

EL 96-024

DOCKET NO. EL 96-024

In the Matter of IN THE MATTER OF THE FILING BY  
 NORTHERN STATES POWER  
 COMPANY FOR APPROVAL OF A  
 RATE REDUCTION/FREEZE AND  
 ADOPTION OF ACCRUAL  
 ACCOUNTING FOR POST-  
 RETIREMENT BENEFITS OTHER THAN  
 PENSIONS

*Filing Fee*

## Public Utilities Commission of the State of South Dakota

DATE	MEMORANDA
9/30 96	<i>Filed andocketed;</i>
10/25 96	<i>Order assessing Filing Fee;</i>
12/26 96	<i>affidavit,</i>
6/6 97	<i>Withdrawal of Petition;</i>
7/2 97	<i>Order closingocket;</i>
7/2 97	<i>Secret Clerk</i>

Northern States Power Company

500 West Russell  
P.O. Box 988  
Sioux Falls, SD 57101-0988  
Telephone (605) 339-8200

Michael J. Hanson  
General Manager and Chief Executive

EL96-024

September 30, 1996

RECEIVED

SEP 30 1996

SOUTH DAKOTA PUBLIC  
UTILITIES COMMISSION

Mr. William Bullard, Executive Director  
South Dakota Public Utilities Commission  
State Capitol Building  
500 East Capitol Avenue  
Pierre, South Dakota 57501-5070

Dear Mr. Bullard:

Enclosed for filing is an original and 10 copies of Northern States Power Company's petition for approval of an overall rate reduction / freeze and adoption of accrual accounting for post-retirement benefits other than pensions.

In summary NSP is seeking an across the board 1.5% rate reduction and permission to adopt accrual accounting for post-retirement benefits other than pensions ("SFAS106"). NSP also pledges to freeze rates at this level through the year 2000 subject only to an exception from extraordinary events.

NSP believes this step is necessary at this time in order to maintain our competitive position in the emerging electric marketplace. We intend to fund this rate reduction from savings achieved through our merger with Wisconsin Energy Corporation. Adoption of accrual accounting for post-retirement benefits other than pensions is an internal accounting change only and will not cause any rate changes.

NSP respectfully requests the Commission approve this petition subject to NSP closing the pending merger with Wisconsin Energy Corporation.

If anyone has any questions, please call Jim Wilcox at 339-8350.

Sincerely,



Michael J. Hanson

RECEIVED

SEP 14 1996

SOUTH DAKOTA PUBLIC  
UTILITIES COMMISSION

PUBLIC UTILITIES COMMISSION  
STATE OF SOUTH DAKOTA

In the matter of the Request of Approval of  
a Rate Reduction Freeze and Adoption of  
Accrual Accounting for Post Retirement  
Benefits Other than Pensions

Docket No. EL96-\_\_\_\_\_

**PETITION FOR APPROVAL OF AN OVERALL RATE REDUCTION/FREEZE AND  
ADOPTION OF ACCRUAL ACCOUNTING FOR POST-RETIREMENT  
BENEFITS OTHER THAN PENSIONS**

**SUMMARY**

Northern States Power Company-South Dakota ("NSP-SD" or "the Company") hereby petitions the South Dakota Public Utilities Commission ("SDPUC" or "the Commission") for approval of an overall 1.5% electric rate reduction resulting from expected savings from Northern States Power Company's ("NSP" or "the Company") proposed merger with Wisconsin Energy Corporation ("WEC") to form Primergy, a new registered utility holding company. The annual amount of the proposed South Dakota revenue decrease is approximately \$1.2 million. Attachment A shows the calculation supporting the annual reduction in retail NSP-SD revenues. Tariff sheets will be revised to reflect the reduction and filed at least 60 days prior to implementation. NSP-SD also proposes to restate the fuel cost per kWh base to reflect Primergy's total system fuel costs and sales levels.

NSP-SD proposes that the decrease be effective upon closing of the merger. NSP-SD also proposes to freeze rates through the year 2000 subject to extraordinary events. NSP-SD will not seek an exception to the freeze unless adverse events occur, which are beyond NSP-SD's control, resulting in at least an 10% increase in an expense component, or decrease in a revenue item, or \$1.0 million. The rate decrease and freeze affects base fuel costs and most electric tariff rates. Other aspects of South Dakota rates, such as the operation of the monthly electric fuel adjustment clause, standby service, surcharge riders, and several optional services remain unaffected.

NSP-SD also hereby petitions the Commission for approval to adopt accrual accounting for post-retirement benefits other than pensions ("PBOPs") as prescribed by the Financial Accounting Standards Board (FASB) in Statement of Financial Accounting Standard No. 106 ("SFAS-106"). NSP-SD seeks no change in South Dakota rates associated with this request. The Commission ordered NSP-SD to continue recognizing PBOPs as incurred, referred to as "PAYGO" accounting, in its last general rate filing, Docket EL92-016. Since then, however, the Commission has approved adoption of SFAS-106 for Montana Dakota Utilities ("MDU", Docket NG94-012), Black Hills Power and Light ("BHP&L", Docket EL95-003), MidAmerican ("MA", Dockets EL95-011 and NG95-006), and US West (Docket TC94-121). In addition to seeking no increase in South Dakota rates related to the adoption of SFAS-106, NSP-SD proposes to forego

rate recovery of the difference between the accrual and PAYGO method, deferred since 1993, which is approximately \$2.0 million.

Pursuant to South Dakota Administrative Rules Section 20.10.13.26, NSP-SD provides the following information:

**(1) Name, Address, and Telephone Number of Utility**

Northern States Power Company - South Dakota  
500 West Russell  
P. O. Box 988  
Sioux Falls, SD 57101-0988  
605-339-8358

**(2) Section and Sheet Number of the Tariff Schedule(s)**

NSP-SD proposes that the following tariff sheets be affected. Revised tariff sheets are not included herein, but will be filed at least 60 days prior to implementation of the decrease. The affected tariff sheets are applicable to residential, commercial, and industrial customers. Street lighting, other sales to government authorities, and residential/commercial automatic protective lighting are not affected.

**Affected Tariff Sheets**

<u>Tariff</u>	<u>Section</u>	<u>Sheet No.</u>
RESIDENTIAL SERVICE	3	1
RESIDENTIAL TIME OF DAY	3	2
RESIDENTIAL SERVICE - UNDERGROUND	3	4
RESIDENTIAL TIME OF DAY - UNDERGROUND	3	5
ENERGY CONTROLLED SERVICE	3	6.1
RESIDENTIAL HEAT PUMP SERVICE	3	6.2
LIMITED OFF PEAK SERVICE	3	6.3
SMALL GENERAL SERVICE	3	24
SMALL GENERAL TIME OF DAY SERVICE	3	25
GENERAL SERVICE	3	37
GENERAL TIME OF DAY SERVICE	3	39
PEAK-CONTROLLED SERVICE	3	40.1
PEAK-CONTROLLED TIME OF DAY SERVICE	3	40.3
ENERGY-CONTROLLED SERVICE	3	43

### Unaffected Tariff Sheets

STREET LIGHTING-LEASED	3	44
STREET LIGHTING-PURCHASED	3	45
STREET LIGHTING-METERED	3	48
FIRE AND CIVIL DEFENSE SIREN SERVICE	3	53
AUTOMATIC PROTECTIVE LIGHTING SERVICE	3	19

No tariff sheets are affected by the request for approval to adopt accrual accounting for PBOPs per SFAS-106

### (3) Description of Change

#### Rate Reduction due to Merger

There are two purposes for this miscellaneous filing. The first is to reduce electric rates to reflect a 1.5%, or \$117.8 million, revenue reduction for South Dakota customers and freeze rates through 2000. Attachment A contains schedules showing the determination of the revenue decrease. Reduced rates will replace existing rates on each affected tariff sheet. The unaffected tariffs include flat rates with a relatively insignificant energy cost component. Since the amount and unit costs of NSP labor and materials underlying the service portion of the rate has not changed, it is inappropriate to lower those rates.

In addition to the above unaffected tariffs, the Company proposes that customer charges for Energy Controlled Services, Residential Heat Pump, Limited Off-Peak, and various General Service and peak tariffs not be changed due to two factors. First, the customer charges on these tariffs are comparably much lower than those charged by other utilities in South Dakota. Second, these charges are a relatively insignificant portion of customers' bills using these tariffs. Thus, these customers will benefit from the reduced energy and/or demand charges in an amount that is approximately a 1.5% reduction in their bills. Also, at the time of the rate decrease, the Company proposes to restate the base cost of fuel to reflect Primergy's total system fuel costs and sales levels.

The reduction will take effect upon closing of the merger and subsequent to approval of the tariff sheets, which will be filed at least 60 days prior to closing. The freeze is subject to extraordinary and uncontrollable adverse events such as a major increase in taxes, orders of governmental agencies, changes in facility ownership, loss of load, accounting changes, or changes in the cost of capital which result in at least a 10% increase in an expense component or a 10% decrease in a revenue item, or \$10 million.

#### Adoption of SFAS-106 for Accounting and Ratemaking

The second purpose of this filing is to request approval for adoption of accrual accounting associated with PBOPs per SFAS-106. The Commission first authorized SFAS-106 accrual accounting for ratemaking purposes in an MDU gas case, Docket NG93-011. Since then, the Commission has authorized several other utilities to adopt SFAS-106 for accounting and ratemaking purposes. NSP-SD seeks similar authorization for accrual accounting, but seeks no corresponding change in rates, and proposes to forego recovery of amounts deferred since the inception of SFAS-106 in 1993.

#### **(4) Reason for Changes**

##### Proposed Rate Reduction

NSP's proposed merger with WEC is expected to result in cost savings beginning in 1997. While steps have not yet been taken to achieve the savings, NSP is confident enough in its plans to offer the rate reduction and freeze in advance of actually achieving the savings.

The savings will originate from three primary areas. First, NSP-Wisconsin is a wholly-owned subsidiary of NSP-Minnesota headquartered in Eau Claire. The Eau Claire headquarters is fully staffed and largely self-sufficient. Combining NSP-Wisconsin and WEC and eliminating the Eau Claire headquarters is a source of about 14% of the total expected savings.

Second, both NSP and WEC have significant nuclear operations. NSP owns and operates a 550 MW boiling water reactor at its Monticello facility and two 500 MW pressurized water reactor units at its Prairie Island site. WEC has two 500 MW pressurized water reactor units at its Point Beach site. The units at both Prairie Island and Point Beach were manufactured by Westinghouse, are of a similar vintage, and are considered "sister plants". Combining the support and, to a lesser extent, operations staffs results in about 6% of the total expected savings.

Third, consolidating corporate support functions is the source for most of the remaining savings, with labor contributing about 80% of that amount. The allocation of the savings to operating companies, utilities, and jurisdictions apportions about 2% of the savings for NSP-SD's South Dakota customers.

#### Adoption of SFAS-106 for Accounting and Ratemaking

No rate change is requested related to the adoption of accrual accounting for PBOPs. However, the reason for adoption is to comply with FASB's 1992 release of SFAS-106 prescribing accrual accounting for PBOPs. Prior to SFAS-106 most companies recognized PBOPs as they were incurred, referred to as the PAYGO method. Due to significant inflation in health care costs, PAYGO materially understates a growing liability for retiree and current service employee health care benefits. SFAS-106 addresses these concerns by calling for recognition of the liability and the adoption of accrual accounting in place of PAYGO. The pronouncement allows companies to amortize recognition of the liability over a period up to twenty years. This amortization, with interest, is referred to as the transition obligation. SFAS-106 improves the integrity of financial reporting by providing far better matching of recognition of PBOP costs within the period of service by the employee and by prescribing full recognition of a previously unrecorded liability. PAYGO accounting procedures result in distorted financial statements, particularly for companies that otherwise utilize full accrual accounting.

In rate cases throughout its service territory, NSP was allowed to adopt SFAS-106 for ratemaking purposes, with the exception of South Dakota. In NSP-SD's 1992 case, Docket EL92-016, The SDPUC ordered that the PAYGO approach be used for South Dakota ratemaking. The Commission has reversed its position and allowed adoption of SFAS-106 for MDU (Docket NG94-012), BHP&L (Docket EL95-003), MA (Docket EL95-011), and USWest (Docket TC94-121). Approval by the South Dakota Commission will permit NSP-SD to comply with FASB accounting requirements, reduce extraordinary reporting disclosures, and eliminate special, and somewhat burdensome, accounting procedures.

#### **(5) Present and Proposed Rates**

Present rates are shown on the tariff sheets referenced in Section (2). Final rates will be filed 60 days prior to implementation of the decrease.

#### **(6) Proposed effective date of Modified Rates**

The reduced rates will be effective upon closing of the merger and after approval of the revised tariff sheets which will be filed with the Commission at least 60 days prior to closing.

#### **(7) Approximation of Annual Amount of Increase or Decrease in Revenue**

The annual decrease in revenue, based on the 1997 forecasted revenue level, will be \$1,178 million as shown on Attachment A. Base rates will not generally be increased, subject to the exceptions explained in Section (3) above, prior to January 1, 2001.

**(8) Points Affected**

Not applicable

**(9) Estimation of the Number of Customers Whose Cost of Service Will be Affected and Annual Amounts of Either Increases or Decreases, or Both, in Cost of Service to Those Customers**

All residential, commercial, and industrial customers, with the exception of residential/commercial automatic protective lighting customers, will see a rate decrease. NSP-SD estimates that 61,000 customers will experience electric bill savings through reduced rates. NSP-SD is applying the reduction across all customer classes with no attempt to change rate design among the classes.

**CONCLUSION**

NSP-SD respectfully requests that the Commission, (1) approve the proposed 1.5%, or approximately \$1.2 million, reduction and freeze in retail electric rates for South Dakota customers, and (2) authorize adoption of accrual accounting for PBOPs consistent with SFAS-106. In addition, NSP-SD pledges not to seek an increase in retail electric rates, subject to the exceptions stated above in (3), with an effective date prior to January 1, 2001.

Dated September 30, 1996

NORTHERN STATES POWER COMPANY

BY 

Michael J. Hansen,  
General Manager and Chief Executive



**Attachment A**

**Amount of Revenue Decrease**

Consists of two workpapers showing calculation of the annual revenue decrease.

Northern States Power Company - South Dakota  
Proposed Electric Rate Reduction  
Annual Revenue Reduction Amount  
(Dollars in Thousands)

Attachment A  
Page 1

Note: The amounts shown below relate to 1997.

1) Forecasted Electric Revenues - 1997	\$78,529
2) Percent Decrease	1.50%
<b>3) Amount of Annual Decrease</b>	<b><u>\$1,178</u></b>

Sources:

Line 1 - Forecast of 1997 retail electric revenues for NSP-SD (South Dakota portion). The 1997 forecast reflects the most recent forecast of 1996 revenues (\$76,316) increased by a growth rate of 2.9% for 1997. Page 2 of this attachment supports the 1996 forecast.

Line 2 - Rate reduction proposed in filing.

Line 3 - Line 1 times Line 2.

## NORTHERN STATES POWER COMPANY (MN)

Electric Utility

## 1996 ACTUALS &amp; FORECAST

Revenue Cover Sheet

(\$000's)

Description	W/P Ref	Jan-May-96 Actual Amount	Jun-96 ADJUSTED TOTAL	TOTAL	Input Code
<b>Retail Revenues w/o City Fees</b>					
Total MN Company	12-1,2	645,662	1,023,506	1,669,168	R01R
MN	12-1,2	574,219	919,191	1,493,410	
ND	12-1,2	40,625	56,382	97,007	
SD	12-1,2	28,677	47,639	76,316	
Wholesale	12-1,2	2,141	295	2,436	
Wholesale	12-1,2	2,141	295	2,436	R01O / S12
<b>Gross Earnings</b>					
Total MN Company	12-1,2	9,638	17,138	26,776	PTRRT/GETEXP
MN	12-1,2	9,050	16,325	25,375	
ND	12-1,2	558	813	1,371	
<b>Total Direct Assignment</b>					
Total MN Company	12-1,2	3,512	4,347	7,859	R16
MN	12-1,2	3,187	3,795	6,982	
ND	12-1,2	157	309	466	
SD	12-1,2	168	242	410	
<b>Interdepartmental Sales</b>					
Total MN Company	12-1,2	423	419	842	S15A
MN	12-1,2	409	404	813	
ND	12-1,2	14	15	29	
<b>Total Rents</b>					
Total MN Company	12-1,2	732	873	1,605	S15
MN	12-1,2	688	754	1,442	
ND	12-1,2	44	61	105	
SD	12-1,2	0	58	58	
<b>Revenue Credit to Expense</b>					
Fuel	12-1,2	(70)	(54)	(124)	XFC
Fuel - Sales for Resale	12-1,2		(5,604)	(5,604)	XFC
Other Production	12-1,2	(1,362)	(2,196)	(3,558)	XOPC
Bulk - Miscellaneous	12-1,2	(607)	(7)	(614)	XTR
Bulk - Wheeling	12-1,2	(6,872)	(13,347)	(20,219)	XTR
A & G	12-1,2	(1)	(2)	(3)	X92R
CIP	12-1,2	(165)	(1,982)	(2,147)	XCIP
Champion Trans - MN Only	12-1,2	(163)	(192)	(355)	XTOL
Champion Dist - MN Only	12-1,2	(142)	(229)	(371)	X60R
Electric Services - MN Only	12-1,2	(990)	(2,050)	(3,040)	X92L
<b>Interchange Agreement Revenue</b>					
Interchange - Demand	12-1,2	43,812	57,965	101,777	S11D
Interchange - Energy	12-1,2	31,840	37,737	69,577	S11E
Interchange - Transmission	12-1,2	5,241	8,671	13,912	S12A

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

IN THE MATTER OF THE FILING BY )	
NORTHERN STATES POWER COMPANY FOR )	ORDER ASSESSING FILING
APPROVAL OF A RATE REDUCTION/FREEZE )	FEE
AND ADOPTION OF ACCRUAL ACCOUNTING )	
FOR POST-RETIREMENT BENEFITS OTHER )	EL96-024
THAN PENSIONS )	

On September 30, 1996, Northern States Power Company (NSP) filed for approval by the Public Utilities Commission (Commission) of an overall rate reduction/freeze and adoption of accrual accounting for post-retirement benefits other than pensions.

The Commission has jurisdiction over this matter pursuant to Chapter 49-34A, SDCL.

On October 8, 1996, at its regularly scheduled meeting, the Commission, pursuant to SDCL 49-1A-8 unanimously voted to assess NSP a filing fee in such amounts as requested by the Executive Director, not to exceed one hundred thousand dollars for the duration of the case. It is therefore

ORDERED that NSP shall deposit an assessment in the SDPUC rate case fund in such amounts as requested from time to time by the Executive Director, not to exceed one hundred thousand dollars.

Dated at Pierre, South Dakota, this 25<sup>th</sup> day of October, 1996.

<b>CERTIFICATE OF SERVICE</b>
<small>The undersigned hereby certifies that this document has been served today upon all parties of record in this docket, as listed on the docket service list, by facsimile or by first class mail, in properly addressed envelopes, with charges prepaid thereon.</small>
By <u><i>Alfred Kalks</i></u>
Date <u>10/25/96</u>
<small>(OFFICIAL SEAL)</small>

BY ORDER OF THE COMMISSION.

*Kenneth Stofferahn*  
KENNETH STOFFERAHN, Chairman

*James A. Burg*  
JAMES A. BURG, Commissioner

*Laska Schoenfelder*  
LASKA-SCHOENFELDER, Commissioner



Northern States Power Company  
South Dakota

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DEC 21 1996

SOUTH DAKOTA PUBLIC  
UTILITIES COMMISSION

Jim Wilcox, Manager  
Community & Government Relations  
500 West Russell Street  
P O Box 988  
Sioux Falls, SD 57101-0988  
Telephone (605) 339-8350 fax 339-8204  
email James C.Wilcox@nspco.com

December 20, 1996

Mr. William Bullard, Executive Director  
South Dakota Public Utilities Commission  
State Capitol Building  
500 East Capitol Avenue  
Pierre, South Dakota 57501-5070

Dear Mr. Bullard:

Enclosed please find an affidavit meant to apply to our response to the data request for Docket EL96-024 sent to your staff on December 10th.

Please accept this oath and attach it to the original data request.

If anyone has any questions, please call me at 339-8350.

Sincerely,

Jim Wilcox

c. Mike Hanson

AFFIDAVIT

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DEC 24 1996

SOUTH DAKOTA PUBLIC  
UTILITIES COMMISSION


STATE OF SOUTH DAKOTA )  
  ) ss.  
COUNTY OF MINNEHAHA )

Affiant, having been first duly sworn, on oath deposes and says:

That he is the Government & Community Relations Manager of Northern States Power Company ("NSP") in Sioux Falls, South Dakota.

That he has read the NSP responses to twenty Staff data requests which were sent to the Staff on December 10, 1996 in Docket EL96-024.

That the facts contained in said responses are true to the best of his knowledge and belief.

  
\_\_\_\_\_  
James C. Wilcox

SUBSCRIBED AND SWORN to me this 20<sup>TH</sup> day of December, 1996.

  
\_\_\_\_\_  
Notary Public

CHARLES E. MEYER  
My Commission Expires 12/15/2001

Northern States Power Company

500 West Russell  
P.O. Box 386  
Sioux Falls, SD 57101-0988  
Telephone: (605) 339-8200

Michael J. Hanson  
General Manager and Chief Executive

June 2, 1997

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JUN 06 1997

SOUTH DAKOTA PUBLIC  
UTILITIES COMMISSION

Mr. William Bullard, Executive Director  
South Dakota Public Utilities Commission  
State Capitol Building  
500 East Capitol Avenue  
Pierre, South Dakota 57501-5070

Re: In the Matter of Northern States Power Company's Petition for  
Approval of a Rate Reduction / Freeze and Adoption of Accrual  
Accounting for Post-Retirement Benefits Other Than Pensions  
EL96-024

Dear Mr. Bullard:

Enclosed for filing, please find an original and ten copies of Northern States Power Company's Request for Withdrawal of Rate Reduction / Freeze Approval Application contingent upon completion of the NSP / Wisconsin Energy Corporation merger. This petition reflects the decision of NSP and WEC to terminate their Merger Agreement. This withdrawal would render all matters considered in this docket moot.

NSP appreciates all the work undertaken by the Commission and its Staff in this matter. Thank you for your consideration.

Very truly yours,



Michael J. Hanson  
General Manager & Chief Executive

Enclosures

STATE OF SOUTH DAKOTA  
BEFORE THE PUBLIC UTILITIES COMMISSION

In the Matter of Request of Approval of  
a Rate Reduction / Freeze and Adoption of  
Accrual Accounting for Post Retirement  
Benefits Other than Pensions

Docket No EL96-024

**PETITION FOR APPROVAL OF AN OVERALL RATE REDUCTION / FREEZE  
AND ADOPTION OF ACCRUAL ACCOUNTING FOR POST-RETIREMENT  
BENEFITS OTHER THAN PENSIONS**

Applicant Northern States Power Company requests approval to withdraw its September 30, 1996 Application for a Rate Reduction / Freeze under SDCL 49-34A-12 contingent upon a proposed merger with Wisconsin Energy Corporation. This withdrawal would render all matters considered in this docket moot so that no further action is needed.

June 2, 1997

Respectfully submitted,

NORTHERN STATES POWER COMPANY

By



Michael J. Hanson  
Chief Executive & General Manager

P.O. Box 988  
Sioux Falls, SD 57101-0988  
(605) 339-8358



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

IN THE MATTER OF THE FILING BY )	ORDER CLOSING DOCKET
NORTHERN STATES POWER COMPANY FOR )	
APPROVAL OF A RATE REDUCTION/FREEZE )	EL96-024
AND ADOPTION OF ACCRUAL ACCOUNTING )	
FOR POST-RETIREMENT BENEFITS OTHER )	
THAN PENSIONS )	

On September 30, 1996, the Public Utilities Commission (Commission) received a filing from Northern States Power Company (NSP) for approval of an overall rate reduction/freeze and adoption of accrual accounting for post-retirement benefits other than pensions. NSP intended to fund the rate reduction from savings achieved through its merger with Wisconsin Energy Corporation. On June 6, 1997, the Commission received a request for withdrawal from NSP. The petition reflects the decision of NSP and Wisconsin Energy Corporation to terminate their Merger Agreement.

On June 24, 1997, at its regularly scheduled meeting, the Commission reviewed this matter. The Commission has jurisdiction over this matter pursuant to SDCL 49-34A and ARSD 20 10. As the withdrawal renders all matters considered in this docket moot, the Commission voted to close the docket. It is therefore

ORDERED, that docket EL96-024 be closed.

Dated at Pierre, South Dakota, this 2nd day of July, 1997

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that this document has been served today upon all parties of record in this docket, as listed on the docket service list, by facsimile or by first class mail, in properly addressed envelopes, with charges prepaid thereon.

By: Alan Kaska

Date: 7/3/97

(OFFICIAL SEAL)

BY ORDER OF THE COMMISSION:

James A. Burg  
JAMES A. BURG, Chairman

Pam Nelson  
PAM NELSON, Commissioner

Laska Schoenfelder  
LASKA SCHOENFELDER, Commissioner