BP-18 Rate Proceeding

Initial Proposal

Transmission Revenue Requirement Study

BP-18-E-BPA-09

November 2016



TRANSMISSION REVENUE REQUIREMENT STUDY

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COMMONLY USED ACRONYMS AND SHORT FORMS

ACNR Accumulated Calibrated Net Revenue ACS Ancillary and Control Area Services

AF Advance Funding aMW average megawatt(s)

ANR Accumulated Net Revenues
ASC Average System Cost
BAA Balancing Authority Area

BiOp Biological Opinion

BPA Bonneville Power Administration

Btu British thermal unit

CDQ Contract Demand Quantity
CGS Columbia Generating Station
CHWM Contract High Water Mark
CNR Calibrated Net Revenue

COE U.S. Army Corps of Engineers COI California-Oregon Intertie

Commission Federal Energy Regulatory Commission

Corps U.S. Army Corps of Engineers COSA Cost of Service Analysis consumer-owned utility

Council Northwest Power and Conservation Council

CP Coincidental Peak

CRAC Cost Recovery Adjustment Clause

CSP Customer System Peak CT combustion turbine

CY calendar year (January through December)

DD Dividend Distribution

dec decrease, decrement, or decremental

DERBS Dispatchable Energy Resource Balancing Service

DFS Diurnal Flattening Service
DNR Designated Network Resource

DOE Department of Energy DOI Department of Interior

DSI direct-service industrial customer or direct-service industry

DSO Dispatcher Standing Order

EE Energy Efficiency

EIS Environmental Impact Statement

EN Energy Northwest, Inc.
ESA Endangered Species Act
ESS Energy Shaping Service

e-Tag electronic interchange transaction information

FBS Federal base system

FCRPS Federal Columbia River Power System

FCRTS Federal Columbia River Transmission System

FELCC firm energy load carrying capability FORS Forced Outage Reserve Service

FPS Firm Power and Surplus Products and Services

FPT Formula Power Transmission

FY fiscal year (October through September)

G&A general and administrative (costs)

GARD Generation and Reserves Dispatch (computer model)
GMS Grandfathered Generation Management Service

GSR Generation Supplied Reactive
GRSPs General Rate Schedule Provisions
GTA General Transfer Agreement

GWh gigawatthour

HLH Heavy Load Hour(s)

HOSS Hourly Operating and Scheduling Simulator (computer model)

HYDSIM Hydrosystem Simulator (computer model)

IE Eastern Intertie
IM Montana Intertie

inc increase, increment, or incremental

IOUinvestor owned utilityIPIndustrial Firm PowerIPRIntegrated Program ReviewIRIntegration of ResourcesIRDIrrigation Rate DiscountIRMIrrigation Rate Mitigation

IS Southern Intertie

kcfs thousand cubic feet per second

kW kilowatt kWh kilowatthour

LDD Low Density Discount
LLH Light Load Hour(s)
LPP Large Project Program

LPTAC Large Project Targeted Adjustment Charge

Maf million acre-feet Mid-C Mid-Columbia

MMBtu million British thermal units
MRNR Minimum Required Net Revenue

MW megawatt MWh megawatthour

NCP Non-Coincidental Peak

NEPA National Environmental Policy Act

NERC North American Electric Reliability Corporation

NFB National Marine Fisheries Service (NMFS) Federal Columbia River

Power System (FCRPS) Biological Opinion (BiOp)

NLSL New Large Single Load

NMFS National Marine Fisheries Service

NOAA Fisheries National Oceanographic and Atmospheric Administration Fisheries

NORM Non-Operating Risk Model (computer model)

Northwest Power Act Pacific Northwest Electric Power Planning and Conservation Act

NP-15 North of Path 15

NPCC Pacific Northwest Electric Power and Conservation Planning

Council

NPV net present value

NR New Resource Firm Power
NRFS NR Resource Flattening Service

NT Network Integration

NTSA Non-Treaty Storage Agreement

NUG non-utility generation NWPP Northwest Power Pool

OATT Open Access Transmission Tariff

O&M operation and maintenance

OATI Open Access Technology International, Inc.

OS Oversupply

OY operating year (August through July)

PDCI Pacific DC Intertie

Peak Reliability (assessment/charge)

PF Priority Firm Power
PFp Priority Firm Public
PFx Priority Firm Exchange

PNCA Pacific Northwest Coordination Agreement

PNRR Planned Net Revenues for Risk

PNW Pacific Northwest POD Point of Delivery

POI Point of Integration or Point of Interconnection

POR Point of Receipt
Project Act Bonneville Project Act

PS Power Services
PSC power sales contract
PSW Pacific Southwest
PTP Point to Point

PUD public or people's utility district

PW WECC and Peak Service

RAM Rate Analysis Model (computer model)

RCD Regional Cooperation Debt

RD Regional Dialogue

REC Renewable Energy Certificate
Reclamation U.S. Bureau of Reclamation
RDC Reserves Distribution Clause
REP Residential Exchange Program

REPSIA REP Settlement Implementation Agreement

RevSim Revenue Simulation Model

RFA Revenue Forecast Application (database)

RHWM Rate Period High Water Mark

ROD Record of Decision

RPSA Residential Purchase and Sale Agreement

RR Resource Replacement

RRS Resource Remarketing Service
RSC Resource Shaping Charge
RSS Resource Support Services

RT1SC RHWM Tier 1 System Capability

SCD Scheduling, System Control, and Dispatch rate

SCS Secondary Crediting Service
SDD Short Distance Discount
SILS Southeast Idaho Load Service
Slice Slice of the System (product)
T1SFCO Tier 1 System Firm Critical Output

TCMS Transmission Curtailment Management Service

TGT Townsend-Garrison Transmission

TOCA Tier 1 Cost Allocator

TPP Treasury Payment Probability
TRAM Transmission Risk Analysis Model

Transmission System Act Federal Columbia River Transmission System Act

Treaty Columbia River Treaty TRL Total Retail Load

TRM Tiered Rate Methodology TS Transmission Services

TSS Transmission Scheduling Service

UAI Unauthorized Increase

UFT Use of Facilities Transmission
UIC Unauthorized Increase Charge
ULS Unanticipated Load Service
USACE U.S. Army Corps of Engineers
USBR U.S. Bureau of Reclamation
USFWS U.S. Fish & Wildlife Service

VERBS Variable Energy Resources Balancing Service

VOR Value of Reserves

VR1-2014 First Vintage Rate of the BP-14 rate period (PF Tier 2 rate)
VR1-2016 First Vintage Rate of the BP-16 rate period (PF Tier 2 rate)

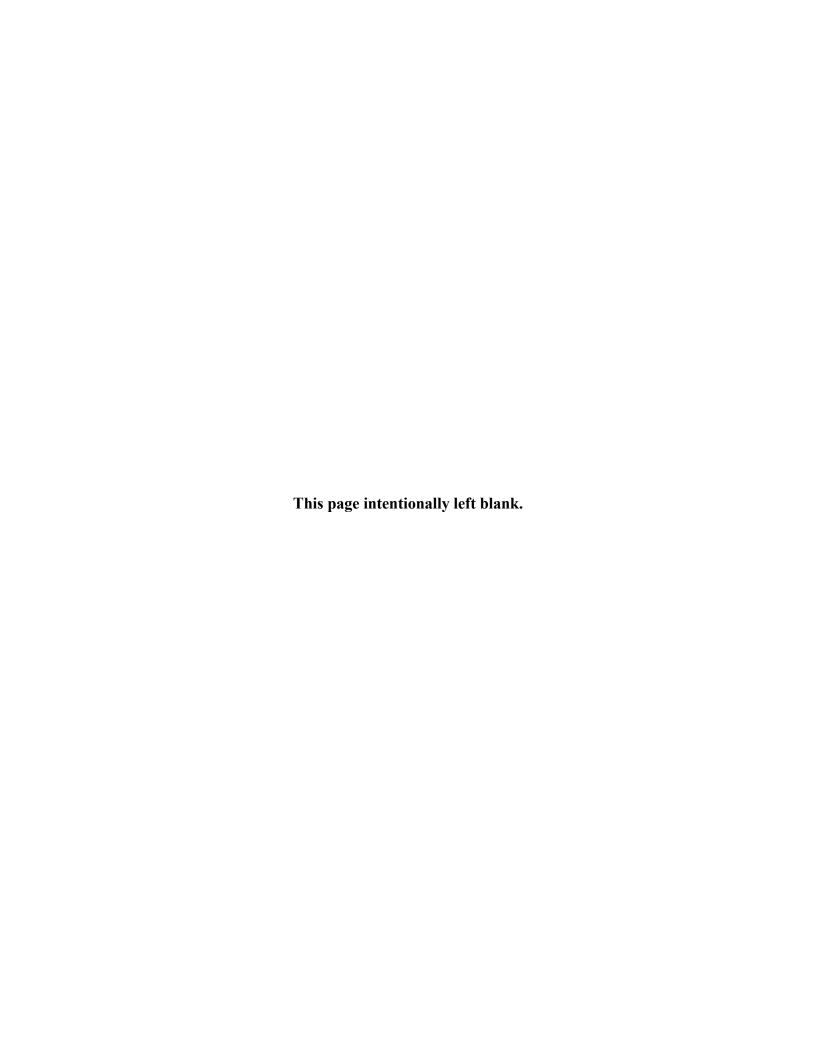
WECC Western Electricity Coordinating Council

WSPP Western Systems Power Pool

Integrated Program Review (IPR) Program Spending Levels Historical Data Risk Analysis Non-Fed Debt Treasury Assets Capital Expense Service Borrowing & Spending Appropriations Projected Plant in Service Repayment AFUDC & Study Depreciation Forecast Revenue Requirement Segmented Revenue Requirement Rate Development Revenues at Revised Proposed Repayment Studies Rates Revised Revenue Test No Adequacy of Cash Flows & TPP Yes

Figure 1: Transmission Revenue Requirement Process

Expected Income Statement & Cash Flow Results



1. INTRODUCTION

1.1 Purpose of the Study

The purpose of the Transmission Revenue Requirement Study is to establish the revenues from transmission and ancillary services that are necessary to recover, in accordance with sound business principles, the Federal Columbia River Transmission System (FCRTS) costs associated with the transmission of electric power. The FCRTS is part of the Federal Columbia River Power System (FCRPS), which also includes the multipurpose generation facilities constructed and operated by the U.S. Army Corps of Engineers (Corps) and the U.S. Bureau of Reclamation (Reclamation) in the Pacific Northwest. The FCRPS costs that are not associated with the FCRTS are funded and repaid through the Bonneville Power Administration's (BPA) power rates. The revenue requirement developed in this study includes recovery of the Federal investment in transmission and transmission-related assets; the operations and maintenance (O&M) and other annual expenses associated with the provision of transmission and ancillary services; the cost of generation inputs for ancillary services and other inter-business line services necessary for the transmission of power; and all other transmission-related costs incurred by BPA.

The cost evaluation period, as defined by the Federal Energy Regulatory Commission (Commission), is the period extending from the last year for which historical information is available through the proposed rate period. The cost evaluation period for this initial proposal filing includes Fiscal Year (FY) 2017 and the proposed rate period, FY 2018–2019. This study is based on transmission revenue requirements that include the results of transmission repayment studies. This study does not include the revenue requirement or a cost recovery demonstration for BPA's power function. *See* Power Revenue Requirement Study, BP-18-E-BPA-02.

1	This Study outlines the policies, forecasts, assumptions, and calculations used to determine the
2	transmission revenue requirement. The Transmission Revenue Requirement Study
3	Documentation, BP-18-E-BPA-09A, contains key technical assumptions and calculations, the
4	results of the transmission repayment studies, and further explanation of the repayment program
5	and its outputs.
6	
7	The revenue requirement for this study is developed using a cost accounting analysis comprised
8	of three parts. First, repayment studies for the transmission function are prepared to determine
9	the schedule of amortization payments and to project annual interest expense for bonds and
10	appropriations that fund the Federal investment in transmission and transmission-related assets.
11	Repayment studies are conducted for each year of the rate period and extend over the 35-year
12	repayment period. Second, transmission operating expenses and Minimum Required Net
13	Revenue (MRNR) are projected for each year of the rate period. Third, annual Planned Net
14	Revenues for Risk (PNRR) are determined after taking into account risks, BPA's cost recovery
15	goals, and other risk mitigation measures, as described in the Power and Transmission Risk
16	Study BP-18-E-BPA-05. From these three steps, the revenue requirement is set at the level
17	necessary to fulfill cost recovery requirements and objectives. This process is depicted in
18	Figure 1, above. Once the revenue requirement is completed, it is segmented and passed to the
19	rate development process, where it is used to develop rates in the Transmission Rates Study and
20	Documentation, BP-18-E-BPA-08.
21	
22	Consistent with Department of Energy (DOE) Order RA 6120.2 and the standards applied by the
23	Commission on review of BPA's rates, BPA must determine the adequacy of both current and
24	proposed rates to recover the revenue requirement. BPA conducts a current revenue test to
25	determine whether revenues projected from current rates meet cost recovery requirements for the

rate period and the repayment period. If the current revenue test indicates that cost recovery and
risk mitigation requirements are met, current rates could be extended through the proposed rate
approval period. The current revenue test, described in section 3.2 of this study, demonstrates
that revenues from current rates will not recover the transmission revenue requirement for the
rate period.
The revised revenue test, which is performed after calculation of the proposed transmission rates
determines whether projected revenues from proposed rates meet cost recovery requirements for
the rate test and repayment periods. The revised revenue test, section 3.3 of this study,
demonstrates that revenues from the proposed transmission rates will recover transmission costs
in the rate period and over the ensuing 35-year repayment period. In addition, revenues from the
proposed rates, together with risk mitigation tools, are sufficient to meet BPA's 95 percent
Treasury Payment Probability standard that all U.S. Treasury payments will be paid on time and
in full, as discussed in the Power and Transmission Risk Study, BP-18-E-BPA-05, section
5.2.3.2.
Table 1 summarizes the revised revenue test and shows projected net revenues from proposed
transmission rates for FY 2018–2019. These net revenues are the lowest level sufficient to
achieve, in combination with other risk mitigation tools, BPA's cost recovery objectives in the
face of transmission-related risks.
Table 2 shows planned transmission amortization payments to the U.S. Treasury for each year of
the rate period.

1	1.2 Legal Requirements
2	This section summarizes the statutory framework that guides the development of BPA's
3	transmission revenue requirement and the recovery of BPA's transmission costs from the various
4	users of the FCRTS, and the repayment policies BPA follows in the development of its revenue
5	requirement.
6	
7	1.2.1 Governing Authorities
8	BPA's revenue requirements are governed primarily by four legislative acts: the Bonneville
9	Project Act of 1937, Pub. L. No. 75-329, 50 Stat. 731, amended 1977; the Flood Control Act of
10	1944, Pub. L. No. 78-534, 58 Stat. 890, amended 1977; the Federal Columbia River
11	Transmission System Act of 1974 (Transmission System Act), Pub. L. No. 93-454,
12	88 Stat. 1376, amended 1977; and the Pacific Northwest Electric Power Planning and
13	Conservation Act (Northwest Power Act), Pub. L. No. 96-501, 94 Stat. 2697. The Omnibus
14	Consolidated Rescissions and Appropriations Act of 1996, Pub. L. No. 104-134, 110 Stat. 1321,
15	also guides the development of BPA's revenue requirements.
16	
17	Department of Energy Order "Power Marketing Administration Financial Reporting,"
18	RA 6120.2, issued by the Secretary of Energy, provides guidance to Federal power marketing
19	administrations regarding repayment of the Federal investment. In addition, policies issued by
20	the Commission provide guidance on separate accounting for transmission system costs.
21	See, e.g., Bonneville Power Admin., 25 FERC ¶ 61,140 (1983).
22	
23	1.2.1.1 Legal Requirements Governing BPA's Revenue Requirement
24	BPA constructs, operates, and maintains the FCRTS within the Pacific Northwest and makes
25	improvements or replacements to the transmission system as are appropriate and required to

1	(a) integrate and transmit electric power from existing or additional Federal or non-Federal
2	generating units; (b) provide service to BPA customers; (c) provide inter-regional transmission
3	facilities; and (d) maintain the electrical stability and reliability of the Federal system.
4	Transmission System Act § 4, 16 U.S.C. § 838b.
5	
6	BPA's rates must be set to ensure that revenues are sufficient to recover costs. This requirement
7	was first set forth in section 7 of the Bonneville Project Act, 16 U.S.C. § 832f, which provides
8	that
9	[r]ate schedules shall be drawn having regard to the recovery (upon the basis of
10	the application of such rate schedules to the capacity of the electric facilities of
11	the Bonneville project) of the cost of producing and transmitting such electric
12	energy, including the amortization of the capital investment over a reasonable
13	period of years.
14	
15	This cost recovery principle was repeated for Army reservoir projects in section 5 of the Flood
16	Control Act of 1944, 16 U.S.C. § 825s. In 1974, section 9 of the Transmission System Act,
17	16 U.S.C. § 838g, expanded the cost recovery principle so that BPA's rates also would be set to
18	recover
19	payments provided [in the Administrator's annual budget] at levels to
20	produce such additional revenues as may be required, in the aggregate with all
21	other revenues of the Administrator, to pay when due the principal of, premiums,
22	discounts, and expenses in connection with the issuance of and interest on all
23	bonds issued and outstanding pursuant to [this Act,] and amounts required to
24	establish and maintain reserve and other funds and accounts established in
25	connection therewith.

The Northwest Power Act reiterates and clarifies the cost recovery principle. Section 7(a)(1) of the Northwest Power Act, 16 U.S.C. § 839e(a)(1), provides that

[t]he Administrator shall establish, and periodically review and revise, rates for the sale and disposition of electric energy and capacity and for the transmission of non-Federal power. Such rates shall be established and, as appropriate, revised to recover, in accordance with sound business principles, the costs associated with the acquisition, conservation, and transmission of electric power, including the amortization of the Federal investment in the Federal Columbia River Power System (including irrigation costs required to be repaid out of power revenues) over a reasonable period of years and the other costs and expenses incurred by the Administrator pursuant to this chapter and other provisions of law. Such rates shall be established in accordance with Sections 9 and 10 of the Federal Columbia River Transmission System Act (16 U.S.C. § 838), Section 5 of the Flood Control Act of 1944, and the provisions of this chapter.

Section 7(a)(2) of the Northwest Power Act, 16 U.S.C. § 839e(a)(2), provides that the Commission shall issue a confirmation and approval of BPA's rates upon a finding that the rates:

- (A) are sufficient to assure repayment of the Federal investment in the Federal Columbia River Power System over a reasonable number of years after first meeting the Administrator's other costs;
- (B) are based upon the Administrator's total system costs; and
- (C) insofar as transmission rates are concerned, equitably allocate the costs of the Federal transmission system between Federal and non-Federal power utilizing such system.

1 Development of the revenue requirement is a critical component of meeting the statutory cost 2 recovery principles relevant to BPA. The costs associated with the FCRTS and associated 3 services and expenses, as well as other costs incurred by the Administrator in furtherance of 4 BPA's mission, are included in the study. 5 6 1.2.1.2 The BPA Appropriations Refinancing Act 7 As in the last rate period, BPA's transmission rates for the FY 2018–19 rate period will reflect 8 the requirements of the Refinancing Act, 16 U.S.C. § 8381, part of the Omnibus Consolidated 9 Rescissions and Appropriations Act of 1996, Pub. L. No. 104-134, 110 Stat. 1321, enacted in 10 April 1996. The Refinancing Act required that unpaid principal on BPA appropriations ("old 11 capital investments") at the end of FY 1996 be reset at the present value of the principal and 12 annual interest payments BPA would make to the U.S. Treasury for these obligations absent the 13 Refinancing Act, plus \$100 million. 16 U.S.C. § 838l(b). The Refinancing Act also specified 14 that the new principal amounts of the old capital investments be assigned new interest rates from 15 the U.S. Treasury yield curve prevailing at the time of the refinancing transaction. 16 U.S.C. 16 § 838l(a)(6)(A). 17 18 The Refinancing Act restricted prepayment of the new principal for old capital investments to 19 \$100 million during the first five years after the effective date of the financing. 16 U.S.C. 20 § 838l(e). The Refinancing Act also specifies that repayment dates on new principal amounts 21 may not be earlier than the repayment dates for old capital investments. 16 U.S.C. § 838l(d). 22 The Refinancing Act further directs the Administrator to offer to provide assurance in new or 23 existing contracts for power, transmission, or related services that the Government will not 24 increase the repayment obligations in the future. 16 U.S.C. § 838l(i).

1 1.2.2 Repayment Requirements and Policies 2 1.2.2.1 Separate Repayment Studies 3 Section 10 of the Transmission System Act, 16 U.S.C. § 838h, and section 7(a)(2)(C) of the 4 Northwest Power Act, 16 U.S.C. § 839e(a)(2)(C), provide that the recovery of the costs of the 5 Federal transmission system shall be equitably allocated between Federal and non-Federal power 6 utilizing such system. In 1982, the Commission first directed BPA to provide accounting and 7 repayment statements for its transmission system separate and apart from the accounting and 8 repayment statements for the Federal generation system. Bonneville Power Admin., 20 FERC 9 ¶ 61,142 (1982). The Commission required BPA to establish books of account for the FCRTS 10 separate from its generation books of account; explained that the FCRTS shall be comprised of 11 all investments, including administrative and management costs, related to the transmission of 12 electric power; and directed BPA to develop repayment studies for its transmission function 13 separate from those for its generation function. Such studies must set forth the date of each 14 investment, the repayment date, and the amount repaid from transmission revenues. Bonneville 15 Power Admin., 26 FERC ¶ 61,096 (1984). 16 17 The Commission approved BPA's methodology for separate repayment studies in 1984. 18 Bonneville Power Admin., 28 FERC ¶ 61,325 (1984). Thus, BPA has prepared separate 19 repayment studies for its transmission and generation functions since 1984. This methodology 20 has enabled BPA to set power and transmission rates separately with minimal change in 21 repayment policy and the process for developing each revenue requirement. This study 22 incorporates only the repayment study for the transmission function for FY 2018–2019. 23 24 25

1 1.2.2.2 Repayment Schedules 2 The statutes applicable to BPA do not include directives for scheduling repayment of capital 3 appropriations and bonds issued to the U.S. Treasury other than a directive that the Federal 4 investment be amortized over a reasonable period of years. BPA's repayment policy has been 5 established largely through administrative interpretation of its statutory requirements. 6 7 There have been a number of changes in BPA's repayment policy over the years concurrent with 8 expansion of the Federal system and changing conditions. In general, current repayment criteria 9 were approved by the Secretary of the Interior on April 3, 1963. These criteria were refined and 10 submitted to the Secretary and the Federal Power Commission (the predecessor agency to the 11 Federal Energy Regulatory Commission) in support of BPA's rate filing in September 1965. 12 13 The repayment policy was presented to Congress for its consideration for the authorization of the 14 Grand Coulee Dam Third Powerhouse in June 1966. The underlying theory of repayment was 15 discussed in the House of Representatives' report related to authorization of this project, 16 H.R. REP. No. 89-1409, 2d Sess., at 9-10 (1966). As stated in that report: 17 Accordingly, [in a repayment study] there is no annual schedule of capital 18 repayment. The test of the sufficiency of revenues is whether the capital 19 investment can be repaid within the overall repayment period established for each 20 power project, each increment of investment in the transmission system, and each 21 block of irrigation assistance. Hence, repayment may proceed at a faster or 22 slower pace from year-to-year as conditions change. . . . 23 24 This approach to repayment scheduling has the effect of averaging the 25 year-to-year variations in costs and revenues over the repayment period. This

results in a uniform cost per unit of power sold, and permits the maintenance of stable rates for extended periods. It also facilitates the orderly marketing of power and permits Bonneville Power Administration customers, which include both electric utilities and electroprocess industries, to plan for the future with assurance.

The Secretary of the Interior issued a statement of power policy on September 30, 1970, setting forth general principles that reaffirmed the repayment policy as previously developed. The most pertinent of these principles were set forth in the Department of the Interior Manual, Part 730, Chapter 1:

A. Hydroelectric power, although not a primary objective, will be proposed to Congress and supported for inclusion in multiple-purpose Federal projects when ... it is capable of repaying its share of the Federal investment, including operation and maintenance costs and interest, in accordance with the law.

B. Electric power generated at Federal projects will be marketed at the lowest rates consistent with sound financial management. Rates for the sale of Federal electric power will be reviewed periodically to assure their sufficiency to repay operating and maintenance costs and the capital investment within 50 years with interest that more accurately reflects the cost of money.

To achieve a greater degree of uniformity in repayment policy for all Federal power marketing administrations, the Deputy Assistant Secretary of the Department of the Interior (DOI) issued a memo on August 2, 1972, outlining (1) a uniform definition of the start of the repayment period for a particular project; (2) the method for including future replacement costs in repayment studies; and (3) a provision that the investment or obligation bearing the highest interest rate shall be amortized first, to the extent possible, while ensuring that BPA still complies with the prescribed repayment period established for each increment of investment.

1	A further clarification of the repayment policy was outlined in a joint memo on January 7, 1974,
2	from the Assistant Secretary for Reclamation and Assistant Secretary for Energy and Minerals.
3	This memo states that in addition to meeting the overall objective of repaying the Federal
4	investment and obligations within the prescribed repayment periods, revenues shall be adequate,
5	except in unusual circumstances, to repay annually all costs for O&M, purchased power, and
6	interest.
7	
8	On March 22, 1976, the DOI issued Chapter 4 of Part 730 of the DOI Manual to codify financial
9	reporting requirements for the Federal power marketing administrations; it describes standard
10	policies and procedures for preparing system repayment studies.
11	
12	BPA and the other Federal power marketing agencies were transferred to the newly established
13	Department of Energy on October 1, 1977. Department of Energy Organization Act, 42 U.S.C.
14	§ 7101 et seq. (2015). The DOE adopted the policies set forth in Part 730 of the DOI Manual by
15	issuing Interim Management Directive No. 1701 on September 28, 1977, which subsequently
16	was replaced by RA 6120.2, issued on September 20, 1979, and amended on October 1, 1983.
17	
18	The repayment policy outlined in DOE Order RA 6120.2, paragraph 12, provides that BPA's
19	total revenues from all sources must be sufficient to:
20 21 22 23 24 25 26 27 28 29	 (1) Pay all annual costs of operating and maintaining the Federal power system; (2) Pay the cost of obtaining power through purchase and exchange agreements, the cost for transmission services, and other costs during the year in which such costs are incurred; (3) Pay interest each year on the unamortized portion of the commercial power investment financed with appropriated funds at the interest rates established for each generating project and for each annual increment of such investment in the BPA transmission system, except that recovery of annual interest expense may be deferred in unusual circumstances for short periods of time;

1 2

- (4) Pay when due the interest and amortization portion on outstanding bonds sold to the U.S. Treasury;
- (5) Repay:
 - each dollar of power investments and obligations in the FCRPS generating projects within 50 years after the projects become revenue-producing (50 years has been deemed a "reasonable period" as intended by Congress, except for the Yakima-Chandler Project, which has a legislated amortization period of 66 years);
 - each annual increment of transmission financed by Federal investments and obligations within the average service life of such transmission facilities (currently 45 years) or within a maximum of 50 years, whichever is less;
 - the Federally-financed amount of each replacement within its service life up to a maximum of 50 years; and
- (6) As required by Pub. L. No. 89-448, § 2, repay the portion of construction costs at Federal reclamation projects that is beyond the repayment ability of the irrigators, and which is assigned for repayment from commercial power revenues, within the same overall period available to the irrigation water users for making their payments on construction costs.

The typical repayment period for appropriated capital investments for generation is 50 years from the year in which the plant is placed in service. Due dates for appropriated transmission investments were set at no more than 45 years. The Refinancing Act (section 1.2.1.2) overrides provisions in DOE Order RA 6120.2 related to determining interest during construction and assigning interest rates to Federal investments financed by appropriations. This Act also contains provisions on repayment periods (due dates) for the refinanced investments.

Other sections within DOE Order RA 6120.2 require that any outstanding deferred interest payments must be repaid before any planned amortization payments are made. Also, repayments are to be made by amortizing those Federal investments and obligations bearing the highest interest rate first, to the extent possible, while ensuring that BPA still completes repayment of each increment of Federal investment and obligation within its prescribed repayment period.

2. DEVELOPMENT OF REVENUE REQUIREMENT

2.1 Spending Level Development

The development of program spending levels occurs outside the rate process. For the FY 2018–2019 rate period it began in June of 2016, when BPA hosted the 2016 Integrated Program Review (IPR) and Capital Investment Review (CIR). This public process focused on reviewing and discussing expense projections and capital forecasts. The process provided customers and constituents an opportunity to examine, understand, and comment on BPA's cost projections for BPA's power and transmission functions.

BPA began the 2016 IPR and CIR discussion with the release of the IPR and CIR initial publication and an opening workshop containing an overview of Power Services', Transmission Services', and corporate agency services' proposed expense and capital spending levels for FY 2017–2019 (the cost evaluation period). The opening workshop launched an eight-week public comment period, providing participants the opportunity to provide feedback on the proposed spending levels. The initial publication and workshop described the drivers, goals, and risks associated with the proposed expense and capital spending levels; and made comparisons to the last rate case.

Following the opening workshop, BPA held a series of workshops to discuss spending levels for the program areas, including the Chief Administrative Office, Information Technology, Federal Hydro, Columbia Generating Station, Environment Fish and Wildlife, Energy Efficiency, and Transmission. While debt management actions are outside the scope of the IPR and CIR process, a workshop was held to enhance participants' understanding of the implications of past debt management decisions, proposed capital spending, and potential debt management tools.

1	After considering the comments received, BPA released a final IPR and CIR close-out report in
2	October 2016.
3	
4	This study incorporates the spending levels identified in the 2016 IPR and CIR final close-out
5	report, which can be found on BPA's public website: Finance & Rates—Financial Public
6	Processes—Integrated Program Review.
7	
8	2.2 Capital Investments
9	The forecast of BPA's capital investments for FY 2018–2019 used in developing the BP-18
10	transmission initial proposal rates was produced from the CIR levels in the IPR/CIR close-out
11	report. The following section describes the capital investment forecasts.
12	
13	BPA transmission capital outlay projections including allowance for funds used during
14	construction (AFUDC) for the FY 2018–2019 rate period are \$1,027.9 million, excluding the
15	effect of reserve financing, which reduces the borrowing amount. Rounded, these investments
16	are:
17	• transmission programs (\$991.6 million)
18	• environmental program (\$14.7 million)
19	• corporate capital program (\$21.7 million)
20	Transmission Revenue Requirement Study Documentation, BP-18-E-BPA-09A, Ch. 7.
21	
22	2.2.1 Bonds Issued to the Treasury
23	Bonds issued to the U.S. Treasury will be one of the primary sources of capital used to finance
24	projected FY 2018–2019 transmission capital program investments. Interest rates on bonds
25	issued by BPA to the U.S. Treasury are set at market interest rates comparable to the interest

1	rates for securities issued by other agencies of the U.S. Government. For interest rates on bonds
2	projected to be issued, see id., Ch. 6.
3	
4	2.2.2 Federal Appropriations
5	This study includes the outstanding balances of the original capital investments in the Federal
6	transmission system that was financed by Congressional appropriations. After the full
7	implementation of BPA's self-funding authority under the Transmission System Act,
8	transmission investments were no longer funded by annual appropriations. The Refinancing Act
9	reset the unpaid principal of all outstanding BPA appropriations and assigned current market
10	interest rates to the principal. New principal amounts were established at the beginning of
11	FY 1997 at the present value of the principal and annual interest payments BPA would make to
12	the Treasury for these obligations in the absence of the Refinancing Act, plus \$100 million.
13	Before implementation of the Refinancing Act, \$1,461.9 million in BPA appropriations was
14	outstanding. After implementation of the Refinancing Act, \$1,075.4 million in BPA
15	appropriations was outstanding. The Refinancing Act restricted prepayment of the new principal
16	to \$100 million in FY 1997–2001. Other repayment terms were unaffected. Through annual
17	repayments, outstanding appropriations for transmission investments had been reduced to
18	\$119 million as of September 30, 2016 after the annual treasury payment had been made.
19	
20	2.2.3 Use of Financial Reserves for Capital Investment
21	As a means to fund capital investments in lieu of borrowing, BPA will draw \$15 million per year
22	from TS Reserves.
23	
24	
25	

1 2.2.4 Non-Federal Payment Obligations 2 The transmission revenue requirements reflect two forms of non-Federal payment obligations. 3 The first is lease purchase arrangements for assets. BPA entered into a transaction in 2004 with 4 the Northwest Infrastructure Financing Corporation (NIFC), a subsidiary of JH Management, to 5 provide for the construction of the 500-kV Schultz-Wautoma transmission line (Schultz-6 Wautoma line). NIFC issued bonds to finance the construction. BPA is making semiannual 7 lease payments to NIFC through 2034, concluding with a single payment for the principal due on 8 the bonds. 9 10 Payment of the debt incurred by NIFC to construct the line is secured solely by BPA's revenues. 11 During the term of the lease, BPA will operate the Schultz-Wautoma line and provide 12 transmission and ancillary services over the facilities. Since the completion of the 13 Schultz-Wautoma project, BPA has entered into additional lease financing arrangements with 14 NIFC, Port of Morrow, and Idaho Energy Resources Authority. BPA will continue to utilize the 15 lease purchase program for transmission construction. The revenue requirement includes all 16 transactions BPA expects to complete by the date of the Final Proposal. 17 18 The revenue requirement also includes projected lease purchase agreements. Half of the 19 projected transmission investments are assumed to be financed through the lease purchase 20 program. See Transmission Revenue Requirement Study Documentation, BP-18-E-BPA-09A, § 21 8.2. Like Treasury bonds, lease purchase obligations are given a maximium maturity of 30 years. 22 They are modeled in a manner consistent with actual practice. Projected lease purchase 23 obligations are modeled with an interest rate of the current 3-month LIBOR forecast plus 60 24 basis points for the first 7 years, and taxable non-Federal interest rates for up to the 23 remaining 25 years. The principal has an additional one percent added to account for the cost of issuance.

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2 The second form of non-Federal payment obligations included in the revenue requirement is the

functional reassignment to Transmission Services of debt service (interest and principal)

payment obligations associated with non-Federal Energy Northwest (EN) bonds. This

reassignment is a result of BPA's Debt Optimization Program (DOP), which refinances and

repays existing EN bonds before they come due and uses the revenues made available from such

refinancing to replenish or create opportunities to replenish BPA's Treasury borrowing authority

by retiring additional Treasury obligations in amounts equal to the principal of the new EN

bonds. When Treasury obligations associated with transmission investments are repaid under

DOP, the debt service obligation associated with new EN debt in equivalent principal amounts is

assigned to Transmission Services. The revenue requirements reflect refinancing actions that

have occurred through FY 2009, when DOP ended. The revenue requirement does not include

forecasts of additional refinancing activities during the rate period.

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For specific calculations regarding non-Federal payment obligations, see id. Ch. 8.

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2.2.5 Customer-Financed Projects

have financed two types of capital construction projects. The first form of customer financing occurs under generation interconnection agreements (LGIA or SGIA). BPA amended its Open Access Transmission Tariff and adopted the LGIA and SGIA in voluntary compliance with Commission Order Nos. 2003 and 2006. Under the generator interconnection agreements, interconnection customers finance the cost of Network Upgrades (facilities at or beyond the

The revenue requirements also reflect the impacts of customer-financed projects. Customers

needed to interconnect their generating facilities to BPA's transmission system if BPA, as the

point at which the customer's interconnection facilities connect to BPA's transmission system)

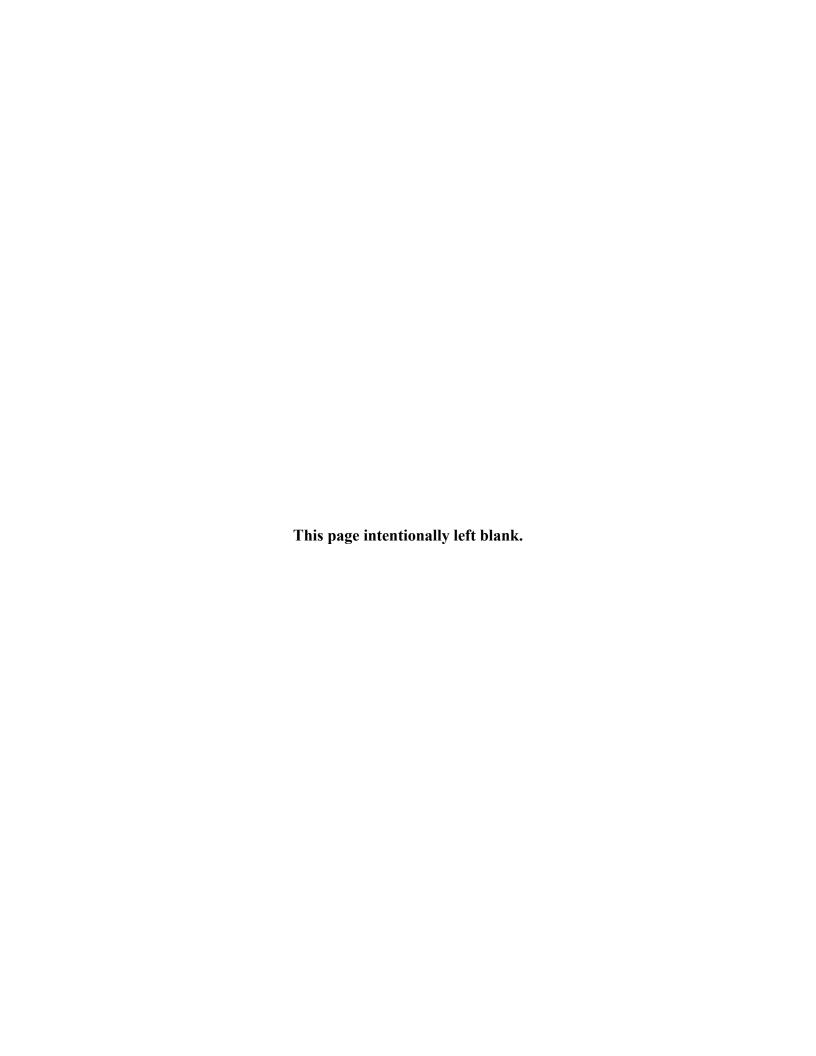
1 transmission owner/provider, does not provide the funding. BPA requires the interconnection 2 customer to advance funds in an amount sufficient to cover the cost of construction. These 3 advance funds, with interest on the outstanding balance, are then returned to the interconnection 4 customer in the form of transmission credits. These credits either offset charges for eligible 5 transmission service in the customer's bill or are provided as monthly cash payments based on 6 the generating facility's capacity and its plant capacity factor. 7 8 The second form of customer-financed projects is the customer-financed upgrade on the 9 California-Oregon Intertie (COI). The COI upgrade increases COI and Pacific Direct-Current 10 Intertie (PDCI) availability so that BPA will be able to support requests for long-term firm 11 transmission service up to the full rating of the COI and PDCI. Like the advance funds provided 12 under generator interconnection agreements, the advance funds provided by customers for the COI upgrade, with interest, will be returned to customers in the form of transmission credits that 13 14 offset eligible charges for transmission service. 15 16 These customer-financed transactions and the associated transmission credits affect several areas 17 of the revenue requirement. Depreciation of the associated assets appears in total transmission 18 depreciation. The interest that accrues on the outstanding credit balances is included in non-19 Federal interest, a component of the net interest calculation on the income statement. Both of 20 these items increase transmission expenses. These items also appear in the statement of cash 21 flows, because they are non-cash expenses. In addition, the revenues associated with customer-22 financed projects for which customers receive credits affect the statement of cash flows because they are non-cash revenues—they provide no cash for cost recovery. Therefore, they generally 23 24 increase the need for Minimum Required Net Revenue (MRNR), which is added to the income

statement if necessary, to ensure that all cash requirements are met.

1	Non-cash expenses (depreciation and interest on outstanding credit balances) offset non-cash
2	revenues and decrease the need for MRNR. The non-cash expenses are subtracted from the non-
3	cash revenues. If the difference is positive, meaning that non-cash revenues exceed non-cash
4	expenses, the need for MRNR increases. If the difference is negative, meaning that non-cash
5	expenses exceed non-cash revenues, the need for MRNR decreases.
6	
7	For the forecasts of interest expense and transmission credits associated with generator
8	interconnection agreements and with the COI upgrade at current and proposed rates, see
9	Transmission Rates Study and Documentation, BP-18-E-BPA-08, Tables 16.1 and 16.2.
10	
11	2.3 Modeling of BPA's Repayment Obligations
12	Repayment studies are performed as part of the process for determining revenue requirements.
13	The studies establish a schedule of annual U.S. Treasury amortization for the rate period and the
14	resulting interest payments. Each repayment study covers a rate test year and the ensuing
15	repayment period, which extends to the last year by which all outstanding and projected
16	obligations must be repaid. For transmission repayment studies, that period is 35 years. This
17	study horizon reflects the fact that bonds are not issued for terms longer than 35 years and that
18	the outstanding appropriations and bonds that finance the transmission system are fully repaid
19	within this period. This study horizon is also appropriate in that it does not exceed the estimated
20	average service life of transmission system plant (45 years).
21	
22	In conducting the repayment studies, BPA includes as fixed inputs the annual debt service
23	payments associated with its non-federal capitalized contract obligations and the fixed annual
24	payments associated with long-term energy resource acquisition contracts. All outstanding and
25	projected transmission repayment obligations for appropriated investments and bonds issued to

1	the U.S. Treasury are included to be scheduled for repayment. Forecast transmission repayment
2	obligations related to the lease purchase program are also modeled and scheduled for repayment.
3	Funding for replacements projected during the repayment period is also included in the
4	repayment study, consistent with the requirements of DOE Order RA 6120.2.
5	
6	Appropriations and bonds are scheduled to be repaid within the expected useful life of the
7	associated facility, or the maximum repayment period (50 years for generation and 35 years for
8	transmission), whichever is less. Bonds issued by BPA to the U.S. Treasury have varying terms,
9	taking into account the estimated average service lives for investments and prudent financing and
10	cash management factors. Projected lease purchase obligations assumed in the repayment study
11	are held to the same parameters.
12	
13	In the repayment studies, all projected bonds are issued with maturities not to exceed 30 years
14	for transmission investment, although they can be refinanced within the 35-year repayment
15	period. Environmental investments have a maximum term of 15 years. Corporate investments,
16	generally for information technology, are for a 5-year period. Generally bonds are issued with a
17	provision that allows the bonds to be called any time. Bonds also may be issued with provisions
18	such as a 5-year call or a no call provision. Early retirement of eligible bonds may require that
19	BPA pay a bond premium to the Treasury. Bonds may also be called and repaid at a discount.
20	Bonds are issued to finance BPA transmission, environment, and corporate investments and are
21	repaid within the provisions of each bond agreement with the Treasury.
22	
23	Based on these parameters, the repayment study establishes a schedule of planned amortization
24	payments and resulting interest expense by determining the lowest levelized debt service stream
25	necessary to repay all transmission obligations within the required repayment period.

1	For further discussion of the repayment program, see Transmission Revenue Requirement Study
2	Documentation, BP-16-E-BPA-09A, Ch. 12.
3	
4	2.4 Products Used by Other Studies
5	This study produces the segmented revenue requirement, which allocates transmission costs
6	among transmission segments. Chapter 2 of the documentation for this study describes the
7	segmentation of the revenue requirement in detail. <i>Id.</i> , Ch. 2.2. The segmented revenue
8	requirement is used in the Transmission Rates Study and Documentation to develop rates for the
9	various transmission products. More detail on the transmission segments is available in the
10	Transmission Segmentation Study and Documentation, BP-18-E-BPA-07.
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1 3. TRANSMISSION REVENUE REQUIREMENTS 2 3 **Revenue Requirement Format** 3.1 4 For each year of a rate period, BPA prepares two tables that reflect the process by which revenue 5 requirements are determined. The Income Statement includes projections of total expenses, any 6 Planned Net Revenues for Risk, and, if necessary, a Minimum Required Net Revenue 7 component. The Statement of Cash Flows shows the analysis used to determine Minimum 8 Required Net Revenues and the cash available for risk mitigation. 9 10 The Income Statement (Table 3) displays the components of the annual revenue requirements, 11 which include total operating expenses (line 9), net interest expense (line 20), Minimum 12 Required Net Revenue (line 22), and Planned Net Revenues for Risk (line 23). The sum of these 13 four major components is the total revenue requirement (line 25) for each year of the rate period. 14 15 The Minimum Required Net Revenue (Table 3, line 22) results from an analysis of the Statement 16 of Cash Flows (Table 4). Minimum Required Net Revenue may be necessary to ensure that 17 revenue requirements are sufficient to cover all cash requirements, including annual amortization 18 of the Federal investment as determined in the transmission repayment studies. 19 20 The Statement of Cash Flows (Table 4) analyzes annual cash inflows and outflows. Cash 21 provided by current operations (line 12), driven by expenses not requiring cash and non-cash 22 revenues, shown in lines 5 through 11, must be sufficient to compensate for the difference 23 between cash used for capital investments (line 16) and cash from treasury borrowing (line 23). 24 If cash provided by current operations is not sufficient, Minimum Required Net Revenue (line 2) 25 must be included in revenue requirements to accommodate the shortfall, yielding at least a zero

1 annual increase in cash (line 24). The Minimum Required Net Revenue amount shown on the 2 Statement of Cash Flows (line 2) then is incorporated in the Income Statement (Table 3, line 22). 3 3.2 **Current Revenue Test** 4 5 Consistent with DOE Order RA 6120.2, the continuing adequacy of existing rates must be tested 6 annually. The current revenue test, exhibited in Tables 5 and 6, determines whether the revenue 7 expected from current rates will meet cost recovery requirements during the FY 2018–2019 rate 8 period and the ensuing repayment period. For revenue at current rates, see Transmission Rates 9 Study and Documentation, BP-18-E-BPA-08, Table 12. 10 11 The result of the current revenue test demonstrates that projected revenue from current rates is 12 inadequate to meet the cost recovery criteria of Order RA 6120.2 over the repayment period, 13 because the net position is negative. See Table 7, column K. If revenues from current rates were 14 adequate, current rates could be extended (although other reasons may exist for revising rates, 15 such as the implementation of a new rate design). 16 17 3.3 **Revised Revenue Test** 18 Consistent with DOE Order RA 6120.2, the adequacy of proposed rates must be demonstrated. 19 The revised revenue test determines whether the revenue projected from proposed rates will meet 20 cost recovery requirements for the rate period. The revised revenue test is conducted using the 21 forecast of revenue under proposed rates. Transmission Rates Study and Documentation, BP-18-22 E-BPA-08, Table 12. 23 24 For the rate period, the demonstration of the adequacy of proposed rates is shown in Tables 8 25 and 9. Table 9 tests the sufficiency of the resulting net revenues from Table 8, line 23 for

1 making the planned annual amortization payments. The sufficiency of net revenues is 2 demonstrated by the annual increase (or decrease) in cash (Table 9, line 25). The annual cash 3 flow must be at least zero to demonstrate the adequacy of the projected revenues to cover all 4 cash requirements. 5 6 The results of the revised revenue test demonstrate that proposed rates are adequate to fulfill cost 7 recovery requirements for the rate period, FY 2018–2019. With the successful test of proposed 8 rates, the rate development process ends. 9 10 3.4 **Repayment Test at Proposed Rates** 11 Table 10, Transmission Revenues from Proposed Rates, demonstrates whether projected revenue 12 from proposed rates is adequate to meet the cost recovery criteria of DOE Order RA 6120.2 over 13 the repayment period. The data are presented in a format consistent with the revised revenue 14 tests, Tables 8 and 9, and the separate accounting analysis that is an attachment to the rate filing 15 BPA submits to the Commission. The focal point of Table 10 is the net position (column K), 16 which is the amount of funds provided by revenues that remain after meeting annual expenses 17 requiring cash for the rate period and repayment of the Federal investment. Thus, if the net 18 position is zero or greater in each of the years of the rate period through the repayment period, 19 the projected revenues demonstrate BPA's ability to repay the Federal investment in the FCRPS 20 within the allowable time. As shown in column K, the resulting net position is zero or greater for 21 each year of the rate period and in each year of the repayment period. 22 23 The historical data on this table have been taken from BPA's separate accounting analysis. The 24 rate period data have been developed specifically for this study. The repayment period data are

presented consistent with the requirements of DOE Order RA 6120.2.

Table 11, Amortization of Transmission Investments Over Repayment Period, summarizes the amortization of Federal investments over the repayment period. It displays the total investment costs through the cost evaluation period, forecast replacements required to maintain the system through the repayment period, the cumulative dollar amount of investments placed in service, scheduled amortization payments for each year of the repayment period (due and discretionary), unamortized investments including replacements through the repayment period, unamortized obligations as determined by a term schedule (if all obligations were paid at maturity and never early), and the predetermined amortization payments and the unamortized amount of irrigation assistance for each year of the repayment period.

TABLES

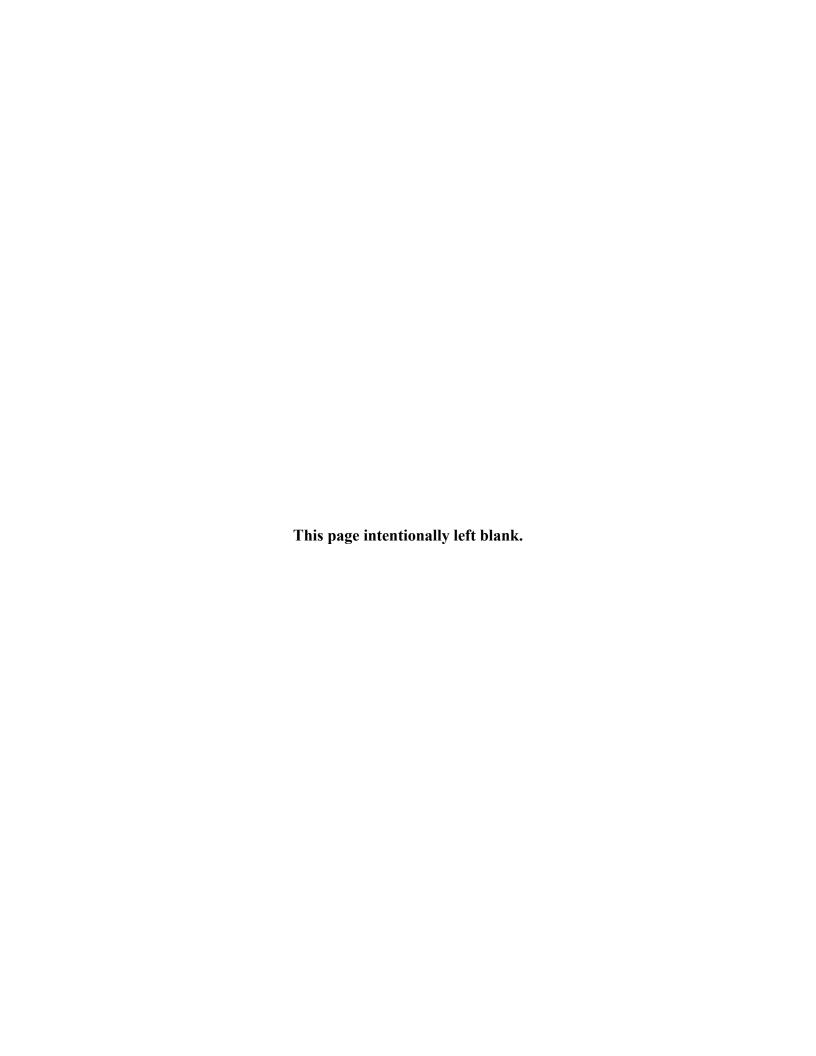


Table 1: Projected Net Revenues from Proposed Rates (\$000s)

		Α	В	С
		FY 2018	FY 2019	Rate Period Average
1	PROJECTED REVENUES FROM PROPOSED RATES	1,054,664	1,064,773	1,059,719
2	PROJECTED EXPENSES	<u>1,015,156</u>	1,041,076	1,028,116
3	NET REVENUES	39,508	\$23,698	31,603

Table 2: Planned Repayments to U.S. Treasury (\$000s)

		Α	В	С
	_	BOND AMORTIZATION	APPROPRIATIONS AMORTIZATION	TOTAL
1	2018	9,250	63,958	73,208
2	2019	256,147	_	256,147
3	TOTAL	265,397	63,958	329,355

Table 3: Transmission Revenue Requirement Income Statement (\$000s)

	-	A FY 2018	B FY 2019
1	OPERATING EXPENSES		
2	TRANSMISSION OPERATIONS	173,609	170,891
3	TRANSMISSION ENGINEERING	58,682	59,506
4	TRANSMISSION MAINTENANCE	176,893	178,365
5	TRANSMISSION ACQUISITION & ANCILLARY SERVICES	105,058	104,491
6	BPA INTERNAL SUPPORT	98,474	100,596
7	OTHER INCOME, EXPENSES & ADJUSTMENTS	(11,831)	(11,825)
8	DEPRECIATION & AMORTIZATION	269,384	281,364
9	TOTAL OPERATING EXPENSES	870,268	883,386
10	INTEREST EXPENSE		
11	INTEREST EXPENSE		
12	FEDERAL APPROPRIATIONS	4,615	-
13	CAPITALIZATION ADJUSTMENT	(18,968)	(18,968)
14	ON LONG-TERM DEBT	103,279	109,639
15	AMORTIZATION OF CAPITALIZED BOND PREMIUMS	561	561
16	DEBT SERVICE REASSIGNMENT INTEREST	13,964	5,111
17	NON-FEDERAL INTEREST	68,820	87,349
18	PREMIUMS/DISCOUNTS	645	2,065
18	AFUDC	(23,503)	(22,621)
19	INTEREST INCOME	(4,526)	(5,447)
20	NET INTEREST EXPENSE	144,888	157,689
21	TOTAL EXPENSES	1,015,156	1,041,076
22	MINIMUM REQUIRED NET REVENUE 1/	34,687	28,130
23	PLANNED NET REVENUES FOR RISK	-	
24	TOTAL PLANNED NET REVENUE	34,687	28,130
25	TOTAL REVENUE REQUIREMENT	1,049,843	1,069,206

1/ See note on cash flow table

Table 4: Transmission Revenue Requirement Statement of Cash Flows (\$000s)

		A FY 2018	B FY 2019
1	CASH FROM CURRENT OPERATIONS:		
2	MINIMUM REQUIRED NET REVENUE	34,687	28,130
3	DRAWDOWN OF CASH RESERVES FOR CAPITAL FUNDING	15,000	15,000
4	EXPENSES NOT REQUIRING CASH:		
5	DEPRECIATION & AMORTIZATION	269,384	281,364
6	TRANSMISSION CREDIT PROJECTS NET INTEREST	4,395	4,146
7	AMORTIZATION OF CAPITALIZED BOND PREMIUMS	561	561
8	CAPITALIZATION ADJUSTMENT	(18,968)	(18,968)
9	NON-CASH REVENUES/ACCRUAL REVENUES		
10	LGIA	(16,587)	(14,896)
11	AC INTERTIE CO/FIBER	(6,887)	(6,887)
12	CASH PROVIDED BY CURRENT OPERATIONS	281,585	288,451
13 14 15 16	CASH USED FOR CAPITAL INVESTMENTS: INVESTMENT IN: UTILITY PLANT CASH USED FOR CAPITAL INVESTMENTS	(506,599) (506,599)	(521,330) (521,330)
17	CASH FROM TREASURY BORROWING AND APPROPRIATIONS:	, ,	, , ,
18	INCREASE IN LONG-TERM DEBT	491,599	506,330
19	DEBT SERVICE REASSIGNMENT PRINCIPAL	(191,504)	(4,838)
20	REPAYMENT OF CAPITAL LEASES	(1,874)	(12,466)
21	REPAYMENT OF LONG-TERM DEBT	(9,250)	(256, 147)
22	REPAYMENT OF CAPITAL APPROPRIATIONS	(63,958)	
23	CASH FROM TREASURY BORROWING AND APPROPRIATIONS	225,014	232,880
24 25 26	ANNUAL INCREASE (DECREASE) IN CASH ^{1/} PLANNED NET REVENUE FOR RISK TOTAL ANNUAL INCREASE (DECREASE) IN CASH		- - -

1/ Line 24 must be greater than or equal to zero, otherwise planned net revenues for risk will be added so that there are no negative cash flows for the year.

Table 5: Transmission Current Revenue Test Income Statement (\$000s)

	<u>-</u>	A FY 2018	B FY 2019
1	REVENUES FROM CURRENT RATES	1,048,451	1,058,853
2	OPERATING EXPENSES		
3	TRANSMISSION OPERATIONS	173,609	170,891
4	TRANSMISSION ENGINEERING	58,682	59,506
5	TRANSMISSION MAINTENANCE	176,893	178,365
6	TRANSMISSION ACQUISITION & ANCILLARY SERVICES	105,058	104,491
7	BPA INTERNAL SUPPORT	98,474	100,596
8	OTHER INCOME, EXPENSES & ADJUSTMENTS	(11,831)	(11,825)
9	DEPRECIATION & AMORTIZATION	269,384	281,364
10	TOTAL OPERATING EXPENSES	870,268	883,386
11	INTEREST EXPENSE		
12	INTEREST EXPENSE		
13	FEDERAL APPROPRIATIONS	4,615	_
14	CAPITALIZATION ADJUSTMENT	(18,968)	(18,968)
15	ON LONG-TERM DEBT	103,279	109,639
16	AMORTIZATION OF CAPITALIZED BOND PREMIUMS	561	561
17	DEBT SERVICE REASSIGNMENT INTEREST	13,964	5,111
18	NON-FEDERAL INTEREST	68,820	87,349
17	PREMIUMS/DISCOUNTS	645	2,065
19	AFUDC	(23,503)	(22,621)
20	INTEREST INCOME	(4,526)	(5,447)
21	NET INTEREST EXPENSE	144,888	157,689
22	TOTAL EXPENSES	1,015,156	1,041,076
23	NET REVENUES	33,295	17,778

Table 6: Transmission Current Revenue Test Statement of Cash Flows (\$000s)

		A FY 2018	B FY 2019
		1 1 2010	1 1 2013
1	CASH FROM CURRENT OPERATIONS:		
2	NET REVENUES	33,295	17,778
3	DRAWDOWN OF CASH RESERVES FOR CAPITAL FUNDING	15,000	15,000
4	EXPENSES NOT REQUIRING CASH:		
5	DEPRECIATION & AMORTIZATION	269,384	281,364
6	TRANSMISSION CREDIT PROJECTS NET INTEREST	4,395	4,146
7	AMORTIZATION OF CAPITALIZED BOND PREMIUMS	561	561
8	CAPITALIZATION ADJUSTMENT	(18,968)	(18,968)
9	NON-CASH REVENUES/ACCRUAL REVENUES		
10	LGIA	(16,587)	(14,896)
11	AC INTERTIE CO/FIBER	(6,887)	(6,887)
12	CASH PROVIDED BY CURRENT OPERATIONS	280,193	278,098
13	CASH USED FOR CAPITAL INVESTMENTS:		
14	INVESTMENT IN:		
15	UTILITY PLANT	(506,599)	(521,330)
16	CASH USED FOR CAPITAL INVESTMENTS	(506,599)	(521,330)
17	CASH FROM TREASURY BORROWING AND APPROPRIATIONS:		
18	INCREASE IN LONG-TERM DEBT	491,599	506,330
19	DEBT SERVICE REASSIGNMENT PRINCIPAL	(191,504)	(4,838)
20	REPAYMENT OF CAPITAL LEASES	(1,874)	(12,466)
21	REPAYMENT OF LONG-TERM DEBT	(9,250)	(256, 147)
22	REPAYMENT OF CAPITAL APPROPRIATIONS	(63,958)	-
23	CASH FROM TREASURY BORROWING AND APPROPRIATIONS	225,014	232,880
24	ANNUAL INCREASE (DECREASE) IN CASH	(1,392)	(10,353)

^{1/} Line 24 must be greater than or equal to zero, otherwise net revenues will be added so that there are no negative cash flows for the year.

Table 7: Transmission Revenues from Current Rates – Results through the Repayment Period (\$000s)

		Α	В	С	D	E	F	G	н	1	J	K
_	YEAR	REVENUES (STATEMENT A)	OPERATION & MAINTENANCE (STATEMENT E)	DEBT SERVICE OFFSETS (REV REQ STUDY DOC)	DEPRECIATION	NET INTEREST (TABLE D)	NET REVENUES (F=A-B-C-D-E)	NONCASH EXPENSES 1/ (COLUMN D)	FUNDS FROM OPERATION (H=F+G)	AMORTIZATION (REV REQ STUDY DOC,Chapter 11)	NON-FEDERAL PRINCIPAL (REV REQ STUDY DOC,Chapter 7)	NET POSITION (K=H-I-J)
	COMBINED											
1	CUMULATIVE 1977	3,298,951	963,839	348,748	807,047	1,220,170	(40,853)	807,047	766,194	628,460		137,734
2	1978 - 2016	22,724,227	10,659,129	-	5,156,689	5,555,070	1,353,341	4,733,319	7,404,474	5,897,253	444,844	1,062,377
	COST EVALUATION		,,,,,,		.,,	.,,	,,	,,	, . ,	,,,,,,,	,	, , , ,
3	PERIOD 2017	1,088,684	603,193		253,854	148,255	83,382	253,854	337,236	96,439	201,476	39,320
	RATE APPROVAL											
	PERIOD	1 040 454	000 004		000.004	444.007	00.000	004.000	005.404	70.000	400.077	(4.000)
4 5	2018 2019	1,048,451 1,058,853	600,884 602,022	-	269,384 281,364	144,887 157,690	33,296 17,777	231,898 245,320	265,194 263,097	73,208 256,147	193,377 17,304	(1,392) (10,353)
3	2013	1,030,033	002,022	-	201,304	137,090	17,777	243,320	200,097	230, 147	17,304	(10,555)
	REPAYMENT PERIOD											
6	2020	1,058,853	602,022	(7,775)	281,364	171,059	12,183	245,320	257,503	168,001	98,925	(9,423)
7	2021	1,058,853	602,022	(8,001)	281,364	186,617	(3,149)	245,320	242,171	151,100	100,084	(9,013)
8	2022 2023	1,058,853 1,058,853	602,022 602,022	(8,191) (8,336)	281,364 281,364	189,512 194,134	(5,855) (10,331)	245,320 245,320	239,466 234,989	153,233 144,336	94,986 99,237	(8,753) (8,584)
10	2023	1,058,853	602,022	(8,471)	281,364	194,033	(10,096)	245,320	235,224	142,638	100,936	(8,350)
11	2025	1,058,853	602,022	(8,610)	281,364	198,353	(14,276)	245,320	231,044	137,677	101,328	(7,961)
12	2026	1,058,853	602,022	(8,786)	281,364	197,776	(13,524)	245,320	231,796	139,696	99,507	(7,407)
13	2027	1,058,853	602,022	(8,923)	281,364	199,140	(14,750)	245,320	230,571	135,290	102,308	(7,027)
14	2028	1,058,853	602,022	(9,077)	281,364	204,641	(20,097)	245,320	225,223	139,530	92,732	(7,039)
15	2029	1,058,853	602,022	(9,209)	281,364	203,111	(18,434)	245,320	226,886	139,519	93,982	(6,615)
16	2030	1,058,853	602,022	(9,415)	281,364	202,424 201,645	(17,542)	245,320	227,778	135,113 135,909	99,306	(6,641)
17 18	2031 2032	1,058,853 1,058,853	602,022 602,022	(9,617) (9,791)	281,364 281,364	201,645	(16,561) (16,512)	245,320 245,320	228,759 228,809	135,909	99,491 101,372	(6,640) (6,641)
19	2032	1,058,853	602,022	(9,971)	281,364	201,769	(16,425)	245,320	228,896	134,083	101,453	(6,641)
20	2034	1,058,853	602,022	(10,181)	281,364	200,729	(15,081)	245,320	230,239	133,877	103,003	(6,641)
21	2035	1,058,853	602,022	(10,362)	281,364	208,416	(22,588)	245,320	222,733	102,915	126,459	(6,641)
22	2036	1,058,853	602,022	(10,535)	281,364	209,422	(23,420)	245,320	221,900	101,993	126,548	(6,641)
23	2037	1,058,853	602,022	(10,707)	281,364	215,148	(28,975)	245,320	216,345	121,817	101,169	(6,641)
24 25	2038 2039	1,058,853 1,058,853	602,022	(10,848)	281,364	217,668	(31,354)	245,320	213,966	118,391	102,216	(6,641)
25 26	2040	1,058,853	602,022 602,022	(10,995) (11,152)	281,364 281,364	219,287 223,710	(32,826) (37,091)	245,320 245,320	212,495 208,229	121,173 98,272	97,962 116,598	(6,641) (6,641)
27	2041	1,058,853	602,022	(11,307)	281,364	231,254	(44,481)	245,320	200,840	90,762	116,718	(6,641)
28	2042	1,058,853	602,022	(11,427)	281,364	236,090	(49, 197)	245,320	196,124	115,813	86,952	(6,641)
29	2043	1,058,853	602,022	(11,597)	281,364	240,582	(53,518)	245,320	191,802	79,733	118,710	(6,641)
30	2044	1,058,853	602,022	(11,751)	281,364	245, 183	(57,965)	245,320	187,355	77,028	116,968	(6,641)
31	2045	1,058,853	602,022	(11,844)	281,364	250,649	(63,338)	245,320	181,982	64,967	123,220	(6,205)
32 33	2046 2047	1,058,853	602,022 602,022	(11,974) (12,117)	281,364 281,364	255,416 257,274	(67,975) (69,690)	245,320 245,320	177,345 175,630	60,330	123,220	(6,205) (6,205)
34	2047	1,058,853 1,058,853	602,022	(12,117)	281,364	257,274 262,597	(74,867)	245,320	175,630	181,835 176,658	-	(6,205)
35	2049	1,058,853	602,022	(12,368)	281,364	268,313	(80,478)	245,320	164,842	171,047	-	(6,205)
36	2050	1,058,853	602,022	(12,462)	281,364	274,413	(86,484)	245,320	158,836	165,041		(6,205)
37	2051	1,058,853	602,022	(12,531)	281,364	280,895	(92,897)	245,320	152,423	158,628	-	(6,205)
38	2052	1,058,853	602,022	(12,661)	281,364	287,797	(99,669)	245,320	145,651	151,856	-	(6,205)
39	2053	1,058,853	602,022	(12,780)	281,364	295,169	(106,921)	245,320	138,399	144,604	-	(6,205)
40	2054	1,058,853	602,022	(12,906)	281,364	303,028	(114,655)	245,320	130,665	136,870	-	(6,205)
	TRANSMISSION											
41	TOTALS	66,279,025	34,499,844	(20, 195)	16,616,085	15,155,188	28,103	14,857,647	16,203,564	11,515,320	3,702,388	985,857

1/CONSISTS OF DEPRECIATION PLUS ANY ACCOUNTING WRITE-OFFS INCLUDED IN EXPENSES.

Table 8: Transmission Revised Revenue Test Income Statement (\$000s)

	<u>-</u>	A FY 2018	B FY 2019
1	REVENUES FROM PROPOSED RATES	1,054,664	1,064,773
2	OPERATING EXPENSES		
3	TRANSMISSION OPERATIONS	173,609	170,891
4	TRANSMISSION ENGINEERING	58,682	59,506
5	TRANSMISSION MAINTENANCE	176,893	178,365
6	TRANSMISSION ACQUISITION & ANCILLARY SERVICES	105,058	104,491
7	BPA INTERNAL SUPPORT	98,474	100,596
8	OTHER INCOME, EXPENSES & ADJUSTMENTS	(11,831)	(11,825)
9	DEPRECIATION & AMORTIZATION	269,384	281,364
10	TOTAL OPERATING EXPENSES	870,268	883,386
11	INTEREST EXPENSE		
12	INTEREST EXPENSE		
13	FEDERAL APPROPRIATIONS	4,615	_
14	CAPITALIZATION ADJUSTMENT	(18,968)	(18,968)
15	ON LONG-TERM DEBT	103,279	109,639
16	AMORTIZATION OF CAPITALIZED BOND PREMIUMS	561	561
17	DEBT SERVICE REASSIGNMENT INTEREST	13,964	5,111
18	NON-FEDERAL INTEREST	68,820	87,349
19	PREMIUMS/DISCOUNTS	645	2,065
19	AFUDC	(23,503)	(22,621)
20	INTEREST INCOME	(4,526)	(5,447)
21	NET INTEREST EXPENSE	144,888	157,689
22	TOTAL EXPENSES	1,015,156	1,041,076
23	NET REVENUES	39,508	23,698

Table 9: Transmission Revised Revenue Test Statement of Cash Flows (\$000s)

		A FY 2018	B FY 2019
1	CASH FROM CURRENT OPERATIONS:		
2	NET REVENUES	39,508	23,698
3	DRAWDOWN OF CASH RESERVES FOR CAPITAL FUNDING	15,000	15,000
4	EXPENSES NOT REQUIRING CASH:		
5	DEPRECIATION & AMORTIZATION	269,384	281,364
6	TRANSMISSION CREDIT PROJECTS NET INTEREST	4,395	4,146
7	AMORTIZATION OF CAPITALIZED BOND PREMIUMS	561	561
8	CAPITALIZATION ADJUSTMENT	(18,968)	(18,968)
9	NON-CASH REVENUES/ACCRUAL REVENUES		
10	LGIA	(16,587)	(14,896)
11	AC INTERTIE CO/FIBER	(6,887)	(6,887)
12	CASH FLOW ADJUSTMENT (RESERVE)/APPLICATION	(4,500)	4,500
13	CASH PROVIDED BY CURRENT OPERATIONS	281,906	288,518
14	CASH USED FOR CAPITAL INVESTMENTS:		
15	INVESTMENT IN:		
16	UTILITY PLANT	(506,599)	(521,330)
17	CASH USED FOR CAPITAL INVESTMENTS	(506,599)	(521,330)
18	CASH FROM TREASURY BORROWING AND APPROPRIATIONS:		
19	INCREASE IN LONG-TERM DEBT	491,599	506,330
20	DEBT SERVICE REASSIGNMENT PRINCIPAL	(191,504)	(4,838)
21	REPAYMENT OF CAPITAL LEASES	(1,874)	(12,466)
22	REPAYMENT OF LONG-TERM DEBT	(9,250)	(256, 147)
23	REPAYMENT OF CAPITAL APPROPRIATIONS	(63,958)	
24	CASH FROM TREASURY BORROWING AND APPROPRIATIONS	225,014	232,880
25	ANNUAL INCREASE (DECREASE) IN CASH	321	68

^{1/} Line 25 must be greater than or equal to zero, otherwise net revenues will be added so that there are no negative cash flows for the year.

Table 10: Transmission Revenues from Proposed Rates through the Repayment Period (\$000s)

С Е Α D G н -1 Κ DEBT SERVICE **FUNDS** NON-FEDERAL **OPERATION &** OFFSETS NET NET NONCASH FROM AMORTIZATION PRINCIPAL NET MAINTENANCE REVENUES (REV REQ INTEREST REVENUES EXPENSES 1/ OPERATION (REV REQ STUDY (REV REQ STUDY **POSITION** YEAR (STATEMENT A) (STATEMENT E) STUDY DOC) DEPRECIATION (TABLE D) (F=A-B-C-D-E) (COLUMN D) (H=F+G) DOC, Chapter 11) DOC, Chapter 7) (K=H-I-J) COMBINED CUMULATIVE 3,298,951 963.839 348,748 807.047 1,220,170 (40,853)807,047 766,194 628,460 137.734 1978-2016 22,724,227 10.659.129 5,156,689 5.555.070 1,353,341 4,733,319 7,404,474 5,897,253 444.844 1,062,377 COST EVALUATION PERIOD 1.088.684 603 193 253.854 148 255 83 382 253.854 337 236 96 439 201.476 39 320 RATE APPROVAL PERIOD 1,054,664 600,884 269,384 144,887 39,509 227,398 266,907 73,208 193,377 321 2019 1,064,773 602,022 157,690 23,697 273,518 256,147 17,304 68 REPAYMENT 2020 1,064,773 601,453 281,364 171,059 18,673 249,820 268,493 168,001 98,925 1,567 (7,775)2021 1.064.773 601.453 (8.001) 281.364 186.617 3.340 249.820 253 161 151.100 100.084 1.976 1,064,773 281,364 249,820 153,233 94,986 2,237 601,453 (8.191) 189,512 2023 (3.842)245.978 144,336 2,406 1,064,773 601.453 (8,336)281.364 194.134 249.820 99.237 10 2024 1,064,773 601,453 (8,471) 281,364 194,033 (3,606) 249,820 246,214 142,638 100,936 2,640 11 601,453 137,677 2025 1.064.773 (8.610) 281.364 198.353 (7.787)249.820 242.033 101.328 3.029 12 2026 1,064,773 601,453 (8,786) 281,364 197,776 (7,035)249,820 242,785 139,696 99,507 3,582 13 2027 601,453 (8,923) 281,364 199,140 249,820 241,560 135,290 102,308 3,962 1.064.773 (8.260) 14 2028 1,064,773 601,453 (9,077) 281,364 204.641 (13,607) 249,820 236,213 139,530 92,732 3,951 2029 1,064,773 601,453 (9,209) 281,364 203,111 (11,945) 249,820 237,875 139,519 93,982 4,375 16 2030 1.064.773 601 453 (9.415) 281 364 202 424 (11.053) 249 820 238 768 135.113 99,306 4 348 17 2031 1,064,773 601,453 (9,617) 281,364 201,645 (10,072) 249,820 239,749 135,909 99,491 4,349 18 2032 1.064.773 601 453 (9.791) 281 364 201.769 (10.022) 249 820 239 798 134 078 101.372 4 349 19 2033 1,064,773 601,453 (9,971) 281,364 201,862 (9,935)249,820 239,885 134,083 101,453 4,349 20 2034 601.453 281.364 200.729 249.820 241.228 133.877 103.003 4.349 1.064.773 (10.181)(8.592)21 2035 1,064,773 601,453 (10, 362)281,364 208,416 (16,098)249,820 233,722 102,915 126,459 4,349 22 1,064,773 601,453 (10,535) 281,364 209,422 (16,931) 249,820 232,890 101,993 126,548 4,349 23 2037 1,064,773 601,453 (10,707)281,364 215,148 (22,485)249,820 227,335 121,817 101,169 4,349 24 2038 1,064,773 601,453 (10,848) 281,364 217,668 (24,865) 249,820 224,956 118,391 102,216 4,349 25 2039 1,064,773 601,453 (10,995)281,364 219,287 (26, 336)249,820 223,484 121,173 97,962 4,349 1,064,773 601,453 281,364 223,710 4,349 (11, 152)(30,602)249,820 219,218 98,272 116,598 27 2041 (11.307) 90 762 4 349 1 064 773 601 453 281 364 231 254 (37 991) 249 820 211 829 116 718 28 2042 1,064,773 601,453 (11,427) 281,364 236,090 (42,707) 249,820 207,113 115,813 86,952 4,349 29 (11.597) 2043 1.064.773 601.453 281.364 240.582 (47.029) 249.820 202.791 79,733 118,710 4.349 30 2044 1,064,773 601.453 (11,751)281.364 245.183 (51,476)249.820 198.345 77.028 116,968 4.349 31 2045 1,064,773 601,453 (11,844)281,364 250,649 (56,849) 249,820 192,972 64,967 123,220 4,785 32 2046 1.064.773 601 453 (11,974)281.364 255,416 (61,485) 249.820 188.335 60.330 123,220 4.785 257,274 181,835 1,064,773 601,453 (12, 117)281.364 (63, 200) 249,820 186,620 34 2048 4.785 1.064.773 601.453 (12, 263)281.364 262.597 (68.377)249.820 181.443 176.658 35 601,453 281,364 268,313 249,820 175,831 171,047 4,785 1,064,773 (12,368)(73,989)36 601.453 274.413 165.041 4.785 2050 1.064.773 (12.462)281.364 (79.995)249 820 169.825 37 2051 1,064,773 601,453 (12,531) 281,364 280,895 (86,407) 249,820 163,413 158,628 4,785 38 2052 1.064.773 601,453 (12.661)281.364 287,797 (93, 180) 249.820 156,640 151,856 4,785 39 2053 1,064,773 601,453 (12,780)281,364 295,169 (100, 432)249,820 149,388 144,604 4,785 40 1,064,773 601,453 281,364 136,870 2054 (12.906) 303.028 (108, 166) 249.820 141.655 4.785 TRANSMISSION 34.479.926 15,155,188 16,600,329 1,382,622 66.498.372 15,015,147 11,515,320 3,702,388

1/CONSISTS OF DEPRECIATION PLUS ANY ACCOUNTING WRITE-OFFS INCLUDED IN EXPENSES.

Table 11: Amortization of Transmission Investments Over Repayment Period (\$000s)

	Α	В	С	D	E	F	G	н
			INVESTMI	ENTS PLACED IN	SERVICE			
	Date	Original & New Obligations	Replacements	Cumulative Amount In Service	Due Amortization	Discretionary Amortization	Unamortized Investment	Term Investment Schedule
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1	2016	12,447,558	-	12,447,558	19,500	74,910	2,937,888	6,536,529
2	2017	243,750	-	12,691,308	40,950	55,489	3,085,198	6,351,980
3	2018	249,050	-	12,940,358	5,000	68,208	3,261,040	6,355,027
4	2019	262,050	-	13,202,408	240,750	15,397	3,266,944	6,126,935
5	2020	-	186,878	13,389,286	159,900	8,101	3,285,821	6,071,071
6	2021	-	192,309	13,581,595	117,000	34,100	3,327,030	6,083,143
7	2022	-	196,866	13,778,461	140,200	13,033	3,370,663	6,086,798
8	2023	-	200,357	13,978,818	109,750	34,586	3,426,684	6,177,405
9	2024	-	203,602	14,182,420	117,050	25,588	3,487,648	6,263,957
10	2025	-	206,945	14,389,365	119,050	18,627	3,556,916	6,236,919
11	2026	-	211,163	14,600,528	125,000	14,696	3,628,383	6,323,082
12	2027	-	214,476	14,815,004	99,000	36,290	3,707,569	6,438,558
13	2028	-	218,174	15,033,178	86,073	53,458	3,786,213	6,357,932
14	2029	-	221,350	15,254,529	97,000	42,519	3,868,045	6,501,561
15	2030	-	226,290	15,480,819	73,000	62,113	3,959,221	6,520,573
16	2031	-	231,155	15,711,974	63,000	72,909	4,054,467	6,388,728
17	2032	-	235,331	15,947,305	114,900	19,178	4,155,721	5,960,259
18	2033	-	239,658	16,186,964	68,000	66,083	4,261,296	5,461,956
19	2034	-	244,701	16,431,665	131,000	2,877	4,372,120	5,168,257
20	2035	-	249,060	16,680,724	92,000	10,915	4,518,265	5,120,316
21	2036	-	253,206	16,933,930	89,000	12,993	4,669,478	5,119,522
22	2037	-	257,336	17,191,266	89,000	32,817	4,804,997	5,306,858
23	2038	-	260,723	17,451,989	80,000	38,391	4,947,329	5,512,581
24	2039	-	264,265	17,716,254	65,000	56,173	5,090,420	5,612,846
25	2040	-	268,037	17,984,291	75,000	23,272	5,260,186	5,700,883
26	2041	-	271,762	18,256,053	75,500	15,262	5,441,186	5,897,145
27	2042	-	274,652	18,530,705	92,500	23,313	5,600,025	6,079,297
28	2043	-	278,741	18,809,446	63,000	16,733	5,799,033	6,093,038
29	2044	-	282,445	19,091,891	60,000	17,028	6,004,450	6,315,483
30	2045	-	284,683	19,376,575	64,967	· -	6,224,167	6,495,167
31	2046	-	287,802	19,664,376	50,000	10,330	6,451,638	6,705,968
32	2047	-	291,244	19,955,621	-	181,835	6,561,048	6,915,713
33	2048	_	294,753	20,250,374	_	176,658	6,679,142	7,128,966
34	2049	_	297,263	20,547,637	_	171,047	6,805,359	7,345,229
35	2050	-	299,518	20,847,155	-	165,041	6,939,836	7,644,747
36	2051	_	301,189	21,148,345	_	158,628	7,082,397	7,945,937
37	2052	_	304,316	21,452,661	_	151,856	7,234,858	8,250,253
38	2053	_	307,182	21,759,842	_	144,604	7,397,436	8,557,434
39	2054	_	310,204	22,070,046	_	136,870	7,570,769	8,867,638
40	2004	\$754,850	\$8,867,638	,070,040	\$2,802,589	\$2,187,017	.,0,0,100	\$243,489,162
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