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September 20, 2024

**BY E-PORTAL**

Mr. Adam Teitzman, Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No. 20240099-EI - Petition for rate increase by Florida Public Utilities Company**

Dear Mr. Teitzman:

Attached for filing in the above-referenced docket, please find Florida Public Utilities Company's Response in Opposition to the OPC's Letter filed in this docket on September 13.

Sincerely,

A handwritten signature in black ink, appearing to read 'Beth Keating', written over a horizontal line.

Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
(850) 521-1706

Enclosure  
Cc:\\ (Service List and Elisabeth Draper)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida  
Public Utilities Company.

DOCKET NO. 20240099-EI

DATED: September 20, 2024

**RESPONSE IN OPPOSITION TO  
OFFICE OF PUBLIC COUNSEL'S "DEFICIENCY" LETTER**

Florida Public Utilities Company ("FPUC" or "Company"), by and through undersigned counsel, files this Response in Opposition to the Office of Public Counsel's ("OPC") Letter of September 13, 2024, to the Director of the Division of Economics. While OPC's Letter is not styled specifically as a motion, it does request that the Company be required to take action to provide a reconciliation and that failure to do so would constitute a deficiency under Rule 25-6.014, Florida Administrative Code ("F.A.C.") As such, FPUC provides this response pursuant to Rule 28-106.204, F.A.C., and asks that the Commission reject OPC's Letter and its attempt to delay the schedule for this proceeding.<sup>1</sup>

Citing Rule 25-6.014(4), F.A.C. ("MFR Rule"), OPC argues that FPUC has not provided "a reconciliation explaining the differences in amounts of certain accounts between the MFR Schedules and FPUC's annual reports."<sup>2</sup> OPC further alleges that FPUC did not seek a waiver in this proceeding of the Rule, which it apparently interprets as requiring the submission of a reconciliation with the MFRs.<sup>3</sup> The MFR Rule does not, however, require that the utility file any documentation or reconciliation of its MFRs with its annual reports. Instead, it requires that the data therein be "consistent with and reconcilable with the utility's Annual Report to the Commission." This language clearly contemplates that the data in the MFRs must be capable of

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<sup>1</sup> The Company notes that the Letter and OPC's affirmative request do not appear to be contemplated in Rule 25-22.029, F.A.C., pertaining to Proposed Agency Action proceedings.

<sup>2</sup> Letter, page 2.

<sup>3</sup> Letter, page 3.

being reconciled to the annual reports, but it does not require that the utility provide documentation of any such reconciliation. As such, FPUC has not erred in failing to provide such a reconciliation nor did it need to seek a waiver of the MFR Rule in order to obtain leave not to provide it.<sup>4</sup>

Furthermore, the inconsistencies alleged by OPC are primarily a reflection of the difference in how data is reported and categorized for purposes of the MFRs as compared to the annual report, particularly as it relates to Common assets. Attachment A to this Response demonstrates that FPUC's MFRs are consistent with its annual reports. As such, OPC's Letter and suggested "deficiencies" should be rejected. FPUC has complied with Rule 25-6.014, F.A.C.

RESPECTFULLY SUBMITTED this 20th day of September, 2024.



Beth Keating  
Florida Bar No. 0022756  
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215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
(850) 521-1706

*Attorneys for Florida Public Utilities Company*

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<sup>4</sup> OPC also references Docket No. 20090079-EI, pertaining to another utility. While FPUC is not directly familiar with that proceeding, it appears based on Document No. 03231-2009 that the deficiencies identified by Commission staff in that proceeding did not relate in any way to any perceived requirement that the utility provide a reconciliation to its annual reports.

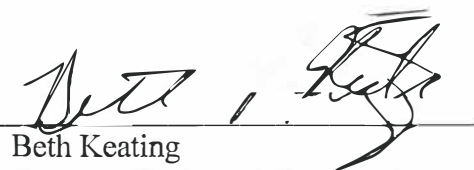
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing filing has been served by Electronic Mail this 20<sup>th</sup> day of September, 2024, upon the following:

Patricia A. Christensen, Esquire  
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By: \_\_\_\_\_



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## **Attachment A**

A summary of the reconciliation of the Annual Report and the MFRs for items identified in OPC's Letter are as follows.

1. In the Annual Report, the allocated portion of Florida Common assets and Corporate Common assets and liabilities are combined into one balance for each account. In the MFRs, in order to be consistent with our last gas filing in Docket No. 20220067-GU and for additional clarity and transparency, the Florida Common and Corporate Common assets and liabilities are provided separately. For example, MFR Schedule B-3 contains the electric business unit balance sheet and MFR Schedule B-3A contains the Florida Common balance sheet. The Florida Common balance sheet contains the allocation factors used for 2023 and calculates the 13-month average effect. In order to reconcile to the 2023 Annual Report, it is necessary to calculate the year-end balance times the allocation factors. MFR Schedules, B-7 thru B-10 provide detail for both the total monthly balances of Florida Common and Corporate Common accounts and the allocated portion.
2. Since the allocations are done for reporting purposes, the 13-month average balances for each year are allocated at the current year's allocation factors. Therefore, multiplying the December 2022 balance by the 2023 factor will not reconcile to the December 2022 Annual Report.
3. MFR D-6 reflects an accurate, corrected amount.

### **MFR B-3**

Attachment A-1 reconciles the Annual Report to MFR Schedule B-3. Pages 1 and 2 reconcile December 2022 balances by using the 2023 allocation factors and showing a separate column identifying the difference between amounts related to the 2022 and 2023 allocation factor differences. Pages 3 and 4 reconcile December 2022 balances in the MFR Schedule B-3 to the Annual Report using the 2022 allocation factors. Pages 5 and 6 reconcile December 2023 balances in MFR Schedule B-3 to the 2023 Annual Report.

Attachment A-1A shows the December 2022, December 2023, and 2023 13-Month average balances allocated using the 2023 Allocation Factors. Attachment A-1B reconciles the December 2023 Intercompany Payable/Receivable Account.

### **MFR C-6**

Attachment A-2 provides the reconciliation to the Annual Report. Of note, the Annual Report categorizes commercial revenues as either Commercial Small and Commercial Large revenues. In MFR C-6, these revenues are categorized more specifically into Commercial Small, Commercial, Commercial Large, and Industrial as recorded in the general ledger. The differences net to zero.

Attachment A-2A reconciles the 2023 Depreciation expense and Attachment 2B reconciling income tax expense are also provided.

None of the differences would result in changes to the 2025 projections or the requested rate relief.

**MFR D-6**

The customer deposit amount is reconciled on Attachment A-1. As stated in the explanations, after the Annual Report had been filed, the Company determined while preparing its MFRs that the electric customer deposit account 235 included some gas deposit balances. A complete analysis was performed, and the corrected amounts were included in the MFR's.

**MFR D-2**

Consistent with prior rate cases, the balances provided on D-2 are the year-end Chesapeake Corporate Balances. The only equity and debt balances in the Annual Report are retained earnings and debt. There is no computation of cost of capital. For purposes of cost of capital in the D Schedules, corporate allocated balances are used except for deferred taxes and customer deposits.

The Annual Report did include the Chesapeake Corporation debt schedule. A reconciliation to D-2 is provided in Attachment A-3.



Attachment A-1A-Schedule B-3a Florida Common (2023) with Year-End Allocations  
 Docket No. 20240099-EI

Line No.	Account No.	Account Name	(1)	(13)	(14)	(15)	Allocation Percent	Average Allocated Amount 13-Month Average	Year End Allocated Amount Dec-23	Allocation of Dec 2022 Using 2023 Factors
			Dec 2022	Dec 2023	13 MONTH AVERAGE	REFERENCE RB WC CS ORP NEU				
<b>FLORIDA COMMON</b>										
<b>ASSETS AND OTHER DEBITS</b>										
1										
2										
3		UTILITY PLANT:								
4										
5	1010	Plant in Service	11,184,337	11,177,704	11,180,701	RB	18.98%	2,121,714	2,121,145.07	2,122,403.78
6	1070	CWIP	-	28,911	1,921	RB	18.98%	364	5,486.32	-
7	1080	Plant Reserve	(469,172)	(1,107,503)	(787,976)	RB	18.98%	(149,531)	(210,166.11)	(89,032.76)
8										
9	1230	OTHER PROPERTY AND INVESTMENTS:	149,205,034	150,147,868	149,422,611	NEU			-	-
10										
11		CURRENT AND ACCRUED ASSETS:								
12						WC				
13	1310	Depository Account- Cash	1,361,680	-	257,761	WC	18.47%	47,609	-	251,502.30
14	1350	Working Funds- Petty Cash	-	-	-	WC				-
15	1420	Accounts Receivable	-	-	-	WC				-
16	1430	Miscellaneous Accounts Receivable	4,408	1,699	2,404	WC	18.47%	444	313.81	814.16
17	1460	Intercompany Receivable	356,093,463	606,128,790	475,902,898	NEU				-
18	1460	Intercompany Payable	(422,618,123)	(673,177,360)	(538,837,143)	NEU				-
19	1440	Allowance for Uncollected Accounts	-	-	-	WC				-
20	1510	Inventory-Propane	-	-	654	NEU				-
21	1540	Materials and Supplies	-	-	-	WC				-
22	1650	Prepaid Expenses	194,336	217,315	199,864	WC	18.47%	36,915	40,138.08	35,893.86
23	1730	Unbilled Revenues	-	-	-	WC				-
24										
25		DEFERRED DEBITS:								
26	1820	Regulatory Assets	-	-	-	WC				-
27	1840	Clearing Accounts	-	-	-	WC				-
28	1850	Temporary Facilities	-	-	-	WC				-
29	1890	Unamortized Loss on Reacquired Debt	647,654	573,953	610,803	CS				-
30	1900	Deferred Income Tax	-	-	-	CS				-
31	1011	Operating Lease Assets	136,544	98,598	66,383	WC	16.70%	11,086	16,465.87	22,802.85
32										
33										
34		<b>TOTAL ASSETS AND OTHER DEBITS</b>	<b>95,740,161</b>	<b>94,089,975</b>	<b>98,020,882</b>			<b>2,068,601</b>	<b>1,973,383</b>	<b>2,344,384</b>
35		<b>LIABILITIES AND OTHER CREDITS</b>								
36										
37		PROPRIETARY CAPITAL:								
38	2160	Unappropriated Retained Earnings	110,362,283	110,901,045	110,424,917	NEU				-
39										
40	2210	Long Term Debt	-	-	-	CS				-
41										
42		OTHER NONCURRENT LIABILITIES:								
43	2270	Operating Lease Liability	94,337	1,397	15,408	WC	16.70%	2,573	233.30	15,754.28
44	2282	Accrued Liability Insurance	-	-	-	WC				-
45	2283	Accrued Pension & Post Ret. Medical	(18,765,704)	(22,567,009)	(19,107,733)	WC	23.94%	(4,574,391)	(5,402,541.95)	(4,492,509.54)
46										
47		CURRENT AND ACCRUED LIABILITIES:								
48	2320	Accounts Payable Revenue Related	3,158,349	4,699,868	5,392,432	WC	18.47%	995,982	868,065.62	583,347.06
49	2321	Accounts Payable Payroll Related	8,984	15,512	64,715	WC	17.57%	11,370	2,725.46	1,578.49
50	2350	Customer Deposits	1,872,641	1,888,321	2,005,385	NEU				-
51	2365	Taxes Accrued Current	(475,442)	(92,436)	(69,876)	WC	18.47%	(12,906)	(17,072.93)	(87,814.14)
52	2367	Taxes Accrued- Prior	(1,545,175)	(2,511,617)	(2,158,780)	WC	18.47%	(398,727)	(463,895.66)	(285,393.82)
53	2410	Tax Collections Payable	22,085	1,364	11,118	WC	17.57%	1,953	239.65	3,880.33
54	2420	Misc Current & Accrued Liabilities	736,638	1,142,293	1,147,136	WC	17.57%	201,552	200,700.88	129,427.30
55	2430	Operating Lease Liability Obligations	58,764	99,290	53,908	WC	16.70%	9,003	16,581.43	9,813.59
56										
57		DEFERRED CREDITS:								
58	2520	Customer Advances-Construction	-	-	-	RB				-
59	2530	Other Deferred Credits	-	-	-	WC				-
60	2540	Other Regulatory Liabilities- Storm Interest	-	-	-	WC				-
61	2540	Other Regulatory Liabilities-Tax Rate Change	28,403	59,603	44,003	CS	16.70%	7,349	9,953.70	4,743.30
62	2550	Accumulated Deferred Investment Tax Credits	-	-	-	CS				-
63										
64		ACCUMULATED DEFERRED INCOME TAXES:								
65	2820	ADIT- Other Property	742,078	825,220	741,805	CS	16.70%	123,881	137,811.74	123,927.03
66	2830	ADIT- Other	(868,369)	(866,985)	(875,319)	CS	16.70%	(146,178)	(144,786.50)	(145,017.62)
67	2832	ADIT- Payroll Related	310,289	494,109	331,763	CS	23.94%	79,424	118,289.69	74,283.19
68		<b>TOTAL LIABILITIES AND OTHER CREDITS</b>	<b>95,740,161</b>	<b>94,089,975</b>	<b>98,020,882</b>			<b>(3,699,115)</b>	<b>(4,673,696)</b>	<b>(4,063,980.56)</b>
69										
70		Net WC/Def Tax						3,795,168.03	4,730,613.31	4,374,993.72
71										

REFERENCE:  
 RB = Rate Base; WC = Working Capital; CS = Capital Structure; ORP = Other Return Provided; NEU = Non-Electric Utility



**Attachment A-1B: Reconciliation of Intercompany Receivable/Payable from MFR to Annual Report in Docket 20240099-EI****Intercompany Receivable/Payable Reconciliation**

	<b>Per Filing 2023</b>
Account 143 with payable for Corporate Common and Florida Common Plant, CWIP and AD included	(44,773,341)
Florida Common Working Capital and Deferred Taxes on B-3A (B-3A shows 13-month average balances so year-end is on attached schedule)	<u>(4,730,613)</u>
	<u><u>(49,503,954)</u></u>
 Per Annual Report 2023	 <u>(49,315,427)</u>
Difference	<u><u>(188,527)</u></u>
 Summary of Differences:	
Annual Report did not include general ledger balances for Account 283 in the Annual Report	71,372
Annual Report included an incorrect December balance for Florida Common Account 236	4,605
Annual Report didn't include the Florida Common CWIP Allocation	5,486
Annual Report didn't include the appropriate Corporate Common balances in it's allocation of plant and accumulated depreciation.	60,076
Annual Report included customer deposits for the gas company.	48,933
Annual Report didn't include Florida Common AD clearing account	<u>(1,933)</u>
Total Adjustments	<u><u>188,539</u></u>
 The offset to the adjustments would be intercompany payable	 <u>(188,539)</u>
Difference -rounding	<u><u>12</u></u>

Attachment A- 2: MFR C-6 Reconciliation to the Annual Report  
Docket No. 20240099-EI

Line No.	Account No.	Account Title	2019		Differences 2019	Fuel	Conservation	LESS			Remaining Difference
			Annual Report (000)	Year 1 Actual (000)				Storm	Franchise	Gross Receipts	
1	<b>BASE REVENUES</b>										
2											
3	4000.4400	RESIDENTIAL SALES	45,405	11,572	33,833	30,382	297	370	1,645	1,139	0
4	4000.4420	COMMERCIAL SALES	26,661	2,336	24,325	5,370	54	69	742	399	17,691
5	4000.4421	COMMERCIAL		3,382	(3,382)	15,085	160	108	553	381	(19,669)
6	4000.4422	COMMERCIAL LARGE	13,404	1,105	12,299	7,406	81	194	325	188	4,105
7	4000.4423	INDUSTRIAL		591	(591)	1,313	25	29	117	51	(2,127)
8	4000.4430	OUTDOOR LIGHTING	2,137	1,662	475	367	(5)	7	72	35	(0)
	4000.4440	Public Street and Highway Lighting	182		182	148		2	24	5	0
11	4000.4480	INTERDEPT. SALES	37		37	34			2	1	(0)
12	4000.4490	RATE REFUNDS			-						-
13					-						-
14	4000.4500	FORFEITED DISC.	386	386	0						0
15	4000.4510	MISC. SERVICE REVENUE	282	242	40						40
16	4000.4540	RENT	275	275	0						0
17	4000.4560	MISC OTHER REVENUE	(5,580)	41	(5,621)	(5,581)					(40)
18	4000.4563	UNBILLED REVENUE	(111)	(111)	(0)						(0)
19	<b>TOTAL BASE REVENUES</b>		83,078	21,481	61,597	54,523	616	779	3,480	2,199	1

Attachment A- 2: MFR C-6 Reconciliation to the Annual Report  
Docket No. 20240099-EI

Line No.	Account No.	Account Title	2019		Differences 2019	Fuel	LESS			Gross Receipts	Remaining Difference
			Annual Report (000)	Year 1 Actual (000)			Conservation	Storm	Franchise		
20	<b>OPERATING EXPENSES (LESS FUEL, STORM &amp; CONSERVATION)</b>										
	555.0000	Fuel	54,057		54,057	54,057					(0)
21	557.0000	Fuel Other	282		282	282					0
22	4010.5600	OPERATION SUP. & ENG.	32	32	0						0
23	4010.5620	STATION EXPENSES	33	33	0						0
24	4010.5660	MIS. TRANS. EXPS.			-						-
25	4010.5800	OP SUPERVISION	189	189	0						0
26	4010.5810	CUSTOMER EQUIPMENT			-						-
27	4010.5820	STATION EXPENSES	124	124	0						0
28	4010.5830	OVHD LINES/TRANS.	100	100	-						-
29	4010.5840	UNDERGROUND LINE EXP.	0	(0)	0						0
30	4010.5850	STREET LIGHT EXPENSE	8	8	0						0
31	4010.5860	METER EXPENSES	291	291	-						-
32	4010.5870	AREA LIGHT EXP.	18	18	-						-
33	4010.5880	MISC. DISTR. OFFICE EXP.	218	218	-						-
34	4010.5890	RENTS			-						-
35					-						-
36	4010.9010	SUPERVISION	254	254	0						0
37	4010.9020	METER READING EXP.	258	258	(0)						(0)
38	4010.9030	CUSTOMER RECORDS	1,095	1,095	(0)						(0)
	4010.9040	UNCOLL. ACCOUNTS	251	251	0						0
39	4010.9050	MISC. CUST. ACCTS. EXP.			-						-
	906.0000	Conservation under-recovery	(231)		(231)		(231)				0
	907.0000	Conservation Supervision	10		10		10				0
	908.0000	Conservation Customer Assistance	650		650		650				(0)
40	909.0000	Conservation info and Instructional	48		48		48				(0)
41	909.0000	Conservation Misc. Cust. Expense	158		158		158				(0)
42	4010.9110	SALES SUPERVISION	1	1	(0)						(0)
43	4010.9120	SELLING EXPENSE	9	9	0						0
44	4010.9130	ADVERTISING	88	88	(0)						(0)
45	4010.9160	MISC. SALES EXPENSE			-						-
46					-						-
47	4010.9200	ADM. & GENERAL SALARIES	2,085	2,085	0						0
48	4010.9210	OFFICE SUPPLIES & EXP.	1,207	1,207	0						0
49	4010.9230	OUTSIDE SERVICES	534	534	(0)						(0)
50	4010.9240	PROPERTY INSURANCE	730	730	(0)						(0)
51	4010.9250	INJURIES AND DAMAGES	817	817	0						0
52	4010.9260	EMPLOYEE PENSION/BENEFITS	1,211	1,211	0						0
53	4010.9280	REGULATORY EXPS.	163	163	(0)						(0)
54	4010.9301	INSTITUTIONAL ADVERTISING	60	60	(0)						(0)
55	4010.9302	MISC. GENERAL EXPENSES	158	158	0						0
56	4010.9310	RENTS	154	154	(0)						(0)
57					-						-
<b>TOTAL OPERATION EXPENSES</b>			<b>65,062</b>	<b>10,087</b>	<b>54,976</b>	<b>54,339</b>	<b>635</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>

Attachment A- 2: MFR C-6 Reconciliation to the Annual Report  
Docket No. 20240099-EI

Line No.	Account No.	Account Title	2019		Differences 2019	Fuel	Conservation	LESS			Remaining Difference
			Annual Report (000)	Actual (000)				Storm	Franchise	Gross Receipts	
58		<b>MAINTENANCE EXPENSE</b>									
59											
60	4020.5700	MAINT. STATION EQ.	43	43	(0)						(0)
61	4020.5710	MAINT. OVERHEAD LINES	6	6	0						0
62	4020.5730	MAINT. MISC. TRANS. PLT.			-						-
63					-						-
64	4020.5900	MAINT. SUPERV./ENG.			-						-
65	4020.5910	MAINT. OF STRUCTURES	6	6	0						0
66	4020.5920	MAINT. OF STATION EQUIP.	67	67	(0)						(0)
67	4020.5930	MAINT. OF POLES/COND/SER	2,605	2,605	-						-
68	4020.5940	MAINT. OF U/G LINES	173	173	(0)						(0)
69	4020.5950	MAINT. OF TRANSFORMERS	119	119	-						-
70	4020.5960	MAINT. OF STREET LIGHTS	86	86	0						0
71	4020.5970	MAINT. OF METERS	171	171	(0)						(0)
72	4020.5980	MAINT. OF MISC. DISTR. PLT.	92	92	0						0
73					-						-
74	4020.9320	MAINT. OF GENERAL PLANT		62	(62)						(62)
75	4020.9350	MAINT. OF GENERAL PLANT	62	-	62						62
76											
77		<b>TOTAL MAINTENANCE EXPENSE</b>	<b>3,430</b>	<b>3,430</b>	<b>(0)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>(0)</b>
78											
79	4030.1000	DEPRECIATION EXPENSE	4,785	4,785	(0)						(0)
80	4050.0000	AMORTIZATION	(285)		(285)						(285)
81	4070.0000	AMORT. REGULATORY ASSET	211	(73)	284						284
82					-						-
83	4080.0000	TAXES OTHER THAN INC. TAXES Note 1	6,989	1,253	5,736				3,480	2,199	58
84					-						-
85	4090.4100	INCOME TAXES CURRENT/DEF.	5,474	357	5,117						5,117
86					-						-
87	4110.0000	Def income Tax Credit	(5,049)		(5,049)						(5,049)
88					-						-
89		<b>TOTAL OPERATING EXPENSES</b>	<b>80,903</b>	<b>19,839</b>	<b>60,779</b>	<b>54,339</b>	<b>635</b>	<b>0</b>	<b>3,480</b>	<b>2,199</b>	<b>126</b>

Note 1: PSC Regulatory Assessment Fee on clause revenues were not included

Note 2: Differences in 921 account and depreciation relate to depreciation expense moved out of 921 in MFR numbers and into depreciation expense.

Note 3: Annual Report included a \$32K reduction to accounts receivable. MFR agrees with the ledger.

Note 4: Annual Report doesn't include \$190K of Corporate Common depreciation expense

Note 5: The MFR income tax includes the tax effect of pension costs that have been approved in a regulatory asset petition but, are required to be below the line for income statement purposes.

Note 6: See Attached Reconciliation

Attachment A- 2: MFR C-6 Reconciliation to the Annual Report  
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Line No.	Account No.	Account Title	2020		Differences 2020	Fuel	Conservation	LESS			Remaining Difference
			Year 2 Annual Report (000)	Actual (000)				Storm	Franchise	Gross Receipts	
1	<b>BASE REVENUES</b>										
2											
3	4000.4400	RESIDENTIAL SALES	46,108	13,238	32,870	23,831	403	5,807	1,668	1,160	0
4	4000.4420	COMMERCIAL SALES	26,605	2,684	23,921	4,051	71	1,162	695	378	17,564
5	4000.4421	COMMERCIAL		3,753	(3,753)	11,180	204	1,586	500	341	(17,564)
6	4000.4422	COMMERCIAL LARGE	9,558	1,744	7,814	5,423	102	481	282	161	1,364
7	4000.4423	INDUSTRIAL		640	(640)	321	4	292	73	33	(1,364)
8	4000.4430	OUTDOOR LIGHTING	3,014	1,726	1,288	301	7	828	98	54	(0)
	4000.4440	Public Street and Highway Lighting	166		166	117	3	8	34	5	(0)
11	4000.4480	INTERDEPT. SALES	29		29	27			2	1	(0)
12	4000.4490	RATE REFUNDS	(1,910)		(1,910)			(1,910)			-
13											
14	4000.4500	FORFEITED DISC.	74	74	0						0
15	4000.4510	MISC. SERVICE REVENUE	247	247	(0)						(0)
16	4000.4540	RENT	250	250	0						0
17	4000.4560	MISC OTHER REVENUE	(1,914)	21	(1,935)	(1,934)					(0)
18	4000.4563	UNBILLED REVENUE	120	120	-						-
19	<b>TOTAL BASE REVENUES</b>		82,347	24,497	57,850	43,317	794	8,254	3,352	2,135	(1)

Note 3

Attachment A- 2: MFR C-6 Reconciliation to the Annual Report  
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Line No.	Account No.	Account Title	2020		Differences 2020	Fuel	Conservation	LESS			Remaining Difference
			Year 2 Annual Report (000)	Actual (000)				Storm	Franchise	Gross Receipts	
20	<b>OPERATING EXPENSES (LESS FUEL, STORM &amp; CONSERVATION)</b>										
	555.0000	Fuel	42,807		42,807	42,807					0
21	557.0000	Fuel Other	111		111	111					(0)
22	4010.5600	OPERATION SUP. & ENG.	30	30	0						0
23	4010.5620	STATION EXPENSES	30	30	0						0
24	4010.5660	MIS. TRANS. EXPS.			-						-
25	4010.5800	OP SUPERVISION	164	164	(0)						(0)
26	4010.5810	CUSTOMER EQUIPMENT			-						-
27	4010.5820	STATION EXPENSES	118	118	(0)						(0)
28	4010.5830	OVHD LINES/TRANS.	94	94	-						-
29	4010.5840	UNDERGROUND LINE EXP.	-	-	-						-
30	4010.5850	STREET LIGHT EXPENSE	17	17	0						0
31	4010.5860	METER EXPENSES	222	222	-						-
32	4010.5870	AREA LIGHT EXP.	48	48	-						-
33	4010.5880	MISC. DISTR. OFFICE EXP.	227	227	-						-
34	4010.5890	RENTS			-						-
35					-						-
36	4010.9010	SUPERVISION	183	183	0						0
37	4010.9020	METER READING EXP.	244	244	(0)						(0)
38	4010.9030	CUSTOMER RECORDS	1,188	1,188	(0)						(0)
	4010.9040	UNCOLL. ACCOUNTS	240	219	21						0
39	4010.9050	MISC. CUST. ACCTS. EXP.			-				21		-
	906.0000	Conservation under-recovery	10		10		10				(0)
	907.0000	Conservation Supervision			-						-
	908.0000	Conservation Customer Assistance	690		690		690				(0)
40	909.0000	Conservation info and Instructional	40		40		40				(0)
41	909.0000	Conservation Misc. Cust. Expense	53		53		53				(0)
42	4010.9110	SALES SUPERVISION	3	3	0						0
43	4010.9120	SELLING EXPENSE	7	7	0						0
44	4010.9130	ADVERTISING	65	65	0						0
45	4010.9160	MISC. SALES EXPENSE			-						-
46					-						-
47	4010.9200	ADM. & GENERAL SALARIES	2,154	2,154	(0)						(0)
48	4010.9210	OFFICE SUPPLIES & EXP.	1,241	1,111	130						130
49	4010.9230	OUTSIDE SERVICES	613	613	0						0
50	4010.9240	PROPERTY INSURANCE	923	173	750						(0)
51	4010.9250	INJURIES AND DAMAGES	362	362	0				750		0
52	4010.9260	EMPLOYEE PENSION/BENEFITS	792	792	(0)						(0)
53	4010.9280	REGULATORY EXPS.	8	8	0						0
54	4010.9301	INSTITUTIONAL ADVERTISING	64	64	0						0
55	4010.9302	MISC. GENERAL EXPENSES	131	131	0						0
56	4010.9310	RENTS	174	174	(0)						(0)
57											
<b>TOTAL OPERATION EXPENSES</b>			<b>53,052</b>	<b>8,440</b>	<b>44,612</b>	<b>42,918</b>	<b>793</b>	<b>771</b>	<b>0</b>	<b>0</b>	<b>130</b>

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Line No.	Account No.	Account Title	2020		Differences 2020	Fuel	Conservation	LESS			Remaining Difference
			Year 2 Annual Report (000)	Actual (000)				Storm	Franchise	Gross Receipts	
58		<b>MAINTENANCE EXPENSE</b>									
59											
60	4020.5700	MAINT. STATION EQ.	45	45	0						0
61	4020.5710	MAINT. OVERHEAD LINES	(12)	(12)	(0)						(0)
62	4020.5730	MAINT. MISC. TRANS. PLT.			-						-
63					-						-
64	4020.5900	MAINT. SUPERV./ENG.			-						-
65	4020.5910	MAINT. OF STRUCTURES	6	6	0						0
66	4020.5920	MAINT. OF STATION EQUIP.	82	82	(0)						(0)
67	4020.5930	MAINT. OF POLES/COND/SER	2,084	2,084	-						-
68	4020.5940	MAINT. OF U/G LINES	254	254	(0)						(0)
69	4020.5950	MAINT. OF TRANSFORMERS	114	114	-						-
70	4020.5960	MAINT. OF STREET LIGHTS	137	137	0						0
71	4020.5970	MAINT. OF METERS	181	181	0						0
72	4020.5980	MAINT. OF MISC. DISTR. PLT.	107	107	(0)						(0)
73					-						-
74	4020.9320	MAINT. OF GENERAL PLANT		54	(54)						(54)
75	4020.9350	MAINT. OF GENERAL PLANT	54	-	54						54
76					-						-
77		<b>TOTAL MAINTENANCE EXPENSE</b>	<b>3,052</b>	<b>3,052</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
78											
79	4030.1000	DEPRECIATION EXPENSE	4,144	4,274	(130)						(130) Note 2
80	4050.0000	AMORTIZATION	(287)		(287)						(287)
81	4070.0000	AMORT. REGULATORY ASSET	8,540	407	8,133			7,846			287
82					-						-
83	4080.0000	TAXES OTHER THAN INC. TAXES Note 1	7,209	1,684	5,525				3,352	2,135	38 Note 1
84					-						-
85	4090.4100	INCOME TAXES CURRENT/DEF.	7,640	793	6,847						6,847 Note 6
86					-						-
87	4110.0000	Def income Tax Credit	(6,847)		(6,847)						(6,847) Note 6
88					-						-
89		<b>TOTAL OPERATING EXPENSES</b>	<b>76,504</b>	<b>18,650</b>	<b>57,854</b>	<b>42,918</b>	<b>793</b>	<b>8,617</b>	<b>3,352</b>	<b>2,135</b>	<b>39</b>

Note 1: PSC Regulatory Assessment Fee on clause revenues were not included

Note 2: Differences in 921 account and depreciation relate to depreciation expense moved out of 921 in MFR numbers and into depreciation expense.

Note 3: Annual Report included a \$32K reduction to accounts receivable. MFR agrees with the ledger.

Note 4: Annual Report doesn't include \$190K of Corporate Common depreciation expense

Note 5: The MFR income tax includes the tax effect of pension costs that have been approved in a regulatory asset petition but, are required to be below the line for income statement purposes.

Note 6: See Attached Reconciliation

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LESS

Line No.	Account No.	Account Title	2021		Differences 2021	Fuel	Conservation	LESS			Remaining Difference
			Year 3 Annual Report (000)	Actual (000)				Storm	Franchise	Gross Receipts	
1	<b>BASE REVENUES</b>										
2											
3	4000.4400	RESIDENTIAL SALES	42,951	13,628	29,323	22,235	456	4,012	1,545	1,075	0
4	4000.4420	COMMERCIAL SALES	25,365	2,856	22,509	3,939	84	736	692	373	16,685
5	4000.4421	COMMERCIAL		3,989	(3,989)	10,593	236	1,044	487	336	(16,684)
6	4000.4422	COMMERCIAL LARGE	11,331	1,347	9,984	5,226	121	2,077	290	166	2,105
7	4000.4423	INDUSTRIAL		512	(512)	1,042	31	275	192	51	(2,105)
8	4000.4430	OUTDOOR LIGHTING	2,408	1,933	475	278	8	71	77	41	(0)
	4000.4440	Public Street and Highway Lighting	169		169	106	3	28	27	5	0
11	4000.4480	INTERDEPT. SALES	27		27	25			1	1	0
12	4000.4490	RATE REFUNDS	-113		(113)						(113)
13											
14	4000.4500	FORFEITED DISC.	561	561	0						0
15	4000.4510	MISC. SERVICE REVENUE	191	191	(0)						(0)
16	4000.4540	RENT	268	268	0						0
17	4000.4560	MISC OTHER REVENUE	321	(90)	411	297					113
18	4000.4563	UNBILLED REVENUE	179	211	(32)						(32) Note 3
19	<b>TOTAL BASE REVENUES</b>		83,658	25,407	58,251	43,742	940	8,242	3,311	2,048	(31)



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Line No.	Account No.	Account Title	2021		Differences 2021	Fuel	Conservation	LESS			Remaining Difference
			Year 3 Annual Report (000)	Actual (000)				Storm	Franchise	Gross Receipts	
<b>20 OPERATING EXPENSES (LESS FUEL, STORM &amp; CONSERVATION)</b>											
	555.0000	Fuel	43,523		43,523	43,523					0
21	557.0000	Fuel Other	155		155	155					0
22	4010.5600	OPERATION SUP. & ENG.	28	28	(0)						(0)
23	4010.5620	STATION EXPENSES	48	48	0						0
24	4010.5660	MIS. TRANS. EXPS.			-						-
25	4010.5800	OP SUPERVISION	319	320	(1)						(1)
26	4010.5810	CUSTOMER EQUIPMENT			-						-
27	4010.5820	STATION EXPENSES	96	96	0						0
28	4010.5830	OVHD LINES/TRANS.	107	107	-						-
29	4010.5840	UNDERGROUND LINE EXP.	-	-	-						-
30	4010.5850	STREET LIGHT EXPENSE	39	39	(0)						(0)
31	4010.5860	METER EXPENSES	289	289	-						-
32	4010.5870	AREA LIGHT EXP.	87	87	-						-
33	4010.5880	MISC. DISTR. OFFICE EXP.	259	259	-						-
34	4010.5890	RENTS			-						-
35					-						-
36	4010.9010	SUPERVISION	222	222	0						0
37	4010.9020	METER READING EXP.	277	277	(0)						(0)
38	4010.9030	CUSTOMER RECORDS	1,782	1,782	0						0
	4010.9040	UNCOLL. ACCOUNTS	81	60	21				21		0
39	4010.9050	MISC. CUST. ACCTS. EXP.			-						-
	906.0000	Conservation under-recovery	213		213		213				(0)
	907.0000	Conservation Supervision			-						-
	908.0000	Conservation Customer Assistance	627		627		627				(0)
40	909.0000	Conservation info and Instructional	45		45		45				(0)
41	909.0000	Conservation Misc. Cust. Expense	44		44		44				(0)
42	4010.9110	SALES SUPERVISION	9	9	(0)						(0)
43	4010.9120	SELLING EXPENSE	19	19	(0)						(0)
44	4010.9130	ADVERTISING	63	63	(0)						(0)
45	4010.9160	MISC. SALES EXPENSE			-						-
46					-						-
47	4010.9200	ADM. & GENERAL SALARIES	2,113	2,113	0						0
48	4010.9210	OFFICE SUPPLIES & EXP.	987	782	205						205
49	4010.9230	OUTSIDE SERVICES	569	569	(0)						(0)
50	4010.9240	PROPERTY INSURANCE	376	189	187						0
51	4010.9250	INJURIES AND DAMAGES	587	587	0			187			0
52	4010.9260	EMPLOYEE PENSION/BENEFITS	584	584	(0)						(0)
53	4010.9280	REGULATORY EXPS.	6	6	(0)						(0)
54	4010.9301	INSTITUTIONAL ADVERTISING	33	33	0						0
55	4010.9302	MISC. GENERAL EXPENSES	118	118	0						0
56	4010.9310	RENTS	144	144	0						0
57											
<b>TOTAL OPERATION EXPENSES</b>			<b>53,849</b>	<b>8,830</b>	<b>45,019</b>	<b>43,678</b>	<b>929</b>	<b>208</b>	<b>0</b>	<b>0</b>	<b>204</b>

Note 2

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Line No.	Account No.	Account Title	2021		Differences 2021	LESS					Remaining Difference
			Year 3 Annual Report (000)	Actual (000)		Fuel	Conservation	Storm	Franchise	Gross Receipts	
58		<b>MAINTENANCE EXPENSE</b>									
59											
60	4020.5700	MAINT. STATION EQ.	62	62	0						0
61	4020.5710	MAINT. OVERHEAD LINES	316	316	0						0
62	4020.5730	MAINT. MISC. TRANS. PLT.			-						-
63					-						-
64	4020.5900	MAINT. SUPERV./ENG.			-						-
65	4020.5910	MAINT. OF STRUCTURES	6	6	(0)						(0)
66	4020.5920	MAINT. OF STATION EQUIP.	43	43	(0)						(0)
67	4020.5930	MAINT. OF POLES/COND/SER	2,737	2,737	-						-
68	4020.5940	MAINT. OF U/G LINES	283	283	(0)						(0)
69	4020.5950	MAINT. OF TRANSFORMERS	71	71	-						-
70	4020.5960	MAINT. OF STREET LIGHTS	66	66	(0)						(0)
71	4020.5970	MAINT. OF METERS	155	155	(0)						(0)
72	4020.5980	MAINT. OF MISC. DISTR. PLT.	74	74	(0)						(0)
73					-						-
74	4020.9320	MAINT. OF GENERAL PLANT		48	(48)						(48)
75	4020.9350	MAINT. OF GENERAL PLANT	48	0	48						48
76											
77		<b>TOTAL MAINTENANCE EXPENSE</b>	<b>3,861</b>	<b>3,863</b>	<b>-2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>(2)</b>
78											
79	4030.1000	DEPRECIATION EXPENSE	4,426	4,631	(205)						(205) Note 2
80	4050.0000	AMORTIZATION	(253)		(253)						(253)
81	4070.0000	AMORT. REGULATORY ASSET	8,380	441	7,939			7,686			253
82					-						-
83	4080.0000	TAXES OTHER THAN INC. TAXES Note 1	7,231	1,872	5,359				3,312	2,048	0
84					-						-
85	4090.4100	INCOME TAXES CURRENT/DEF.	4,477	399	4,078						4,078 Note 5
86					-						-
87	4110.0000	Def income Tax Credit	(4,147)		(4,147)						(4,147) Note 5
88											-
89		<b>TOTAL OPERATING EXPENSES</b>	<b>77,824</b>	<b>20,036</b>	<b>57,788</b>	<b>43,678</b>	<b>929</b>	<b>7,894</b>	<b>3,312</b>	<b>2,048</b>	<b>(72)</b>

Note 1: PSC Regulatory Assessment Fee on clause revenues were not included

Note 2: Differences in 921 account and depreciation relate to depreciation expense moved out of 921 in MFR numbers and into depreciation expense.

Note 3: Annual Report included a \$32K reduction to accounts receivable. MFR agrees with the ledger.

Note 4: Annual Report doesn't include \$190K of Corporate Common depreciation expense

Note 5: The MFR income tax includes the tax effect of pension costs that have been approved in a regulatory asset petition but, are required to be below the line for income statement purposes.

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Line No.	Account No.	Account Title	2022		Differences 2022	Fuel	Conservation	LESS			Gross Receipts	Remaining Difference
			Year 4 Annual Report (000)	Actual (000)				Storm	SPP	Franchise		
1	<b>BASE REVENUES</b>											
2												
3	4000.4400	RESIDENTIAL SALES	44,727	13,725	31,002	23,912	409	3,911		1,633	1,136	0
4	4000.4420	COMMERCIAL SALES	27,721	2,930	24,791	4,603	78	744		770	413	18,184
5	4000.4421	COMMERCIAL		4,070	(4,070)	11,973	219	1,025		531	366	(18,184)
6	4000.4422	COMMERCIAL LARGE	12,380	1,355	11,025	5,746	109	2,108		308	177	2,577
7	4000.4423	INDUSTRIAL		568	(568)	1,501	21	202		223	62	(2,577)
8	4000.4430	OUTDOOR LIGHTING	2,413	1,930	483	289	7	68		78	41	0
	4000.4440	Public Street and Highway Lighting	184		184	122	3	28		27	5	0
11	4000.4480	INTERDEPT. SALES	39		39	37				2	1	0
12	4000.4490	RATE REFUNDS			-							-
13					-							-
14	4000.4500	FORFEITED DISC.	372	372	(0)							(0)
15	4000.4510	MISC. SERVICE REVENUE	211	211	(0)							(0)
16	4000.4540	RENT	285	285	0							0
17	4000.4560	MISC OTHER REVENUE	-1,289	1,184	(2,473)	(2,473)						0
18	4000.4563	UNBILLED REVENUE	437	118	319				318			1
19	<b>TOTAL BASE REVENUES</b>		<b>87,479</b>	<b>26,747</b>	<b>60,732</b>	<b>45,709</b>	<b>846</b>	<b>8,085</b>	<b>318</b>	<b>3,571</b>	<b>2,202</b>	<b>0</b>

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Line No.	Account No.	Account Title	2022		Differences 2022	Fuel	Conservation	Storm	LESS			Remaining Difference
			Year 4 Annual Report (000)	Actual (000)					SPP	Franchise	Gross Receipts	
20	<b>OPERATING EXPENSES (LESS FUEL, STORM &amp; CONSERVATION)</b>											
	555.0000	Fuel	45,336		45,336	45,336						0
21	557.0000	Fuel Other	249		249	249						0
22	4010.5600	OPERATION SUP. & ENG.	47	47	0							0
23	4010.5620	STATION EXPENSES	77	77	(0)							(0)
24	4010.5660	MIS. TRANS. EXPS.			-							-
25	4010.5800	OP SUPERVISION	245	245	(0)							(0)
26	4010.5810	CUSTOMER EQUIPMENT	33	33	(0)							(0)
27	4010.5820	STATION EXPENSES	73	73	0							0
28	4010.5830	OVHD LINES/TRANS.	77	77	(0)							(0)
29	4010.5840	UNDERGROUND LINE EXP.	-	-	-							-
30	4010.5850	STREET LIGHT EXPENSE	16	16	(0)							(0)
31	4010.5860	METER EXPENSES	297	297	0							0
32	4010.5870	AREA LIGHT EXP.	138	137	1							1
33	4010.5880	MISC. DISTR. OFFICE EXP.	274	274	0							0
34	4010.5890	RENTS			-							-
35					-							-
36	4010.9010	SUPERVISION	225	225	0							0
37	4010.9020	METER READING EXP.	209	209	0							0
38	4010.9030	CUSTOMER RECORDS	2,038	2,038	(0)							(0)
	4010.9040	UNCOLL. ACCOUNTS	109	88	21							-
39	4010.9050	MISC. CUST. ACCTS. EXP.			-			21				-
	906.0000	Conservation under-recovery	180		180		180					(0)
	907.0000	Conservation Supervision			-							-
	908.0000	Conservation Customer Assistance	575		575		575					(0)
40	909.0000	Conservation info and Instructional	51		51		51					0
41	909.0000	Conservation Misc. Cust. Expense	42		42		42					0
42	4010.9110	SALES SUPERVISION	26	26	0							0
43	4010.9120	SELLING EXPENSE	0	0	0							0
44	4010.9130	ADVERTISING	93	93	0							0
45	4010.9160	MISC. SALES EXPENSE			-							-
46					-							-
47	4010.9200	ADM. & GENERAL SALARIES	2,191	2,191	(0)							(0)
48	4010.9210	OFFICE SUPPLIES & EXP.	1,147	875	272							272
49	4010.9230	OUTSIDE SERVICES	631	631	(0)							(0)
50	4010.9240	PROPERTY INSURANCE	199	199	(0)							(0)
51	4010.9250	INJURIES AND DAMAGES	437	437	(0)							(0)
52	4010.9260	EMPLOYEE PENSION/BENEFITS	531	531	0							0
53	4010.9280	REGULATORY EXPS.	-	-	-							-
54	4010.9301	INSTITUTIONAL ADVERTISING	50	50	0							0
55	4010.9302	MISC. GENERAL EXPENSES	123	123	0							0
56	4010.9310	RENTS	87	87	(0)							(0)
57												
<b>TOTAL OPERATION EXPENSES</b>			<b>55,806</b>	<b>9,078</b>	<b>46,728</b>	<b>45,585</b>	<b>848</b>	<b>21</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>274</b>

Note 2:

Attachment A- 2: MFR C-6 Reconciliation to the Annual Report  
Docket No. 20240099-EI

Line No.	Account No.	Account Title	2022		Differences 2022	LESS					Remaining Difference	
			Year 4 Annual Report (000)	Actual (000)		Fuel	Conservation	Storm	SPP	Franchise		Gross Receipts
58		<b>MAINTENANCE EXPENSE</b>										
59												
60	4020.5700	MAINT. STATION EQ.	17	17	0							0
61	4020.5710	MAINT. OVERHEAD LINES	2	2	(0)							(0)
62	4020.5730	MAINT. MISC. TRANS. PLT.			-							-
63					-							-
64	4020.5900	MAINT. SUPERV./ENG.	0		0							0
65	4020.5910	MAINT. OF STRUCTURES	5	5	0							0
66	4020.5920	MAINT. OF STATION EQUIP.	20	20	(0)							(0)
67	4020.5930	MAINT. OF POLES/COND/SER	3,310	3,310	(0)							(0)
68	4020.5940	MAINT. OF U/G LINES	255	255	(0)							(0)
69	4020.5950	MAINT. OF TRANSFORMERS	112	112	(0)							(0)
70	4020.5960	MAINT. OF STREET LIGHTS	149	149	(0)							(0)
71	4020.5970	MAINT. OF METERS	118	118	0							0
72	4020.5980	MAINT. OF MISC. DISTR. PLT.	52	52	(0)							(0)
73					-							-
74	4020.9320	MAINT. OF GENERAL PLANT		64	(64)							(64)
75	4020.9350	MAINT. OF GENERAL PLANT	64	-	64							64
76					-							-
77		<b>TOTAL MAINTENANCE EXPENSE</b>	<b>4,103</b>	<b>4,104</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>(0)</b>
78												
79	4030.1000	DEPRECIATION EXPENSE	4,540	4,731	(190)							(190) Note 4
80	4050.0000	AMORTIZATION	(248)		(248)							(248)
81	4070.0000	AMORT. REGULATORY ASSET	9,004	1,123	7,881			7,632				248
82					-							-
83	4080.0000	TAXES OTHER THAN INC. TAXES Note 1	7,647	1,834	5,813					3,571	2,202	40 Note 1
84					-							-
85	4090.4100	INCOME TAXES CURRENT/DEF.	4,178	1,585	2,593							2,593 Note 5
86					-							-
87	4110.0000	Def income Tax Credit	(2,680)		(2,680)							(2,680) Note 5
88					-							-
89		<b>TOTAL OPERATING EXPENSES</b>	<b>82,351</b>	<b>22,454</b>	<b>59,896</b>	<b>45,585</b>	<b>848</b>	<b>7,653</b>	<b>0</b>	<b>3,571</b>	<b>2,202</b>	<b>37</b>

Note 1: PSC Regulatory Assessment Fee on clause revenues were not included

Note 2: Differences in 921 account and depreciation relate to depreciation expense moved out of 921 in MFR numbers and into depreciation expense.

Note 3: Annual Report included a \$32K reduction to accounts receivable. MFR agrees with the ledger.

Note 4: Annual Report doesn't include \$190K of Corporate Common depreciation expense

Note 5: The MFR income tax includes the tax effect of pension costs that have been approved in a regulatory asset petition but, are required to be below the line for income statement purposes.

Note 6: See Attached Reconciliation

Attachment A- 2: MFR C-6 Reconciliation to the Annual Report  
Docket No. 20240099-EI

Line No.	Account No.	Account Title	2023		Differences 2023	Fuel	Conservation	LESS			Gross Receipts	Remaining Difference
			Annual Report (000)	Year 5 Actual (000)				Storm	SPP	Franchise		
1	<b>BASE REVENUES</b>											
2												
3	4000.4400	RESIDENTIAL SALES	56,921	13,585	43,336	34,877	339	3,841	751	2,091	1,437	0
4	4000.4420	COMMERCIAL SALES	36,889	2,942	33,947	6,838	66	748	171	1,022	544	24,557
5	4000.4421	COMMERCIAL		4,048	-4,048	17,917	183	1,007	217	701	484	(24,557)
6	4000.4422	COMMERCIAL LARGE	15,158	1,385	13,773	8,661	90	2,085	110	411	240	2,176
7	4000.4423	INDUSTRIAL		694	-694	1,151	4	47	0	230	51	(2,176)
8	4000.4430	OUTDOOR LIGHTING	2,705	1,924	782	474	6	66	110	85	41	0
	4000.4440	Public Street and Highway Lighting	271		271	203	2	28		32	7	0
11	4000.4480	INTERDEPT. SALES	54		54	50				2	1	0
12	4000.4490	RATE REFUNDS			0							-
13					0							-
14	4000.4500	FORFEITED DISC.	505	505	0							(0)
15	4000.4510	MISC. SERVICE REVENUE	213	213	0							0
16	4000.4540	RENT	269	269	0							0
17	4000.4560	MISC OTHER REVENUE	-6,111	700	-6,811	(6,779)			(32)			(0)
18	4000.4563	UNBILLED REVENUE	(22)	(22)	0							(0)
19	<b>TOTAL BASE REVENUES</b>		106,853	26,242	80,610	63,392	690	7,823	1,326	4,574	2,805	0

Attachment A- 2: MFR C-6 Reconciliation to the Annual Report  
Docket No. 20240099-EI

Line No.	Account No.	Account Title	2023		Differences 2023	Fuel	Conservation	LESS			Gross Receipts	Remaining Difference	
			Annual Report (000)	Actual (000)				Storm	SPP	Franchise			
20	<b>OPERATING EXPENSES (LESS FUEL, STORM &amp; CONSERVATION)</b>												
	555.0000	Fuel	62,081		62,081	62,081						0	
21	557.0000	Fuel Other	259		259	259						0	
22	4010.5600	OPERATION SUP. & ENG.	16	16	0							0	
23	4010.5620	STATION EXPENSES	101	101	0							0	
24	4010.5660	MIS. TRANS. EXPS.		-	0							-	
25	4010.5800	OP SUPERVISION	246	246	0							(0)	
26	4010.5810	CUSTOMER EQUIPMENT	23	23	0							(0)	
27	4010.5820	STATION EXPENSES	86	86	0							0	
28	4010.5830	OVHD LINES/TRANS.	90	90	0							(0)	
29	4010.5840	UNDERGROUND LINE EXP.	(3)	-3	0							0	
30	4010.5850	STREET LIGHT EXPENSE		7	0							(0)	
31	4010.5860	METER EXPENSES	315	315	0							0	
32	4010.5870	AREA LIGHT EXP.	58	58	0							(0)	
33	4010.5880	MISC. DISTR. OFFICE EXP.	303	303	0							(0)	
34	4010.5890	RENTS		0	0							-	
35					0							-	
36	4010.9010	SUPERVISION	138	138	0							0	
37	4010.9020	METER READING EXP.	218	218	0							0	
38	4010.9030	CUSTOMER RECORDS	2,083	2,083	0							0	
	4010.9040	UNCOLL. ACCOUNTS	389	389	0							-	
39	4010.9050	MISC. CUST. ACCTS. EXP.			0							-	
	906.0000	Conservation under-recovery	(220)		-220		(220)					0	
	907.0000	Conservation Supervision										-	
	908.0000	Conservation Customer Assistance	752		752		752					(0)	
40	909.0000	Conservation info and Instructional	63		63		63					(0)	
41	909.0000	Conservation Misc. Cust. Expense	105		105		105					(0)	
42	4010.9110	SALES SUPERVISION	34	34	0							(0)	
43	4010.9120	SELLING EXPENSE	0	0	0							-	
44	4010.9130	ADVERTISING	98	98	0							0	
45	4010.9160	MISC. SALES EXPENSE		0	0							-	
46					0							-	
47	4010.9200	ADM. & GENERAL SALARIES	2,471	2,471	0							(0)	
48	4010.9210	OFFICE SUPPLIES & EXP.	1,298	1,003	295							295 Note 2	
49	4010.9230	OUTSIDE SERVICES	715	715	0							0	
50	4010.9240	PROPERTY INSURANCE	248	248	0							(0)	
51	4010.9250	INJURIES AND DAMAGES	636	636	0							(0)	
52	4010.9260	EMPLOYEE PENSION/BENEFITS	1,074	1,074	0							0	
53	4010.9280	REGULATORY EXPS.	0	0	0							-	
54	4010.9301	INSTITUTIONAL ADVERTISING	32	32	0							(0)	
55	4010.9302	MISC. GENERAL EXPENSES	132	132	0							(0)	
56	4010.9310	RENTS	60	60	0							0	
57													
<b>TOTAL OPERATION EXPENSES</b>			<b>73,908</b>	<b>10,573</b>	<b>63,335</b>	<b>62,340</b>	<b>700</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>295</b>	<b>0</b>

Attachment A- 2: MFR C-6 Reconciliation to the Annual Report  
Docket No. 20240099-EI

Line No.	Account No.	Account Title	2023		Differences 2023	Fuel	Conservation	LESS			Gross Receipts	Remaining Difference
			Annual Report (000)	Year 5 Actual (000)				Storm	SPP	Franchise		
58		<b>MAINTENANCE EXPENSE</b>										
59												
60	4020.5700	MAINT. STATION EQ.	7	7	0							0
61	4020.5710	MAINT. OVERHEAD LINES	3	3	0							(0)
62	4020.5730	MAINT. MISC. TRANS. PLT.			0							-
63					0							-
64	4020.5900	MAINT. SUPERV./ENG.	6	6	0							(0)
65	4020.5910	MAINT. OF STRUCTURES	(0)	0	0							0
66	4020.5920	MAINT. OF STATION EQUIP.	131	131	0							0
67	4020.5930	MAINT. OF POLES/COND/SER	3,160	3,160	0							(0)
68	4020.5940	MAINT. OF U/G LINES	260	260	0							(0)
69	4020.5950	MAINT. OF TRANSFORMERS	55	55	0							(0)
70	4020.5960	MAINT. OF STREET LIGHTS	87	87	0							0
71	4020.5970	MAINT. OF METERS	164	164	0							0
72	4020.5980	MAINT. OF MISC. DISTR. PLT.	11	11	0							-
73					0							-
74	4020.9320	MAINT. OF GENERAL PLANT		59	-59							(59)
75	4020.9350	MAINT. OF GENERAL PLANT	60	1	59							59
76												
77		<b>TOTAL MAINTENANCE EXPENSE</b>	<b>3,942</b>	<b>3,942</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>(0)</b>
78												
79	4030.1000	DEPRECIATION EXPENSE	3,938	4,171	-233				34			(267) Note 6
80	4050.0000	AMORTIZATION	(237)		-237							(237)
81	4070.0000	AMORT. REGULATORY ASSET	9,004	1,134	7,870			7,632				237
82					0							-
83	4080.0000	TAXES OTHER THAN INC. TAXES Note 1	9,149	1,705	7,444					4,574	2,805	65 Note 1
84					0							-
85	4090.4100	INCOME TAXES CURRENT/DEF.	9,321	941	8,379							8,379 Note 6
86					0							-
87	4110.0000	Def income Tax Credit	(7,955)	0	-7,955							(7,955) Note 6
88												-
89		<b>TOTAL OPERATING EXPENSES</b>	<b>101,070</b>	<b>22,467</b>	<b>78,603</b>	<b>62,340</b>	<b>700</b>	<b>7,632</b>	<b>34</b>	<b>4,574</b>	<b>2,805</b>	<b>517</b>

Note 1: PSC Regulatory Assessment Fee on clause revenues were not included

Note 2: Differences in 921 account and depreciation relate to depreciation expense moved out of 921 in MFR numbers and into depreciation expense.

Note 3: Annual Report included a \$32K reduction to accounts receivable. MFR agrees with the ledger.

Note 4: Annual Report doesn't include \$190K of Corporate Common depreciation expense

Note 5: The MFR income tax includes the tax effect of pension costs that have been approved in a regulatory asset petition but, are required to be below the line for income statement purposes.

Note 6: See Attached Reconciliation



**Attachment A-2A**  
**2023 Depreciation Reconciliation**

**Docket No. 20240099-EI**

	MFR	Annual Report	
Ledger	3,828,262.66	3,828,262.66	
Florida Common Allocation	119,190.81	109,931.00	Annual Report has an incorrect calculation that was corrected in the MFR filing. In addition, the annual report did not reduce Account 921 for the portion of Florida Common Depreciation Recorded there.
Corporate Common Allocation	175,692.00		Corporate Common Depreciation in the Annual Report is included in Account 921.
Depreciation in Operating Accounts for Vehicles	82,877.00		
Less SPP Depreciation	(34,458.00)		
Non-Utility Vehicle Depreciation	(615.00)		
	<u>4,170,949.47</u>	<u>3,938,193.66</u>	

**Attachment A-2B**  
**Income Tax Reconciliation 2023**

**Docket No. 20240099-EI**

	<b>MFR</b>	<b>Annual Report</b>
Net Current and Deferred General Ledger	1,366,181.00	1,366,181.00
Income Tax on Fuel	(253,806.00)	
Income Tax on Conservation	2,541.00	
Income Tax on Non-Utility Adjustment	156.00	
Income Tax Sync Adjustment	43,777.00	
Income Tax on Storm Recovery	(41,523.00)	
Income Tax on Economic Development Adjustment	228.00	
Income Tax on EEI dues adjustment	1,901.00	
Income Tax on SPP	(177,988.00)	
	<u>941,467.00</u>	<u>1,366,181.00</u>
Per Annual Report 409		6,306,623.00
Per Annual Report 410		3,014,219.00
Per Annual Report 411		(7,954,660.00)
		<u>1,366,182.00</u>

**Attachment A-3: Reconcile D-2 to the Annual Report**  
**Docket No. 20240099-EI**

***Long Term Debt Chesapeake Corporate***

Page 256 of the Annual Report total amount outstanding column H	1,209,333,422
Less Marlin Note (1)	<u>7,633,422</u>
	<u><u>1,201,700,000</u></u>
Per Year End Filing on D-2	1,197,372,727
Plus Year-End Unamortized Debt not shown on page 256 of Annual Report	<u>4,327,273</u>
	<u><u>1,201,700,000</u></u>
Difference	<u><u>-</u></u>

Note (1)-This note is not charged to Marlin but could only be granted based on its assets so it has been excluded in the debt allocation.