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May 13, 2024

VIA E-MAIL TO

Public Utility Commission of Oregon
Filing Center
201 High Street SE, Suite 100
Salem, Oregon 97301-3398

Re: Docket UE 437 – In the Matter the Application of Idaho Power Company, For Amortization in Rates of the Power Cost Adjustment Mechanism, Intervenor Funding Amounts, Annual Regulatory Fees, Oregon Corporate Activity Tax Expenses, and Community Solar Program Costs.

Attached for filing in the above-referenced docket, please find Idaho Power Company's Stipulation and Exhibit 101.

Please contact this office with any questions.

Sincerely,

A handwritten signature in blue ink that reads "Lauren Richards".

Lauren Richards
Legal Assistant
McDowell Rackner Gibson PC

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 437

In The Matter of the Application of
IDAHO POWER COMPANY

STIPULATION

For Amortization in Rates of the Power Cost
Adjustment Mechanism, Intervenor Funding
Amounts, Annual Regulatory Fees, Oregon
Corporate Activity Tax Expenses, and
Community Solar Program Costs.

1 This Stipulation resolves all issues between the parties related to Idaho Power
2 Company’s (“Idaho Power” or “Company”) 2023 Annual Power Supply Expense True-Up (“True-
3 Up”) filed pursuant to Order No. 08-238,¹ as amended by Order No. 09-373.² This True-Up
4 implements the Company’s Power Cost Adjustment Mechanism (“PCAM”) by calculating the
5 deviation between actual net power supply expenses (“NPSE”) and those expenses recovered
6 through the Combined Rate.

PARTIES

7
8 1. The parties to this Stipulation are Staff of the Public Utility Commission of Oregon
9 (“Staff”), the Oregon Citizens’ Utility Board (“CUB”), and Idaho Power (together, the “Stipulating
10 Parties”). No other party intervened in this docket.

BACKGROUND

11
12 2. As part of the PCAM approved by the Public Utility Commission of Oregon
13 (“Commission”), each February, Idaho Power must file a True-Up that calculates the difference
14 between the actual NPSE incurred by the Company in the relevant PCAM year (January through

¹ *In re Idaho Power Company’s Application for Authority to Implement a Power Cost Adjustment Mechanism*, Docket No. UE 195, Order No. 08-238 (Apr. 28, 2008).

² Docket No. UE 195, Order No. 09-373 (Sept. 18, 2009).

1 December) and the expenses recovered for that period through the Combined Rate.³ NPSE
2 deviations that are eligible, as determined by the terms of Order No. 08-238, are added to the
3 Annual Power Supply Expense True-Up Balancing Account (“True-Up Balancing Account”) at
4 the end of each 12-month period ending in December, along with 50 percent of the annual
5 interest calculated at the Company’s authorized cost of capital.⁴ To be eligible for inclusion in
6 the True-Up Balancing Account, the NPSE deviation must fall outside the NPSE deadband⁵ and
7 pass the earnings test described in Order No. 08-238.⁶

8 3. On February 29, 2024, Idaho Power filed its True-Up reflecting the NPSE deviation
9 for calendar year 2023. The Company’s initial filing used the 2022 Oregon Results of
10 Operations (“ROO”) report, which was the most recent ROO available at the time of the filing.⁷
11 The NPSE deviation was negative \$56,782,578 on a system-wide basis, or negative \$2,487,077
12 on an Oregon-allocated basis.⁸

13 4. The Company’s initial filing also addressed the difference between the actual
14 operations and maintenance (“O&M”) expense incurred because of the Company’s participation
15 in the Western Energy Imbalance Market (“EIM”) and the EIM expenses included in rates.⁹ The
16 Oregon-jurisdictional variance was \$8,846, which reduced the NPSE deviation to negative
17 \$2,478,231 on an Oregon-allocated basis.

³ Docket No. UE 195, Order No. 08-238 at 2-3.

⁴ *Id.*

⁵ *Id.* The NPSE deadband is based upon the Company’s capital structure and the rate base, measured on an Oregon basis, from the most recent Oregon Results of Operations report. The Oregon Allocated Power Cost Deviation is compared to the positive and/or negative deadbands. A positive deviation (actual NPSE greater than those recovered through the Combined Rate) constitutes an excess power supply expense. This expense is first reduced by a deadband that is the dollar equivalent of 250 basis points of return on equity (“ROE”) (Oregon basis). A negative deviation (actual NPSE less than those recovered through the Combined Rate) is a power supply expense savings. This savings is reduced by a deadband that is the dollar equivalent of 125 basis points of ROE (Oregon basis).

⁶ *Id.* If the Company’s earnings are within 100 basis points of its authorized ROE for the previous year ending December 31, then no amounts will be added to the True-Up Balancing Account even if the NPSE deviation falls outside the NPSE deadbands.

⁷ Idaho Power/100, Brady/5.

⁸ Idaho Power/100, Brady/5.

⁹ Idaho Power/100, Brady/6.

1 5. The NPSE deadbands, calculated using the 2022 ROO, were \$3,123,431 (upper)
2 and negative \$1,561,716 (lower).¹⁰ The Oregon-allocated NPSE deviation was outside the
3 NPSE deadbands calculated using the 2022 ROO, *i.e.*, the amount of the NPSE deviation,
4 negative \$2,478,231, was less than the lower deadband of negative \$1,561,716.¹¹ As a result,
5 the Company's initial filing also detailed the Sharing Amount to calculate the portion of the True-
6 Up Allowed and subsequently applied an Earnings Test.¹² The Sharing Amount is 90 percent
7 of the amount that the Oregon-allocated NPSE deviation is above or below the deadband, *i.e.*,
8 negative \$916,515 x 90 percent for a total of deferral of negative \$856,856, including accrued
9 interest.¹³

10 6. Order No. 08-238 states that before deferral amounts are approved for a True-Up,
11 the Commission will apply an Earnings Test. Because the Company is seeking the deferral's
12 addition to the True-Up Balancing Account made up of 2023 expenses, an Earnings Test based
13 on the 2023 Oregon ROO was required, but because the Company did not yet have the 2023
14 Oregon ROO data, the application of the Earnings Test was deferred until the Company's filing
15 of supplemental testimony in April 2024.

16 7. The Company's initial filing also reflected the appropriate treatment of proceeds
17 from the sale of Renewable Energy Credits ("REC").¹⁴ Consistent with Orders Nos. 11-086 and
18 17-185, the REC proceeds are applied as a credit to the True-Up Balancing Account.¹⁵ For
19 2023, the total Oregon jurisdictional customer benefit of REC sales made is \$595,391.¹⁶ As a

¹⁰ Idaho Power/100, Brady/7.

¹¹ Idaho Power/100, Brady/7.

¹² Idaho Power/100, Brady/7.

¹³ Idaho Power/100, Brady/7.

¹⁴ Idaho Power/100, Brady/8; *In re Application of Idaho Power Company to Sell RECs*, Docket No. UP 269, Order No. 11-086 (Mar. 15, 2011); *In re Idaho Power Company 2016 Annual Power Supply Expense True-Up*, Docket No. UE 320, Order No. 17-185 (May 25, 2017).

¹⁵ Idaho Power/100, Brady/8.

¹⁶ Idaho Power/100, Brady/8

1 result of the credit, the Company proposed adding negative \$1,452,247 to the Annual Power
2 Supply Expenses True-Up Balancing Account, i.e., $-\$856,856 - \$595,391 = -\$1,452,247$.¹⁷

3 8. As part of Idaho Power’s initial filing, the Company also proposed a number of
4 changes to amortization levels currently being recovered through Schedule 56: (1) an update
5 to intervenor funding amounts approved in Order No. 23-185, (2) continued collection of
6 deferred Langley Gulch Power Plant (“Langley”) revenues approved with Order No. 20-374 in
7 Docket No. UE 382, (3) an update to the annual regulatory fee expenses approved for recovery
8 with Order No. 23-185, (4) an update to the level of Oregon Corporate Activity Tax (“OCAT”)
9 expense collection approved with Order No. 23-185, (5) inclusion of Oregon Community Solar
10 costs approved with Order No. 23-310, and (6) removal of COVID-19 Arrearage Management
11 Program costs approved in Docket No. UM 2067 with Order No. 20-377.¹⁸ The customer benefit
12 of REC sales plus the sum of the changes to the amortization levels Idaho Power proposed to
13 recover through Schedule 56 would result in a \$1,857,722, or 2.72 percent, decrease to
14 customer rates.

15 9. In Order No. 23-185, the Commission approved the amortization and collection
16 through Schedule 56 of \$37,729 in deferred intervenor funding amounts for the period beginning
17 June 1, 2023, through May 31, 2024.¹⁹ All intervenor funding amounts approved for
18 amortization in Order No. 23-185 were associated with intervenors acting on behalf of the
19 residential customer class and therefore will be collected only from residential customers. Full
20 amortization of the \$37,729 in deferred intervenor funding amounts will occur on May 31,
21 2024.²⁰ Idaho Power proposed to begin amortization and collection in rates of \$60,463 in
22 intervenor funding amounts accrued since the Company’s last request, beginning June 1, 2024.

¹⁷ Idaho Power/100, Brady/8

¹⁸ Idaho Power/100, Brady/8–9.

¹⁹ *In re Idaho Power Company 2022 Annual Power Supply Expense True-Up*, Docket No. UE 417, Order No. 23-185 (May 27, 2021). Idaho Power/100, Brady/9.

²⁰ Idaho Power/100, Brady/10.

1 10. The Company proposed the continued collection of deferred Langley revenues.²¹
2 The Commission approved the recovery of amortization expense associated with deferred
3 Langley revenues over a four-year period beginning November 1, 2020.²² Because
4 amortization will be complete by October 31, 2024, the Company proposed to recover the
5 remaining 5 months of amortization, \$153,821, over the June 1, 2024, to May 31, 2025, time
6 period, to limit the number of rate changes experienced by customers.²³

7 11. With respect to deferred annual regulatory fee expenses, full amortization of the
8 \$82,637 in deferred annual regulatory fee amounts approved with Order No. 23-185 will occur on
9 May 31, 2024. The annual regulatory fees paid in 2023 were \$115,344 greater than the 2019
10 base level, or prior to Senate Bill 68 which increased the annual fee imposed on public utilities.
11 Idaho Power proposed to begin amortization and collection in rates of \$115,344 in incremental
12 annual regulatory fee expenses and \$13,044 in accrued interest incurred since June 1, 2023, for
13 total collection of \$128,388.²⁴

14 12. Idaho Power proposed to continue the amortization of OCAT expense deferrals.²⁵
15 The Commission authorized the Company to defer the costs associated with OCAT for the
16 calendar year 2023 in Order No. 23-185.²⁶ The Company proposed to begin amortization of
17 \$364,674 in accrued OCAT expenses deferred in 2023 beginning June 1, 2024. In 2023, Idaho
18 Power deferred \$345,789 associated with the accrued 2023 OCAT payment, which was offset
19 by negative \$5,501 for the true-up of the 2022 OCAT payment, and included \$24,386 in accrued
20 interest charges, for total deferred expenses in 2023 of \$364,674.²⁷

²¹ Idaho Power/100, Brady/10.

²² *In re Idaho Power Company Request to Amortize in Rates Deferred Revenues Associated with the Langley Gulch Power Plant*, Docket No. UE 382, Order No. 20-374 (Oct. 27, 2020).

²³ Idaho Power/100, Brady/10.

²⁴ Idaho Power/100, Brady/10-11.

²⁵ Idaho Power/100, Brady/11.

²⁶ Docket No. UE 417, Order No. 23-185 (May 26, 2023)

²⁷ Idaho Power/100, Brady/11.

1 13. Order No. 23-310 issued in Docket No. UM 1795 authorized the Company to defer,
2 beginning March 1, 2023, start-up costs associated with the development of a Community Solar
3 Program.²⁸ The Company proposed to begin amortization of \$272,654 in accrued Oregon
4 Community Solar expenses, including accrued interest charges, deferred from 2019 - 2023
5 beginning June 1, 2024.²⁹

6 14. Finally, Idaho Power removed amortization of the deferred COVID-19 Arrearage
7 Management Program costs because full amortization of the \$163,167 in deferred COVID-19
8 incremental costs and savings approved with Order No. 22-192 occurred on May 31, 2023.³⁰

9 15. On March 7, 2024, Administrative Law Judge John Mellgren issued a
10 memorandum directing the Company and all interested parties to collaborate on a jointly
11 proposed schedule.³¹ On March 19, 2024, Idaho Power filed a proposed procedural schedule
12 that would allow for a Commission decision by June 1, 2024, if a settlement was reached and
13 a Stipulation was filed by May 13, 2024.³² Judge Mellgren adopted the jointly proposed
14 procedural schedule on March 20, 2024.³³ On April 1, 2024, CUB filed its Notice of Intervention.

15 16. As required by Order No. 09-373, on April 12, 2024, the Company filed
16 supplemental testimony that calculated the NPSE deadband using the Company's 2023 ROO
17 report, which was finalized after the initial February filing. The use of the 2023 ROO resulted in
18 changes to the upper and lower power supply expense deadband values. The upper deadband
19 changed to \$2,993,991 and the lower deadband changed to negative \$1,496,996.³⁴ In addition,
20 using the Oregon allocation percentage of 4.17 percent from the 2023 ROO, which was 4.38
21 percent in the 2022 ROO, slightly decreased the total customer benefit of REC sales to

²⁸ *In re Idaho Power Company, Application for Reauthorization to Defer Start-Up Expenses Associated with a Community Solar Program*, Docket UM 1795, Order No. 23-310 (Aug. 24, 2023).

²⁹ Idaho Power/100, Brady/11-12.

³⁰ Idaho Power/100, Brady/11.

³¹ See Memorandum (Mar. 7, 2024).

³² See Memorandum (Mar. 20, 2024).

³³ *Id.*

³⁴ Idaho Power/200, Brady/2.

1 \$567,291.³⁵ The Company also used the 2023 ROO to update the Oregon allocation
2 percentage used to calculate Oregon's share of the NPSE deviation. The Oregon-allocated
3 NPSE deviation based on the 2023 ROO was negative \$2,369,695, which was then offset by
4 the EIM-related O&M expense variance of \$8,846.³⁶ The resulting net Oregon Allocated Power
5 Cost Deviation is negative \$2,360,849, which is less than the lower deadband of negative
6 \$1,496,996, resulting in a True-Up of \$863,853.³⁷ The Company then applied the 90 percent
7 Sharing Amount and added in accrued interest to calculate the True-Up amount.³⁸ The resulting
8 True-Up was negative \$807,622.³⁹ Applying the total customer benefit of REC sales of
9 \$567,291 decreased the amount the Company proposed to be added to the True-Up Balancing
10 Account to negative \$1,374,913.⁴⁰ The Company applied the Earnings Test using the 2023
11 ROO and determined the Company's earnings during the January 1, 2023, through December
12 31, 2023, time period were below the threshold of plus or minus 100 basis points of its 2023
13 authorized ROE. As a result, \$807,622 of the total deferral amount of negative \$1,374,913 is
14 not eligible to be included in the True-Up Balancing Account. However, the total customer
15 benefit of REC sales in the amount of \$567,291 are included in the True-Up Balancing Account,
16 as these amounts are not subject to an earnings test.⁴¹

17 17. The Company's supplemental testimony did not modify the proposed changes to
18 amortization levels for intervenor funding amounts, Langley revenues, the annual regulatory fee
19 expenses, the level of OCAT expenses, or the Oregon Community Solar Expenses.⁴² However,
20 Staff subsequently identified an overpayment of the Company's annual regulatory fee expenses

³⁵ Idaho Power/200, Brady/2.

³⁶ Idaho Power/200, Brady/3.

³⁷ Idaho Power/200, Brady/3.

³⁸ Idaho Power/200, Brady/3.

³⁹ Idaho Power/200, Brady/3.

⁴⁰ Idaho Power/200, Brady/3.

⁴¹ Idaho Power/200, Brady/4.

⁴² Idaho Power/200, Brady/1.

1 for 2023. Idaho Power received a refund for the overpayment on May 8, 2024, and will account
2 for the refund in the 2024 PCAM docket.

3 18. Staff, CUB, and the Company participated in a settlement conference on May 6,
4 2024. As a result of the settlement discussions, the Stipulating Parties have agreed as follows:

5 **AGREEMENT**

6 19. The Stipulating Parties agree that the Company has correctly calculated the NPSE
7 deviation amounts to the True-Up Balancing Account for 2023 for later inclusion in rates as \$0
8 and that this calculation complies with the terms of Orders Nos. 08-238 and 09-373.

9 20. The Stipulating Parties agree that the 2023 net proceeds from the sale of RECs in
10 the amount of \$567,291 should be applied as a credit to the True-Up Balancing Account,
11 consistent with Order No. 11-086.⁴³

12 21. The Stipulating Parties agree that \$60,463 in deferred intervenor funding amounts
13 accrued since the Company's last request should be amortized and collected in rates beginning
14 June 1, 2024.

15 22. The Stipulating Parties agree that the Company should continue to collect the
16 amortization expense associated with deferred Langley revenues consistent with Order No. 20-
17 374.

18 23. The Stipulating Parties agree that \$128,388 in annual regulatory fee expenses for
19 the purpose of defraying costs of the Commission as a result of Senate Bill 68 plus accrued
20 interest should be amortized beginning June 1, 2024.

21 24. The Stipulating Parties agree that \$364,674 in deferred OCAT expenses, including
22 interest, as of December 31, 2023, should be amortized beginning June 1, 2024.

⁴³ Docket No. UP 269, Order No. 11-086 at 2 ("Idaho Power will record all net proceeds from the sale of RECs in a regulatory liability account to accrue interest at the Company's authorized cost of capital. Net REC proceeds shall be applied as a credit to the Annual Power Supply Expense True-up Balancing Account as part of the Power Cost Adjustment Mechanism (PCAM) after all variances (including deadbands and earnings review), less 10 percent of proceeds which may be retained by the Company.").

1 25. The Stipulating Parties agree that \$272,654 in Oregon Community Solar expenses
2 should be amortized beginning June 1, 2024.

3 26. Attached as Exhibit 1 to this Stipulation is a summary calculation of the rate impact
4 resulting from the Stipulation. The Stipulating Parties agree that the rate change resulting from
5 the Stipulation results in rates that are fair, just, and reasonable, as required by ORS 756.040.

6 27. The Stipulating Parties agree to submit this Stipulation to the Commission and
7 request that the Commission approve the Stipulation as presented.

8 28. This Stipulation will be offered into the record of this proceeding as evidence
9 pursuant to OAR 860-001-0350(7). The Stipulating Parties agree to support this Stipulation
10 throughout this proceeding and any appeal, (if necessary) provide witnesses to sponsor this
11 Stipulation at the hearing, and recommend that the Commission issue an order adopting the
12 settlements contained herein.

13 29. If this Stipulation is challenged by any other party to this proceeding, the Stipulating
14 Parties agree that they will continue to support the Commission's adoption of the terms of this
15 Stipulation. The Stipulating Parties agree to cooperate in cross-examination and put on such a
16 case as they deem appropriate to respond fully to the issues presented, which may include
17 raising issues that are incorporated in the settlements embodied in this Stipulation.

18 30. The Stipulating Parties have negotiated this Stipulation as an integrated document.
19 If the Commission rejects all or any material part of this Stipulation, or adds any material
20 condition to any final order that is not consistent with this Stipulation, each Stipulating Party
21 reserves its right, pursuant to OAR 860-001-0350(9), to present evidence and argument on the
22 record in support of the Stipulation or to withdraw from the Stipulation. Stipulating Parties shall
23 be entitled to seek rehearing or reconsideration pursuant to OAR 860-001-0720 in any manner
24 that is consistent with the agreement embodied in this Stipulation.

25 31. By entering into this Stipulation, no Stipulating Party shall be deemed to have
26 approved, admitted, or consented to the facts, principles, methods, or theories employed by any

1 other Stipulating Party in arriving at the terms of this Stipulation, other than those specifically
2 identified in the body of this Stipulation. No Stipulating Party shall be deemed to have agreed
3 that any provision of this Stipulation is appropriate for resolving issues in any other proceeding,
4 except as specifically identified in this Stipulation.

5 32. This Stipulation may be executed in counterparts and each signed counterpart
6 shall constitute an original document.

7 This Stipulation is entered into by each Stipulating Party on the date entered below such
8 Stipulating Party's signature.

STAFF

OREGON CITIZENS' UTILITY BOARD

By: /s/ Stephanie Andrus

By: /s/ Jennifer Hill-Hart

Date: 5/13/24

Date: 5/13/24

IDAHO POWER

By: /s/ Adam Lowney

Date: 5/13/24

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

IDAHO POWER COMPANY

Exhibit 1 to Stipulation

Idaho Power Company's Calculation of Revenue Impact of Stipulation

May 13, 2024

**Idaho Power Company
 Calculation of Revenue Impact
 State of Oregon
 PCAM
 Effective June 1, 2024**

**Summary of Revenue Impact
 Current Billed Revenue to Proposed Billed Revenue**

Line No	Tariff Description	Rate Sch. No.	Average Number of Customers ⁽¹⁾	Normalized Energy (kWh) ⁽¹⁾	Current Billed Revenue	Mills Per kWh	Total Adjustments to Billed Revenue	Proposed Total Billed Revenue	Mills Per kWh	Percent Change Billed to Billed ⁽²⁾
<u>Uniform Tariff Rates:</u>										
1	Residential Service	1	13,816	194,241,834	\$22,445,747	115.56	(\$295,013)	\$22,150,734	114.04	(1.31%)
2	Residential Service - Time-of-Day Pilot	5	4	121,119	\$13,606	112.34	(\$184)	\$13,422	110.82	(1.35%)
3	Small General Service	7	2,740	19,151,261	\$2,436,732	127.24	(\$27,452)	\$2,409,280	125.80	(1.13%)
4	Large General Service	9	975	134,189,553	\$13,187,994	98.28	(\$183,704)	\$13,004,290	96.91	(1.39%)
5	Dusk to Dawn Lighting	15	0	219,547	\$113,348	516.28	(\$387)	\$112,961	514.52	(0.34%)
6	Large Power Service	19	6	243,185,755	\$20,000,940	82.25	(\$325,278)	\$19,675,662	80.91	(1.63%)
7	Agricultural Irrigation Service	24	2,304	64,898,972	\$7,845,656	120.89	(\$92,286)	\$7,753,370	119.47	(1.18%)
8	Unmetered General Service	40	2	5,388	\$458	84.93	(\$7)	\$450	83.59	(1.58%)
9	Street Lighting	41	27	384,406	\$153,806	400.11	(\$627)	\$153,179	398.48	(0.41%)
10	Traffic Control Lighting	42	11	21,254	\$2,591	121.91	(\$30)	\$2,561	120.49	(1.17%)
11	Total Uniform Tariffs		19,885	656,419,089	\$66,200,877	100.85	(\$924,968)	\$65,275,909	99.44	(1.40%)
12	Total Oregon Retail Sales		19,885	656,419,089	\$66,200,877	100.85	(\$924,968)	\$65,275,909	99.44	(1.40%)

(1) 6/2024-5/2025 Spring '24 Update

(2) Percentage impact does not include components which are applied as percentages, Riders and Franchise Fees.

**Idaho Power Company
Calculation of Revenue Impact
State of Oregon
PCAM
Effective June 1, 2024**

**Summary of Revenue Impact - Rates 9, 19, and 24 Distribution Level Detail
Current Billed Revenue to Proposed Billed Revenue**

Line No	Tariff Description	Rate Sch. No.	Average Number of Customers	Normalized Energy (kWh)	Current Billed Revenue	Mills Per kWh	Total Adjustments to Billed Revenue	Proposed Total Billed Revenue	Mills Per kWh	Percent Change Billed to Billed Revenue
<u>Uniform Tariff Rates:</u>										
1	Large General Secondary	9S	965	110,181,444	\$11,018,350	100.00	(\$151,191)	\$10,867,160	98.63	(1.37%)
2	Large General Primary	9P	9	20,956,450	\$1,916,247	91.44	(\$28,432)	\$1,887,815	90.08	(1.48%)
3	Large General Transmission	9T	1	3,051,659	\$253,397	83.04	(\$4,081)	\$249,315	81.70	(1.61%)
4	Total Schedule 9		975	134,189,553	\$13,187,994	98.28	(\$183,704)	\$13,004,290	96.91	(1.39%)
5	Large Power Secondary	19S	0	0	\$0	0.00	\$0	\$0	0.00	0.00%
6	Large Power Primary	19P	5	148,156,195	\$12,162,103	82.09	(\$198,172)	\$11,963,931	80.75	(1.63%)
7	Large Power Transmission	19T	1	95,029,560	\$7,838,837	82.49	(\$127,106)	\$7,711,730	81.15	(1.62%)
8	Total Schedule 19		6	243,185,755	\$20,000,940	82.25	(\$325,278)	\$19,675,662	80.91	(1.63%)
9	Irrigation Secondary	24S	2,304	64,898,972	\$7,845,656	120.89	(\$92,286)	\$7,753,370	119.47	(1.18%)
10	Irrigation Transmission	24T	0	0	\$0	0.00	\$0	\$0	0.00	0.00%
11	Total Schedule 24		2,304	64,898,972	\$7,845,656	120.89	(\$92,286)	\$7,753,370	119.47	(1.18%)

(1) 6/2024-5/2025 Spring '24 Update