

**Settlement Initial Data Request  
Revenue Requirement  
Major IOU**

Updated June 30, 2025

This is Commission staff's initial data request for rate case settlements. To allow staff to begin its audit process, responses should be provided at the time the initial application is filed. Subsequent data requests will occur during the normal course of the audit. When filing responses to these questions on the Commission's Electronic Records Filing (ERF) system, please label the response by question number and include a short title of the subject matter. If the information was provided in the initial rate application, please reference by providing the description of the document and the ERF number. Below is a summary of changes from the June 21, 2024, initial data request, followed by the updated initial data request. Please note that new questions will change the numbering from prior year updates.

**Summary of Changes to Settlement IOU Initial Data Request**

**New Questions**

- Question 30. For each Board of Directors fees or costs included in the test year revenue requirements, provide a detailed listing, by utility and account, that provides justification and support identifying the specific customer benefit associated with each amount.
- Question 38. Provide the actual employee vacancy rates by month for the three most recent calendar years, identified by union and non-union employees.
- Question 76. Provide a comparison of all debt forecasted and/or issued by the applicant from the two previous rate cases. For each issuance include:
- a. the principal,
  - b. maturity,
  - c. forecasted interest rate,
  - d. actual interest rate,
  - e. spread between forecast and actual in basis points,
  - f. spread between forecast and actual in dollars,
  - g. any re/financing or transaction charges for these debts,
  - h. Include an identifier for any debt that has been refinanced (show original rate, refinanced rate, and date of refinancing).
  - i. Summative total dollar amount above/below forecast by rate case and total.
  - j. Include a summative total dollar amount of the re/financing or transaction charges for these debts by rate case and year.

**Edited Questions**

- Question 45. Question expanded.
- Question 72. Question expanded.

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**General Information**

1. Provide the requested dollar amount and percent of increase/decrease, the rates of return on equity and rate base. Include a statement of general assumptions, inflation rates and methods of projection in developing the test year income statement and rate base and provide the instructions given to budget preparers for this rate case. In addition, explain any material changes to accounting procedures implemented since the last rate case, and any proposed for the test year. Summarize the major changes in rate base and/or operating results since the last rate application filing.
2. Provide a derivation of composite inflation rates used to inflate the most recent actuals through the bridge period and the test year, and a description of where such overall assumptions impact the test year revenue requirement.
3. Provide the supporting calculations of the common allocation or apportionment factors used in the test year for all costs that are split between utilities (*i.e.*, electric, gas, steam, and water as applicable) and identify which costs they are applied to. Also indicate how often these factors are reviewed and when they were last updated.
4. If the utility's earned regulatory return on equity (ROE) for the latest calendar year exceeds the authorized ROE, provide explanations in both narrative and quantitative forms regarding the main causes of such overearnings.
5. Provide the date of the Settlement Initial Data Request used.

**Gas Sales Forecast, Gas Operating Revenues, Cost of Gas, and Gas in Storage**

6. Provide historical billing determinants **by rate schedule** for each of the most recent five years on a calendar basis including, but not limited to the following:
  - a. Monthly and annual therm sales
  - b. Monthly and annual weather-normalized therm sales (using heating-degree days (HDD) and cooling-degree days (CDD) 20-year actual on a 65 degree basis)
  - c. Annual average customers
  - d. Annual demands

The information should be provided in the same format as the sales priced out so the relationships among billing determinants can be compared.

The historical data should include a restatement of all historical billing determinants to show any adjustments to the historical data to correct for billing errors. Any billing error

corrections should be shown in the month the error occurred, not in the month in which it was corrected. In addition, the restatement of all historical billing determinants should include adjustments for any rate schedule switches, such that the historical usage is stated as if the customer who switched was on the new rate schedule during the entire historical period.

Provide a summary schedule showing these annual gas sales on a calendar year basis, by rate schedule, with a separate column showing the test year gas sales by rate schedule.

7. Provide a detailed analysis of how sales revenues were calculated for the test year at both present and proposed rates. Show each billing component, by rate schedule. Show each component separately: distribution margin rate, gas cost acquisition rate, customer charge, administrative charge, commodity rate, peak demand rate, annual demand rate, etc. The analysis should also identify the sales data and applicable billing adjustments for 2005 Wisconsin Act 141 (Act 141) large-energy customers by each rate schedule.
8. Provide a detailed analysis of how cost of gas was calculated. Every gas cost component must be shown, and every rate calculation must be shown, so it is apparent exactly how commodity, peak, annual demand, and other rate components were derived.

## Electric Sales Forecast

9. Provide a step-by-step description of how the forecast was developed. Be specific and include not only how but why a certain assumption or method was used. Note any significant changes in how the forecast was developed from the methods used in the last rate filing and any significant changes in assumptions. The data should include, but not be limited to, the following:
  - a. Assumptions
  - b. Weather normalization methods
  - c. Growth expectations
  - d. Time period used as the base for building test year sales
10. Provide historical billing determinants **by rate schedule** for the most recent five years on a calendar basis including, but not be limited to the following:
  - a. Monthly and annual kilowatt-hour (kWh) sales
  - b. Monthly and annual weather-normalized kWh sales (using HDD and CDD 20-year actual on a 65 degree basis)
  - c. Monthly and annual average customers
  - d. Annual demands (show each separately)
  - e. Annual on-peak/off-peak splits
  - f. Annual summer/winter splits
  - g. Annual secondary/primary/transmission splits
  - h. Annual limiters
  - i. Annual discounts

- j. Average annual number of street lights in each street lighting rate schedule

The information should be provided in the same format as the sales priced out so the relationships among billing determinants can be compared.

The historical data should include a restatement of all historical billing determinants to show any adjustments to the historical data to correct for billing errors. Any billing error corrections should be shown in the month the error occurred, not in the month in which it was corrected. In addition, the restatement of all historical billing determinants should include adjustments for any rate schedule switches, such that the historical usage is stated as if the customer who switched was on the new rate schedule during the entire historical period.

Provide a summary schedule showing these annual electric sales, by rate schedule, with a separate column showing the test year electric sales by rate schedule on a calendar basis.

11. Provide actual HDD and CDD information, by month, and totaled for each calendar year, for the most recent 20 years on a 65 degree basis. Show the 20-year average, for each month, and the annual total. Show what degree day information was used to calculate the test year electric sales forecast.

## **Other Operating Revenues**

12. Provide a summary schedule that shows actual Other Operating Revenues, by utility (e.g. electric, gas, water, and steam) (Wisconsin and Total Company), by account, for the most recent five years, and the company test year estimates. For any test year estimates that are significantly different from historical actuals, provide support/explanation.

## **Operation and Maintenance (O&M) Expenses**

13. Provide a summary of O&M expenses by account and by utility for the test year and most recent three calendar years of actual, broken down between labor and other. Show fuel and non-fuel amounts separately. If the test year estimate is shown by something other than PSC account, provide the most recent three calendar years of actual on the same basis. Provide a reconciliation for the fuel amounts shown in this response to the fuel amounts shown in Filing Requirement 7A for the test year.
14. Provide a description and amounts, by utility and account, of items that have previously been disallowed by the Commission.
15. Provide calculations showing all non-fuel costs or charges from other operating entities such as the Midcontinent Independent System Operator, Inc. (MISO) or the American Transmission Company LLC (ATC) for the most recent three calendar years of actual and for the test year. Provide accounts charged by MISO rate schedule. If applicable,

provide the most recent available supporting calculations and documentations for the ATC Network Service Fee and for the MISO charges included in Schedules 26 and 26A for the test year.

16. Provide a schedule by utility of regulatory assets and liabilities of the year-end balances by account with descriptions for each of the most recent three calendar years through the test year, as applicable, showing the actual year-end balances along with the annual activity of amortizations and expenditures by account.
17. Provide uncollectible accounts expense by utility for the test year and each of the most recent three calendar years of actual. Include gross write-offs and collections of amounts previously written off. Also show net write-offs as a percentage of applicable sales revenue.
18. Describe the company's current procedures related to bad debt collections and identify any changes from the last rate case. Also describe any anticipated changes to such procedures during the current year and test year.
19. Provide customer service expenses by utility for the test year and each of the most recent three calendar years of actual. Provide the breakdown between conservation (including weatherization) and other costs, by program, between labor and other.
20. Provide a summary of the conservation escrow account by utility through the most recent available month and show what was included in the test year revenue requirement. Beginning with an actual balance, show expenditures and amortization expense for the bridge period and the test year as well as any other adjustments to the escrow account.
21. Provide all sales promotion expenses by utility and by project, and account for the test year and for each of the most recent three calendar years of actual. Show labor and non-labor separately.
22. Provide all economic development costs by program and by account for the test year and each of the most recent three calendar years of actual. Show labor and non-labor separately.
23. Provide a breakdown by utility of non-labor expenses in Account 921, Office Supplies and Expenses, for the test year and each of the most recent three calendar years.
24. Provide a summary of most recent three calendar years of actual and test year estimated advertising expenses. This summary should provide the total amount by utility and by account and should be further broken down to show the type of advertising, such as Conservation and Load Management, Safety, Required by Law, Emergency Conditions, Sales Promotion, and Institutional or Goodwill.
25. Provide a breakdown by utility of Outside Services Expense (Account 923) by vendor and by project for the test year and each of the most recent three calendar years of actual.

26. Provide a breakdown by utility of Insurance Expense (Account 924) by policy for the test year and the most recent three calendar years of actual. Include current premiums and expiration dates. Provide the calculation of the test year amount.
27. Provide a breakdown by utility of Pensions and Benefits Expense (Account 926) by benefit for the test year and the most recent three calendar years. Provide a calculation of how the test year estimate was derived for each benefit.
28. Provide a breakdown by utility of non-labor Miscellaneous General Expense (Account 930.2) for the test year and each of the most recent three calendar years.
29. Provide a detailed summary of all industry association dues, corporate memberships, etc., by utility, including a listing of accounts charged. For each due or fee where the applicant is seeking recovery, provide justification and support identifying the specific customer benefit associated with each estimated payment.
30. For each Board of Directors fees or costs included in the test year revenue requirement(s), provide a detailed listing, by utility and account, that provides justification and support identifying the specific customer benefit associated with each amount.
31. Regarding manufactured gas clean-up (MGP) expenditures, provide a breakdown of what has been included in the company's revenue requirement for the test year. For example, if \$1,000,000 has been included for an MGP amortization, show the individual vintage year components of that \$1,000,000. Show when the individual vintage year amortizations start and stop. Show in what account(s) such amortization was included.
32. Provide specific detail of all MGP expenditures that have occurred since the last rate audit, by vendor. Show how the unamortized balance of MGP cleanup costs has been treated in the cash flow analysis, ratio calculation, and revenue requirement.
33. Provide detail of any insurance settlements that have been received regarding MGP, and show how they have been recognized/treated for the test year.

## **Payroll**

34. Provide a description of how test year payroll and employee estimates were developed. Include payroll increases for the most recent calendar year and the test year, by employee group. Also explain how part-time, summer help, overtime, and vacancy factors were developed. Provide specific detail of any incentive pay program included in the test year estimates.
35. Provide a calculation of test year total payroll expense. The calculation should begin with actual total payroll and build to test year total payroll, showing wage increases, changes in employee levels, and any other factors used to derive test year total payroll.

36. Provide total compensation by employee group and by specific union for the most recent calendar year and the test year. Show detail by component, including bonuses and incentive payments.
37. Provide the distribution of total payroll by utility for the most recent three calendar years and the test year between plant accounts, O&M, etc.
38. Provide the actual employee vacancy rates by month for the three most recent calendar years, identified by union and non-union employees.
39. Provide monthly employee counts by employee group and by specific union for the most recent three calendar years and the test year. For any new positions, provide position titles, documentation supporting the need for a new employee, and estimated wages for such employee for the test year.
40. Provide the number of part time and summer employees and related dollar amounts for the most recent three calendar years and the test year.
41. Provide overtime hours and dollars for each of the most recent three calendar years and the test year.
42. Provide executive payroll (all compensation) for the most recent three calendar years and the test year by position. Show allocations of executive payroll to all utility and non-utility entities and the basis for the allocations. Show each component of total executive compensation separately.
43. Provide the wage increases included in each employee union's current contract. Indicate the term of the contract and the status of negotiations for the next contract, if applicable.
44. Provide the most recent year actual and the estimated test year incentive compensation costs by utility and employee group. Additionally, provide the incentive compensation dollars included in the test year(s) revenue requirements, identify all FERC accounts, including dollar amounts where the incentive compensation is recorded broken out by utility and employee group.
45. For each performance measure of the applicants' incentive pay program(s) where an amount is included in the test year(s) revenue requirement, provide a narrative describing the ratepayer benefit and identify if the amount is tied to a financial or operational driver. Provide a copy of the incentive compensation plan related to the performance measures.

## **Taxes Other than Income Taxes**

46. Provide a summary schedule that shows actual Taxes Other than Income Taxes (TOTIT), for the electric utility and the gas utility (and other utility if applicable), by component, for the most recent five years, and the company test year estimates. For any test year estimates that are significantly different from historical actuals, provide support/explanation.
47. Provide calculations for the following items.
  - a. All payroll related taxes. Show the payroll amount used and the rate.
  - b. Wisconsin License Fee/Gross Receipts Tax. Show the revenue amount used and the rate.
  - c. Remainder Assessment. Show the revenue amount used and the rate.
  - d. Other.
  - e. Provide historical gross TOTITs by component for the most recent three calendar years.

For each item above, show the portion that is transferred to construction/removal and other accounts.

## **Income Taxes**

48. Provide calculation of state and federal income tax expenses for the test year. Include components such as net income before taxes, synchronized interest expense and Schedule M adjustments.
49. Provide calculations supporting the adjustments to operating income that have been assumed for the test year. Include the supporting calculation for synchronized interest expense.
50. Identify and describe any new aggressive tax stances or changes in tax accounting that are reflected in the current filing.
51. Identify each tax position included in tax asset and liability settlement items for the test year. Provide a description and a calculation of the dollar amount for each item.
52. Describe any state or federal tax law changes enacted since the last full rate proceeding that affected the utility and describe how these tax law changes are reflected in the estimates.

## **Construction Work in Progress (CWIP) and Rate Base**



53. Provide CWIP balances by month and by account for the bridge period from the latest actual balances through the test year. Show expenditures and transfers to plant in service by account.
54. Provide a schedule showing the portion of the average test year CWIP, by project, that is forecasted to earn 100 percent current return, a 50 percent current return, 100 percent Allowance for Funds Used During Construction (AFUDC), or other rate treatment. Identify the authorization for such treatment, by project, if it has already been determined by the Commission.
55. Provide a detailed summary of the construction budget by project for the bridge period and the test year. Subcategorize into functional areas. Include descriptions of major budget items. Identify all projects for which a Certificate of Authority (CA) or Certificate of Public Convenience and Necessity (CPCN) is required and indicate the status of each CA or CPCN application.
56. For approved buy/sell or construction projects not currently included in authorized revenue requirement, provide a detailed schedule identifying, by project, the dollar amount authorized versus what is included in this rate application.
57. For approved buy/sell or construction projects that have exceeded the authorized project cost which are included in this application, explain and identify the drivers for the excess costs and identify any cost mitigation efforts.
58. Provide the following budget-to-actual analysis comparing the originally “filed for” pertinent test year forecast to actual for the most recent four years:
  - a. Expenditures.
  - b. Plant additions
  - c. Plant retirements

Provide the analysis by utility type and functional category (i.e. production, transmission, distribution, etc.).

59. Provide plant in-service balances by month and by account from the last actual balances through the bridge period and the test year, showing additions and retirements. Also provide four years of actual average annual plant in service balances by account, showing actual plant additions and retirements.
60. Provide accumulated depreciation balances by month and by plant account from the last actual balances for the bridge period and the test year. Show accruals, retirements, salvage, cost of removal, and amortizations separately for the bridge year and the test year. Explain any significant items. Also provide the most recent four years of actual average accumulated depreciation balances by plant account as well as four years of actual accruals, retirements, salvage, cost of removal, and amortizations separately.

61. Provide depreciation expense accrual included in the test year revenue requirement, by month and by plant account or functional category, showing derivation. Reconcile to Commission certified rates.
62. Provide customer advances by month from the most recent actual balances through the bridge period and the test year estimates. Also provide four years' actual average balances.
63. Provide materials and supply balances by month from the most recent actual balances, through the company estimates for the bridge period and the test year. Also provide four years' actual average balances.
64. Provide all liquefied natural gas, propane, and gas in storage balances, by month, from the most recent actual balances through the bridge period and the test year estimates. Show volumes, cost assumptions, and dollars. Explain if the supply plan has changed for the test year, specifically if capacity contracted for has changed. Also provide four years' actual average balances.
65. Provide a detailed narrative on any significant changes in law, rules, etc. that impact deferred taxes.
66. Provide deferred tax balances by month from the most recent actual balances through the bridge period and the test year estimates.
67. Show a summary calculation of deferred taxes from the most recent actual balances through the bridge period and the test year estimates.
68. Identify and provide a summary of any opportunities the applicant has pursued to obtain grants, loans, rebates, incentives, and tax credits related to the Infrastructure Investment Jobs Act of 2021 and the Inflation Reduction Act of 2022. The summary should include all anticipated financial impacts of the funds or tax credits being pursued. Additionally, identify by FERC account any amounts which are included in the test year.

## **Capital**

69. Provide monthly estimates of all capital components from the most recent actual balances through the bridge period and the test year. Include debt issuances, principal repayments, and retirement of debt, all by month. For common equity, show estimated net income, dividends, and capital infusions, all by month.

70. Provide a source and use of funds schedule (cash flow) from the most recent actual balances through the bridge period and the test year. Demonstrate that the cash flow schedule is derived from the same estimates used to develop the Ratio schedule.
71. Show the calculation of the cost of long-term debt for the test year, separating interest from amortization of debt discount, premium, and expense. Show debt by month and issue.
72. Show the Ratio (of rate base plus CWIP to capital) by month from the most recent actual balances through the bridge period and the test year estimates. Provide working capital detail by account and by month, as well as adjustments to the numerator and denominator. Provide supporting work papers.
73. Provide the calculation of the Ratio on a monthly basis for the most recent 3 calendar years and the current year to date.
74. Provide the following detailed information regarding all off-balance sheet obligations:
  - a. Minimum annual lease and PPA obligations
  - b. Method of calculation along with the calculated amount of debt equivalent
  - c. Supporting documentation, including all reports, correspondence and any other justification that clearly established S&P's and other major credit rating agencies determination of the off-balance sheet debt equivalent, to the extent available, and publicly available documentation when S&P and other major credit rating agencies
75. Disclose the number of times in the last 10 years that the applicant has reported earnings above its authorized return. The response should include the year, the percentage earned above the authorized return, the total dollar amount subject to the applicant's earning sharing mechanism, and the total dollar amount shared with the applicant's ratepayers in each year.
76. Provide a comparison of all debt forecasted and/or issued by the applicant from the two previous rate cases. For each issuance include:
  - a. the principal,
  - b. maturity,
  - c. forecasted interest rate,
  - d. actual interest rate,
  - e. spread between forecast and actual in basis points,
  - f. spread between forecast and actual in dollars,
  - g. any re/financing or transaction charges for these debts,
  - h. Include an identifier for any debt that has been refinanced (show original rate, refinanced rate, and date of refinancing).
  - i. Summative total dollar amount above/below forecast by rate case and total.
  - j. Include a summative total dollar amount of the re/financing or transaction charges for these debts by rate case and year.

### **NSPW Only**

77. Provide a current copy of the Interchange Agreement. Also provide a summation of all FERC filings regarding the Interchange Agreement for the most recent three years to present – include a brief description of such filings and status.
78. Provide copies of the Interchange billings for both WI and MN for the most recent calendar year and the test year.
79. Provide a listing of NSPM production and transmission projects that require a Certificate of Need (“CON”) and flow through the Interchange Agreement in the test year.

### **WEPCO Only**

80. Provide a step-by-step description of how the steam sales forecast was developed. Be specific and include not only how but why a certain assumption or method was used. Note any significant changes in how the forecast was developed from the methods used in the last rate filing and any significant changes in assumptions. The data should include, but not be limited to, the following:
  - a. Assumptions
  - b. Growth expectations
  - c. Time period used as the base for building test year sales
81. Provide historical billing determinants by rate schedule for the most recent five years on a calendar basis for WEPCO Steam.
82. Provide test year forecasts of sales and customer counts by rate schedule for WEPCO Steam.

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