the General Plant Amortization is a double recovery of costs. As discussed by Mr. Watson, Mr. Pous' adjustments artificially lower the level of depreciation expense for current customers at the expense of future customers. Mr. Watson details why Mr. Pous' rationale for the changes is flawed and his recommendations should be rejected.

Mr. Watson also responds to Office of Consumer Counsel ("OCC") Witness Mr. Neil's challenges to the decommissioning costs and retirement dates used in developing the generation assets depreciation rates. Mr. Watson addresses Mr. Neil's overall recommendation to disregard the depreciation rates for **all** generation property. As explained by Mr. Watson, such an approach creates intergenerational inequity by

continuing to use the same depreciation rates that were first established more than eight years ago in Proceeding No. 06S-234EG. While other Company witnesses will be addressing each specific issue in detail, Mr. Watson concludes that Mr. Neil's proposal to retain the existing depreciation rates is not a reasonable approach and should be rejected.

BEFORE THE PUBLIC UTILITIES COMMISSION
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REBUTTAL TESTIMONY AND ATTACHMENTS OF DANE A. WATSON

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LIST OF ATTACHMENTS

Attachment No. DAW-2	Revised Appendices to Public Service Company of Colorado's Electric and Common Utility Plant Depreciation Rate Study at December 31, 2013: • Appendix A-4 Revised • Appendix A-5 Revised • Appendix A-6 Revised • Appendix B Revised • Appendix C Revised • Appendix F Revised

GLOSSARY OF ACRONYMS AND DEFINED TERMS

AR 15	Accounting Release 15
CCR	Coal Combustion Residues
CEC	Colorado Energy Consumers
CHECC	Colorado Healthcare Energy Coordinating Council
CLIMAX	Climax Molybdenum Company
Commission Staff, CPUC Staff, or Staff	Staff of the Colorado Public Utilities Commission
EPA	Environmental Protection Agency
FEA	Federal Executive Agencies
FERC	Federal Energy Regulatory Commission
HVAC	Heating, Ventilation, and Air Conditioning
NADA	National Automobile Dealers Association
OCC	Colorado Office of Consumer Counsel
OLT	Observed Life Table
Public Service or the Company	Public Service Company of Colorado
SCE	Southern California Edison
SPR	Simulated Plant Record
TCO	Total Cost of Ownership
Xcel Energy	Xcel Energy Services Inc.

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REBUTTAL TESTIMONY AND ATTACHMENTS OF DANE A. WATSON

I. INTRODUCTION, QUALIFICATIONS, PURPOSE OF TESTIMONY, AND RECOMMENDATIONS

Q. PLEASE STATE YOUR NAME AND BY WHOM YOU ARE EMPLOYED.

A. My name is Dane A. Watson. I am a Partner of Alliance Consulting Group. Alliance Consulting Group provides consulting and expert services to the utility industry.

Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY AND ATTACHMENTS IN THIS PROCEEDING?

A. Yes. I submitted Direct Testimony and Attachments in this proceeding on behalf of Public Service Company of Colorado ("Public Service" or "Company") as part of the Company's original filing on June 17, 2014.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY IN THIS PROCEEDING?

A. The purpose of my Rebuttal Testimony is to respond to and explain why the positions taken by Mr. Jacob Pous, who submitted Answer Testimony on behalf of Colorado Energy Consumers ("CEC") and Federal Executive Agencies ("FEA") (jointly, "CEC/FEA") should be rejected and the depreciation rates recommended in the Depreciation Rate Study submitted as Attachment No. DAW-1 to my Direct Testimony ("Depreciation Study"), as slightly modified herein, should be approved. I will also address the position taken by Office of Consumer Counsel ("OCC") Witness Mr. Chris Neil that no changes to depreciation rates should be made in this proceeding, and that the existing depreciation rates should be retained.

Q. WHAT SPECIFIC ISSUES RELATED TO DEPRECIATION DID CEA/FEA WITNESS MR. POUS ADDRESS IN HIS ANSWER TESTIMONY?

A. Mr. Pous addresses and recommends adjustments to depreciation expense related to the following areas:

1. Decommissioning Cost Study Estimates;
2. Interim Retirement Ratios for Accounts 312-Boiler Plant and 314-Turbogenerators;
3. Amortization of Intangible Plant;
4. Average Service Life for Accounts 353-Transmission Station Equipment and 391.2-General Computer Hardware;
5. Net Salvage for Accounts 353-Transmission Station Equipment, 390-General Structures & Improvements, and 392 General Transportation Equipment (All); and
6. Amortization of Reserve Differences for General Plant Amortization

Accounts.

Q. WILL YOU BE ADDRESSING EACH OF THESE IN YOUR REBUTTAL TESTIMONY?

A. No. The Decommissioning Cost Study Estimates will be addressed by Company Witness Mr. Jeffrey T. Kopp and the Amortization of Intangible Plant will be addressed by Ms. Lisa H. Perkett in their Rebuttal Testimonies. I will be addressing each of the other four issues (enumerated items 2, 4, 5 and 6 above) in detail.

Q. WHAT SPECIFIC ISSUES RELATED TO DEPRECIATION DID MR. NEIL ADDRESS IN HIS TESTIMONY?

A. Mr. Neil addresses Decommissioning Cost Study Estimates, Generation Unit Retirement Dates and Remaining Life, and Retired and Retiring Generating Units.

Q. WILL YOU BE ADDRESSING EACH OF THESE IN YOUR REBUTTAL TESTIMONY?

A. No, I respond only generally to Mr. Neil's recommendations. The Decommissioning Cost Study estimates will be addressed by Company Witness Mr. Jeffrey T. Kopp. The Generating Unit Retirement Dates and Remaining Life and the Retired and Retiring Generating Units will be addressed by Company Witness Ms. Lisa Perkett.

Q. WHAT RECOMMENDATIONS ARE YOU MAKING IN YOUR TESTIMONY?

A. I recommend that the Commission reject the recommendations of Mr. Pous and Mr. Neil pertaining to depreciation changes and find that the depreciation rates reflected in the Depreciation Study presented in my Direct Testimony, as slightly

modified herein, are reasonable and appropriate for calculating the depreciation expense accruals for Public Service's electric and common utility plant.

II. GENERAL RESPONSE TO CEC/FEA'S RECOMMENDED CHANGES TO DEPRECIATION

Q. DO YOU HAVE ANY GENERAL OBSERVATIONS ABOUT CEC/FEA'S RECOMMENDED CHANGES TO DEPRECIATION THAT YOU WILL BE ADDRESSING?

A. Yes. Unlike my balanced and comprehensive approach in performing the Depreciation Study, each of the changes recommended by Mr. Pous results in a decrease to depreciation or amortization expense. While not conducting a complete or thorough depreciation study, Mr. Pous simply chose to address a few accounts that contain significant investment. Overall, Mr. Pous recommends a reduction of $13.6 million in annual depreciation expense for the four specific areas I am addressing. Mr. Pous repeatedly claims that I have not provided enough detailed information to support the various recommendations contained in the Depreciation Study. In fact, Alliance has provided hundreds of pages of workpapers underlying and supporting the Depreciation Study. Mr. Pous admits that the Company has provided a large quantity of information, referring to such information as "dots,"[1] but complains there is not enough explanatory information to allow him to connect these dots. In other words, what Mr. Pous wants is a step-by-step playbook documenting all of the thought processes and every technical judgment decision that went into the Depreciation Study. In my 20 years of performing depreciation studies and supporting them before regulatory commissions, this level of detailed support has never been required.

[1] Answer Testimony of Jacob Pous, p. 50, lns 6-9.

Q. DOES MR. POUS' SUPPORT HIS RECOMMENDATIONS IN THE SAME WAY THAT HE EXPECTS OF THE COMPANY?

A. No. Most of Mr. Pous' support for his recommendations are citations provided in his testimony to Company responses to discovery requests. He has not provided an independent and complete analysis of the data. If the level and depth of supporting information that Mr. Pous states is required were truly the standard, Mr. Pous' own recommendations should be rejected categorically due to his failing to meet that standard.

Q. DO YOU HAVE OTHER GENERAL CONCERNS ABOUT CEC/FEA'S TESTIMONY REGARDING DEPRECIATION?

A. Yes. I am concerned that the record pertaining to the depreciation issues in this case not become confused or conflicting. In his Answer Testimony, Mr. Pous repeatedly states his opinions and then later discusses those opinions as if they were established facts. Similarly, Mr. Pous will mischaracterize certain facts and then use those mischaracterizations to support an opinion.

Q. CAN YOU GIVE ANY EXAMPLES OF MR. POUS' OPINIONS BEING REPRESENTED AS FACT?

A. Yes. At page 61, line 10, of his Answer Testimony, Mr. Pous states that circuit breakers "are short-lived assets," which is incorrect since breakers can have lives of 40 years or longer. He then uses his inaccurate opinion as if it were fact as a basis for recommending a longer life for Account 353, Station Equipment, based on his claim that long-lived assets are under-reported and short-lived assets (including breakers) are over-reported in recent retirement activity. Since he fails

to define "short lived" but uses this characterization to inaccurately categorize circuit breakers, both his opinion and the conclusion he subsequently draws are incorrect.

Another example is Mr. Pous' unsupported opinion that EPA rules have been causing significant levels of retirements, leading to an abnormal level of retirements in recent years.[2] This speculation is then taken as fact to discount the use of historical averages that include recent year retirements. In reality, although the Company did not capture and could not provide specific accounting data identifying particular retirements related to promulgated EPA rules, it is much more common in the industry for pollution control equipment to be added (as is the case with Public Service), not retired and replaced. Additions would not drive large levels of retirements, as speculated by Mr. Pous. In addition, it is extremely difficult to isolate the impact of particular laws and regulations. There are numerous rules and regulations of various agencies that would continue to require the Company to retire/replace and add assets. The impact of all of these legal requirements is captured in the use of historical averages.

Q. CAN YOU GIVE A SPECIFIC EXAMPLE OF MISCHARACTERIZATION BEING USED TO SUPPORT AN OPINION?

A. Yes. At pages 53-54 of his Answer testimony, Mr. Pous quotes an excerpt from my testimony in a Southern California Edison ("SCE") case to challenge my reliance on certain bands specific to Account 353 for Public Service. In doing so, Mr. Pous has incorrectly applied sound depreciation theory related to the Simulated Plant Record ("SPR") life analysis used in the SCE study to the very

[2] Answer Testimony of Jacob Pous, p. 31, ln. 19 through p. 32, ln. 2, and p. 33, lns. 12-13.

different Actuarial life analysis used in the Public Service study. This is an example of where Mr. Pous has mischaracterized a discussion applicable to one analysis method by using it with a different analysis method where it does not apply.

Q. WHY MIGHT MR. POUS MISCHARACTERIZE THE ISSUE OF BAND LENGTH FOR ACCOUNT 353, STATION EQUIPMENT?

A. This mischaracterization is critical to being able to undermine the life and survivor curve recommendation for Account 353 in the Depreciation Study. While the indications in the bands used by Mr. Pous are good fits for both his recommendation and mine, when you shorten the bands for more recent experience, which is appropriate in Actuarial analysis, his recommended 60 S0.5 is no longer as good a fit as my recommended 55 R2. In fact, when reviewing the curve fits, as provided in the study workpapers, in the shorter bands, the majority of the fits are at or below the 55-year life that I have recommended. This is also important to the specific support from the interview notes, provided in discovery, where Company subject matter experts explained that changes in certain equipment over the last 15-20 years will have a shorter life. By discounting the use of shorter bands, Mr. Pous could ignore the remaining facts and support for the account.

III. RESPONSES TO CEC/FEA'S RECOMMENDED ACCOUNT-SPECIFIC ADJUSTMENTS

A. INTERIM RETIREMENT RATIOS FOR GENERATION

Q. WHAT IS AN INTERIM RETIREMENT RATIO?

A. An interim retirement ratio represents an annual estimated retirement percentage for assets remaining in service until the terminal retirement date of a generating unit. They are estimated on an account-level basis.

Q. WHAT IS AN INTERIM NET SALVAGE PERCENTAGE?

A. An interim net salvage percentage represents the estimated removal cost for interim retirements that will occur annually over the remaining life of each generating unit. The selection of interim retirement ratios goes with the selection of interim net salvage percentages. Both should be considered in setting depreciation accrual rates.

Q. PLEASE SUMMARIZE THE POSITIONS TAKEN BY CEC/FEA REGARDING THE ACCOUNT-SPECIFIC INTERIM RETIREMENT RATIOS.

A. The table below provides the existing interim retirement ratios, the Company's proposed interim retirement ratio and CEC/FEA's proposed interim retirement ratio for Accounts 312 and 314.

Account	Existing	Company's Proposal	CEC/FEA's Proposal
312 Boiler Plant	0.70%	0.70%	0.40%
314 Turbogenerators	0.60%	0.56%	0.30%

Q. WHAT ARE THE PROPOSED INTERIM NET SALVAGE PROPOSALS FOR THESE ACCOUNTS?

A. The table below provides the existing interim net salvage rates, the Company's proposed and CEC/FEA proposed.

Account	Existing	Company's Proposal	CEC/FEA's Proposal
312 Boiler Plant	-10%	-10%	-10%
314 Turbogenerators	-10%	-10%	-10%

Q. HAS MR. POUS PROVIDED THE REASON FOR HIS DISAGREEMENT WITH YOUR PROPOSED INTERIM RETIREMENT RATIOS FOR ACCOUNTS 312 AND 314?

A. Yes. He asserts at pages 31-32 of his Answer Testimony that I have three fatal flaws. First, Mr. Pous states that I developed interim retirement ratios for each subaccount in Account 312 and then applied a composite only to the largest subaccount. Second, he states that, due to the correction of the analysis without changing the interim retirement ratios, I have an unexplained and inconsistent basis for my proposal. Third, he states that, since I did not correct my proposal, I believe the uncorrected historical averages can be relied upon without further consideration.

Q. DO YOU AGREE WITH MR. POUS ASSESSMENT?

A. No. I will address each of "flaws" alleged by Mr. Pous. First, the selection of interim retirement ratios and net salvage parameters is a process that involves judgment. While I computed interim retirement ratios based on history, solely

relying on history without judgment was not the process that led to my selections for these accounts. Specifically, I did not use the calculated composite interim retirement ratio for any of the 312 subaccounts. The historical composite rate was 0.69 percent for the original analysis and 0.49 percent for the corrected analysis. Furthermore, if I had simply used historical averages, the interim retirement ratio for 312 subaccount for Coal Cars would be 8.19 percent versus the 0.20 percent I proposed. For the 312 subaccount for AQIR Equipment, the interim retirement ratio would be 0.27 percent versus the 0 percent I proposed. A composite was not the basis for my recommendations in the 312 account or the 312 subaccounts. Nevertheless, Mr. Pous only takes issue with the one recommendation (Account 312) that could potentially result in a higher expense. Mr. Pous' statements regarding my computations are a red herring that cloud the issue and try to discount the conservative nature of my recommendations.

Second, Mr. Pous makes a one-sided adjustment to address only interim retirements, but not removal cost. The correction I made both reduced the interim retirements and increased the net salvage ratios. After the errata were identified, the correction has a two-sided impact on interim activity -- both life and net salvage. I chose to leave both interim retirements and net salvage at historical levels, while Mr. Pous only adjusted the one value that would reduce depreciation expense -- the interim retirement rate -- while not addressing the other that would increase depreciation expense. Our proposed interim net salvage for those accounts is negative 10 percent. The corrected ten-year historic interim net salvage for Accounts 312 and 314 is negative 29.96 percent

and negative 46.90 percent, respectively. If corrected historic interim retirements and net salvage percentages were used for those accounts, depreciation expense would be at the same level as what I proposed.

Last, given my rationale for staying at the existing approved levels for interim retirement and net salvage factors, Mr. Pous' presumption that I did not give consideration to the corrected analysis is incorrect.

Q. MR. POUS CLAIMS AT PAGES 31 AND 33 OF HIS ANSWER TESTIMONY THAT IT IS HIGHLY IMPROBABLE THAT FUTURE INTERIM RETIREMENTS WILL MIRROR THE SAME LEVEL OF EPA-DRIVEN RETIREMENT ACTIVITY SEEN IN THE LAST FIVE-TO-SEVEN YEARS. DO YOU AGREE?

A. No. First, Mr. Pous speculates that the interim activity analyzed contains retirements related to environmental assets. However, environmental assets generally result in additions to the plants, not retirements. Therefore, Mr. Pous' assertion regarding the activity reflected in the data we used to analyze interim retirements is not based on fact. Second, Mr. Pous claims that the level of EPA activity will decline, which is also incorrect. In response to Mr. Pous' claims in his Answer Testimony, I have discussed current EPA activity with Company personnel and learned there are numerous pending regulations, as well as new standards being proposed. The Company believes there is more, not less, regulation coming in the future. In addition, one of the two more recent regulatory actions in response to President Obama's "The Clean Power Plan" regarding Greenhouse Gas is expected to be far reaching in the utility industry. To validate the discussions with Company personnel, I went to the EPA website

and confirmed that there have been two actions taken by the EPA since June 2014 that will have an impact on the industry.[3] These are two specific examples that refute Mr. Pous' claims and are not based on conjecture like Mr. Pous has offered. There are other general environmental regulations, such as coal combustion residues ("CCR"), cooling water intake rules to protect fish, and regional haze that requires park and wilderness areas (Class 1), of which Public Service has 12 in Colorado, be returned to natural conditions, all of which will have an impact on Public Service and its generating fleet. Mr. Pous' suggestion that interim retirement activity related to environmental activity is temporary, or that it created significant retirement activity that will not be repeated, has no basis and should be rejected.

B. MASS ACCOUNT LIFE PROPOSALS

Q. PLEASE SUMMARIZE THE POSITIONS TAKEN BY CEC/FEA REGARDING THE MASS ACCOUNT SPECIFIC LIFE PROPOSALS.

A. Mr. Pous has made alternate life proposals for two accounts, both of which are increases in life (reducing depreciation expense) compared to my recommendations. One is for Transmission Account 353-Station Equipment and the other is General Account 391.2 Computer Hardware. The table below provides the existing life, the Company's proposed life and the CEC/FEA proposed life. No other party challenges the Company's recommendations. I will discuss each account in detail.

[3] Clean Power Plan, EPA Press Office June 2, 2014, and Ground Level Ozone Proposal, November 25, 2014. www.epa.gov.

Account	Existing	Company Proposal	CEC/FEA Proposal
353.0 Station Equipment	60 R2.5	55 R2	60 S0.5
391.2 Computer Hardware	5 SQ	5 SQ	6 SQ

Q. DOES MR. POUS STATE WHY HE DISAGREES WITH YOUR LIFE PARAMETERS?

A. Yes. Basically, Mr. Pous claims the study, its workpapers, and responses to his data requests do not provide an adequate level of support for my recommendations.

Q. DOES MR. POUS SEEM TO GENERALLY FIND FAULT WITH DEPRECIATION STUDIES FILED BY UTILITIES IN OTHER REGULATORY PROCEEDINGS?

A. Yes. Mr. Pous routinely uses the same or similar language to disparage the quality of the depreciation studies by other depreciation rate consultants for their utility clients. For example, Mr. Pous has criticized the work performed by Gannett Fleming, a company that has gained international prominence in the field of depreciation studies. In criticizing Gannett Fleming's work in testimony before the Utah Public Service Commission, Mr. Pous stated as follows:

> Due to the inadequate support, documentation, and justification for the Company's proposed depreciation rates, I recommend that the Commission order the Company to perform a complete, thorough and well-documented depreciation study in conjunction with its next rate case filing.[4]

[4] Utah Public Service Commission, Docket No. 05-057-T01, *Joint Application of Questar Gas Company, the Division of Public Utilities and Utah Clean Energy for the Approval of the Conservation Enabling Tariff Adjustment Option and Accounting Orders*, Direct Testimony of Jacob Pous on behalf of Committee of Consumer Services, page 6.

Against a depreciation study performed by Depreciation Valuation Services International in testimony before the Arkansas Public Service Commission, Mr. Pous stated as follows:

> Further, I recommend that the Commission order the Company to perform a comprehensive, well-documented and supported net salvage evaluation in all future depreciation studies.[5]
>
> * * *
>
> The Company failed to perform a proper evaluation phase of a depreciation analysis.[6]

Against a study performed by AUS Consulting in testimony before the Massachusetts Department of Telecommunications & Energy, Mr. Pous states as follows:

> I recommend that the Department order the Company to specifically, thoroughly and in great detail present all justification for whatever level of net salvage it proposes in its next depreciation study. The Department should direct the Company to meet its burden of proof in demonstrating the reasonableness of its proposal, rather than submit the generalities contained in this filing where it failed to demonstrate a specific identifiable approach to the establishment of a very specific value.[7]

Against a study performed by DSR Depreciation Consulting in testimony before Utah Public Service Commission, Mr. Pous stated as follows:

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[5] Arkansas Public Service Commission, Docket No. 01-243-U, *In the Matter of an Application for a General Change or Modification in Arkla's Rates, Charges, and Tariffs,* Direct Testimony of Jacob Pous on behalf of the Attorney General, page 7, footnote 8.

[6] Ibid, page 15.

[7] Massachusetts Department of Telecommunications and Energy, Docket No. D.T.E. 05-27, *Investigation as to the propriety of the rates and charges set forth in the following tariffs: M.D.T.E. Nos 34 through 68, filed with the Department on April 27, 2005 by Bay State Gas Company*, Direct Testimony of Jacob Pous on behalf of the Attorney General's Office, page 25.

> While the Company claims to have performed an evaluation process, a careful review of RMP's 2006 Study, its workpapers, and its responses to data request yields a different result.[8]

Quite simply, Mr. Pous' criticisms of the Depreciation Study I sponsor and support in this case and the resulting depreciation rates are simply representative of the boilerplate opinions that he routinely uses in rate cases throughout the country.

Q. DO YOU AGREE WITH MR. POUS?

A. No. The assertion by Mr. Pous is merely "rhetoric" that he utilizes often. The facts are that Mr. Pous did not conduct a depreciation study himself, but appears to review and selectively look for accounts with a life decrease and/or large investment balance, which is the case for Account 353-Station Equipment.

Q. WHY MIGHT MR. POUS TAKE THIS APPROACH?

A. It would appear to be for one purpose, to lower depreciation expense. Challenging only a few accounts appears reasonable. This is in contrast to my study, which is to independently analyze and evaluate each account to arrive at the best life estimate. Further evidence of my unbiased approach is the fact that my study recommendations do not always create an increase in depreciation expense for every account. In the Transmission function, there are nine accounts, four of which have a decrease in annual depreciation expense when compared to the existing. See Appendix B to Attachment No. DAW-1 (pp. 330-337 of 400).

[8] Utah Public Service Commission, Docket No. 07-035-13, *In the Matter of Rocky Mountain Power for Authority to Change its Depreciation Rates Effective January 1, 2008*, Pre-filed Direct Testimony of Jacob Pous on behalf of Committee of Consumer Services, page 32.

Q. WHAT SUPPORT DO YOU HAVE FOR YOUR STATEMENT?

A. My study made life recommendations for each account in the Transmission, Distribution, General, and Common Plant Functions. For those functions 22 accounts had increases in life contrasted with only 6 accounts that had a decrease in life. See Executive Summary to Attachment No. DAW-1, pp. 2-4 of 400.

C. ACCOUNT 353-TRANS. STAT. EQUIP. AVERAGE SERVICE LIFE

Q. WHAT IS MR. POUS' SPECIFIC CRITICISM AGAINST YOUR LIFE-CURVE PROPOSAL FOR ACCOUNT 353?

A. Mr. Pous claims at page 48 of his Answer Testimony that we did not consistently follow any criteria associated with establishing the statistically significant portion of the Observed Life Table ("OLT"), which is the curve of the actual company experience that is compared against the standardized Iowa curves in the curve fitting process. And, at page 53, he asserts that we did not have identifiable support and justification.

Q. DO YOU AGREE WITH THIS CRITICISM?

A. No. Essentially, Mr. Pous bases this claim on the fact that I did not maintain a detailed written record of my thought process as I reviewed 78 different life-curve combinations for this account.

Q. UPON WHAT BASIS DID MR. POUS STATE HE RELIED FOR HIS LIFE RECOMMENDATION FOR ACCOUNT 353?

A. He states at page 51, lines 9-11, of his Answer Testimony that his recommendation "is based on a superior interpretation of the actuarial analysis,

recognition of the type and mix of assets in the account, review of input from Company personnel, and judgment."

Q. MR. POUS HAS NUMEROUS PAGES OF HIS ANSWER TESTIMONY (PAGES 50-64) RELATED TO THE LIFE-CURVE PROPOSAL FOR ACCOUNT 353. CAN YOU SUMMARIZE WHY YOUR RECOMMENDATION FOR ACCOUNT 353 IS MORE APPROPRIATE?

A. Yes. First and foremost, the Commission should understand that the Company's depreciation expense proposal is the result of the only complete and thorough depreciation study provided in this case. Mr. Pous' recommendations are based only on a review of that study. My analysis and evaluation for this account consisted of 78 different life-curve combinations over various placement and experience bands, notes from interviews with Company subject matter experts, and other analytical tools, all of which were part of what I considered when making my proposal for a 55 R2. This information has all been provided as workpapers in this case.

Q. DO YOU HAVE ANY COMMENTS ON THE GRAPHS MR. POUS PRESENTED AT PAGE 59 OF HIS ANSWER TESTIMONY?

A. Yes. Mr. Pous has magnified the middle part of the curve, as well as chosen a specific placement and experience band, which will accentuate what can be statistically irrelevant differences. The use of only a single specific placement and experience band in this manner can mask trends and patterns in the various curves and can be misleading. In addition, Mr. Pous' reference to the Depreciation Systems textbook quote in the Company's response to Discovery

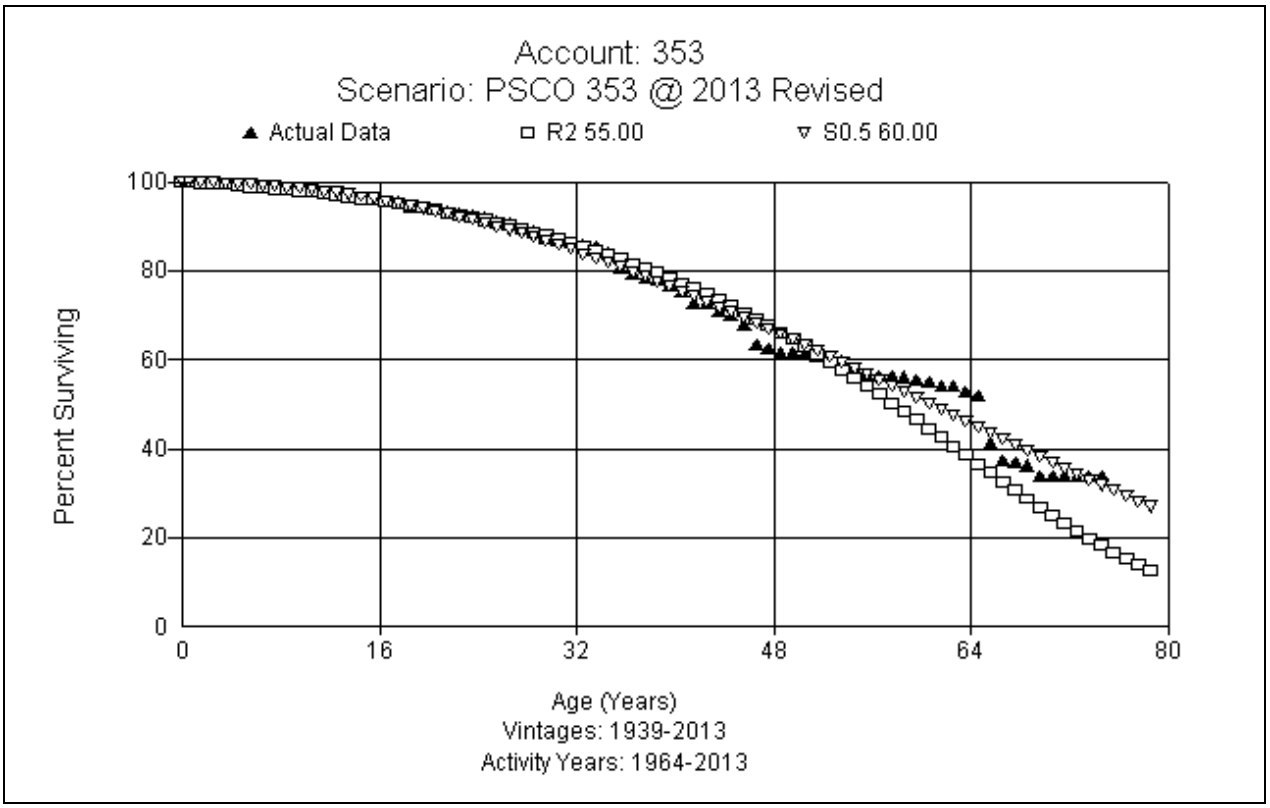
Request No. CEC15-1 (Attachment JP-4, p. 55 of 95) is accurate but is misleading. As I explained above, he has confused the need for longer bands when using the SPR life analysis and attempts to apply it to Actuarial life analysis, which was used for Public Service. Furthermore, the reliance on a particular band is dependent on other information the depreciation analyst has obtained in the course of conducting a thorough depreciation study.

Q. CAN YOU EXPLAIN FURTHER?

A. Yes. Mr. Pous has provided the theory, but it must be applied correctly. For Account 353, I reviewed 78 different life-curve and placement and experience band combinations. As acknowledged by Mr. Pous at page 52 of his Answer Testimony, the life indications from those 78 different curves ranged from 50 to 64 years. In order to narrow the possibilities for the best recommendation, I looked to the interview notes with Company personnel. The notes indicated a life shorter than my recommendation for several of the assets, such as transformers and circuit breakers, which comprise nearly a third of the account based on the retirement unit data I also use during my evaluations of an account. I also looked at the average age of survivors and retirements for this account, which was 11.71 and 22.72 years, respectively. Mr. Pous' citations supporting use of a placement and experience band at least as long as the average service life is misplaced, due to the use of actuarial analysis and the other relevant information that indicated changes to the life are occurring in more recent years.

Q. WHAT DOES ALL THAT INDICATE?

A. It indicates to an experienced and independent depreciation analyst that the overall life of this account is decreasing as stated in the Depreciation Study (Attachment No. DAW-1, p. 32 of 400) and cited by Mr. Pous in his Answer testimony (page 50). Despite the "fit" Mr. Pous has provided, it is only one small part of all the information that ultimately should be considered. My recommended 55 R2 is a good fit and adheres to sound depreciation theory, as evidenced in the comparison graph below. It is a better match to current and future expectations for the type and mix of assets in the account based on discussions with Company subject matter experts. Mr. Pous seemingly ignores other information provided in the interview notes that suggest the life of transformers is between 35 and 45 years, which refute his claims. Mr. Pous' testimony does not contain the relevant detail for the Company and this account when compared to very specific and relevant workpapers underlying the Depreciation Study that were provided to the parties. The Commission should reject Mr. Pous' recommendations and approve my 55 R2 recommendation for Account 353.



D. ACCOUNT 391.20-COMPUTER HARDWARE AVERAGE SERVICE LIFE

Q. WHAT IS THE NEXT LIFE ADJUSTMENT MR. POUS RECOMMENDS?

A. Mr. Pous recommends adjusting Account 391.20 Computer Hardware (Electric General) and Acct 391.04 (Common Plant Function) to six years compared to a five-year life recommended in the Depreciation Study.

Q. WHAT IS THE BASIS FOR MR. POUS' RECOMMENDED ONE-YEAR LIFE INCREASE?

A. Mr. Pous uses the average age of retirements and the current age of surviving assets. He also alludes that the Company has not performed the necessary analysis to support the five-year life.

Q. WOULD YOU ELABORATE ON THE FACTS RELATED TO THIS ACCOUNT?

A. Yes. This account falls under FERC Accounting Release 15 ("AR 15"), commonly referred to as General Plant Amortization, which means that assets in this account should be retired when they meet or exceed the approved life of five years. However, due to the Company's system issues that existed in the fixed asset system, the system was not allowing these assets to be retired on the Company's books at the end of their five-year life as provided under the AR 15 retirement process.[9] The result of this system issue is the average age of retirements is near or above six years and there are assets on the books with a life of eight and a half years. Mr. Pous' claim that the Company has not performed the required service life analysis is incorrect. The Company did assess service life at implementation of AR 15, which determined that a life of five years was appropriate, which was used to develop the current depreciation rate for this account as approved by the Commission in Proceeding No. 06S-234EG. Had the Company's fixed asset system been working as designed, the assets that met or exceeded the service life (5 years) would have been retired on the Company's books. Absent changes in policy or technology, the approved five-year life remains appropriate.

[9] See the Company's response to Discovery Request No. CEC 16-8, Attachment No. JP-4, page 85 of 95.

Q. MR. POUS CLAIMS AT PAGE 68 OF HIS ANSWER TESTIMONY THAT THE APPROVED FIVE-YEAR LIFE WAS MADE AT A TIME OF CONSIDERABLE CHANGE, BUT IT NO LONGER APPLIES. DO YOU AGREE?

A. No. I believe any person who owns computer equipment would acknowledge that a five-year life is reasonable. Furthermore, a business entity has an even greater need to keep up with technology.

Q. WHAT IS YOUR RESPONSE TO MR. POUS' CLAIMS THAT OTHER UTILITY COMPANIES HAVE A LIFE LONGER THAN FIVE YEARS AND YOU HAVE MADE LIFE RECOMMENDATIONS LONGER THAN FIVE YEARS, TOO?

A. In order to comply with AR 15, an analysis and evaluation of the account is necessary to set an appropriate service life. Each company has different historical experience, different capitalization policies, and different refresh policies for this type of equipment. Again, it is a combination of many factors, not one that an independent and experienced depreciation analyst considers to make an appropriate service life recommendation. Mr. Pous has provided two references to cases where I recommended a longer life for this account.[10] While I would note these instances are the exception and not the rule, they were reflective of the specific facts and circumstances related to the entities involved. Mr. Pous' reliance on these two "outlier" utilities only further validates my independence in assessing and recommending account service lives based on the specifics of the company being analyzed.

[10] Answer Testimony of Jacob Pous, p.70, fn. 122.

Q. WHAT IS THE BASIS FOR THE APPROVED FIVE-YEAR LIFE FOR THIS ACCOUNT?

A. There are two inputs for the existing five-year life for computer hardware. One is that the Company's subject matter experts state a 3-4 year refresh cycle is still appropriate. The second is Commission Decision No. C06-1379 issued in Proceeding No. 06S-234EG approving a depreciation rate based on a 5-year life. Also supporting a life of five years or less are three other cases. The Commission in Proceeding No. 12AL-1268G, Decision No. C13-1568, approved a life of 5 years for the same equipment for Public Service's gas utility. The Minnesota and Wisconsin commissions have approved a life of 4 years for the same type of equipment, in Docket No. E,G-002/D-12-858 and Docket No. 4220-DU-108, respectively. Absent changes in Company policy or technology, the five year life remains appropriate and should be approved again.

Q. DOES THE COMPANY HAVE ANY OUTSIDE INFORMATION THAT SUPPORTS THEIR POLICY AND EXPECTATIONS FOR THIS TYPE OF EQUIPMENT?

A. Yes. Based upon discussions I had with Company personnel to respond to Mr. Pous' Answer Testimony, the Company referred me to an article from Information Week, titled "The PC Replacement Decisions." The following is an excerpt from that article:

> According to a recent survey that research firm Gartner conducted with 177 large businesses, the average life span of a desktop PC is 43 months, and only 36 months for mobile PCs. More than a third of respondents said the main reason for replacement of PCs is to improve user productivity, while more than a quarter cited escalating support costs with older

machines. More than 20% said new software requirements led to the need for new computing systems.

Also, in those discussions with Company subject matter experts, they indicated that some of the "best practice" thoughts relate to assessing total cost of ownership ("TCO"). This is a complex calculation that determines optimal replacement cycles for computer equipment. The variables of the calculation attempt to assess cost of failures to the business and other enterprise-specific variables. The Company indicated, in the realm of these experts, that the TCO is in the 3- to 5-year range, as it avoids hardware failures and maintains software and device compatibility and support. Again, this is very specific information that refutes Mr. Pous' assertions.

Q. DO YOU AGREE WITH MR. POUS' ISSUES REGARDING THE MIX OF ASSETS AND ASSOCIATED LIVES?

A. No. At page 70, lines 6-8, of his Answer Testimony, Mr. Pous cites a Company response to a discovery request that provides that routers can have a life of between 12-15 years. However, Mr. Pous does not mention the many other categories of short-lived assets are in the account (some as short as 3-5 years), such as laptops, PCs, servers and storage equipment, which are below or consistent with the recommendation in the Depreciation Study. The Depreciation Study did recognize that there were different assets with different lives in this account. The recommendation is an average life for all of the assets, which gives appropriate recognition that some have a shorter life and some have a longer life. Mr. Pous' recommended six-year life should be rejected and the existing five-year life recommended for retention should be approved.

E. MASS ACCOUNT NET SALVAGE RATIOS

Q. PLEASE SUMMARIZE THE POSITIONS TAKEN BY CEC/FEA REGARDING THE MASS ACCOUNT SPECIFIC NET SALVAGE RATIOS.

A. Mr. Pous challenges the net salvage ratios used for three accounts. No other party challenges the Company's recommendations, as set forth in the depreciation study. The three accounts at issue and the existing, Company proposed and CEC/FEA proposed net salvage ratios are summarized below:

Account	Existing	Company's Proposal	CEC's Proposal
353 Station Equipment	-5%	-15%	-10%
390 Structures & Improvements	-10%	-5%	15%
392 (All) Transportation Equipment	10%	0%	25%

Q. IN ADDRESSING MASS PROPERTY NET SALVAGE, MR. POUS PROVIDES A PREAMBLE WITH EXAMPLES AT PAGES 72-75 OF HIS ANSWER TESTIMONY. DO YOU HAVE ANY COMMENTS TO THAT?

A. Yes. Mr. Pous attacks my use of judgment, but interestingly then claims in his testimony to use his own judgment to arrive at his recommendations.[11] He raises the issue of "blind reliance on historical averages,"[12] which is pejorative and does not add credibility to his recommendations in this case, as I will demonstrate in my discussion of each of his recommendations.

[11] Answer Testimony of Jacob Pous, p. 72, ln. 19 through p. 73, ln. 3; p. 77, lns. 13-16.
[12] Answer Testimony of Jacob Pous, p. 73, ln. 6 through p. 75, ln. 13.

F. ACCOUNT 353 – TRANS. STAT. EQUIP. NET SALVAGE

Q. WHAT IS THE STATED BASIS FOR MR. POUS' ADJUSTMENT TO ACCOUNT 353?

A. He claims at page 77, lines 13-16, of his Answer Testimony that it is due to a review of historical data, the mix of retirement versus mix of investment, a comparison to Distribution Account 362-Station Equipment, the concept of gradualism, and judgment.

Q. DO YOU HAVE ANY THOUGHTS ON THE BASES MR. POUS PROVIDES?

A. Yes. Mr. Pous lays out the net salvage analysis between the two accounts (353 and 362) and focuses on the most recent 10-year band. He correctly states that I selected negative 10 percent for Account 362 and negative 15 percent for Account 353 and they have similar equipment. He correctly asserts that the assets in the two accounts are similar in nature and function. However, Mr. Pous fails to mention that the equipment in Account 353 is generally of a higher voltage and, as a result, is larger equipment which can require more effort to remove. In fact, as acknowledged by Mr. Pous, the results of the net salvage analysis most recent 10 year band is almost the same for each account. However, Mr. Pous does not acknowledge that statement in the Depreciation Study that my selection for Account 362 was based on "trends" in the widest band (10 years) for Account 362. See Depreciation Study, Attachment No. DAW-1, p. 63 of 400. This is important and telling as you focus on the 10-year bands for the last five activity years 2009-2013 for each account below. In addition, the level of retirements is much greater for Account 353, giving more confidence in the net salvage percentage.

Acct	Year	Retirements	Salvage	Removal	Net Salvage	Net Salvage	10- yr. Net Salvage
		$	$	$	$	%	%
353	2009	1,844,701	49,251	1,009,388	-960,138	-52.05%	-13.47%
353	2010	1,934,027	91,083	691,976	-600,892	-31.07%	-16.10%
353	2011	6,857,934	99,919	784,265	-684,346	-9.98%	-15.50%
353	2012	2,849,555	70,483	1,049,145	-978,662	-34.34%	-19.51%
353	2013	2,264,740	237,978	1,306,457	-1,068,479	-47.18%	-22.61%
362	2009	1,964,666.93	83,031.17	292,950.19	(209,919.02)	-10.68%	-9.03%
362	2010	521,737.80	3,475.00	543,779.85	(540,304.85)	-103.56%	-11.86%
362	2011	681,183.27	-	112,931.31	(112,931.31)	-16.58%	-14.17%
362	2012	1,461,974.37	104,051.49	1,450,621.31	(1,346,569.82)	-92.11%	-22.59%
362	2013	2,880,189.78	56,594.00	324,769.27	(268,175.27)	-9.31%	-21.15%

Q. MR. POUS ALSO DISCUSSES THE RETIREMENT MIX OF ASSETS FOR THIS ACCOUNT AT PAGE 79-80 OF HIS ANSWER TESTIMONY. DO YOU AGREE WITH HIS CHARACTERIZATION?

A. No. Mr. Pous has made a point for only one year (2009) out of 40-plus years of data that was analyzed. While it is in the most recent five years of the total experience, it merely illustrates there are cycles of replacement for the various assets over time. The analysis contained in my study encompasses all 40-plus years and utilizes moving averages of 2-10 years for each of those years to illustrate these cycles and trends. It also aids the depreciation analyst in making the best net salvage recommendation considering all of the information.

Q. BASED ON THE ANALYSIS PROVIDED BY THE COMPANY, IS MR. POUS' CRITIQUE SOUND?

A. No. As I stated above, the analysis I performed contains over 40 years of data and the analysis provides moving averages for 10 years for each of the years presented. I reviewed each year and the averages from 2 to 10 years for each of those years. Additionally, I met with Company personnel who provided input on various aspects of the depreciation study, trends, and overall expectations for all accounts in the depreciation study. My recommendation gives consideration to the entire analysis and input from the Company operations personnel, making it more than "blind reliance" of historical averages or my judgment, as Mr. Pous suggests.

Q. IF YOU HAD RELIED SOLEY ON HISTORICAL AVERAGES WITHOUT GRADUALISM AND JUDGMENT, WHAT WOULD THE COMPANY RECOMMENDATION HAVE BEEN FOR ACCOUNT 353?

A. As can be seen in the table above for the 10-year band in 2013, it would be closer to negative 20 percent.

Q. DO YOU HAVE ANY SUMMARY COMMENTS CONCERNING CEC/FEA'S RECOMMENDATIONS REGARDING ACCOUNT 353?

A. Yes. Mr. Pous encourages the Commission to focus on the internally consistent recommendation based on historical data and through the process of applied judgment,[13] all of which have been incorporated into the Depreciation Study, its supporting workpapers, and in my final recommendation of negative 15 percent

[13] Answer Testimony of Jacob Pous, p. 77, lns. 1-3.

net salvage for this account. For these reasons, the Commission should reject Mr. Pous' recommendation and approve my recommendation.

G. ACCOUNT 390 – STRUCTURES & IMPROVEMENTS NET SALVAGE

Q. WHAT DOES MR. POUS RECOMMEND FOR ACCOUNT 390, STRUCTURES & IMPROVEMENTS, NET SALVAGE?

A. Mr. Pous recommends a positive 15 percent, compared to the negative 5 percent recommended in the Depreciation Study.

Q. DO YOU AGREE WITH HIS NET SALVAGE RECOMMENDATION?

A. No.

Q. WHY DO YOU DISAGREE WITH MR. POUS ON THIS ISSUE?

A. Mr. Pous has anticipated my Rebuttal Testimony regarding the sale of buildings by claiming to have moderated his recommendation to account for the land value associated with those buildings.[14] However, his adjustment is way too conservative and should be disregarded. Mr. Pous points to the fact that the Company has sold numerous buildings over the past 15 years, hinting that it will be an ongoing situation,[15] which is not true. The utility business as a whole has seen many of its neighborhood business offices closed to streamline costs. The expectation is that there will be fewer of these buildings to sell in the future. This was a short-term effort and will end when the neighborhood offices have been closed – as is the case with Public Service. In other words, the long-term look at this account will not include a wholesale continued sale of offices and, therefore, those sales should not be included in the analysis of the future of this account.

[14] Answer Testimony of Jacob Pous, p. 81, lns. 10-14.
[15] Answer Testimony of Jacob Pous, p. 83, ln. 20, through p. 84, ln. 3.

Without reflecting the one-time sale of neighborhood offices, a reasonable person should expect there will be more removal cost for replacement of roofs, HVAC equipment, etc., than salvage for those assets. The analysis of this account, excluding sales, yielded a negative -- not positive -- net salvage. While Mr. Pous claims gradualism, the movement is over 25 percent compared to existing and 20 percent over my recommendation. The Commission should reject Mr. Pous' recommendation in favor of my negative 5 percent net salvage proposal for Account 390, which is based on the reasonable future prospects for this account.

H. ACCOUNT 392 (ALL) – TRANSPORTATION EQUIPMENT NET SALVAGE

Q. PLEASE ADDRESS MR. POUS' CHALLENGE TO THE PROPOSED NET SALVAGE RATIO FOR ALL ACCOUNT 392 TRANSPORTATION EQUIPMENT.

A. Mr. Pous recommends a positive 25 percent net salvage ratio in lieu of my proposed 0 percent.

Q. DO YOU KNOW WHAT THE COMPANY'S POSITION REGARDING SALVAGE WILL BE IN THE FUTURE?

A. Yes. It is my understanding the Company has stopped applying like-kind exchange accounting for transportation assets and will resume accounting for transportation equipment as it does for its other assets. Full book cost will be recorded to Accounts 392 and any salvage or cost to retire will be recorded to the Accumulated Provision for Depreciation, Account 108.

Q. DO YOU AGREE WITH MR. POUS THAT A 25 PERCENT POSITIVE NET SALVAGE VALUE IS APPROPRIATE GIVEN THE COMPANY'S CHANGE IN PROCESS FOR RECORDING VEHICLE SALVAGE?

A. No. Based upon the change from like-kind exchange accounting, I believe the facts support retaining the existing the approved positive 10 percent net salvage for vehicles.

Q. ARE YOU CHANGING YOUR RECOMMENDED NET SALVAGE RATIO FOR ACCOUNT 392 TRANSPORTATION EQUIPMENT THAT WAS INCLUDED IN THE DEPRECIATION STUDY FOR PURPOSES OF THIS CASE?

A. Yes. Upon reconsideration, and in light of the Company's accounting change and discussion with Company personnel, I am revising my recommendation.

Q. WHAT IS THE EFFECT OF YOUR CHANGE IN RECOMMENDATION TO THE RECOMMENDED DEPRECIATION RATES REFLECTED IN THE DEPRECIATION STUDY?

A. The change reduces the Company's annual depreciation expense, based on plant balances as of December 31, 2013, by $789,225 (total company). Due to the reserve reallocation, however, the recommended depreciation rates for all electric general and common general plant accounts will change. I have recalculated the affected appendices to the Depreciation Study (Appendix A-4, A-5, A-6, B, C and F) and included the revised appendices as Attachment No. DAW-2 hereto.

Q. WHAT SUPPORT DOES MR. POUS PROVIDE FOR HIS 25 PERCENT POSITIVE SALVAGE?

A. At pages 89-90 of his Answer Testimony, Mr. Pous takes the Ford F-150 truck and obtains standard pricing from AutoTrader.com for $22,295 and implies that a 15.89 percent deal discount from MSRP could be available. He then uses the National Automobile Dealers Association ("NADA") information for a 2004 Ford F-150 pickup truck in the Denver area with 150,000 miles to yield a clean trade in price of $4,375 and a retail price of $6,750. When you take the $22,295 adjusted for the 15.89 percent discount and the $4,375 trade-in, it yields 23 percent. Mr. Pous then increases the percentage to 25 percent based on the fact that the Company trucks have a 10-year life not 11-12 years in his assumed example.

Q. DOES THE COMPANY HAVE ANY INFORMATION TO REFUTE MR. POUS' EXAMPLE?

A. Yes. In the process of preparing my Rebuttal Testimony, I discussed Mr. Pous' Answer Testimony with Company personnel to see if they had any specific thoughts or information that would help the Commission determine the most appropriate net salvage for these assets. As a result of those conversations, Company subject matter experts indicated that Mr. Pous' example was based on standard information, not specific information to the Company fleet. Specifically, they indicated the cost to "upfit" a truck for utility service could increase the cost from Mr. Pous' hypothetical $18,752 to $28,000 to $30,000. In regard to resale, using the JJ Kane dataset, the resale values for F-150's at age 10 was closer to $2,400, not Mr. Pous $4,375. Using $28,000 as the cost basis and $2,400 as the

resale (salvage), the net salvage would be 8.6 percent, not the 23 percent or 25 percent as Mr. Pous claims.

Since implementing the change from like-kind accounting, the Company began to track specific information for its F-150's. Based on the sale of six F-150's across Xcel Energy companies aged 7-12 years, the average sale proceeds after commission was approximately $3,200. Using JJ Kane Resale, the salvage equates to 8.1 percent and using the limited Xcel Energy experience, it would be 10.9 percent.

The Company also indicated that the Ford F-150's in Public Service's fleet are about 36 percent of its light truck category. This would suggest a more appropriate salvage value would be between 8 and 10 percent, not 25 percent as recommended by Mr. Pous. The Commission should retain the existing positive 10 percent at this time.

Q. DID THE COMPANY PROVIDE ANY OTHER SPECIFIC INFORMATION THAT MIGHT BE USEFUL?

A. Yes. Walking through each of the categories of assets included in the Depreciation Study using the same type of cost information and JJ Kane Resale, the average price for automobiles 2011 or newer is $32,826 and, at 8 years, has an expected resale price of $3,384, or a 10.3 percent net salvage value. For Light Trucks, an average price for 2012 or newer is $33,825 and, at 10 years, has an expected resale of $2,643, or 7.8 percent net salvage value. Finally, we talked about Heavy Trucks 2010 or newer, which had an average price paid of

$108,396 and, at 12 years, the expected resale price is $6,453, or a 6.0 percent net salvage.

Q. WHAT DOES ALL THIS MEAN?

A. For each specific category of transportation assets, the net salvage being realized is expected to be between 6.0 percent and 11.0 percent on average. Mr. Pous' single example of the Ford F-150 is inaccurate for Public Service's specific assets and it does not match up with the other transportation categories either. This information supports the retention of the existing 10 percent for each of the categories and subaccounts for Account 392 contained in this case.

Q. DO YOU HAVE ANY SUMMARY COMMENTS ON THIS ISSUE?

A. Yes. While the Company's accounting for Account 392 has changed since the case was filed, we have found and provided current and relevant net salvage information, which confirms that the existing net salvage of 10 percent remains applicable and should be approved. Mr. Pous' recommendation of 25 percent should be denied, should he continue with his objection for this account. The change to 10 percent net salvage for Account 392 Transportation Equipment reduces the Company's requested depreciation expense by a *de minimus* amount of $176 thousand.

I. GENERAL PLANT AMORTIZATION RESERVE TRUEUP

Q. MR. POUS CLAIMS AT PAGES 90-92 OF HIS ANSWER TESTIMONY THAT THE COMPANY WILL OVER RECOVER ITS CAPITAL COSTS IF THE TRUE-UP OF THE RESERVE FOR GENERAL PLANT AMORTIZATION ACCOUNTS IS APPROVED. DO YOU AGREE?

A. No. At implementation of amortization accounting, a rate that would have provided for the over/under-recovered portion of existing assets given the existing reserve position for each account, based on the assets within that account at the time, was not calculated The only way to fully and correctly implement amortization accounting is to make an assessment of the reserve, based upon existing assets and their ages, to ensure there is no more and no less than what will be required to fully fund the retirement of those assets when they reach the stated amortization life. For example, assume an asset has a life of 10 years and it is 5 years old with only 40 percent recovery of its depreciation expense (*i.e.*, the depreciation reserve is 40 percent of the asset value). The amortization rate for the 10-year life is 10-percent per year for 10 years. The problem relates to the asset only being 40 percent recovered at the 5-year point (when there should be 50 percent recovered). The remaining 5 years of amortization will only recover 50 percent of the cost of the asset. This will only allow for a 90 percent recovery of the cost of the asset at the time it is retired -- *i.e.*, 40 percent of the depreciation reserve recovered at the 5-year point and another 50 percent recovered over the remaining 5 years. There must be a mechanism to recover the under-recovered 10 percent. I am recommending such a mechanism through inclusion of an annual accrual amount to recover the

reserve difference in the amortization rate calculation.[16] Without that mechanism, effectively, 10 percent of the cost of the asset is being disallowed and will never be recovered under amortization accounting. Mr. Pous is suggesting this disallowance is appropriate for amortization accounting accounts. With no finding that the costs of the assets were imprudent, this disallowance is unfairly prohibiting the Company from recovering legitimately incurred costs to serve its customers. It is not a timing difference; it is a permanent disallowance. We have reviewed these accounts and identified the necessary reserve amount, a remaining life, and the resulting total rate that must be recorded to ensure full recovery and proper implementation of amortization accounting. Those calculations are found in Appendix A to the Depreciation Study, Attachment No. DAW-1 to my Direct Testimony.

Q. HOW HAVE OTHER UTILITIES HANDLED THE TIMING OF ANY RESERVE DIFFERENCE AT IMPLEMENTATION OF AMORTIZATION ACCOUNTING?

A. Some utilities have proposed, and their Commissions have approved, a set amortization period, *i.e.*, five or six years, to be consistent with their next required depreciation filing. I believe that accruing for the reserve difference for amortization accounting is more appropriate over each account's respective remaining life for consistency and fairness. Regardless of the time period determined by the Commission for recovery of the reserve differences, the important aspect is that the reserve differences be identified and recovered. It is

[16] See Appendix A-5 and Appendix A-6 to the Depreciation Study, Attachment No. DAW-1, pp. 328-329 of 400. See also Appendix A-5 Revised and Appendix A-6 Revised included in Attachment No. DAW-2 hereto.

only after this is accomplished that amortization accounting for these accounts will be correct and achieve its goal of time and cost effectiveness.

Q. AT PAGES 92-93 OF HIS ANSWER TESTIMONY, MR. POUS REFERENCES A NEVADA CASE FOR SOUTHWEST GAS WHERE THIS ISSUE WAS LITIGATED AND THE UTILITY'S REQUEST FOR RECOVERY DENIED. DO YOU HAVE ANY THOUGHTS ON THIS?

A. Yes. The fact that a regulatory agency in another state did not allow the true-up of the reserve for General Plant Amortization is not a good reason for this Commission to follow suit. Other regulatory agencies have allowed such true-ups. [17] The illustration I provided above shows the Company has not recovered the full cost of those assets and is entitled to full recovery.

Q. MR. POUS CLAIMS AT PAGE 91, LINE 20, THROUGH PAGE 92, LINE 6, OF HIS ANSWER TESTIMONY THAT THE INITIAL RATE ESTABLISHED AT IMPLEMENTATION OF AR 15 HAS ACCOUNTED FOR ANY TRUE-UP. DO YOU AGREE?

A. No. If that had been the case, a reserve deficiency would not be present in the calculations shown in Appendix A-5 and A-6 to the Depreciation Study, Attachment No. DAW-1 to my Direct Testimony. The book reserve is not a number that is created, but rather accumulated through recorded transactions on the Company's financial records over time. The theoretical reserve, which is used to determine any over- or under- amount, is calculated based on the current assets recorded in each account. Based on this, the Company has not and

[17] Colorado Commission, Dockets 12AL-1268G and 12AL-1269ST. Public Utility Commission of Texas, Dockets 35717, 38339, and 38896.

cannot over-collect on these accounts and that, once an asset reaches its approved average service life, it would show the appropriate amount of reserve. Mr. Pous has not challenged the investment balances or the reserve balances in the Depreciation Study because they tie out to the financial books and records of the Company.

IV. OTHER DEPRECIATION ISSUES

Q. PLEASE EXPLAIN YOUR EXCEPTION TO THE CEC/FEA'S CALCULATION OF DEPRECIATION EXPENSE AS A RESULT OF MR. POUS' PROPOSED CHANGES.

A. The depreciation rates in the Alliance Group's Depreciation Study reflect an allocation of the book reserve among the accounts of each function. What this means is that, when you change the parameters such as decommissioning costs, or net salvage, it will change how the reserve is allocated among all the accounts contained within that function. Mr. Pous failed to update the allocation of book depreciation reserve among the accounts, thereby invalidating his calculations.

Q. HAS THE OCC RECOMMENDED RESERVE REALLOCATION?

A. No. Mr. Neil recommends rejecting the concept of reserve reallocation despite the fact this Commission has accepted that concept in two recent cases for the Company, Proceeding Nos. 12AL-1268G and 12AL-1269ST.

Q. HAVE YOU CALCULATED THE DEPRECIATION RATES INCORPORATING MR. POUS' RECOMMENDATIONS?

A. Not at this time. However, given the fact there are several areas being contested that all feed into the ultimate depreciation expense and rate calculations, I would offer to update the calculations once the Commission has given its approval directing what retirement dates, estimated decommissioning costs and interim retirement factors for Production Plant should be used, as well as the Transmission and General Plant life and net salvage parameters.

Q. ARE THE DEPRECIATION RATES PROPOSED BY CEC/FEA CORRECT?

A. Not for most functional groups. In most of his rate computations, Mr. Pous failed to reset the proration factor to have the difference between the allocated reserve and the book reserve equal zero. I again offer to update the calculations once the Commission has ruled on the issues impacting the inputs to calculation of depreciation in this case.

Q. WHAT COMMENTS DO YOU HAVE REGARDING THE OCC'S RECOMMENDATION TO RETAIN THE EXISTING DEPRECIATION RATES?

A. Ms. Perkett addresses the OCC's recommendation more comprehensively in her Rebuttal testimony. I believe the Commission is aware and knowledgeable about the significant issues facing the Company concerning decommissioning and retirement dates of its generating units. In addition, the other parties in this case have also contributed additional information to allow for a more informed decision in these areas. No party other than the OCC, however, has suggested that all the recommended depreciation rates be ignored. The OCC's approach creates intergenerational inequity by continuing to use the same depreciation rates that were first established more than eight years ago in Proceeding No. 06S-234EG. This approach creates intergenerational inequity by continuing with outdated depreciation rates and is not a sound and reasonable approach to setting appropriate depreciation rates and expense. Mr. Neil's proposal to retain the existing depreciation rates is not a reasonable approach and should be rejected.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes, it does.

Appendix A-4 Revised

Public Service Company of Colorado
Computation of Proposed Depreciation Accrual Rates
For Transmission, Distribution, General, and Common Property
December 31, 2013

Account Number	Description	Plant Balance 12/31/2013	Allocated Reserve Balance	Net Salvage %	Net Salvage Amount	Unaccrued Balance	Remaining Life	Annual Accrual	Annual Accrual %
	TRANSMISSION PLANT								
350.20	Land Rights	67,315,763	12,261,965	0%	0	55,053,798	82.89	664,174	0.9867%
352.00	Structures and Improvements	53,888,327	9,994,684	-10%	(5,388,833)	49,282,475	63.12	780,746	1.4488%
353.00	Station Equipment	778,241,887	169,688,618	-15%	(116,736,283)	725,289,552	45.21	16,044,361	2.0616%
354.00	Towers and Fixtures	164,637,307	77,186,956	-20%	(32,927,461)	120,377,813	48.74	2,469,674	1.5001%
355.00	Poles and Fixtures	338,652,785	53,135,368	-25%	(84,663,196)	370,180,613	54.69	6,768,672	1.9987%
356.00	OH Conductors and Devices	245,477,507	52,297,902	-5%	(12,273,875)	205,453,480	55.04	3,732,756	1.5206%
357.00	UG Conduit	30,031,249	6,485,103	0%	0	23,546,147	47.83	492,286	1.6392%
358.00	UG Conductors and Devices	55,740,292	11,503,148	-5%	(2,787,015)	47,024,158	48.92	961,176	1.7244%
359.00	Roads and Trails	3,756,395	1,390,812	0%	0	2,365,583	55.44	42,671	1.1359%
	Total Transmission	1,737,741,512	393,944,555		(254,776,663)	1,598,573,620		31,956,516	
	DISTRIBUTION PLANT								
360.20	Land Rights	28,224,884	3,093,636	0%	0	25,131,248	90.21	278,599	0.9871%
361.00	Structures and Improvements	54,790,554	14,105,472	-5%	(2,739,528)	43,424,610	46.85	926,797	1.6915%
362.00	Station Equipment	498,115,612	111,165,158	-10%	(49,811,561)	436,762,016	49.12	8,891,267	1.7850%
364.00	Poles, Towers and Fixtures	234,442,848	83,677,976	-50%	(117,221,424)	267,986,295	43.31	6,188,246	2.6396%
365.00	OH Conductors and Devices	279,924,042	70,566,612	-35%	(97,973,415)	307,330,845	45.82	6,706,962	2.3960%
366.00	UG Conduit	306,863,958	85,147,357	-15%	(46,029,594)	267,746,194	46.28	5,785,458	1.8853%
367.00	UG Conductors and Devices	1,463,040,667	358,043,110	-5%	(73,152,033)	1,178,149,591	37.21	31,660,900	2.1640%
368.00	Line Transformers	443,978,064	166,681,863	-5%	(22,198,903)	299,495,105	29.94	10,002,831	2.2530%
369.00	Services	23,201,711	20,021,511	-15%	(3,480,257)	6,660,457	16.14	412,544	1.7781%
369.10	Services-Overhead	41,608,742	23,237,458	-15%	(6,241,311)	24,612,595	27.66	889,702	2.1383%
369.20	Services-Underground	204,555,586	109,447,574	-15%	(30,683,338)	125,791,350	28.63	4,393,911	2.1480%
370.00	Meters	131,317,395	76,746,254	0%	0	54,571,140	11.46	4,761,798	3.6262%
370.20	AMR Equipment	66,539,036	40,855,843	0%	0	25,683,193	9.03	2,845,240	4.2760%
371.00	Installation on Customer Premises	6,807,758	5,012,940	-20%	(1,361,552)	3,156,370	10.39	303,830	4.4630%
373.00	Street Lighting and Signal Systems	157,383,223	65,198,560	-20%	(31,476,645)	123,661,307	24.20	5,109,303	3.2464%
	Total Distribution	3,940,794,078	1,233,001,322		(482,369,560)	3,190,162,316		89,157,388	
	ELECTRIC GENERAL PLANT								
390.00	Structures and Improvements	5,332,804	1,112,942	0%	0	4,219,862	39.27	107,457	2.0150%
	COMMON GENERAL PLANT								
390.00	Structures and Improvements	125,577,884	29,860,570	-5%	(6,278,894)	101,996,208	37.88	2,692,449	2.1440%
390.08	Structures and Improvements - Partitions	844,405	718,795	0	0	125,610	2.23	56,440	6.6840%

Appendix A-5 Revised

Public Service Company of Colorado
Computation of Proposed Amortization Accrual Rates
Electric General Property at December 31, 2013

Account Number	Description	Plant Balance 12/31/2013	Allocated Reserve 12/31/2013	Theoretical Reserve 12/31/2013	Reserve Difference	Remaining Life	Amortize Reserve Difference
	ELECTRIC GENERAL PLANT						
391.00	Office Furniture and Equipment	5,070,381	2,580,430	2,607,313	(26,883)	13.54	1,986
391.20	Computer Hardware	3,411,420	1,807,844	1,849,671	(41,828)	2.30	18,165
392.10	Transportation Equipment - Automobiles	143,098	52,986	53,796	(810)	5.47	148
392.20	Transportation Equipment - Light Trucks	9,859,115	4,036,077	4,105,962	(69,885)	6.14	11,373
392.30	Transportation Equipment - Trailers	3,102,448	539,825	552,456	(12,631)	12.03	1,050
392.40	Transportation Equipment - Heavy Trucks	34,061,984	14,879,796	15,163,262	(283,466)	6.72	42,194
393.00	Stores Equipment	323,389	219,351	220,577	(1,226)	19.72	62
394.00	Tools, Shop, and Garage Equipment	26,871,648	8,544,924	8,689,657	(144,734)	18.54	7,805
395.00	Laboratory Equipment	6,352,636	4,999,318	5,031,050	(31,732)	4.88	6,506
396.00	Power Operated Equipment	7,606,265	3,027,610	3,090,885	(63,275)	0.44	21,092
397.00	Communication Equipment	53,807,634	20,068,970	20,485,557	(416,587)	9.70	42,958
397.30	Communication Equipment - EMS	3,890,570	362,794	371,283	(8,489)	13.57	626
398.00	Miscellaneous Equipment	1,273,559	445,194	454,965	(9,770)	13.14	744
	Total Electric General	155,774,147	61,565,118	62,676,435	(1,111,317)		154,707

After Retirement of Fully Accrued Assets

		Plant Balance 12/31/2013	Allocated Reserve 12/31/2013	Amortization Life	Amortization Net Salv %	Annual Amortization	Accrual For Reserve Difference	Total Amortization	Amortization Rate
	ELECTRIC GENERAL PLANT								
391.00	Office Furniture and Equipment	3,638,856	1,148,905	20	0.00%	181,943	1,986	183,929	5.0546%
391.20	Computer Hardware	3,391,140	1,787,564	5	0.00%	678,228	18,165	696,393	20.5356%
392.10	Transportation Equipment - Automobiles	124,738	34,626	8	10.00%	14,033	148	14,181	11.3686%
392.20	Transportation Equipment - Light Trucks	8,809,691	2,986,653	10	10.00%	792,872	11,373	804,245	9.1291%
392.30	Transportation Equipment - Trailers	3,102,448	539,825	15	10.00%	186,147	1,050	187,197	6.0338%
392.40	Transportation Equipment - Heavy Trucks	31,296,534	12,114,346	12	10.00%	2,347,240	42,194	2,389,434	7.6348%
393.00	Stores Equipment	156,423	52,385	30	0.00%	5,214	62	5,276	3.3731%
394.00	Tools, Shop, and Garage Equipment	24,512,141	6,185,417	25	0.00%	980,486	7,805	988,291	4.0318%
395.00	Laboratory Equipment	2,709,452	1,356,134	10	0.00%	270,945	6,506	277,451	10.2401%
396.00	Power Operated Equipment	7,282,830	2,704,174	10	0.00%	728,283	21,092	749,375	10.2896%
397.00	Communication Equipment	51,542,129	17,803,466	15	0.00%	3,436,142	42,958	3,479,100	6.7500%
397.30	Communication Equipment - EMS	3,890,570	362,794	15	0.00%	259,371	626	259,997	6.6827%
398.00	Miscellaneous Equipment	1,245,921	417,556	20	0.00%	62,296	744	63,040	5.0597%
	Total Electric General	141,702,875	47,493,844			9,943,200	154,707	10,097,907	

* For assets with a remaining life less than 1 year, amortize reserve difference over three years.

Appendix A-6 Revised

Public Service of Colorado
Computation of Amortization Rates
for Common General Plant at December 31, 2013

Account Number	Description	Plant Balance 12/31/2013	Allocated Reserve 12/31/2013	Theoretical Reserve 12/31/2013	Reserve Difference	Remaining Life	Amortize Reserve Difference
	COMMON GENERAL PLANT						
391.00	Office Furniture and Equipment	41,830,599	23,922,883	24486738.83	(563,856)	13.37	42,171
391.04	Computer Hardware	83,792,896	47,634,065	50637974.65	(3,003,909)	2.10	1,430,904
391.05	Computer Hardware - 3 Year Life	1,591,513	743,578	795756.665	(52,179)	1.50	34,786
391.09	Office Equipment - Partition Lease Fac	1,946,747	1,875,931	1926412.254	(50,482)	0.51	16,827
392.10	Transportation Equipment - Automobiles	1,525,099	1,140,154	1146337.744	(6,184)	6.23	993
392.20	Transportation Equipment - Light Trucks	8,545,430	6,479,443	6606138.941	(126,696)	4.45	28,442
392.30	Transportation Equipment - Trailers	609,911	220,324	235785.2265	(15,461)	8.56	1,807
392.40	Transportation Equipment - Heavy Trucks	3,111,247	1,928,823	2021212.027	(92,389)	4.48	20,611
393.00	Stores Equipment	803,839	627,940	650853.045	(22,913)	9.13	2,508
394.00	Tools, Shop, and Garage Equipment	9,437,847	6,045,934	6309312.794	(263,379)	10.95	24,061
395.00	Laboratory Equipment	402,475	401,436	401447.9605	(12)	8.50	1
396.00	Power Operated Equipment	3,748,520	2,589,889	2696033.855	(106,145)	3.94	26,940
397.00	Communication Equipment	44,005,532	33,967,666	35236534.36	(1,268,868)	4.68	271,263
398.00	Miscellaneous Equipment	1,224,566	811,200	850887.508	(39,687)	7.63	5,198
	Total Electric General	202,576,221	128,389,266	134,001,426	(5,612,160)		1,906,512

After Retirement of Fully Accrued Assets

		Plant Balance 12/31/2013	Allocated Reserve 12/31/2013	Amortization Life	Amortization Net Salv %	Annual Amortization	Accrual For Reserve Difference	Total Amortization	Amortization Rate
	COMMON GENERAL PLANT								
391.00	Office Furniture and Equipment	25,942,985	8,035,269	20	0.00%	1,297,149	42,171	1,339,320	5.1626%
391.04	Computer Hardware	78,966,255	42,807,425	5	0.00%	15,793,251	1,430,904	17,224,155	21.8120%
391.05	Computer Hardware - 3 Year Life	1,591,513	743,578	3	0.00%	530,504	34,786	565,290	35.5190%
391.09	Office Equipment - Partition Lease Fac	790,208	719,391	20	0.00%	39,510	16,827	56,338	7.1295%
392.10	Transportation Equipment - Automobiles	473,067	88,121	8	10.00%	53,220	993	54,213	11.4599%
392.20	Transportation Equipment - Light Trucks	3,871,483	1,805,496	10	10.00%	348,434	28,442	376,875	9.7346%
392.30	Transportation Equipment - Trailers	609,911	220,324	15	10.00%	36,595	1,807	38,402	6.2962%
392.40	Transportation Equipment - Heavy Trucks	2,499,025	1,316,601	12	10.00%	187,427	20,611	208,038	8.3248%
393.00	Stores Equipment	502,423	326,524	30	0.00%	16,747	2,508	19,256	3.8326%
394.00	Tools, Shop, and Garage Equipment	7,145,216	3,753,303	25	0.00%	285,809	24,061	309,870	4.3367%
395.00	Laboratory Equipment	1,208	169	10	0.00%	121	1	122	10.1157%
396.00	Power Operated Equipment	2,671,260	1,512,629	10	0.00%	267,126	26,940	294,066	11.0085%
397.00	Communication Equipment	28,119,958	18,082,093	15	0.00%	1,874,664	271,263	2,145,926	7.6313%
398.00	Miscellaneous Equipment	978,932	565,566	20	0.00%	48,947	5,198	54,145	5.5310%
	Total Electric General	154,163,445	79,976,490			20,779,504	1,906,512	22,686,016	

* For assets with a remaining life less than 1 year, amortize reserve difference over three years.

Public Service of Colorado
Comparison of Depreciation Rates and Annual Amounts
December 31, 2013

Unit or Account Number	Account Number and / or Description	Unit Balance 12/31/2013 (14)	Notes	Approved (1) Life Depr Rate	Approved (1) COR Depr Rate	Approved (1) Tot Depr Rate	Proposed Life Depr Rate	Proposed COR Depr Rate	Proposed Tot Depr Rate	Approved Life Depr Exp	Approved COR Depr Exp	Approved Total Depr Exp	Proposed Life Depr Exp	Proposed COR Depr Exp	Proposed Total Depr Exp	Difference Life Depr Exp	Difference COR Depr Exp	Difference Total Depr Exp
	ELECTRIC INTANGIBLE PLANT																	
301.00	Organization Costs	-																
302.00	Franchises and Consents	16,928,069	(9)	0.0000%		0.0000%	0.0000%		0.0000%	-	-	-	-	-	-	-	-	-
303.00	Miscellaneous Intangible Plant	8,762,060		0.0000%		0.0000%	0.0000%		0.0000%	-	-	-	-	-	-	-	-	-
303.4	Misc Computer Software - 3 Year	-		33.3333%		33.3333%	33.3333%		33.3333%	-	-	-	-	-	-	-	-	-
303.40	Misc Computer Software - 5 Year	26,541,872		20.0000%		20.0000%	20.0000%		20.0000%	5,308,374	-	5,308,374	5,308,374	-	5,308,374	-	-	-
303.40	Misc Computer Software - 10 Year	9,298,597		10.0000%		10.0000%	10.0000%		10.0000%	929,860	-	929,860	929,860	-	929,860	-	-	-
303.4	Misc Computer Software - 15 Year	-		6.6667%		6.6667%	6.6667%		6.6667%	-	-	-	-	-	-	-	-	-
	Total Electric Intangible Plant	61,530,599								6,238,234	-	6,238,234	6,238,234	-	6,238,234	-	-	-
	STEAM PRODUCTION PLANT																	
Cameo Common (15)	310.2 Land Rights	1,392		2.0000%	0.0000%	2.0000%				28	-	28	83	-	83	56	-	56
Cherokee Unit 2 SC	314 Turbogenerator Units	10,516,704		2.1116%	0.1964%	2.3080%	5.6217%	0.1182%	5.7399%	222,071	20,655	242,726	591,218	12,431	603,648	369,147	(8,224)	360,923
Cherokee Unit 2 SC	315 Accessory Electric Equipment	2,040,021		3.0393%	0.2827%	3.3220%	3.6665%	0.0605%	3.7270%	62,002	5,767	67,769	74,797	1,234	76,032	12,795	(4,533)	8,262
		12,556,725								284,073	26,422	310,495	666,015	13,665	679,680	381,942	(12,757)	369,185
Cherokee Unit 3	311 Structures and Improvements	1,591,838		1.7502%	0.1628%	1.9130%	6.4772%	1.4580%	7.9352%	27,860	2,592	30,452	103,107	23,209	126,316	75,246	20,617	95,864
Cherokee Unit 3	312 Boiler Plant Equipment	36,712,697		2.4273%	0.2257%	2.6530%	6.8226%	1.5539%	8.3765%	891,127	82,861	973,988	2,504,760	570,479	3,075,239	1,613,633	487,618	2,101,251
Cherokee Unit 3	312 Boiler Plant Equipment AQIR	20,338,549		6.6667%	0.0000%	6.6667%	9.3053%	0.0000%	9.3053%	1,355,910	-	1,355,910	1,892,563	-	1,892,563	536,653	-	536,653
Cherokee Unit 3	314 Turbogenerator Units	11,124,245		2.1985%	0.2045%	2.4030%	6.2764%	1.4283%	7.7047%	244,567	22,749	267,316	698,202	158,888	857,090	453,636	136,139	589,774
Cherokee Unit 3	315 Accessory Electric Equipment	4,820,000		2.2617%	0.2103%	2.4720%	7.1009%	1.6090%	8.7099%	109,014	10,136	119,150	342,263	77,554	419,817	233,249	67,417	300,667
Cherokee Unit 3	315.2 Computers and Peripherals	1,234,347		3.8545%	0.3585%	4.2130%	7.9161%	1.8350%	9.7511%	47,578	4,425	52,003	97,712	22,650	120,362	50,134	18,225	68,359
Cherokee Unit 3	316 Miscellaneous Power Plant Equipment	88,008		2.3449%	0.2181%	2.5630%	6.8951%	1.5670%	8.4621%	2,064	192	2,256	6,068	1,379	7,447	4,005	1,187	5,192
(15)		75,909,684								2,678,120	122,955	2,801,074	5,644,676	854,158	6,498,834	2,966,556	731,204	3,697,760
Cherokee Unit 4	311 Structures and Improvements	10,682,532		1.8240%	0.2330%	2.0570%	3.2735%	0.4753%	3.7488%	194,849	24,890	219,740	349,693	50,774	400,467	154,843	25,884	180,727
Cherokee Unit 4	312 Boiler Plant Equipment	66,574,122		1.6920%	0.2220%	1.9140%	4.2786%	0.8178%	5.0964%	1,126,434	147,795	1,274,229	2,848,440	544,443	3,392,884	1,722,006	396,649	2,118,655
Cherokee Unit 4	312 Boiler Plant Equipment AQIR	20,948,318		6.6667%	0.0000%	6.6667%	8.7775%	0.0000%	8.7775%	1,396,562	-	1,396,562	1,838,739	-	1,838,739	442,177	-	442,177
Cherokee Unit 4	314 Turbogenerator Units	24,784,248		1.7190%	0.2240%	1.9430%	3.2026%	0.4794%	3.6820%	426,041	55,517	481,558	793,740	118,816	912,556	367,699	63,299	430,998
Cherokee Unit 4	315 Accessory Electric Equipment	8,581,107		1.5800%	0.2000%	1.7800%	3.1180%	0.4530%	3.5710%	135,581	17,162	152,744	267,559	38,872	306,431	131,977	21,710	153,688
Cherokee Unit 4	315.2 Computers and Peripherals	3,233,582		4.3147%	0.4013%	4.7160%	4.6099%	0.6674%	5.2773%	139,519	12,976	152,496	149,065	21,581	170,646	9,546	8,605	18,150
Cherokee Unit 4	316 Miscellaneous Power Plant Equipment	475,874		1.4290%	0.1700%	1.5990%	4.3447%	0.6221%	4.9668%	6,800	809	7,609	20,675	2,960	23,636	13,875	2,151	16,026
		135,279,783								3,425,787	259,149	3,684,936	6,267,911	777,447	7,045,358	2,842,124	518,298	3,360,421
Cherokee Common	310.2 Land Rights	12,865,962		2.0000%	0.0000%	2.0000%	1.8531%	0.0000%	1.8531%	257,319	-	257,319	238,419	-	238,419	(18,900)	-	(18,900)
Cherokee Common	310.3 Water Rights	112,245		2.0000%	0.0000%	2.0000%	2.0774%	0.0000%	2.0774%	2,245	-	2,245	2,332	-	2,332	87	-	87
Cherokee Common	311 Structures and Improvements	42,495,458		2.3050%	0.2480%	2.5530%	4.4619%	1.0138%	5.4757%	979,520	105,389	1,084,909	1,896,105	430,819	2,326,924	916,585	325,430	1,242,015
Cherokee Common	312 Boiler Plant Equipment	31,640,675		2.7650%	0.2910%	3.0560%	7.4398%	2.0553%	9.4951%	874,865	92,074	966,939	2,354,003	650,311	3,004,314	1,479,138	558,236	2,037,375
Cherokee Common	312 Boiler Plant Equipment AQIR	37,327,680		6.6667%	0.0000%	6.6667%	11.3065%	0.0000%	11.3065%	2,488,524	-	2,488,524	4,220,454	-	4,220,454	1,731,930	-	1,731,930
Cherokee Common	314 Turbogenerator Units	265,115		4.6390%	0.4350%	5.0740%	5.9482%	1.4816%	7.4298%	12,299	1,153	13,452	15,770	3,928	19,698	3,471	2,775	6,246
Cherokee Common	315 Accessory Electric Equipment	11,051,314		1.9540%	0.2050%	2.1590%	3.6915%	0.7505%	4.4420%	215,943	22,655	238,598	407,959	82,940	490,899	192,017	60,285	252,301
Cherokee Common	315.2 Computers and Peripherals	725,364		3.1757%	0.2953%	3.4710%	8.5067%	1.9402%	10.4469%	23,035	2,142	25,177	61,705	14,074	75,778	38,669	11,932	50,601
Cherokee Common	316 Miscellaneous Power Plant Equipment	3,274,182		2.1380%	0.2040%	2.3420%	7.5621%	1.4413%	9.0034%	70,002	6,679	76,681	247,597	47,191	294,788	177,595	40,511	218,106
		139,757,994								4,923,752	230,093	5,153,845	9,444,343	1,229,262	10,673,605	4,520,591	999,169	5,519,760
Coal Cars	312 Boiler Plant Equipment	20,405,663		3.1667%	0.0000%	3.1667%	4.3413%	0.0000%	4.3413%	646,186	-	646,186	885,871	-	885,871	239,685	-	239,685
Comanche Unit 1	311 Structures and Improvements	16,633,155		1.6360%	0.1970%	1.8330%	2.5925%	0.0902%	2.6827%	272,118	32,767	304,886	431,215	15,003	446,218	159,096	(17,764)	141,332
Comanche Unit 1	312 Boiler Plant Equipment	199,811,071		1.9460%	0.2270%	2.1730%	3.4306%	0.1482%	3.5788%	3,888,323	453,571	4,341,895	6,854,719	296,120	7,150,839	2,966,395	(157,451)	2,808,944
Comanche Unit 1	314 Turbogenerator Units	29,821,057		1.6980%	0.2040%	1.9020%	2.8409%	0.1166%	2.9575%	506,362	60,835	567,197	847,186	34,771	881,958	340,825	(26,064)	314,761
Comanche Unit 1	315 Accessory Electric Equipment	16,982,113		1.5310%	0.1760%	1.7070%	2.5445%	0.0870%	2.6315%	259,996	29,889	289,885	432,110	14,774	446,884	172,114	(15,114)	157,000
Comanche Unit 1	315.2 Computers and Peripherals	1,407,501		3.6712%	0.3488%	4.0200%	3.0946%	0.1058%	3.2004%	51,672	4,909	56,582	43,557	1,489	45,046	(8,116)	(3,420)	(11,536)
Comanche Unit 1	316 Miscellaneous Power Plant Equipment	527,534		1.3680%	0.1450%	1.5130%	2.4041%	0.0768%	2.4809%	7,217	765	7,982	12,682	405	13,088	5,466	(360)	5,106
		265,182,431								4,985,688	582,736	5,568,425	8,621,468	362,563	8,984,032	3,635,780	(220,173)	3,415,607
Comanche Unit 2	311 Structures and Improvements	8,258,093		1.3710%	0.1650%	1.5360%	2.2577%	0.0877%	2.3454%	113,218	13,626	126,844	186,443	7,242	193,685	73,225	(6,384)	66,841
Comanche Unit 2	312 Boiler Plant Equipment	169,592,720		1.8040%	0.2080%	2.0120%	3.2123%	0.1547%	3.3670%	3,059,453	352,753	3,412,206	5,447,827	262,360	5,710,187	2,388,374	(90,393)	2,297,981
Comanche Unit 2	314 Turbogenerator Units	40,359,930		1.6350%	0.1920%	1.8270%	2.8241%	0.1293%	2.9534%	659,885	77,491	737,376	1,139,805	52,185	1,191,990	479,920	(25,306)	454,614
Comanche Unit 2	315 Accessory Electric Equipment	18,669,123		1.6290%	0.1790%	1.8080%	2.5285%	0.0965%	2.6250%	304,120	33,418	337,538	472,049	18,016	490,064	167,929	(15,402)	152,527
Comanche Unit 2	316 Miscellaneous Power Plant Equipment	671,523		1.3560%	0.1370%	1.4930%	2.2692%	0.0809%	2.3501%	9,106	920	10,026	15,238	543	15,781	6,132	(377)	5,756
		237,551,389								4,145,782	478,207	4,623,989	7,261,362	340,347	7,601,708	3,115,580	(137,861)	2,977,719
Comanche Unit 3	310.2 Land Rights	8,159		2.0000%	0.0000%	2.0000%	1.6703%	0.0000%	1.6703%	163	-	163	136	-	136	(27)	-	(27)
Comanche Unit 3	311 Structures and Improvements	137,994,048	(6)	1.8850%	0.1210%	2.0060%	1.7528%	0.0312%	1.7840%	2,601,188	166,973	2,768,161	2,418,760	43,054	2,461,814	(182,428)	(123,919)	(306,347)
Comanche Unit 3	312 Boiler Plant Equipment	531,853,638	(6)	1.8850%	0.1210%	2.0060%	2.0082%	0.0827%	2.0909%	10,025,441	643,543	10,668,984	10,680,685	439,843	11,120,528	655,244	(203,700)	451,544
Comanche Unit 3	314 Turbogenerator Units	166,337,546	(6)	1.8850%	0.1210%	2.0060%	1.9369%	0.0690%	2.0059%	3,135,463	201,268	3,336,731	3,221,792	114,773	3,336,565	86,329	(86,496)	(166)
Comanche Unit 3	315 Accessory Electric Equipment	88,732,081	(6)	1.8850%	0.1210%	2.0060%	1.7974%	0.0281%	1.8255%	1,672,600	107,366	1,779,966	1,594,870	24,934	1,619,804	(77,729)	(82,432)	(160,161)
Comanche Unit 3	316 Miscellaneous Power Plant Equipment	19,983,592	(6)	1.8850%	0.1210%	2.0060%	2.0761%	0.0208%	2.0969%	376,691	24,180	400,871	414,879	4,157	419,036	38,189	(20,024)	18,165
		944,909,064								17,811,545	1,143,330	18,954,875	18,331,122	626,760	18,957,883	519,577	(516,570)	3,007

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			Approved (1)			Proposed			Approved			Proposed			Difference		
Unit or Account Number	Account Number and / or Description	Unit Balance 12/31/2013 (14)	Notes	Life Depr Rate	COR Depr Rate	Tot Depr Rate	Life Depr Rate	COR Depr Rate	Tot Depr Rate	Life Depr Exp	COR Depr Exp	Total Depr Exp	Life Depr Exp	COR Depr Exp	Total Depr Exp	Life Depr Exp	COR Depr Exp	Total Depr Exp
Comanche Common	311 Structures and Improvements	23,575,472		1.5000%	0.1780%	1.6780%	1.2897%	0.8233%	2.1130%	353,632	41,964	395,596	304,053	194,097	498,150	(49,579)	152,133	102,553
Comanche Common	312 Boiler Plant Equipment	22,105,187		1.6290%	0.1920%	1.8210%	1.5532%	1.0269%	2.5801%	360,093	42,442	402,535	343,338	226,998	570,336	(16,756)	184,556	167,800
Comanche Common	314 Turbogenerator Units	2,224,798		2.3140%	0.2520%	2.5660%	1.5925%	1.0443%	2.6368%	51,482	5,606	57,088	35,430	23,234	58,663	(16,052)	17,627	1,575
Comanche Common	315 Accessory Electric Equipment	2,042,227		1.6650%	0.1820%	1.8470%	1.3833%	0.8803%	2.2636%	34,003	3,717	37,720	28,250	17,978	46,228	(5,753)	14,261	8,508
Comanche Common	315.2 Computers and Peripherals	190,989		3.4484%	0.3276%	3.7760%	1.4938%	0.9506%	2.4444%	6,586	626	7,212	2,853	1,816	4,669	(3,733)	1,190	(2,543)
Comanche Common	316 Miscellaneous Power Plant Equipment	1,663,352		1.6030%	0.1580%	1.7610%	1.4697%	0.9253%	2.3950%	26,664	2,628	29,292	24,446	15,391	39,837	(2,217)	12,763	10,546
		51,802,025								832,460	96,983	929,443	738,370	479,513	1,217,883	(94,090)	382,529	288,439
Craig Unit 1	311 Structures and Improvements	6,403,881		1.4600%	0.0880%	1.5480%	2.0800%	0.0772%	2.1572%	93,497	5,635	99,132	133,201	4,944	138,145	39,704	(692)	39,012
Craig Unit 1	312 Boiler Plant Equipment	17,985,364		1.5570%	0.1060%	1.6630%	2.2033%	0.1071%	2.3104%	280,032	19,064	299,097	396,272	19,262	415,534	116,239	198	116,437
Craig Unit 1	314 Turbogenerator Units	1,836,217		2.6570%	0.1590%	2.8160%	3.6861%	0.1685%	3.8546%	48,788	2,920	51,708	67,685	3,094	70,779	18,897	174	19,071
Craig Unit 1	315 Accessory Electric Equipment	2,848,265		1.5290%	0.0860%	1.6150%	2.1404%	0.0776%	2.2180%	43,550	2,450	45,999	60,964	2,210	63,175	17,414	(239)	17,175
Craig Unit 1	316 Miscellaneous Power Plant Equipment	122,465		1.5120%	0.0690%	1.5810%	2.1587%	0.0714%	2.2301%	1,852	85	1,936	2,644	87	2,731	792	3	795
		29,196,192								467,719	30,153	497,872	660,765	29,598	690,363	193,046	(556)	192,491
Craig Unit 2	311 Structures and Improvements	6,341,652		1.4380%	0.0870%	1.5250%	2.1098%	0.0741%	2.1839%	91,193	5,517	96,710	133,796	4,699	138,495	42,603	(818)	41,785
Craig Unit 2	312 Boiler Plant Equipment	14,365,801		1.5470%	0.1060%	1.6530%	2.2792%	0.1053%	2.3845%	222,239	15,228	237,467	327,425	15,127	342,553	105,186	(101)	105,086
Craig Unit 2	314 Turbogenerator Units	6,580,197		1.5140%	0.1010%	1.6150%	2.6848%	0.1165%	2.8013%	99,624	6,646	106,270	176,665	7,666	184,331	77,041	1,020	78,061
Craig Unit 2	315 Accessory Electric Equipment	3,487,582		1.4990%	0.0850%	1.5840%	2.1839%	0.0749%	2.2588%	52,279	2,964	55,243	76,165	2,612	78,778	23,886	(352)	23,534
Craig Unit 2	316 Miscellaneous Power Plant Equipment	117,201		1.4780%	0.0690%	1.5470%	2.1697%	0.0679%	2.2376%	1,732	81	1,813	2,543	80	2,622	811	(1)	809
		30,892,433								467,067	30,436	497,503	716,595	30,184	746,779	249,528	(252)	249,275
Craig Common	311 Structures and Improvements	6,719,626		1.4870%	0.0890%	1.5760%	2.2009%	0.2576%	2.4585%	99,921	5,980	105,901	147,892	17,310	165,202	47,971	11,329	59,301
Craig Common	312 Boiler Plant Equipment	23,064,289		2.2670%	0.1440%	2.4110%	2.7313%	0.3495%	3.0808%	522,867	33,213	556,080	629,955	80,610	710,565	107,087	47,397	154,485
Craig Common	314 Turbogenerator Units	3,300,265		1.5560%	0.1030%	1.6590%	2.6396%	0.3316%	2.9712%	51,352	3,399	54,751	87,114	10,944	98,057	35,762	7,544	43,306
Craig Common	315 Accessory Electric Equipment	1,936,970		1.5410%	0.0870%	1.6280%	2.2348%	0.2596%	2.4944%	29,849	1,685	31,534	43,287	5,028	48,316	13,439	3,343	16,782
Craig Common	315.2 Computers and Peripherals	284,630		2.8817%	0.1383%	3.0200%	2.4940%	0.2897%	2.7837%	8,202	394	8,596	7,099	825	7,923	(1,104)	431	(673)
Craig Common	316 Miscellaneous Power Plant Equipment	1,493,550		1.6400%	0.0740%	1.7140%	2.7698%	0.3131%	3.0829%	24,494	1,105	25,599	41,368	4,676	46,045	16,874	3,571	20,445
		36,799,330								736,686	45,776	782,462	956,715	119,392	1,076,108	220,030	73,616	293,646
Hayden Unit 1	311 Structures and Improvements	6,716,474		1.6759%	0.1961%	1.8720%	2.3252%	0.2133%	2.5385%	112,561	13,171	125,732	156,171	14,326	170,498	43,610	1,155	44,765
Hayden Unit 1	312 Boiler Plant Equipment	68,576,573		2.9517%	0.3453%	3.2970%	3.3888%	0.3347%	3.7235%	2,024,175	236,795	2,260,970	2,323,923	229,526	2,553,449	299,748	(7,269)	292,479
Hayden Unit 1	314 Turbogenerator Units	16,477,114		2.0627%	0.2413%	2.3040%	2.9460%	0.2856%	3.2316%	339,873	39,759	379,633	485,416	47,059	532,474	145,542	7,299	152,842
Hayden Unit 1	315 Accessory Electric Equipment	4,347,746		1.9391%	0.2269%	2.1660%	2.5459%	0.2323%	2.7782%	84,307	9,865	94,172	110,689	10,100	120,789	26,382	235	26,617
Hayden Unit 1	315.2 Computers and Peripherals	1,097,995		3.6598%	0.4282%	4.0880%	5.6021%	0.5111%	6.1132%	40,184	4,702	44,886	61,511	5,612	67,123	21,326	910	22,237
Hayden Unit 1	316 Miscellaneous Power Plant Equipment	209,564		1.6902%	0.1978%	1.8880%	2.3674%	0.2116%	2.5790%	3,542	415	3,957	4,961	443	5,405	1,419	29	1,448
		97,425,466								2,604,643	304,706	2,909,349	3,142,671	307,066	3,449,737	538,028	2,359	540,388
Hayden Unit 2	311 Structures and Improvements	27,247,511		1.3310%	0.1950%	1.5260%	2.9339%	0.1222%	3.0561%	362,664	53,133	415,797	799,415	33,296	832,711	436,750	(19,836)	416,914
Hayden Unit 2	312 Boiler Plant Equipment	70,686,380		1.7300%	0.2370%	1.9670%	2.7537%	0.1416%	2.8953%	1,222,874	167,527	1,390,401	1,946,491	100,092	2,046,583	723,616	(67,435)	656,182
Hayden Unit 2	314 Turbogenerator Units	13,597,092		1.4760%	0.2090%	1.6850%	2.5297%	0.1238%	2.6535%	200,693	28,418	229,111	343,966	16,833	360,799	143,273	(11,585)	131,688
Hayden Unit 2	315 Accessory Electric Equipment	7,119,269		1.3750%	0.1870%	1.5620%	2.3788%	0.0974%	2.4762%	97,890	13,313	111,203	169,353	6,934	176,287	71,463	(6,379)	65,084
Hayden Unit 2	315.2 Computers and Peripherals	87,658		3.4324%	0.4016%	3.8340%	2.8743%	0.1176%	2.9919%	3,009	352	3,361	2,520	103	2,623	(489)	(249)	(738)
Hayden Unit 2	316 Miscellaneous Power Plant Equipment	513,904		1.3970%	0.1710%	1.5680%	2.2561%	0.0864%	2.3425%	7,179	879	8,058	11,594	444	12,038	4,415	(435)	3,980
		119,251,814								1,894,310	263,621	2,157,931	3,273,338	157,703	3,431,041	1,379,028	(105,918)	1,273,110
Hayden Common	311 Structures and Improvements	5,843,437		2.2160%	0.2900%	2.5060%	3.4645%	1.2090%	4.6735%	129,491	16,946	146,437	202,446	70,647	273,093	72,955	53,701	126,656
Hayden Common	312 Boiler Plant Equipment	27,604,137		2.5300%	0.3190%	2.8490%	3.1148%	1.1174%	4.2322%	698,385	88,057	786,442	859,814	308,449	1,168,262	161,429	220,391	381,820
Hayden Common	314 Turbogenerator Units	1,576,305		2.7010%	0.3350%	3.0360%	3.6910%	1.3148%	5.0058%	42,576	5,281	47,857	58,181	20,725	78,907	15,605	15,445	31,050
Hayden Common	315 Accessory Electric Equipment	188,111		2.4740%	0.2960%	2.7700%	3.0881%	1.0754%	4.1635%	4,654	557	5,211	5,809	2,023	7,832	1,155	1,466	2,621
Hayden Common	315.2 Computers and Peripherals	-				0.0000%	3.0881%	1.0754%	4.1635%	-	-	-	-	-	-	-	-	-
Hayden Common	316 Miscellaneous Power Plant Equipment	959,882		2.3100%	0.2540%	2.5640%	3.8484%	1.3301%	5.1785%	22,173	2,438	24,611	36,940	12,767	49,707	14,767	10,329	25,096
		36,171,872								897,278	113,279	1,010,557	1,163,190	414,611	1,577,801	265,912	301,333	567,244
Pawnee Unit 1	311 Structures and Improvements	140,370,253		1.4840%	0.0900%	1.5740%	2.0440%	0.0500%	2.0940%	2,083,095	126,333	2,209,428	2,869,168	70,185	2,939,353	786,073	(56,148)	729,925
Pawnee Unit 1	312 Boiler Plant Equipment	246,872,948		1.6670%	0.1130%	1.7800%	2.2734%	0.0827%	2.3561%	4,115,372	278,966	4,394,338	5,612,410	204,164	5,816,574	1,497,038	(74,803)	1,422,235
Pawnee Unit 1	314 Turbogenerator Units	60,972,990		1.5970%	0.1060%	1.7030%	2.2944%	0.0766%	2.3710%	973,739	64,631	1,038,370	1,398,964	46,705	1,445,670	425,226	(17,926)	407,300
Pawnee Unit 1	315 Accessory Electric Equipment	57,845,952		1.5620%	0.0880%	1.6500%	2.0645%	0.0486%	2.1131%	903,554	50,904	954,458	1,194,230	28,113	1,222,343	290,676	(22,791)	267,885
Pawnee Unit 1	315.2 Computers and Peripherals	3,666,279		2.9428%	0.1442%	3.0870%	3.4464%	0.0812%	3.5276%	107,891	5,287	113,178	126,355	2,977	129,332	18,463	(2,310)	16,154
Pawnee Unit 1	316 Miscellaneous Power Plant Equipment	6,061,041		1.5700%	0.0710%	1.6410%	2.2001%	0.0446%	2.2447%	95,158	4,303	99,462	133,349	2,703	136,052	38,191	(1,600)	36,591
		515,789,463								8,278,809	530,426	8,809,234	11,334,475	354,848	11,689,323	3,055,667	(175,578)	2,880,089

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				Approved (1)			Proposed			Approved			Proposed			Difference		
Unit or Account Number	Account Number and / or Description	Unit Balance 12/31/2013 (14)	Notes	Life Depr Rate	COR Depr Rate	Tot Depr Rate	Life Depr Rate	COR Depr Rate	Tot Depr Rate	Life Depr Exp	COR Depr Exp	Total Depr Exp	Life Depr Exp	COR Depr Exp	Total Depr Exp	Life Depr Exp	COR Depr Exp	Total Depr Exp
Pawnee Common	311 Structures and Improvements	5,206,854		2.7150%	0.1440%	2.8590%	2.9971%	4.9154%	7.9125%	141,366	7,498	148,864	156,055	255,938	411,992	14,689	248,440	263,128
Pawnee Common	312 Boiler Plant Equipment	27,956,261		2.8790%	0.1750%	3.0540%	3.1634%	5.1923%	8.3557%	804,861	48,923	853,784	884,368	1,451,573	2,335,941	79,508	1,402,649	1,482,157
Pawnee Common	314 Turbogenerator Units	290,213		2.2750%	0.1420%	2.4170%	3.0372%	5.0084%	8.0456%	6,602	412	7,014	8,814	14,535	23,349	2,212	14,123	16,335
Pawnee Common	315 Accessory Electric Equipment	883,500		2.1720%	0.1160%	2.2880%	2.6817%	4.3959%	7.0776%	19,190	1,025	20,214	23,693	38,838	62,531	4,503	37,813	42,316
Pawnee Common	315.2 Computers and Peripherals	407,317		2.6463%	0.1297%	2.7760%	2.4686%	4.0463%	6.5149%	10,779	528	11,307	10,055	16,481	26,536	(724)	15,953	15,229
Pawnee Common	316 Miscellaneous Power Plant Equipment	2,266,268		2.3210%	0.0980%	2.4190%	3.0220%	4.9436%	7.9656%	52,600	2,221	54,821	68,487	112,035	180,522	15,887	109,814	125,701
		37,010,413								1,035,398	60,608	1,096,005	1,151,472	1,889,400	3,040,872	116,074	1,828,792	1,944,866
Valmont Unit 5	311 Structures and Improvements	6,572,380		2.3783%	0.1807%	2.5590%	6.9213%	0.8879%	7.8092%	156,311	11,876	168,187	454,894	58,356	513,250	298,583	46,480	345,063
Valmont Unit 5	312 Boiler Plant Equipment	49,711,019		2.5920%	0.1970%	2.7890%	7.3726%	0.9482%	8.3208%	1,288,510	97,931	1,386,440	3,664,995	471,360	4,136,354	2,376,485	373,429	2,749,914
Valmont Unit 5	312 Boiler Plant Equipment AQIR	35,121,511		6.6667%	0.0000%	6.6667%	9.3356%	0.0000%	9.3356%	2,341,446	-	2,341,446	3,278,804	-	3,278,804	937,358	-	937,358
Valmont Unit 5	314 Turbogenerator Units	19,342,827		3.4591%	0.2629%	3.7220%	10.1740%	1.3064%	11.4804%	669,088	50,852	719,940	1,967,939	252,695	2,220,634	1,298,851	201,842	1,500,694
Valmont Unit 5	315 Accessory Electric Equipment	5,174,087		2.3950%	0.1820%	2.5770%	7.0567%	0.9041%	7.9608%	123,919	9,417	133,336	365,120	46,779	411,899	241,200	37,362	278,562
Valmont Unit 5	316 Miscellaneous Power Plant Equipment	349,803		2.4879%	0.1891%	2.6770%	8.3614%	1.0630%	9.4244%	8,703	661	9,364	29,248	3,718	32,967	20,546	3,057	23,603
(15)		116,271,627								4,587,976	170,738	4,758,714	9,761,000	832,908	10,593,908	5,173,024	662,170	5,835,194
Valmont Common	311 Structures and Improvements	13,590,370		2.6617%	0.2023%	2.8640%	7.1568%	6.9508%	14.1076%	361,735	27,493	389,228	972,636	944,639	1,917,275	610,901	917,146	1,528,047
Valmont Common	312 Boiler Plant Equipment	4,690,747		3.6357%	0.2763%	3.9120%	8.1676%	8.0404%	16.2080%	170,541	12,961	183,502	383,121	377,155	760,276	212,580	364,194	576,774
Valmont Common	314 Turbogenerator Units	1,018,431		4.1403%	0.3147%	4.4550%	9.7160%	9.5313%	19.2473%	42,166	3,205	45,371	98,951	97,070	196,020	56,785	93,865	150,649
Valmont Common	315 Accessory Electric Equipment	1,617,234		2.5678%	0.1952%	2.7630%	7.1746%	6.9440%	14.1186%	41,527	3,157	44,684	116,030	112,301	228,331	74,503	109,144	183,647
Valmont Common	315.2 Computers and Peripherals	14,092		3.3690%	0.2560%	3.6250%	7.6895%	7.5688%	15.2583%	475	36	511	1,084	1,067	2,150	609	1,031	1,639
Valmont Common	316 Miscellaneous Power Plant Equipment	2,028,320		2.7063%	0.2057%	2.9120%	7.6463%	7.3739%	15.0202%	54,892	4,172	59,065	155,091	149,566	304,658	100,199	145,394	245,593
(15)		22,959,194								671,337	51,024	722,361	1,726,913	1,681,798	3,408,711	1,055,576	1,630,774	2,686,349
Zuni Unit 2	311 Structures and Improvements	66,789	(2)	0.0000%	0.0000%	0.0000%	8.5950%	6.7995%	15.3945%	-	-	-	5,741	4,541	10,282	5,741	4,541	10,282
Zuni Unit 2	312 Boiler Plant Equipment	9,414,241		2.3901%	0.3179%	2.7080%	6.4437%	5.4908%	11.9345%	225,010	29,928	254,938	606,625	516,917	1,123,543	381,616	486,989	868,605
Zuni Unit 2	314 Turbogenerator Units	873,326		14.6920%	1.9540%	16.6460%	8.8219%	9.3961%	18.2180%	128,309	17,065	145,374	77,044	82,059	159,103	(51,265)	64,994	13,729
Zuni Unit 2	315 Accessory Electric Equipment	35,903	(2)	2.6134%	0.3476%	2.9610%	5.8323%	5.0438%	10.8761%	938	125	1,063	2,094	1,811	3,905	1,156	1,686	2,842
(15)		10,390,259								354,257	47,117	401,375	691,504	605,328	1,296,832	337,247	558,210	895,457
Zuni Common	310.3 Water Rights	565,476		2.0000%	0.0000%	2.0000%	10.4719%	0.0000%	10.4719%	11,310	-	11,310	59,216	-	59,216	47,907	-	47,907
Zuni Common	311 Structures and Improvements	5,602,300		2.4184%	0.3216%	2.7400%	6.0054%	1.4811%	7.4865%	135,486	18,017	153,503	336,441	82,976	419,416	200,955	64,959	265,913
Zuni Common	312 Boiler Plant Equipment	5,179,554		3.0229%	0.4021%	3.4250%	6.0462%	1.5063%	7.5525%	156,573	20,827	177,400	313,166	78,020	391,186	156,593	57,193	213,786
Zuni Common	314 Turbogenerator Units	559,827		1.8464%	0.2456%	2.0920%	5.5171%	1.3509%	6.8680%	10,337	1,375	11,712	30,886	7,563	38,449	20,550	6,188	26,737
Zuni Common	315 Accessory Electric Equipment	724,627		2.2586%	0.3004%	2.5590%	7.2053%	1.7604%	8.9657%	16,366	2,177	18,543	52,212	12,756	64,968	35,845	10,580	46,425
Zuni Common	315.2 Computers and Peripherals	164,573		6.7582%	0.8988%	7.6570%	7.1676%	1.8676%	9.0352%	11,122	1,479	12,601	11,796	3,074	14,869	674	1,594	2,268
Zuni Common	316 Miscellaneous Power Plant Equipment	795,699		4.9409%	0.6571%	5.5980%	6.6222%	1.6919%	8.3141%	39,315	5,229	44,543	52,693	13,462	66,155	13,378	8,234	21,612
(15)		13,592,056								380,508	49,103	429,612	856,409	197,850	1,054,260	475,901	148,747	624,648
	Total Steam Production	2,949,106,269								62,109,410	4,636,864	66,746,273	93,296,270	11,304,401	104,600,671	31,186,860	6,667,537	37,854,397
	HYDRAULIC PRODUCTION PLANT																	
Ames	331 Structures and Improvements	151,870		1.4679%	0.0191%	1.4870%	1.8792%	0.4428%	2.3220%	2,229	29	2,258	2,854	672	3,526	625	643	1,268
Ames	332 Reservoirs, Dams and Waterways	6,022,451		1.5420%	0.0200%	1.5620%	2.1502%	0.5066%	2.6568%	92,866	1,204	94,071	129,495	30,510	160,004	36,629	29,305	65,934
Ames	333 Waterwheels, Turbines and Generators	117,655		0.9299%	0.0121%	0.9420%	1.6580%	0.4358%	2.0938%	1,094	14	1,108	1,951	513	2,463	857	499	1,355
Ames	334 Accessory Electric Equipment	1,760,800		2.4393%	0.0317%	2.4710%	2.3246%	0.5477%	2.8723%	42,951	558	43,509	40,932	9,644	50,575	(2,020)	9,086	7,066
Ames	335 Misc. Power Plant Equipment	102,063		1.8095%	0.0235%	1.8330%	2.1165%	0.5012%	2.6177%	1,847	24	1,871	2,160	512	2,672	313	488	801
Ames	335.2 Recreational Facilities	168,012		2.3258%	0.0302%	2.3560%	2.1375%	0.5062%	2.6437%	3,908	51	3,958	3,591	850	4,442	(316)	800	483
Ames	336 Roads, Railroads and Bridges	21,231		2.3722%	0.0308%	2.4030%	2.2094%	0.5206%	2.7300%	504	7	510	469	111	580	(35)	104	69
Ames Total		8,344,082								145,399	1,887	147,286	181,451	42,811	224,263	36,053	40,924	76,977
Cabin Creek	331 Structures and Improvements	14,155,166		0.9324%	0.1296%	1.0620%	2.2782%	0.9405%	3.2187%	131,983	18,345	150,328	322,483	133,129	455,612	190,500	114,784	305,284
Cabin Creek	332 Reservoirs, Dams and Waterways	20,150,024		0.9587%	0.1333%	1.0920%	2.0004%	0.8259%	2.8263%	193,178	26,860	220,038	403,081	166,419	569,500	209,903	139,559	349,462
Cabin Creek	333 Waterwheels, Turbines and Generators	19,505,079		1.0773%	0.1497%	1.2270%	2.3482%	1.0228%	3.3710%	210,128	29,199	239,327	458,018	199,498	657,516	247,890	170,299	418,189
Cabin Creek	334 Accessory Electric Equipment	4,305,517		1.2581%	0.1749%	1.4330%	2.3230%	0.9591%	3.2821%	54,168	7,530	61,698	100,017	41,294	141,311	45,849	33,764	79,613
Cabin Creek	334.2 Computers and Peripherals	56,206		1.1563%	0.1607%	1.3170%	2.2542%	0.9307%	3.1849%	650	90	740	1,267	523	1,790	617	433	1,050
Cabin Creek	335 Misc. Power Plant Equipment	509,578		1.4978%	0.2082%	1.7060%	2.1525%	0.8908%	3.0433%	7,632	1,061	8,693	10,969	4,539	15,508	3,336	3,478	6,815
Cabin Creek	335.2 Recreational Facilities	3,927		1.3565%	0.1885%	1.5450%	2.3101%	0.9560%	3.2661%	53	7	61	91	38	128	37	30	68
Cabin Creek	336 Roads, Railroads and Bridges	478,624		0.9359%	0.1301%	1.0660%	1.9692%	0.8130%	2.7822%	4,479	623	5,102	9,425	3,891	13,316	4,946	3,269	8,214
Cabin Creek Total		59,164,121								602,272	83,716	685,988	1,305,351	549,332	1,854,683	703,079	465,616	1,168,695
Georgetown	331 Structures and Improvements	147,604		1.6952%	0.0068%	1.7020%	3.0314%	1.6660%	4.6974%	2,502	10	2,512	4,474	2,459	6,934	1,972	2,449	4,421
Georgetown	332 Reservoirs, Dams and Waterways	4,864,742		2.3038%	0.0092%	2.3130%	3.2060%	1.7619%	4.9679%	112,074	448	112,521	155,964	85,712	241,676	43,890	85,264	129,154
Georgetown	333 Waterwheels, Turbines and Generators	55,253		1.0269%	0.0041%	1.0310%	2.3571%	1.3344%	3.6915%	567	2	570	1,302	737	2,040	735	735	1,470
Georgetown	334 Accessory Electric Equipment	522,378		1.6056%	0.0064%	1.6120%	3.1610%	1.7372%	4.8982%	8,387	33	8,421	16,512	9,075	25,587	8,125	9,041	17,166
Georgetown	335 Misc. Power Plant Equipment	1,317		2.8665%	0.0115%	2.8780%	2.6425%	1.4542%	4.0967%	38	0	38	35	19	54	(3)	19	16
Georgetown	335.2 Recreational Facilities	240,335		2.2570%	0.0090%	2.2660%	3.0769%	1.6931%	4.7700%	5,424	22	5,446	7,395	4,069	11,464	1,971	4,047	6,018
Georgetown Total		5,831,629								128,993	515	129,508	185,682	102,071	287,754	56,690	101,556	158,246

Public Service of Colorado
Comparison of Depreciation Rates and Annual Amounts
December 31, 2013

				Approved (1)			Proposed			Approved			Proposed			Difference		
Unit or Account Number	Account Number and / or Description	Unit Balance 12/31/2013 (14)	Notes	Life Depr Rate	COR Depr Rate	Tot Depr Rate	Life Depr Rate	COR Depr Rate	Tot Depr Rate	Life Depr Exp	COR Depr Exp	Total Depr Exp	Life Depr Exp	COR Depr Exp	Total Depr Exp	Life Depr Exp	COR Depr Exp	Total Depr Exp
Salida	331 Structures and Improvements	148,613		1.8055%	0.0325%	1.8380%	4.6543%	4.2897%	8.9440%	2,683	48	2,732	6,917	6,375	13,292	4,234	6,327	10,560
Salida	332 Reservoirs, Dams and Waterways	3,251,497		1.5658%	0.0282%	1.5940%	5.0034%	4.6114%	9.6148%	50,912	917	51,829	162,685	149,940	312,625	111,773	149,023	260,796
Salida	333 Waterwheels, Turbines and Generators	259,920		0.6965%	0.0125%	0.7090%	4.5236%	4.2110%	8.7346%	1,810	32	1,843	11,758	10,945	22,703	9,947	10,913	20,860
Salida	334 Accessory Electric Equipment	485,848		2.0010%	0.0360%	2.0370%	4.2765%	3.9415%	8.2180%	9,722	175	9,897	20,777	19,150	39,927	11,055	18,975	30,030
Salida	335 Misc. Power Plant Equipment	7,006		3.6248%	0.0652%	3.6900%	3.7877%	3.4924%	7.2801%	254	5	259	265	245	510	11	240	252
Salida	335.2 Recreational Facilities	151,492		3.2711%	0.0589%	3.3300%	4.8962%	4.5145%	9.4107%	4,955	89	5,045	7,417	6,839	14,256	2,462	6,750	9,212
Salida	336 Roads, Railroads and Bridges	20,450		2.6189%	0.0471%	2.6660%	4.3416%	4.0015%	8.3431%	536	10	545	888	818	1,706	352	809	1,161
Salida Total		4,324,826								70,872	1,276	72,148	210,708	194,312	405,019	139,836	193,036	332,871
Shoshone	331 Structures and Improvements	3,697,198		1.6234%	0.0536%	1.6770%	2.0482%	0.1059%	2.1541%	60,020	1,982	62,002	75,726	3,915	79,641	15,706	1,934	17,639
Shoshone	332 Reservoirs, Dams and Waterways	14,573,247		0.8325%	0.0275%	0.8600%	1.7646%	0.0912%	1.8558%	121,322	4,008	125,330	257,160	13,291	270,450	135,837	9,283	145,120
Shoshone	333 Waterwheels, Turbines and Generators	2,841,905		1.7212%	0.0568%	1.7780%	1.9014%	0.1613%	2.0627%	48,915	1,614	50,529	54,036	4,584	58,620	5,121	2,970	8,091
Shoshone	334 Accessory Electric Equipment	3,276,559		2.2323%	0.0737%	2.3060%	2.0614%	0.1066%	2.1680%	73,143	2,415	75,557	67,543	3,493	71,036	(5,600)	1,078	(4,522)
Shoshone	335 Misc. Power Plant Equipment	878,735		2.7396%	0.0904%	2.8300%	1.9313%	0.1027%	2.0340%	24,074	794	24,868	16,971	902	17,873	(7,103)	108	(6,995)
Shoshone	336 Roads, Railroads and Bridges	9,247		1.0852%	0.0358%	1.1210%	1.4263%	0.0737%	1.5000%	100	3	104	132	7	139	32	4	35
Shoshone Total		25,276,889								327,574	10,816	338,390	471,567	26,192	497,760	143,993	15,376	159,369
Tacoma	331 Structures and Improvements	388,927		1.3804%	0.0276%	1.4080%	1.8925%	1.0185%	2.9110%	5,369	107	5,476	7,360	3,961	11,322	1,992	3,854	5,846
Tacoma	332 Reservoirs, Dams and Waterways	9,281,059		1.3500%	0.0270%	1.3770%	2.4633%	1.3257%	3.7890%	125,294	2,506	127,800	228,620	123,039	351,659	103,326	120,533	223,859
Tacoma	333 Waterwheels, Turbines and Generators	1,245,406		1.8147%	0.0363%	1.8510%	2.3232%	1.3136%	3.6368%	22,600	452	23,052	28,933	16,360	45,293	6,333	15,908	22,240
Tacoma	334 Accessory Electric Equipment	1,548,118		1.7667%	0.0353%	1.8020%	2.1912%	1.1793%	3.3705%	27,351	546	27,897	33,922	18,257	52,179	6,572	17,710	24,282
Tacoma	335 Misc. Power Plant Equipment	177,092		1.8912%	0.0378%	1.9290%	1.9819%	1.0689%	3.0508%	3,349	67	3,416	3,510	1,893	5,403	161	1,826	1,987
Tacoma	335.2 Recreational Facilities	478,920		1.6294%	0.0326%	1.6620%	1.9641%	1.0594%	3.0235%	7,804	156	7,960	9,406	5,074	14,480	1,603	4,918	6,520
Tacoma	336 Roads, Railroads and Bridges	270,175		1.3029%	0.0261%	1.3290%	1.8171%	0.9779%	2.7950%	3,520	71	3,591	4,909	2,642	7,551	1,389	2,572	3,961
Tacoma Total		13,389,697								195,287	3,905	199,192	316,662	171,225	487,887	121,375	167,320	288,695
Total Hydro		116,331,244								1,470,397	102,116	1,572,513	2,671,422	1,085,944	3,757,366	1,201,025	983,828	2,184,853
	OTHER PRODUCTION PLANT																	
Alamosa	341 Structures and Improvements	521,932		4.4734%	0.1566%	4.6300%	4.2031%	0.2383%	4.4414%	23,348	817	24,165	21,937	1,244	23,181	(1,411)	426	(984)
Alamosa	342 Fuel Holders, Producers, and Accessories	331,421		1.0058%	0.0352%	1.0410%	2.4544%	0.1409%	2.5953%	3,333	117	3,450	8,134	467	8,601	4,801	350	5,151
Alamosa	343 Prime Movers	-				0.0000%	2.9716%	0.0569%	3.1449%	-	-	-	-	-	-	-	-	-
Alamosa	344 Generators	7,578,649		1.5633%	0.0547%	1.6180%	2.6762%	0.1577%	2.8339%	118,477	4,146	122,623	202,820	11,952	214,771	84,343	7,806	92,149
Alamosa	345 Accessory Electric Equipment	511,783		3.6184%	0.1266%	3.7450%	5.7449%	0.3223%	6.0672%	18,518	648	19,166	29,401	1,649	31,051	10,883	1,002	11,885
Alamosa	346 Miscellaneous Power Plant Equipment	112,425		0.9430%	0.0330%	0.9760%	6.0767%	0.3409%	6.4176%	1,060	37	1,097	6,832	383	7,215	5,772	346	6,118
	Total	9,056,209								164,737	5,765	170,502	269,125	15,695	284,820	104,388	9,930	114,318
Blue Spruce	E341 Structures and Improvements	-	(7)	2.5000%	0.1887%	2.6887%	2.2156%	0.0706%	2.2862%	-	-	-	-	-	-	-	-	-
Blue Spruce	E342 Fuel Holders, Producers, and Accessories	-	(7)	2.5000%	0.1887%	2.6887%	2.2156%	0.0706%	2.2862%	-	-	-	-	-	-	-	-	-
Blue Spruce	E343 Prime Movers	-	(7)	2.5000%	0.1887%	2.6887%	2.2156%	0.0706%	2.2862%	-	-	-	-	-	-	-	-	-
Blue Spruce	E344 Generators	214,976,653	(7)	2.0244%	0.1528%	2.1772%	2.2147%	0.0706%	2.2853%	4,352,034	328,491	4,680,525	4,761,088	151,774	4,912,861	409,054	(176,718)	232,336
Blue Spruce	E345 Accessory Electric Equipment	328,810	(7)	2.5000%	0.1887%	2.6887%	2.8582%	0.0643%	2.9225%	8,220	620	8,841	9,398	211	9,609	1,178	(409)	769
Blue Spruce	E346 Miscellaneous Power Plant Equipment	-	(7)	2.5000%	0.1887%	2.6887%	2.2156%	0.0706%	2.2862%	-	-	-	-	-	-	-	-	-
	Total	215,305,464								4,360,254	329,112	4,689,366	4,770,486	151,985	4,922,471	410,232	(177,127)	233,105
Fruita	E340 Land Rights	452		2.0000%	0.0000%	2.0000%	2.2656%	0.0000%	2.2656%	9	-	9	10	-	10	1	-	1
Fruita	E341 Structures and Improvements	92,002		0.8302%	0.0548%	0.8850%	2.4956%	0.3039%	2.7995%	764	50	814	2,296	280	2,576	1,532	229	1,761
Fruita	E342 Fuel Holders, Producers, and Accessories	599,152		0.9756%	0.0644%	1.0400%	3.6110%	0.4423%	4.0533%	5,845	386	6,231	21,635	2,650	24,285	15,790	2,264	18,054
Fruita	E343 Prime Movers	-				0.0000%	2.9336%	0.3625%	3.2961%	-	-	-	-	-	-	-	-	-
Fruita	E344 Generators	2,725,386		0.9653%	0.0637%	1.0290%	2.7880%	0.3457%	3.1337%	26,308	1,736	28,044	75,984	9,422	85,405	49,676	7,686	57,361
Fruita	E345 Accessory Electric Equipment	53,775		3.9428%	0.2602%	4.2030%	3.5248%	0.4271%	3.9519%	2,120	140	2,260	1,895	230	2,125	(225)	90	(135)
Fruita	E346 Miscellaneous Power Plant Equipment	4,511		1.0610%	0.0700%	1.1310%	2.3255%	0.2817%	2.6072%	48	3	51	105	13	118	57	10	67
	Total	3,475,278								35,094	2,315	37,410	101,926	12,594	114,519	66,831	10,278	77,110
Ft Saint Vrain Unit 1	E341 Structures and Improvements	22,720,266		1.3811%	0.0539%	1.4350%	1.8417%	0.0425%	1.8842%	313,790	12,246	326,036	418,439	9,656	428,095	104,650	(2,590)	102,059
Ft Saint Vrain Unit 1	E342 Fuel Holders, Producers, and Accessories	3,707,827		2.3879%	0.0931%	2.4810%	1.9304%	0.0480%	1.9784%	88,539	3,452	91,991	71,576	1,780	73,356	(16,963)	(1,672)	(18,636)
Ft Saint Vrain Unit 1	E343 Prime Movers	1,054,308		2.1280%	0.0830%	2.2110%	3.4969%	0.0755%	3.5724%	22,436	875	23,311	36,868	796	37,664	14,432	(79)	14,353
Ft Saint Vrain Unit 1	E344 Generators	76,931,196		1.3705%	0.0535%	1.4240%	2.3362%	0.0667%	2.4029%	1,054,342	41,158	1,095,500	1,797,267	51,313	1,848,580	742,925	10,155	753,079
Ft Saint Vrain Unit 1	E345 Accessory Electric Equipment	18,983,405		1.3831%	0.0539%	1.4370%	2.2368%	0.0483%	2.2851%	262,559	10,232	272,792	424,621	9,169	433,790	162,061	(1,063)	160,998
Ft Saint Vrain Unit 1	E345.2 Computers and Peripherals	95,966		1.6487%	0.0643%	1.7130%	2.0912%	0.0452%	2.1364%	1,582	62	1,644	2,007	43	2,050	425	(18)	406
Ft Saint Vrain Unit 1	E346 Miscellaneous Power Plant Equipment	3,834,804		1.4379%	0.0561%	1.4940%	1.9102%	0.0413%	1.9515%	55,141	2,151	57,292	73,252	1,584	74,836	18,112	(568)	17,544
	Total	127,327,772								1,798,389	70,177	1,868,565	2,824,030	74,341	2,898,371	1,025,641	4,165	1,029,806

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			Approved (1)				Proposed			Approved			Proposed			Difference		
Unit or Account Number	Account Number and / or Description	Unit Balance 12/31/2013 (14)	Notes	Life Depr Rate	COR Depr Rate	Tot Depr Rate	Life Depr Rate	COR Depr Rate	Tot Depr Rate	Life Depr Exp	COR Depr Exp	Total Depr Exp	Life Depr Exp	COR Depr Exp	Total Depr Exp	Life Depr Exp	COR Depr Exp	Total Depr Exp
Ft Saint Vrain Unit 2	E341 Structures and Improvements	-				0.0000%	2.4892%	0.0060%	2.4952%	-	-	-	-	-	-	-	-	-
Ft Saint Vrain Unit 2	E342 Fuel Holders, Producers, and Accessories	117,804		2.7469%	0.1071%	2.8540%	2.8885%	0.0480%	2.9365%	3,236	126	3,362	3,403	57	3,459	167	(70)	97
Ft Saint Vrain Unit 2	E343 Prime Movers	1,081,973		2.2281%	0.0869%	2.3150%	3.4618%	0.0462%	3.5080%	24,107	940	25,048	37,456	500	37,956	13,348	(440)	12,908
Ft Saint Vrain Unit 2	E344 Generators	80,302,784		2.3272%	0.0908%	2.4180%	2.5681%	0.0521%	2.6202%	1,868,806	72,915	1,941,721	2,062,256	41,838	2,104,094	193,449	(31,077)	162,372
Ft Saint Vrain Unit 2	E345 Accessory Electric Equipment	685,243		1.9838%	0.2262%	2.2100%	3.4849%	0.0465%	3.5314%	13,594	1,550	15,144	23,880	319	24,199	10,286	(1,231)	9,055
Ft Saint Vrain Unit 2	E346 Miscellaneous Power Plant Equipment	57,988		1.6876%	0.1924%	1.8800%	3.4128%	0.0455%	3.4583%	979	112	1,090	1,979	26	2,005	1,000	(85)	915
	Total	82,245,793								1,910,722	75,643	1,986,365	2,128,973	42,739	2,171,713	218,251	(32,904)	185,347
Ft Saint Vrain Unit 3	E341 Structures and Improvements	-				0.0000%	3.3824%	0.2225%	3.6048%	-	-	-	-	-	-	-	-	-
Ft Saint Vrain Unit 3	E342 Fuel Holders, Producers, and Accessories	317,171		2.7825%	0.1085%	2.8910%	3.4909%	0.1974%	3.6883%	8,825	344	9,169	11,072	626	11,698	2,247	282	2,529
Ft Saint Vrain Unit 3	E343 Prime Movers	4,958,952	(4)	1.8582%	0.2118%	2.0700%	3.9134%	0.2085%	4.1219%	92,147	10,503	102,650	194,064	10,339	204,403	101,916	(164)	101,753
Ft Saint Vrain Unit 3	E344 Generators	14,488,995		2.6237%	0.1023%	2.7260%	3.0921%	0.1863%	3.2784%	380,148	14,822	394,970	448,014	26,993	475,007	67,866	12,171	80,037
Ft Saint Vrain Unit 3	E345 Accessory Electric Equipment	628,436		1.9838%	0.2262%	2.2100%	3.6318%	0.1935%	3.8253%	12,467	1,422	13,888	22,824	1,216	24,040	10,357	(205)	10,151
Ft Saint Vrain Unit 3	E346 Miscellaneous Power Plant Equipment	109,786		1.6876%	0.1924%	1.8800%	3.6397%	0.1940%	3.8337%	1,853	211	2,064	3,996	213	4,209	2,143	2	2,145
	Total	20,503,340								495,440	27,302	522,742	679,969	39,388	719,357	184,529	12,085	196,615
Ft Saint Vrain Unit 4	E341 Structures and Improvements	3,062,941		2.3994%	0.0936%	2.4930%	1.9013%	0.0214%	1.9227%	73,492	2,867	76,359	58,236	655	58,891	(15,257)	(2,211)	(17,468)
Ft Saint Vrain Unit 4	E342 Fuel Holders, Producers, and Accessories	27,527,222		2.4321%	0.0949%	2.5270%	2.6282%	0.0343%	2.6625%	669,490	26,123	695,613	723,470	9,442	732,912	53,981	(16,681)	37,299
Ft Saint Vrain Unit 4	E343 Prime Movers	118,444		1.8582%	0.2118%	2.0700%	3.9221%	0.0383%	3.9604%	2,201	251	2,452	4,646	45	4,691	2,445	(206)	2,239
Ft Saint Vrain Unit 4	E344 Generators	73,043,233		2.5881%	0.1009%	2.6890%	2.6631%	0.0446%	2.7077%	1,890,432	73,701	1,964,133	1,945,214	32,577	1,977,792	54,782	(41,123)	13,659
Ft Saint Vrain Unit 4	E345 Accessory Electric Equipment	7,448,551		2.4456%	0.0954%	2.5410%	2.6737%	0.0261%	2.6998%	182,162	7,106	189,268	199,152	1,944	201,096	16,990	(5,162)	11,828
Ft Saint Vrain Unit 4	E346 Miscellaneous Power Plant Equipment	17,384		2.4283%	0.0947%	2.5230%	2.6226%	0.0256%	2.6482%	422	16	439	456	4	460	34	(12)	22
	Total	111,217,775								2,818,199	110,064	2,928,263	2,931,174	44,668	2,975,842	112,975	(65,396)	47,580
Ft Saint Vrain Unit 5	E341 Structures and Improvements	7,451,299	(6)	2.3680%	0.1940%	2.5620%	2.5055%	0.0266%	2.5321%	176,447	14,456	190,902	186,692	1,982	188,674	10,246	(12,473)	(2,228)
Ft Saint Vrain Unit 5	E342 Fuel Holders, Producers, and Accessories	2,200,775	(6)	2.3680%	0.1940%	2.5620%	2.6030%	0.0336%	2.6366%	52,114	4,270	56,384	57,286	739	58,026	5,172	(3,530)	1,642
Ft Saint Vrain Unit 5	E343 Prime Movers		(6)			0.0000%	2.1482%	0.0325%	2.1807%	-	-	-	-	-	-	-	-	-
Ft Saint Vrain Unit 5	E344 Generators	61,107,992	(6)	2.3680%	0.1940%	2.5620%	1.9803%	0.0352%	2.0155%	1,447,037	118,550	1,565,587	1,210,122	21,510	1,231,632	(236,916)	(97,039)	(333,955)
Ft Saint Vrain Unit 5	E345 Accessory Electric Equipment	12,495,431	(6)	2.3680%	0.1940%	2.5620%	2.6484%	0.0229%	2.6713%	295,892	24,241	320,133	330,929	2,861	333,790	35,037	(21,380)	13,658
Ft Saint Vrain Unit 5	E346 Miscellaneous Power Plant Equipment	644,763	(6)	2.3680%	0.1940%	2.5620%	2.6712%	0.0231%	2.6943%	15,268	1,251	16,519	17,223	149	17,372	1,955	(1,102)	853
	Total	83,900,260								1,986,758	162,767	2,149,525	1,802,252	27,242	1,829,494	(184,506)	(135,525)	(320,031)
Ft Saint Vrain Unit 6	E341 Structures and Improvements	7,364,719	(6)	2.3680%	0.1940%	2.5620%	2.5054%	0.0275%	2.5329%	174,397	14,288	188,684	184,516	2,025	186,541	10,119	(12,262)	(2,143)
Ft Saint Vrain Unit 6	E342 Fuel Holders, Producers, and Accessories	2,477,944	(6)	2.3680%	0.1940%	2.5620%	2.6030%	0.0345%	2.6375%	58,678	4,807	63,485	64,501	855	65,356	5,823	(3,952)	1,871
Ft Saint Vrain Unit 6	E343 Prime Movers		(6)			0.0000%	2.5598%	0.0210%	2.5808%	-	-	-	-	-	-	-	-	-
Ft Saint Vrain Unit 6	E344 Generators	60,791,745	(6)	2.3680%	0.1940%	2.5620%	2.5702%	0.0466%	2.6168%	1,439,549	117,936	1,557,485	1,562,469	28,329	1,590,798	122,921	(89,607)	33,314
Ft Saint Vrain Unit 6	E345 Accessory Electric Equipment	9,191,245	(6)	2.3680%	0.1940%	2.5620%	2.6484%	0.0238%	2.6722%	217,649	17,831	235,480	243,421	2,188	245,608	25,772	(15,643)	10,129
Ft Saint Vrain Unit 6	E346 Miscellaneous Power Plant Equipment	631,726	(6)	2.3680%	0.1940%	2.5620%	2.5988%	0.0234%	2.6222%	14,959	1,226	16,185	16,417	148	16,565	1,458	(1,078)	380
	Total	80,457,379								1,905,231	156,087	2,061,318	2,071,324	33,544	2,104,869	166,093	(122,543)	43,551
Ft Saint Vrain Common	E341 Structures and Improvements	9,418,924		1.6554%	0.0646%	1.7200%	1.7843%	0.4314%	2.2157%	155,921	6,085	162,005	168,062	40,633	208,695	12,141	34,549	46,690
Ft Saint Vrain Common	E342 Fuel Holders, Producers, and Accessories	1,417,105		1.6391%	0.0639%	1.7030%	1.8148%	0.4430%	2.2578%	23,228	906	24,133	25,718	6,278	31,995	2,490	5,372	7,862
Ft Saint Vrain Common	E343 Prime Movers	858,056		2.6266%	0.1024%	2.7290%	2.8469%	0.6828%	3.5297%	22,538	879	23,416	24,428	5,859	30,287	1,890	4,980	6,870
Ft Saint Vrain Common	E344 Generators	43,527,787		2.5881%	0.1009%	2.6890%	2.0234%	0.5038%	2.5272%	1,126,543	43,920	1,170,462	880,741	219,293	1,100,034	(245,801)	175,373	(70,428)
Ft Saint Vrain Common	E345 Accessory Electric Equipment	13,806,769		2.5958%	0.1012%	2.6970%	2.0869%	0.5005%	2.5874%	358,396	13,972	372,369	288,133	69,103	357,236	(70,263)	55,130	(15,132)
Ft Saint Vrain Common	E345.2 Computers and Peripherals	1,136,671		2.1193%	0.0827%	2.2020%	2.8076%	0.6734%	3.4810%	24,089	940	25,029	31,913	7,654	39,568	7,824	6,714	14,538
Ft Saint Vrain Common	E346 Miscellaneous Power Plant Equipment	814,696		2.5303%	0.0987%	2.6290%	2.5982%	0.6232%	3.2214%	20,614	804	21,418	21,167	5,077	26,245	553	4,273	4,826
	Total	70,980,008								1,731,329	67,505	1,798,834	1,440,163	353,897	1,794,060	(291,166)	286,392	(4,774)
Ft. Lupton CT	E341 Structures and Improvements	191,963		2.4128%	0.1472%	2.5600%	3.1740%	0.3333%	3.5073%	4,632	283	4,914	6,093	640	6,733	1,461	357	1,818
Ft. Lupton CT	E342 Fuel Holders, Producers, and Accessories	350,190		3.6664%	0.2236%	3.8900%	3.5390%	0.3742%	3.9132%	12,839	783	13,622	12,393	1,310	13,704	(446)	527	81
Ft. Lupton CT	E343 Prime Movers					0.0000%	3.4699%	0.3716%	3.8415%	-	-	-	-	-	-	-	-	-
Ft. Lupton CT	E344 Generators	10,889,403		3.7945%	0.2315%	4.0260%	3.4779%	0.3730%	3.8509%	413,198	25,209	438,407	378,723	40,617	419,340	(34,476)	15,409	(19,067)
Ft. Lupton CT	E345 Accessory Electric Equipment	200,456		1.2875%	0.0785%	1.3660%	3.1795%	0.3320%	3.5115%	2,581	157	2,738	6,373	666	7,039	3,793	508	4,301
Ft. Lupton CT	E346 Miscellaneous Power Plant Equipment	4,773		1.3713%	0.0837%	1.4550%	2.5054%	0.2616%	2.7670%	65	4	69	120	12	132	54	8	63
	Total	11,636,784								433,316	26,436	459,752	403,702	43,246	446,947	(29,614)	16,810	(12,804)

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			Approved (1)			Proposed			Approved			Proposed			Difference		
Unit or Account Number	Account Number and / or Description	Unit Balance 12/31/2013 (14)	Notes	Life Depr Rate	COR Depr Rate	Tot Depr Rate	Life Depr Rate	COR Depr Rate	Tot Depr Rate	Life Depr Exp	COR Depr Exp	Total Depr Exp	Life Depr Exp	COR Depr Exp	Total Depr Exp	Life Depr Exp	COR Depr Exp	Total Depr Exp
Rocky Mountain	E341 Structures and Improvements	2,415,613	(7)	2.5000%	0.3491%	2.8491%	2.6044%	0.1061%	2.7105%	60,390	8,433	68,823	62,912	2,563	65,475	2,522	(5,870)	(3,348)
Rocky Mountain	E342 Fuel Holders, Producers, and Accessories	95,042	(7)	2.5000%	0.3491%	2.8491%	2.6658%	0.1150%	2.7808%	2,376	332	2,708	2,534	109	2,643	158	(222)	(65)
Rocky Mountain	E343 Prime Movers		(7)			0.0000%	2.2831%	0.1096%	2.3927%	-	-	-	-	-	-	-	-	-
Rocky Mountain	E344 Generators	377,324,398	(7)	2.1271%	0.2970%	2.4241%	2.2779%	0.1096%	2.3875%	8,026,097	1,120,764	9,146,861	8,595,072	413,548	9,008,620	568,975	(707,217)	(138,241)
Rocky Mountain	E345 Accessory Electric Equipment	2,183,474	(7)	2.5000%	0.3491%	2.8491%	2.7580%	0.1068%	2.8648%	54,587	7,623	62,209	60,220	2,332	62,552	5,633	(5,291)	343
Rocky Mountain	E346 Miscellaneous Power Plant Equipment	225,640	(7)	2.5000%	0.3491%	2.8491%	2.6613%	0.1031%	2.7644%	5,641	788	6,429	6,005	233	6,238	364	(555)	(191)
	Total	382,244,168								8,149,091	1,137,939	9,287,031	8,726,744	418,784	9,145,528	577,652	(719,155)	(141,503)
Valmont	E341 Structures and Improvements	58,103		0.7780%	0.0420%	0.8200%	2.3353%	0.0360%	2.3713%	452	24	476	1,357	21	1,378	905	(3)	901
Valmont	E342 Fuel Holders, Producers, and Accessories	97,388		1.2837%	0.0693%	1.3530%	2.6229%	0.0423%	2.6652%	1,250	67	1,318	2,554	41	2,596	1,304	(26)	1,278
Valmont	E343 Prime Movers					0.0000%	2.8042%	0.0485%	2.8527%	-	-	-	-	-	-	-	-	-
Valmont	E344 Generators	6,832,724		1.8046%	0.0974%	1.9020%	2.7340%	0.0482%	2.7822%	123,303	6,655	129,958	186,807	3,293	190,100	63,503	(3,362)	60,142
Valmont	E345 Accessory Electric Equipment	561,482		4.3197%	0.2333%	4.5530%	3.7132%	0.0550%	3.7682%	24,254	1,310	25,564	20,849	309	21,158	(3,405)	(1,001)	(4,407)
Valmont	E346 Miscellaneous Power Plant Equipment	16,711		4.5873%	0.2477%	4.8350%	3.6914%	0.0546%	3.7460%	767	41	808	617	9	626	(150)	(32)	(182)
	Total	7,566,409								150,027	8,098	158,125	212,184	3,673	215,857	62,157	(4,425)	57,732
Ponnequin Wind	E341.2 Structures and Improvements- Wind	457,736	(3)	6.6700%	0.0000%	6.6700%	6.6700%	0.0000%	6.6700%	30,531	-	30,531	30,531	-	30,531	-	-	-
Ponnequin Wind	E342 Fuel Holders, Producers, and Accessories	-	(3)	6.6700%	0.0000%	6.6700%	6.6700%	0.0000%	6.6700%	-	-	-	-	-	-	-	-	-
Ponnequin Wind	E343 Prime Movers	-	(3)	6.6700%	0.0000%	6.6700%	6.6700%	0.0000%	6.6700%	-	-	-	-	-	-	-	-	-
Ponnequin Wind	E344.2 Generators	33,382,516	(3)	6.6700%	0.0000%	6.6700%	6.6700%	0.0000%	6.6700%	2,226,614	-	2,226,614	2,226,614	-	2,226,614	-	-	-
Ponnequin Wind	E345 Accessory Electric Equipment	221,476	(3)	6.6700%	0.0000%	6.6700%	6.6700%	0.0000%	6.6700%	14,772	-	14,772	14,772	-	14,772	-	-	-
Ponnequin Wind	E346 Miscellaneous Power Plant Equipment	-	(3)	6.6700%	0.0000%	6.6700%	6.6700%	0.0000%	6.6700%	-	-	-	-	-	-	-	-	-
	Total	34,061,729								2,271,917	-	2,271,917	2,271,917	-	2,271,917	-	-	-
Wind to Hydrogen	E344 Generators	1,017,482	(5)	6.6700%	0.0000%	6.6700%	7.3671%	0.0105%	7.3776%	67,866	-	67,866	74,959	107	75,066	7,093	107	7,200
Cherokee CC 5-7	All Accounts						2.5213%	0.0485%	2.5698%									
	Total Other Production	1,240,995,849								28,278,370	2,179,210	30,457,580	30,708,927	1,261,904	31,970,831	2,430,557	(917,306)	1,513,251
	Total Production	4,306,433,362								91,858,176	6,918,189	98,776,366	126,676,619	13,652,248	140,328,867	34,818,442	6,734,059	41,552,502
	TRANSMISSION PLANT																	
350.20	Land Rights	67,315,763		1.0300%	0.0000%	1.0300%	0.9867%	0.0000%	0.9867%	693,352	-	693,352	664,174	-	664,174	(29,179)	-	(29,179)
352.00	Structures and Improvements	53,888,327		1.3091%	0.1309%	1.4400%	1.3171%	0.1317%	1.4488%	705,452	70,540	775,992	709,769	70,977	780,746	4,317	437	4,754
353.00	Station Equipment	778,241,887		1.6481%	0.1319%	1.7800%	1.7927%	0.2689%	2.0616%	12,826,205	1,026,501	13,852,706	13,951,618	2,092,743	16,044,361	1,125,413	1,066,242	2,191,655
354.00	Towers and Fixtures	164,637,307		1.1238%	0.0562%	1.1800%	1.2501%	0.2500%	1.5001%	1,850,194	92,526	1,942,720	2,058,062	411,612	2,469,674	207,867	319,086	526,954
355.00	Poles and Fixtures	338,652,785		1.5619%	0.0781%	1.6400%	1.5990%	0.3997%	1.9987%	5,289,418	264,488	5,553,906	5,414,938	1,353,734	6,768,672	125,520	1,089,247	1,214,767
356.00	OH Conductors and Devices	245,477,507		1.7048%	0.0852%	1.7900%	1.4482%	0.0724%	1.5206%	4,184,901	209,147	4,394,047	3,555,006	177,750	3,732,756	(629,894)	(31,397)	(661,291)
357.00	UG Conduit	30,031,249		1.9400%	0.0000%	1.9400%	1.6392%	0.0000%	1.6392%	582,606	-	582,606	492,286	-	492,286	(90,320)	-	(90,320)
358.00	UG Conductors and Devices	55,740,292		1.8800%	0.0000%	1.8800%	1.6423%	0.0821%	1.7244%	1,047,917	-	1,047,917	915,405	45,770	961,176	(132,512)	45,770	(86,742)
359.00	Roads and Trails	3,756,395		0.9700%	0.0000%	0.9700%	1.1359%	0.0000%	1.1359%	36,437	-	36,437	42,671	-	42,671	6,234	-	6,234
	Total Transmission	1,737,741,512								27,216,482	1,663,202	28,879,684	27,803,929	4,152,587	31,956,516	587,446	2,489,385	3,076,832
	DISTRIBUTION PLANT																	
360.20	Land Rights	28,224,884		1.0900%	0.0000%	1.0900%	0.9871%	0.0000%	0.9871%	307,651	-	307,651	278,599	-	278,599	(29,052)	-	(29,052)
361.00	Structures and Improvements	54,790,554		1.7100%	0.0000%	1.7100%	1.6110%	0.0805%	1.6915%	936,918	-	936,918	882,664	44,133	926,797	(54,254)	44,133	(10,121)
362.00	Station Equipment	498,115,612		1.7826%	0.2674%	2.0500%	1.6227%	0.1623%	1.7850%	8,879,409	1,331,961	10,211,370	8,082,970	808,297	8,891,267	(796,439)	(523,664)	(1,320,103)
364.00	Poles, Towers and Fixtures	234,442,848		2.8077%	0.8423%	3.6500%	1.7597%	0.8799%	2.6396%	6,582,452	1,974,712	8,557,164	4,125,497	2,062,749	6,188,246	(2,456,955)	88,036	(2,368,918)
365.00	OH Conductors and Devices	279,924,042		2.3643%	0.9457%	3.3100%	1.7748%	0.6212%	2.3960%	6,618,244	2,647,242	9,265,486	4,968,120	1,738,842	6,706,962	(1,650,124)	(908,400)	(2,558,524)
366.00	UG Conduit	306,863,958		1.9135%	0.0765%	1.9900%	1.6394%	0.2459%	1.8853%	5,871,842	234,751	6,106,593	5,030,833	754,625	5,785,458	(841,009)	519,874	(321,135)
367.00	UG Conductors and Devices	1,463,040,667		1.8636%	0.1864%	2.0500%	2.0610%	0.1030%	2.1640%	27,265,226	2,727,108	29,992,334	30,153,238	1,507,662	31,660,900	2,888,012	(1,219,446)	1,668,566
368.00	Line Transformers	443,978,064		2.2100%	0.0000%	2.2100%	2.1457%	0.1073%	2.2530%	9,811,915	-	9,811,915	9,526,505	476,325	10,002,831	(285,410)	476,325	190,915
369.00	Services	23,201,711		1.9580%	0.3720%	2.3300%	1.5462%	0.2319%	1.7781%	454,289	86,310	540,600	358,734	53,810	412,544	(95,555)	(32,500)	(128,056)
369.10	Services-Overhead	41,608,742		1.9580%	0.3720%	2.3300%	1.8594%	0.2789%	2.1383%	814,699	154,785	969,484	773,654	116,048	889,702	(41,045)	(38,736)	(79,782)
369.20	Services-Underground	204,555,586		1.9580%	0.3720%	2.3300%	1.8679%	0.2802%	2.1480%	4,005,198	760,947	4,766,145	3,820,792	573,119	4,393,911	(184,406)	(187,828)	(372,234)
370.00	Meters	131,317,395		3.9700%	0.0000%	3.9700%	3.6262%	0.0000%	3.6262%	5,213,301	-	5,213,301	4,761,798	-	4,761,798	(451,502)	-	(451,502)
370.20	AMR Equipment	66,539,036	(13)	0.0000%	0.0000%	0.0000%	4.2760%	0.0000%	4.2760%	-	-	-	2,845,240	-	2,845,240	2,845,240	-	2,845,240
371.00	Installation on Customer Premises	6,807,758		0.8333%	0.1667%	1.0000%	3.7192%	0.7438%	4.4630%	56,729	11,349	68,078	253,192	50,638	303,830	196,463	39,290	235,753
373.00	Street Lighting and Signal Systems	157,383,223		2.4583%	0.4917%	2.9500%	2.7053%	0.5411%	3.2464%	3,868,952	773,853	4,642,805	4,257,752	851,550	5,109,303	388,801	77,697	466,498
	Total Distribution	3,940,794,078								80,686,826	10,703,017	91,389,843	80,119,589	9,037,799	89,157,388	(567,237)	(1,665,218)	(2,232,456)

Public Service of Colorado
Comparison of Depreciation Rates and Annual Amounts
December 31, 2013

Unit or Account Number	Account Number and / or Description	Unit Balance 12/31/2013 (14)	Notes	Approved (1) Life Depr Rate	Approved (1) COR Depr Rate	Approved (1) Tot Depr Rate	Proposed Life Depr Rate	Proposed COR Depr Rate	Proposed Tot Depr Rate	Approved Life Depr Exp	Approved COR Depr Exp	Approved Total Depr Exp	Proposed Life Depr Exp	Proposed COR Depr Exp	Proposed Total Depr Exp	Difference Life Depr Exp	Difference COR Depr Exp	Difference Total Depr Exp
	ELECTRIC GENERAL PLANT																	
390.00	Structures and Improvements	5,332,804		4.8800%	0.0000%	4.8800%	2.0150%	0.0000%	2.0150%	260,241	-	260,241	107,457	-	107,457	(152,783)	-	(152,783)
391.00	Office Furniture and Equipment	3,638,856		4.7500%	0.0000%	4.7500%	5.0546%	0.0000%	5.0546%	172,846	-	172,846	183,929	-	183,929	11,083	-	11,083
391.20	Computer Hardware	3,391,140		20.0000%	0.0000%	20.0000%	21.3299%	0.0000%	20.5356%	678,228	-	678,228	723,326	-	696,393	45,098	-	18,165
392.10	Transportation Equipment-Autos	124,738		9.0000%	0.0000%	9.0000%	12.8273%	0.0000%	11.3686%	11,226	-	11,226	16,001	-	14,181	4,774	-	2,955
392.20	Transportation Equipment-Light Trucks	8,809,691		9.0000%	0.0000%	9.0000%	10.3561%	0.0000%	9.1291%	792,872	-	792,872	912,342	-	804,245	119,470	-	11,373
392.30	Transportation Equipment-Trailers	3,102,448		9.0000%	0.0000%	9.0000%	6.7600%	0.0000%	6.0338%	279,220	-	279,220	209,726	-	187,197	(69,494)	-	(92,024)
392.40	Transportation Equipment-Heavy Trucks	31,296,534		9.0000%	0.0000%	9.0000%	8.7052%	0.0000%	7.6348%	2,816,688	-	2,816,688	2,724,441	-	2,389,434	(92,247)	-	(427,254)
393.00	Stores Equipment	156,423		3.1700%	0.0000%	3.1700%	3.4320%	0.0000%	3.3731%	4,959	-	4,959	5,368	-	5,276	410	-	318
394.00	Tools, Shop and Garage Equipment	24,512,141		3.8000%	0.0000%	3.8000%	4.0791%	0.0000%	4.0318%	931,461	-	931,461	999,863	-	988,291	68,402	-	56,829
395.00	Laboratory Equipment	2,709,452		9.5000%	0.0000%	9.5000%	10.5961%	0.0000%	10.2401%	257,398	-	257,398	287,097	-	277,451	29,699	-	20,053
396.00	Power Operated Equipment	7,282,830		9.0000%	0.0000%	9.0000%	10.7190%	0.0000%	10.2896%	655,455	-	655,455	780,649	-	749,375	125,194	-	93,920
397.00	Communication Equipment	51,542,129		6.6700%	0.0000%	6.6700%	6.8736%	0.0000%	6.7500%	3,437,860	-	3,437,860	3,542,796	-	3,479,100	104,936	-	41,240
397.30	Communication Equipment-EMS	3,890,570		6.6700%	0.0000%	6.6700%	6.7066%	0.0000%	6.6827%	259,501	-	259,501	260,925	-	259,997	1,424	-	496
398.00	Miscellaneous Equipment	1,245,921		5.0000%	0.0000%	5.0000%	5.1482%	0.0000%	5.0597%	62,296	-	62,296	64,142	-	63,040	1,846	-	744
	Total Electric General	147,035,678								10,620,251	-	10,620,251	10,818,061	-	10,205,365	197,810	-	(414,887)
	Total Electric Plant	10,193,535,229								216,619,970	19,284,408	235,904,378	251,656,432	26,842,634	277,886,369	35,036,462	7,558,226	41,981,991
	COMMON INTANGIBLE PLANT																	
301.00	Organization Costs																	
302.00	Franchises and Consents	3,383,421	(9)	Various	0.0000%	Various												
303.00	Misc Computer Software-3 Year	-		33.3333%	0.0000%	33.3333%	33.3333%	0.0000%	33.3333%	-	-	-	-	-	-	-	-	-
303.04	Misc Computer Software-5 Year	156,573,762		20.0000%	0.0000%	20.0000%	20.0000%	0.0000%	20.0000%	31,314,752	-	31,314,752	31,314,752	-	31,314,752	-	-	-
303.04	Misc Computer Software-10 Year	36,349,766		10.0000%	0.0000%	10.0000%	10.0000%	0.0000%	10.0000%	3,634,977	-	3,634,977	3,634,977	-	3,634,977	-	-	-
303.04	Misc Computer Software-15 Year	-		6.6667%	0.0000%	6.6667%	6.6667%	0.0000%	6.6667%	-	-	-	-	-	-	-	-	-
303.14	Misc Computer Software-CRS	70,131,178		10.0000%	0.0000%	10.0000%	10.0000%	0.0000%	10.0000%	7,013,118	-	7,013,118	7,013,118	-	7,013,118	-	-	-
	Total Common Intangible	266,438,127								41,962,847	-	41,962,847	41,962,847	-	41,962,847	-	-	-
	COMMON GENERAL PLANT																	
390.00	Structures and Improvements	125,577,884		2.7304%	0.4096%	3.1400%	2.1213%	0.0228%	2.1440%	3,428,779	514,367	3,943,146	2,663,825	28,624	2,692,449	(764,954)	(485,743)	(1,250,697)
390.08	Structures and Improvements - Partitions	844,405		3.8000%	0.0000%	3.8000%	6.6840%	0.0000%	6.6840%	32,087	-	32,087	56,440	-	56,440	24,353	-	24,353
390.07	Structures and Improvements - Leasehold Improve	2,165,257	(10)	Various	0.0000%	Various					-	-	-	-	-	-	-	-
390.85	Structures and Improvements - 1800 Larimer	15,180,820	(8)	Various	0.0000%	Various					-	-	-	-	-	-	-	-
391.00	Office Furniture and Equipment	25,942,985		4.7500%	0.0000%	4.7500%	5.1626%	0.0000%	5.1626%	1,232,292	-	1,232,292	1,339,320	-	1,339,320	107,028	-	107,028
391.04	Computer Hardware	78,966,255		20.0000%	0.0000%	20.0000%	21.8120%	0.0000%	21.8120%	15,793,251	-	15,793,251	17,224,155	-	17,224,155	1,430,904	-	1,430,904
391.05	Computer Hardware - 3 Year Life	1,591,513		33.3300%	0.0000%	33.3300%	35.5190%	0.0000%	35.5190%	530,451	-	530,451	565,290	-	565,290	34,839	-	34,839
391.09	Office Equipment - Partition Lease Fac	790,208		5.0000%	0.0000%	5.0000%	7.1295%	0.0000%	7.1295%	39,510	-	39,510	56,338	-	56,338	16,827	-	16,827
392.10	Transportation Equipment - Automobiles	473,067		9.0000%	0.0000%	9.0000%	11.4599%	0.0000%	11.4599%	42,576	-	42,576	54,213	-	54,213	11,637	-	11,637
392.20	Transportation Equipment - Light Trucks	3,871,483		9.0000%	0.0000%	9.0000%	9.7346%	0.0000%	9.7346%	348,434	-	348,434	376,875	-	376,875	28,442	-	28,442
392.30	Transportation Equipment - Trailers	609,911		9.0000%	0.0000%	9.0000%	6.2962%	0.0000%	6.2962%	54,892	-	54,892	38,402	-	38,402	(16,491)	-	(16,491)
392.40	Transportation Equipment - Heavy Trucks	2,499,025		9.0000%	0.0000%	9.0000%	8.3248%	0.0000%	8.3248%	224,912	-	224,912	208,038	-	208,038	(16,874)	-	(16,874)
393.00	Stores Equipment	502,423		3.1700%	0.0000%	3.1700%	3.8326%	0.0000%	3.8326%	15,927	-	15,927	19,256	-	19,256	3,329	-	3,329
394.00	Tools and Shop Equipment	7,145,216		3.8000%	0.0000%	3.8000%	4.3367%	0.0000%	4.3367%	271,518	-	271,518	309,870	-	309,870	38,352	-	38,352
395.00	Laboratory Equipment	1,208		9.5000%	0.0000%	9.5000%	10.1157%	0.0000%	10.1157%	115	-	115	122	-	122	7	-	7
396.00	Power Operated Equipment	2,671,260		9.0000%	0.0000%	9.0000%	11.0085%	0.0000%	11.0085%	240,413	-	240,413	294,066	-	294,066	53,653	-	53,653
397.00	Communication Equipment	28,119,958		6.6700%	0.0000%	6.6700%	7.6313%	0.0000%	7.6313%	1,875,601	-	1,875,601	2,145,926	-	2,145,926	270,325	-	270,325
398.00	Miscellaneous Equipment	978,932		5.0000%	0.0000%	5.0000%	5.5310%	0.0000%	5.5310%	48,947	-	48,947	54,145	-	54,145	5,198	-	5,198
	Total Common General Plant	297,931,810								24,179,705	514,367	24,694,072	25,406,281	28,624	25,434,905	1,226,575	(485,743)	740,832
	Total Common Plant	564,369,937								66,142,552	514,367	66,656,919	67,369,128	28,624	67,397,752	1,226,575	(485,743)	740,832
	Total PSCO Electric and Common	10,757,905,166								282,762,522	19,798,775	302,561,297	319,025,559	26,871,258	345,284,121	36,263,037	7,072,483	42,722,824
	As Filed Appendix B									282,762,522	19,798,775	302,561,297	319,202,088	26,871,258	346,073,346	36,439,566	7,072,483	43,512,049
	Difference									-	-	-	176,529	-	789,225	176,529	(0)	789,225

Notes:

(1) Approved Rates are from Docket No. 06S-234EG, unless specified in the Notes column.
(2) Zuni Unit 2 for some FERC Accounts has no depreciation rate since July, 2003; Unaddressed in in 06S-234EG Rate Case.
(3) Ponnequin Wind assets transferred in 2009 from Non-Utility to Electric Utility. Depreciation rates were utilized from Non-utility business for Other Production Wind assets.
(4) Depreciation rate since July, 2003; Unaddressed in in 06S-234EG Rate Case.
(5) Depreciation rates were utilized from Non-utility Wind prior to transfer to Electric Utility.
(6) Depreciation rates for Comanche 3, FSV GT 5 and FSV GT 6 were approved in Docket 08S-520E.

(7) Depreciation rates for Blue Spruce and Rocky Mountain were approved in CPUC Docket 11AL-947E. FERC subsequently required the Company to record an acquisition adjustment, resulting in depreciation calculated at net plant, plus amortization of the acquisition adjustment, per FERC Docket ER11-2853-000.
(8) Amortized to the end of the lease term 6/2025.
(9) Amortized over the terms of the franchise agreements or license.
(10) Amortized over the lease term.
(11) Individual amounts may not total to balance due to rounding.
(12) Proposed Depreciation Expense reflects 2015 expense.
(13) Account 370.20 AMR Equipment is fully depreciated, thus and approved depreciation rate is not computed. The approved rate is 8.81%.

Public Service of Colorado
Comparison of Depreciation Parameters
December 31, 2013

Account Number	Description	Notes	Approved (1) Curve	Approved (1) ASL	Approved (1) Net Salvage Percent	Proposed Curve	Proposed ASL	Proposed Net Salvage Percent
	ELECTRIC INTANGIBLE PLANT							
301.00	Organization Costs							
302.00	Franchises and Consents	(5)	Various			Various		
303.00	Miscellaneous Intangible Plant		Various			Various		
303.40	Misc Computer Software - 3 Year		SQ	3	0%	SQ	3	0%
303.40	Misc Computer Software - 5 Year		SQ	5	0%	SQ	5	0%
303.40	Misc Computer Software - 10 Year		SQ	10	0%	SQ	10	0%
303.40	Misc Computer Software - 15 Year		SQ	15	0%	SQ	15	0%
	COMMON INTANGIBLE PLANT							
301.00	Organization Costs							
302.00	Franchises and Consents	(5)						
303.00	Miscellaneous Computer Software - 3 Year		SQ	3	0%	SQ	3	0%
303.04	Miscellaneous Computer Software - 5 Year		SQ	5	0%	SQ	5	0%
303.04	Miscellaneous Computer Software - 10 Year		SQ	10	0%	SQ	10	0%
303.04	Miscellaneous Computer Software - 15 Year		SQ	15	0%	SQ	15	0%
303.14	Miscellaneous Computer Software - CRS		SQ	10	0%	SQ	10	0%
	TRANSMISSION PLANT							
350.10	Land							
350.20	Land Rights		R5	100	0%	R5	100	0%
352.00	Structures and Improvements		S6	70	-5%	R3	75	-10%
353.00	Station Equipment		R2.5	60	-5%	R2	55	-15%
354.00	Towers and Fixtures		R4	70	0%	R4	77	-20%
355.00	Poles and Fixtures		R3	50	5%	R2.5	62	-25%
356.00	OH Conductors and Devices		R1.5	50	0%	R1.5	68	-5%
357.00	UG Conduit		R3	50	0%	R5	60	0%
358.00	UG Conductors and Devices		R3	50	0%	R5	60	-5%
359.00	Roads and Trails		S6	85	0%	S6	85	0%
	DISTRIBUTION PLANT							
360.10	Land							
360.20	Land Rights		R4	90	0%	R4	100	0%
361.00	Structures and Improvements		R1.5	50	0%	R2	60	-5%
362.00	Station Equipment		R1.5	50	-5%	R1.5	60	-10%
364.00	Poles, Towers and Fixtures		L2	45	-25%	R0.5	55	-50%
365.00	OH Conductors and Devices		R1	45	-25%	L0	55	-35%
366.00	UG Conduit		R2	79	-4%	R3	59	-15%
367.00	UG Conductors and Devices		R2.5	50	0%	R1.5	47	-5%
368.00	Line Transformers		R0.5	35	5%	R1.5	44	-5%
369.00	Services		R3	45	-9%	S5	49	-15%
369.10	Services-Overhead		R3	45	-9%	S5	49	-15%
369.20	Services-Underground		R3	45	-9%	S5	49	-15%
370.00	Meters		R0.5	25	0%	R2	24	0%
370.20	AMR Equipment		S6	10	5%	R3	20	0%
371.00	Installation on Customer Premises		L0	20	-20%	L1	23	-20%
373.00	Street Lighting and Signal Systems		R0.5	35	-20%	R0.5	35	-20%

Public Service of Colorado
Comparison of Depreciation Parameters
December 31, 2013

Account			Approved (1)			Proposed		
Number	Description	Notes	Curve	ASL	Net Salvage Percent	Curve	ASL	Net Salvage Percent
	ELECTRIC GENERAL PLANT							
389.00	Land							
390.00	Structures and Improvements		L1.5	20	0%	R1.5	50	0%
390.20	Partitions	(2)	R4	25	0%	NA	NA	NA
391.00	Office Furniture and Equipment		SQ	20	5%	SQ	20	0%
391.20	Computer Hardware		SQ	5	0%	SQ	5	0%
392.10	Transportation Equipment - Automobiles		SQ	10	10%	SQ	8	10%
392.20	Transportation Equipment - Light Trucks		SQ	10	10%	SQ	10	10%
392.30	Transportation Equipment - Trailers		SQ	10	10%	SQ	15	10%
392.40	Transportation Equipment - Heavy Trucks		SQ	10	10%	SQ	12	10%
393.00	Stores Equipment		SQ	30	5%	SQ	30	0%
394.00	Tools, Shop and Garage Equipment		SQ	25	5%	SQ	25	0%
395.00	Laboratory Equipment		SQ	10	5%	SQ	10	0%
396.00	Power Operated Equipment		SQ	10	10%	SQ	10	0%
397.00	Communication Equipment		SQ	15	0%	SQ	15	0%
397.30	Communication Equipment - EMS		SQ	15	0%	SQ	15	0%
398.00	Miscellaneous Equipment		SQ	20	0%	SQ	20	0%
	COMMON GENERAL PLANT							
389.01	Land Owned in Fee							
390.00	Structures and Improvements		R1.5	50	-10%	R1.5	50	-5%
390.08	Structures and Improvements - Partitions		R4	25	5%	R4	25	0%
390.07	Structures and Improvements - Leasehold Improvements	(3)						
390.85	Structures and Improvements - 1800 Larimer	(4)						
391.00	Office Furniture and Equipment		SQ	20	5%	SQ	20	0%
391.04	Computer Hardware		SQ	5	0%	SQ	5	0%
391.05	Computer Hardware - 3 Year Life		SQ	3	0%	SQ	3	0%
391.09	Office Equipment - Partition Lease Facilities		SQ	20	0%	SQ	20	0%
392.10	Transportation Equipment - Automobiles		SQ	10	10%	SQ	8	10%
392.20	Transportation Equipment - Light Trucks		SQ	10	10%	SQ	10	10%
392.30	Transportation Equipment - Trailers		SQ	10	10%	SQ	15	10%
392.40	Transportation Equipment - Heavy Trucks		SQ	10	10%	SQ	12	10%
393.00	Stores Equipment		SQ	30	5%	SQ	30	0%
394.00	Tools and Shop Equipment		SQ	25	5%	SQ	25	0%
395.00	Laboratory Equipment		SQ	10	5%	SQ	10	0%
396.00	Power Operated Equipment		SQ	10	10%	SQ	10	0%
397.00	Communication Equipment		SQ	15	0%	SQ	15	0%
398.00	Miscellaneous Equipment		SQ	20	0%	SQ	20	0%

Notes:

(1) Approved Rates are from Docket No. 06S-234EG, unless specified in the Notes column.

(2) Account 390.2 Electric Partitions is fully accrued. Future additions to this account will be booked in Electric account 390.0 Structures and Improvements

(3) Amortized over the lease term.

(4) Amortized to the end of the lease term 6/2025.

(5) Amortized over the terms of the franchise agreements or license.

Public Service Company of Colorado
Comparison of Book vs Allocated Reserve
Intangible, Transmission, Distribution, General, and Common Plant
At December 31, 2013

FERC Acct	Description	Plant Balance	Per Book Life Reserve Balance	Per Book COR Reserve Balance	Per Book Total Reserve Balance	Proposed Reallocation Life Reserve Balance	Proposed Reallocation COR Reserve Balance	Proposed Reallocation Total Reserve Balance	Difference Life Reserve Balance	Difference COR Reserve Balance	Difference Total Reserve Balance
ELECTRIC INTANGIBLE PLANT											
301.0	Organization Costs	-	-	-	-	-	-	-	-	-	-
302.0	Franchises and Consents	16,928,069	3,202,266	-	3,202,266	3,202,266	-	3,202,266	-	-	-
303.0	Miscellaneous Intangible Plant	8,762,060	5,726,657	(4,434)	5,722,223	5,726,657	(4,434)	5,722,223	-	-	-
303.4	Misc Computer Software - 3 Year	-	-	-	-	-	-	-	-	-	-
303.4	Misc Computer Software - 5 Year	26,541,872	19,830,526	-	19,830,526	19,830,526	-	19,830,526	-	-	-
303.4	Misc Computer Software - 10 Year	9,298,597	9,145,423	-	9,145,423	9,145,423	-	9,145,423	-	-	-
303.4	Misc Computer Software - 15 Year	-	-	-	-	-	-	-	-	-	-
	Total Electric Intangible Plant	61,530,599	37,904,872	(4,434)	37,900,438	37,904,872	(4,434)	37,900,438	-	-	-
TRANSMISSION PLANT											
350.1	Land	16,154,636	2,686	-	2,686	-	-	-	(2,686)	-	(2,686)
350.2	Land Rights	67,315,763	12,030,662	-	12,030,662	12,261,965	-	12,261,965	231,302	-	231,302
352.0	Structures and Improvements	53,888,327	10,351,891	936,695	11,288,585	9,086,076	908,608	9,994,684	(1,265,814)	(28,087)	(1,293,901)
353.0	Station Equipment	778,241,887	146,010,396	(658,412)	145,351,985	147,555,320	22,133,298	169,688,618	1,544,924	22,791,710	24,336,633
354.0	Towers and Fixtures	164,637,307	77,009,060	4,638,432	81,647,492	64,322,463	12,864,493	77,186,956	(12,686,597)	8,226,061	(4,460,537)
355.0	Poles and Fixtures	338,652,785	44,737,103	(902,779)	43,834,324	42,508,295	10,627,074	53,135,368	(2,228,808)	11,529,852	9,301,044
356.0	OH Conductors and Devices	245,477,507	77,552,390	904,970	78,457,360	49,807,525	2,490,376	52,297,902	(27,744,865)	1,585,406	(26,159,458)
357.0	UG Conduit	30,031,249	7,265,426	-	7,265,426	6,485,103	-	6,485,103	(780,323)	-	(780,323)
358.0	UG Conductors and Devices	55,740,292	12,310,667	-	12,310,667	10,955,379	547,769	11,503,148	(1,355,288)	547,769	(807,519)
359.0	Roads and Trails	3,756,395	1,755,366	-	1,755,366	1,390,812	-	1,390,812	(364,554)	-	(364,554)
	Total Transmission	1,753,896,147	389,025,649	4,918,906	393,944,555	344,372,938	49,571,617	393,944,555	(44,652,711)	44,652,711	(0)
DISTRIBUTION PLANT											
360.1	Land	20,830,684	-	-	-	-	-	-	-	-	-
360.2	Land Rights	28,224,885	3,299,975	-	3,299,975	3,093,636	-	3,093,636	(206,339)	-	(206,339)
361.0	Structures and Improvements	54,790,552	15,547,137	-	15,547,137	13,433,782	671,689	14,105,472	(2,113,354)	671,689	(1,441,665)
362.0	Station Equipment	498,115,611	124,961,266	3,266,414	128,227,680	101,059,234	10,105,923	111,165,158	(23,902,031)	6,839,509	(17,062,522)
364.0	Poles, Towers and Fixtures	234,442,846	92,695,554	14,525,061	107,220,615	55,785,317	27,892,659	83,677,976	(36,910,236)	13,367,598	(23,542,639)
365.0	OH Conductors and Devices	279,924,043	90,826,162	(1,843,269)	88,982,893	52,271,564	18,295,047	70,566,612	(38,554,598)	20,138,317	(18,416,281)
366.0	UG Conduit	306,863,960	76,957,959	(1,370,491)	75,587,468	74,041,180	11,106,177	85,147,357	(2,916,778)	12,476,668	9,559,890
367.0	UG Conductors and Devices	1,463,040,667	264,592,891	6,993,242	271,586,133	340,993,438	17,049,672	358,043,110	76,400,547	10,056,430	86,456,977
368.0	Line Transformers	443,978,065	188,392,509	-	188,392,509	158,744,631	7,937,232	166,681,863	(29,647,878)	7,937,232	(21,710,647)
369.0	Services	23,201,711	17,738,210	3,015,705	20,753,915	17,410,009	2,611,501	20,021,511	(328,200)	(404,204)	(732,404)
369.1	Services-Overhead	41,608,741	17,130,491	(668,528)	16,461,964	20,206,485	3,030,973	23,237,458	3,075,994	3,699,501	6,775,494
369.2	Services-Underground	204,555,586	93,521,324	15,345,226	108,866,551	95,171,803	14,275,771	109,447,574	1,650,479	(1,069,456)	581,023
370.0	Meters	131,317,395	52,630,745	-	52,630,745	76,746,254	-	76,746,254	24,115,509	-	24,115,509
370.2	AMR Equipment	66,539,036	63,212,600	-	63,212,600	40,855,843	-	40,855,843	(22,356,757)	-	(22,356,757)
371.0	Installation on Customer Premises	6,807,758	6,914,787	(45,905)	6,868,882	4,177,450	835,490	5,012,940	(2,737,338)	881,395	(1,855,942)
373.0	Street Lighting and Signal Systems	157,383,221	85,285,569	76,688	85,362,257	54,332,133	10,866,427	65,198,560	(30,953,435)	10,789,739	(20,163,697)
	Total Distribution	3,961,624,762	1,193,707,179	39,294,143	1,233,001,322	1,108,322,762	124,678,561	1,233,001,322	(85,384,417)	85,384,417	0
ELECTRIC GENERAL PLANT											
389.0	Land	114,647	-	-	-						
390.0	Structures and Improvements	5,332,804	1,456,816	-	1,456,816	1,112,942	-	1,112,942	(343,875)	-	(343,875)
390.2	Partitions	125,814	125,814	-	125,814	125,814	-	125,814	-	-	-
391.0	Office Furniture and Equipment	5,070,381	2,370,191	-	2,370,191	2,580,430	-	2,580,430	210,239	-	210,239
391.2	Computer Hardware	3,411,420	1,573,279	-	1,573,279	1,807,844	-	1,807,844	234,565	-	234,565
392.10	Transportation Equipment - Automobiles	143,098	42,537	-	42,537	52,986	-	52,986	10,448	-	10,448
392.20	Transportation Equipment - Light Trucks	9,859,115	3,995,432	-	3,995,432	4,036,077	-	4,036,077	40,645	-	40,645

Public Service Company of Colorado
Comparison of Book vs Allocated Reserve
Intangible, Transmission, Distribution, General, and Common Plant
At December 31, 2013

FERC Acct	Description	Plant Balance	Per Book Life Reserve Balance	Per Book COR Reserve Balance	Per Book Total Reserve Balance	Proposed Reallocation Life Reserve Balance	Proposed Reallocation COR Reserve Balance	Proposed Reallocation Total Reserve Balance	Difference Life Reserve Balance	Difference COR Reserve Balance	Difference Total Reserve Balance
392.30	Transportation Equipment - Trailers	3,102,448	774,643	-	774,643	539,825	-	539,825	(234,818)	-	(234,818)
392.40	Transportation Equipment - Heavy Trucks	34,061,984	17,223,813	-	17,223,813	14,879,796	-	14,879,796	(2,344,017)	-	(2,344,017)
393.0	Stores Equipment	323,389	194,687	-	194,687	219,351	-	219,351	24,664	-	24,664
394.0	Tools, Shop, and Garage Equipment	26,871,648	7,399,707	-	7,399,707	8,544,924	-	8,544,924	1,145,217	-	1,145,217
395.0	Laboratory Equipment	6,352,636	4,725,720	-	4,725,720	4,999,318	-	4,999,318	273,598	-	273,598
396.0	Power Operated Equipment	7,606,265	2,633,024	-	2,633,024	3,027,610	-	3,027,610	394,586	-	394,586
397.0	Communication Equipment	53,807,634	19,515,343	-	19,515,343	20,068,970	-	20,068,970	553,628	-	553,628
397.3	Communication Equipment - EMS	3,890,570	342,547	-	342,547	362,794	-	362,794	20,247	-	20,247
398.0	Miscellaneous Equipment	1,273,559	430,322	-	430,322	445,194	-	445,194	14,872	-	14,872
	Total Electric General	161,347,413	62,803,874	-	62,803,874	62,803,874	-	62,803,874	(0)	-	(0)
COMMON INTANGIBLE PLANT											
301.00	Organization Costs										
302.00	Franchises and Consents	3,383,421	2,022,403	-	2,022,403	2,022,403	-	2,022,403	-	-	-
303.00	Misc Computer Software - 3 Year	-	-	-	-	-	-	-	-	-	-
303.04	Misc Computer Software - 5 Year	156,573,762	123,406,197	-	123,406,197	123,406,197	-	123,406,197	-	-	-
303.04	Misc Computer Software - 10 Year	36,349,766	30,122,193	-	30,122,193	30,122,193	-	30,122,193	-	-	-
303.04	Misc Computer Software - 15 Year	-	-	-	-	-	-	-	-	-	-
303.14	Misc Computer Software - CRS	70,131,178	66,210,442	-	66,210,442	66,210,442	-	66,210,442	-	-	-
	Total Common Intangible	266,438,127	221,761,235	-	221,761,235	221,761,235	-	221,761,235	-	-	-
COMMON GENERAL PLANT											
389.01	Land Owned in Fee	5,894,842	-	-	-	-	-	-			
390.00	Structures and Improvements	125,577,884	33,210,775	5,194,549	38,405,324	24,666,021	5,194,549	29,860,570	(8,544,754)	-	(8,544,754)
390.08	Structures and Improvements - Partitions	844,405	810,789	-	810,789	718,795		718,795	(91,993)	-	(91,993)
390.07	Structures and Improvements - Leasehold Improvements	2,165,257	1,788,732	-	1,788,732	1,788,732		1,788,732	-	-	-
390.85	Structures and Improvements - 1800 Larimer	15,180,820	3,551,772	-	3,551,772	3,551,772		3,551,772	-	-	-
391.00	Office Furniture and Equipment	41,830,599	21,730,190	-	21,730,190	23,922,883		23,922,883	2,192,693	-	2,192,693
391.04	Computer Hardware	83,792,896	47,923,437	-	47,923,437	47,634,065		47,634,065	(289,372)	-	(289,372)
391.05	Computer Hardware - 3 Year Life	1,591,513	814,374	-	814,374	743,578		743,578	(70,796)	-	(70,796)
391.09	Office Equipment - Partition Lease Fac	1,946,747	1,548,419	-	1,548,419	1,875,931		1,875,931	327,512	-	327,512
392.10	Transportation Equipment - Automobiles	1,525,099	686,770	-	686,770	1,140,154		1,140,154	453,384	-	453,384
392.20	Transportation Equipment - Light Trucks	8,545,430	4,920,165	-	4,920,165	6,479,443		6,479,443	1,559,278	-	1,559,278
392.30	Transportation Equipment - Trailers	609,911	242,668	-	242,668	220,324		220,324	(22,344)	-	(22,344)
392.40	Transportation Equipment - Heavy Trucks	3,111,247	1,349,973	-	1,349,973	1,928,823		1,928,823	578,850	-	578,850
393.00	Stores Equipment	803,839	572,056	-	572,056	627,940		627,940	55,884	-	55,884
394.00	Tools, Shop, and Garage Equipment	9,437,847	5,092,847	-	5,092,847	6,045,934		6,045,934	953,087	-	953,087
395.00	Laboratory Equipment	402,475	380,141	-	380,141	401,436		401,436	21,295	-	21,295
396.00	Power Operated Equipment	3,748,520	2,216,346	-	2,216,346	2,589,889		2,589,889	373,542	-	373,542
397.00	Communication Equipment	44,005,532	31,478,732	-	31,478,732	33,967,666		33,967,666	2,488,935	-	2,488,935
398.00	Miscellaneous Equipment	1,224,566	796,401	-	796,401	811,200		811,200	14,799	-	14,799
	Total Common General Plant	352,239,428	159,114,586	5,194,549	164,309,135	159,114,586	5,194,549	164,309,135	(0)	-	(0)
	Total Common Plant	618,677,555	380,875,821	5,194,549	386,070,370	380,875,821	5,194,549	386,070,370	(0)	-	(0)