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Office of Commissioner Kim David
Commission Chairman

2401 N. Lincoln Blvd.
P.O. Box 52000
Oklahoma City, OK 73152-2000

March 6, 2025

Governor J. Kevin Stitt
Senate President Pro Tempore Lonnie Paxton
Speaker of the House Kyle Hilbert
Oklahoma Development Finance Authority President
and CEO Michael D. Davis

(Sent by electronic submission to: State Online Filing System and mdavis@okfinance.com)

Re: Summit Utilities Oklahoma, Inc. – Audit pursuant to 74 O.S. § 9078
Case No. PUD2024-000022 – Annual Performance Based Rate Change Proceeding

Governor Stitt, Pro-Tempore Paxton, Speaker Hilbert, and Authority President Davis:

As Chairman of the Oklahoma Corporation Commission (“Commission”), I am forwarding the below information and attached audit documentation to you in accordance with 74 O.S. § 9078, following the completion of Summit Utilities Oklahoma, Inc.’s (“Summit”) annual performance-based rate case (“PBRC”) review in Case No. PUD2024-000022.

Title 74 O.S. § 9078 requires the Commission to:

...require an audit of all amounts received from customers under an irrevocable and non-bypassable mechanism and paid to a utility, the amounts paid by the utility to the Oklahoma Development Finance Authority or other holder of securitization property. An audit, as provided in this section, shall be part of any general rate case filed by a regulated utility currently affected by a financing order with outstanding ratepayer-backed bonds.

Compliance with 74 O.S. § 9078 is necessary because the Commission issued [Final Financing Order No. 723435](#) in Cause No. PUD 202100087 on February 10, 2022, authorizing the issuance of ratepayer-backed bonds to finance CenterPoint Energy Oklahoma Gas, now Summit for the extreme purchase costs incurred during the February 2021 Winter Storm Uri. The bonds were issued on October 19, 2022, and the total amount securitized was \$81,565,000.

In this current Case, Summit sought approval of its annual PBRC plan for calendar year 2023. In preparation for this Case, Summit contracted PricewaterhouseCoopers LLP, an independent



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third-party auditor, to perform the required audit. The audit was made available to all parties of record in this Case, and is attached to this letter¹.

During its analysis of the Case, the Commission's Public Utility Division ("PUD") reviewed the independent audit performed by PricewaterhouseCoopers LLP and verified its accuracy and completeness. To reach this conclusion, PUD witness Andrew Scribner in his Responsive Testimony² stated that PUD completed the following:

1. Issued a data request for this information;
2. Reviewed the monthly servicer certificates during the calendar year;
3. Held an audit conference with Summit to discuss their accounting process regarding collection and repayment of the bonds; and
4. Validated numbers reported in the monthly servicer certificates and Winter Event Securitized Cost Recovery Mechanism ("WESCRM") Rider true-up work papers to Summit's internal accounting system and banking records.

To further confirm Summit's information, each month PUD reviews the monthly servicer certificate from Summit, which outlines the amount of money that has been collected from customers, as well as the amount of money that has been remitted to the trustee. Additionally, PUD receives Summit's WESCRM true-up and supporting work papers from Summit on a semi-annual basis. The following figures are as of October 2, 2024:

1.	Total amount of the original securitization bond	\$81,565,000
2.	Annual interest rate on the securitization bond	5.269%
3.	Total annual interest expense paid	\$4,182,325
4.	Total interest expense paid to date	\$8,265,102
5.	Total annual revenue collected per the utility tariff	\$5,507,190
6.	Total revenue collected to date per the utility tariff	\$14,574,533
7.	Remaining repayment term	157 months
8.	Outstanding principal balance	\$76,308,088

On September 24, 2024, an Administrative Law Judge ("ALJ") heard the merits of Summit's PBRC case. After hearing sworn testimony from the witnesses, including Mr. Scribner, and allowing cross-examination of each witness, the ALJ recommended approval of the [Unanimous Joint Stipulation and Settlement Agreement](#) entered into by Summit, PUD, and the Oklahoma

¹ PricewaterhouseCoopers LLC Report of Independent Registered Public Accounting Firm for the year ended December 31, 2023; C-1 Annual Servicing Criteria Compliance Certificate; C-2 Certificate of Compliance.

² Case No. PUD2024-000022, Responsive Testimony of Andrew Scribner on behalf of the Public Utility Division, filed on August 5, 2024.

<https://public.occ.ok.gov/WebLink/DocView.aspx?id=16916446&dbid=0&repo=OCC&searchid=5a47c00c-d968-4606-a3fa-1b9c4acd0597>



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Attorney General. On October 30, 2024, the Commission adopted the recommendation of the ALJ and issued [Final Order No. 745070](#) in this matter.

If you have questions regarding this information, please contact my office at (405) 521-2211.

Sincerely,

Kim David

cc: Mark Argenbright, Director, Public Utility Division, Oklahoma Corporation Commission

Attachments:

- PricewaterhouseCoopers Report of Independent Registered Public Accounting Firm for the year ended December 31, 2023
- C-1 Annual Servicing Criteria Compliance Certificate
- C-2 Certificate of Compliance
- Summit Monthly Servicer Certificates for the twelve months of calendar year 2023
- Summit WESCRM Payments by Date for the twelve months of calendar year 2023



Report of Independent Registered Public Accounting Firm

To the Board of Directors and Management of Summit Utilities Oklahoma, Inc.

We have examined management's assertion, included in the accompanying Annual Servicing Criteria Compliance Certificate, that Summit Utilities Oklahoma, Inc. (the "Company") complied with the servicing criteria set forth in Exhibit C-1 of the Securitization Property Servicing Agreement dated October 19, 2022 ("Securitization Agreement") for which the Company is the servicer for the Ratepayer-Backed Bonds Series 2022 (the "Platform") as of December 31, 2023 and for the year then ended. Summit Utilities Oklahoma, Inc.'s management is responsible for its assertion and for the Company's compliance with the applicable servicing criteria. Our responsibility is to express an opinion on management's assertion about the Company's compliance with the applicable servicing criteria based on our examination.

Our examination was conducted in accordance with the standards of the Public Company Accounting Oversight Board (United States) and in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether management's assertion about compliance with the applicable servicing criteria is fairly stated, in all material respects, and, accordingly, included examining, on a test basis, evidence about the Company's compliance with the applicable servicing criteria and performing such other procedures as we considered necessary in the circumstances. Our examination included testing of selected asset-backed transactions and securities that comprise the Platform, testing of selected servicing activities related to the Platform, and determining whether the Company processed those selected transactions and performed those selected activities in compliance with the applicable servicing criteria. Our procedures were limited to the selected transactions and servicing activities performed by the Company during the period covered by this report. Our procedures were not designed to detect noncompliance arising from errors that may have occurred prior to or subsequent to our tests that may have affected the balances or amounts calculated or reported by the Company during the period covered by this report. We believe that our examination provides, and that the evidence we obtained is sufficient and appropriate to provide, a reasonable basis for our opinion. Our examination does not provide a legal determination on the Company's compliance with the servicing criteria.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements related to the engagement.

In our opinion, management's assertion that Summit Utilities Oklahoma, Inc. complied with the aforementioned applicable servicing criteria as of and for the period ended December 31, 2023 for the Platform is fairly stated, in all material respects.

PricewaterhouseCoopers LLP

Los Angeles, California
March 28, 2024

ANNUAL SERVICING CRITERIA COMPLIANCE CERTIFICATE

The undersigned hereby certifies that he is the duly elected and acting Executive Vice President and Chief Financial Officer of **SUMMIT UTILITIES OKLAHOMA, INC.**, as servicer (the “Servicer”) under the Securitization Property Servicing Agreement dated as of October 19, 2022 (the “Servicing Agreement”) between the Servicer and The Oklahoma Development Finance Authority (the “Issuer”) and further that:

1. The undersigned is responsible for assessing the Servicer’s compliance with the servicing criteria set forth in the table below (the “Servicing Criteria”). Terms used herein have the meaning assigned to them in the Servicing Agreement.
2. With respect to each of the Servicing Criteria, the undersigned has made the following assessment of the Servicing Criteria during the fiscal year ended December 31, 2023 (such period, the “Assessment Period”):

Servicing Criteria
General Servicing Considerations
Policies and procedures are instituted to monitor any performance or other triggers and events of default in accordance with the Servicing Agreement.
Aggregation of information, as applicable, is mathematically accurate and the information conveyed accurately reflects the information.
Remittance, Reporting and Reconciliation of WES Charge Collections
Payments of WES Charges (or estimates thereof) are remitted to the Trustee no more than two business days of receipt & posted to customer accounts in its customer information system, or such other number of days specified in the transaction agreements. Estimated Daily Remittances of WES Charges are calculated in accordance with the Servicing Agreement.
Reports of remittances of WES Charges (or estimates thereof) in monthly or semi-annual reports required by the Servicing Agreement are prepared on a timely basis, and consistent with accounting records and transaction documents.
Semi-annual reconciliations of WES Charges pursuant to Section 6.11 of the Servicing Agreement are prepared on a timely basis, based upon a review of custodial accounts and related bank clearing accounts. These reconciliations (A) are mathematically accurate;

<p>Servicing Criteria</p>

<p>(B) are prepared within 30 calendar days after the bank statement cutoff date, or such other number of days specified in the transaction agreements; (C) are reviewed and approved by someone other than the person who prepared the reconciliation; and (D) contain explanations for reconciling items. These reconciling items are resolved within 90 calendar days of their original identification, or such other number of days specified in the transaction agreements.</p>
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<p>Investor Remittances and Reporting</p>
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<p>Reports to the Issuer, the Trustee, Bondholders or the Commission, including without limitation True-Up Adjustment filings, are maintained in accordance with the transaction agreements and applicable Commission requirements. Specifically, such reports (A) are prepared in accordance with timeframes and other terms set forth in the transaction agreements; (B) provide information calculated in accordance with the terms specified in the transaction agreements; (C) if filed with the Commission, are filed with the Commission as required by its rules and regulations; and (D) agree with investors' or the Trustee's records as to the total unpaid principal balance and number of WES Charge customer accounts serviced by the Servicer.</p>
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<p>WES Charge Customer Account Administration</p>
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<p>Securitization Property held by the Servicer is maintained as required by the transaction agreements or related Securitization Bond Collateral documents.</p>
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<p>Payments on WES Charges, including any payoffs, made in accordance with the Servicing Agreement, are posted to the Servicer's obligor records maintained no more than two business days after receipt, or such other number of days specified in the Servicing Agreement.</p>
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<p>Changes with respect to the terms or status of WES Charges payable by any customer (e.g., payment modifications or re-agings) are made, reviewed and approved by authorized personnel in accordance with the Servicing Agreement.</p>
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<p>Loss mitigation or recovery actions with respect to WES Charges are initiated, conducted and concluded in accordance with the timeframes or other requirements established by the Servicing Agreement and applicable Commission rules and protocols.</p>

<p>Records documenting collection efforts are maintained during the period a WES Charge customer account is delinquent in accordance with the Servicing Agreement. Such records are maintained on at least a monthly basis, or such other period specified in the Servicing Agreement, and describe the Servicer's activities in monitoring delinquent WES Charge customer accounts including, for example, phone calls, letters and payment rescheduling plans in cases where delinquency is deemed temporary (e.g., illness or unemployment).</p>

Servicing Criteria

Regarding any funds held in trust for the Issuer or customers (such as escrow accounts): (A) such funds are analyzed, in accordance with the Servicing Agreement, on at least an annual basis, or such other period specified in the transaction agreements; (B) interest on such funds is paid, or credited, to the Issuer or customers in accordance with the Servicing Agreement, Commission regulations and applicable State laws; and (C) such funds are returned to the obligor within 30 calendar days of full repayment of the related WES Charge customer account, or such other number of days specified in the transaction agreements.

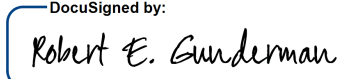
Delinquencies, charge-offs and uncollectable accounts are recognized and recorded in accordance with the Servicing Agreement.

3. To the best of the undersigned's knowledge, based on such review, the Servicer is in compliance in all material respects with the applicable Servicing Criteria set forth above as of and for the Assessment Period.
4. A registered public accounting firm has issued an attestation report on the undersigned's assessment of compliance with the applicable Servicing Criteria set forth above as of and for the Assessment Period.

IN WITNESS WHEREOF, the undersigned has duly executed and delivered this Servicer's Annual Servicing Criteria Compliance Certificate as of the date first above written.

SERVICER:

SUMMIT UTILITIES OKLAHOMA, INC., as
Servicer

By: 
7AABA2B4B6D4462...
 Name: Robert E. Gunderman
 Title: Executive Vice President and
 Chief Financial Officer

CERTIFICATE OF COMPLIANCE

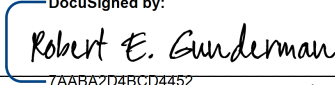
Oklahoma Development Finance Authority Ratepayer-Backed Bonds
(Summit Utilities Oklahoma, Inc.)
Series 2022 (Federally Taxable)

The undersigned hereby certifies that he is the duly elected and acting Executive Vice President and Chief Financial Officer of SUMMIT UTILITIES OKLAHOMA, INC., as servicer (the “Servicer”) under the Securitization Property Servicing Agreement dated as of October 19, 2022 (the “Servicing Agreement”) between the Servicer and THE OKLAHOMA DEVELOPMENT FINANCE AUTHORITY and further that:

1. A review of the activities of the Servicer and of its performance under the Servicing Agreement during the twelve months ended December 31, 2023 has been made under the supervision of the undersigned pursuant to Section 4.01(c)(iv) of the Servicing Agreement; and
2. To the best of the undersigned’s actual knowledge, based on such review, the Servicer has fulfilled all of its obligations in all material respects under the Servicing Agreement throughout the twelve months ended December 31, 2023, except as set forth on Annex A hereto.

Executed as of this 28th day of March, 2024.

SUMMIT UTILITIES OKLAHOMA, INC., as
Servicer

By: 
Name: Robert E. Gunderman
Title: Executive Vice President and
Chief Financial Officer

**ANNEX A
TO CERTIFICATE OF COMPLIANCE**

LIST OF SERVICER DEFAULTS

The following Servicer Defaults, or events which with the giving of notice, the lapse of time, or both, would become Servicer Defaults known to the undersigned occurred during the year ended December 31, 2023:

Nature of Default

Status

NONE

MONTHLY SERVICER'S CERTIFICATE

Oklahoma Development Finance Authority Ratepayer-Backed Bonds
 (Summit Utilities Oklahoma, Inc.)
Series 2022 (Federally Taxable)

Servicer: Summit Utilities Oklahoma, Inc.

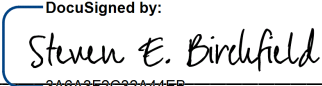
Pursuant to Section 3.01(b)(i) of the Securitization Property Servicing Agreement, dated as of October 19, 2022 (the "Servicing Agreement"), between SUMMIT UTILITIES OKLAHOMA, INC., as Servicer, and THE OKLAHOMA DEVELOPMENT FINANCE AUTHORITY, the Servicer does hereby certify as follows:

For period beginning January 1, 2023 and ended January 31, 2023:

<u>Customer Class</u>	<u>Tariff</u>	<u>Amount Collected</u>	<u>Amount Remitted</u>
Customer Class 1	Residential Service	\$534,906.55	\$513,131.13
Customer Class 2	General Firm Sales Service (GS1)	\$139,494.97	\$140,227.25
Customer Class 3	Commercial Firm Sales Service (CS1)	\$159,185.92	\$161,342.36
Customer Class 4	Large Firm Sales Service (LS1)	\$0.00	\$0.00
Total		\$833,587.44	\$814,700.74

In WITNESS HEREOF, the undersigned has duly executed and delivered this Monthly Servicer's Certificate the 6th day of February 2023.

SUMMIT UTILITIES OKLAHOMA, INC., as Servicer

DocuSigned by:

 By _____
 Name: Steven E. Birchfield
 Title: Executive Vice President and CFO

MONTHLY SERVICER'S CERTIFICATE

Oklahoma Development Finance Authority Ratepayer-Backed Bonds
 (Summit Utilities Oklahoma, Inc.)
Series 2022 (Federally Taxable)

Servicer: Summit Utilities Oklahoma, Inc.


Pursuant to Section 3.01(b)(i) of the Securitization Property Servicing Agreement, dated as of October 19, 2022 (the "Servicing Agreement"), between SUMMIT UTILITIES OKLAHOMA, INC., as Servicer, and THE OKLAHOMA DEVELOPMENT FINANCE AUTHORITY, the Servicer does hereby certify as follows:

For period beginning February 1, 2023 and ended February 28, 2023:

<u>Customer Class</u>	<u>Tariff</u>	<u>Amount Collected</u>	<u>Amount Remitted</u>
Customer Class 1	Residential Service	\$369,763.43	\$372,547.76
Customer Class 2	General Firm Sales Service (GS1)	\$98,091.47	\$92,277.64
Customer Class 3	Commercial Firm Sales Service (CS1)	\$117,773.63	\$105,280.26
Customer Class 4	Large Firm Sales Service (LS1)	\$10,150.76	\$10,150.76
Total		\$595,779.29	\$580,256.42

In WITNESS WHEREOF, the undersigned has duly executed and delivered this Monthly Servicer's Certificate the 10th day of March 2023.

SUMMIT UTILITIES OKLAHOMA, INC., as Servicer

DocuSigned by:

 By _____
 Name: Hallie F. Gilman
 Title: Executive Vice President and
 Chief Legal Officer

MONTHLY SERVICER'S CERTIFICATE

Oklahoma Development Finance Authority Ratepayer-Backed Bonds
 (Summit Utilities Oklahoma, Inc.)
Series 2022 (Federally Taxable)

Servicer: Summit Utilities Oklahoma, Inc.

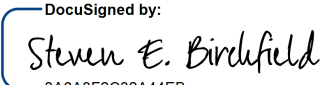
Pursuant to Section 3.01(b)(i) of the Securitization Property Servicing Agreement, dated as of October 19, 2022 (the "Servicing Agreement"), between SUMMIT UTILITIES OKLAHOMA, INC., as Servicer, and THE OKLAHOMA DEVELOPMENT FINANCE AUTHORITY, the Servicer does hereby certify as follows:

For period beginning March 1, 2023 and ended March 31, 2023:

<u>Customer Class</u>	<u>Tariff</u>	<u>Amount Collected</u>	<u>Amount Remitted</u>
Customer Class 1	Residential Service	\$432,153.19	\$449,441.97
Customer Class 2	General Firm Sales Service (GS1)	\$109,431.64	\$115,870.00
Customer Class 3	Commercial Firm Sales Service (CS1)	\$128,785.85	\$137,423.50
Customer Class 4	Large Firm Sales Service (LS1)	\$0.00	\$0.00
Total		\$670,370.68	\$702,735.47

In WITNESS HEREOF, the undersigned has duly executed and delivered this Monthly Servicer's Certificate the 10th day of April 2023.

SUMMIT UTILITIES OKLAHOMA, INC., as Servicer

By 
 Name: Steven E. Birchfield
 Title: Executive Vice President and
 Chief Financial Officer

MONTHLY SERVICER'S CERTIFICATE

Oklahoma Development Finance Authority Ratepayer-Backed Bonds
(Summit Utilities Oklahoma, Inc.)
Series 2022 (Federally Taxable)

Servicer: Summit Utilities Oklahoma, Inc.

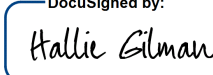
Pursuant to Section 3.01(b)(i) of the Securitization Property Servicing Agreement, dated as of October 19, 2022 (the "Servicing Agreement"), between SUMMIT UTILITIES OKLAHOMA, INC., as Servicer, and THE OKLAHOMA DEVELOPMENT FINANCE AUTHORITY, the Servicer does hereby certify as follows:

For period beginning April 1, 2023 and ended April 30, 2023:

<u>Customer Class</u>	<u>Tariff</u>	<u>Amount Collected</u>	<u>Amount Remitted</u>
Customer Class 1	Residential Service	\$384,131.28	\$379,814.38
Customer Class 2	General Firm Sales Service (GS1)	\$99,963.45	\$97,375.97
Customer Class 3	Commercial Firm Sales Service (CS1)	\$123,795.29	\$124,090.57
Customer Class 4	Large Firm Sales Service (LS1)	\$15,226.14	\$15,226.14
Total		\$623,116.16	\$616,507.06

In WITNESS WHEREOF, the undersigned has duly executed and delivered this Monthly Servicer's Certificate the 12th day of May 2023.

SUMMIT UTILITIES OKLAHOMA, INC., as Servicer

DocuSigned by:

 By _____
 Name: Hallie F. Gilman
 Title: Executive Vice President and
 Chief Legal Officer

MONTHLY SERVICER'S CERTIFICATE

Oklahoma Development Finance Authority Ratepayer-Backed Bonds
 (Summit Utilities Oklahoma, Inc.)
Series 2022 (Federally Taxable)

Servicer: Summit Utilities Oklahoma, Inc.

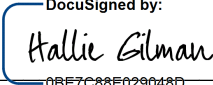
Pursuant to Section 3.01(b)(i) of the Securitization Property Servicing Agreement, dated as of October 19, 2022 (the "Servicing Agreement"), between SUMMIT UTILITIES OKLAHOMA, INC., as Servicer, and THE OKLAHOMA DEVELOPMENT FINANCE AUTHORITY, the Servicer does hereby certify as follows:

For period beginning May 1, 2023 and May 31, 2023:

<u>Customer Class</u>	<u>Tariff</u>	<u>Amount Collected</u>	<u>Amount Remitted</u>
Customer Class 1	Residential Service	\$497,726.92	\$490,666.72
Customer Class 2	General Firm Sales Service (GS1)	\$116,436.95	\$117,814.38
Customer Class 3	Commercial Firm Sales Service (CS1)	\$142,384.07	\$144,662.84
Customer Class 4	Large Firm Sales Service (LS1)	\$10,150.76	\$10,150.76
Total		\$766,698.70	\$763,294.70

In WITNESS HEREOF, the undersigned has duly executed and delivered this Monthly Servicer's Certificate on the 9th day of June 2023.

SUMMIT UTILITIES OKLAHOMA, INC., as Servicer

DocuSigned by:

 By _____
 Name: Hallie F. Gilman
 Title: Executive Vice President and
 Chief Legal Officer

MONTHLY SERVICER'S CERTIFICATE

Oklahoma Development Finance Authority Ratepayer-Backed Bonds
 (Summit Utilities Oklahoma, Inc.)
Series 2022 (Federally Taxable)

Servicer: Summit Utilities Oklahoma, Inc.

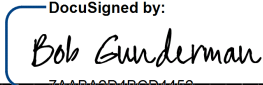
Pursuant to Section 3.01(b)(i) of the Securitization Property Servicing Agreement, dated as of October 19, 2022 (the "Servicing Agreement"), between SUMMIT UTILITIES OKLAHOMA, INC., as Servicer, and THE OKLAHOMA DEVELOPMENT FINANCE AUTHORITY, the Servicer does hereby certify as follows:

For period beginning June 1, 2023 and June 30, 2023:

<u>Customer Class</u>	<u>Tariff</u>	<u>Amount Collected</u>	<u>Amount Remitted</u>
Customer Class 1	Residential Service	\$443,153.07	\$452,992.21
Customer Class 2	General Firm Sales Service (GS1)	\$93,479.18	\$97,109.67
Customer Class 3	Commercial Firm Sales Service (CS1)	\$100,977.46	\$107,316.38
Customer Class 4	Large Firm Sales Service (LS1)	\$0.00	\$0.00
Total		\$637,609.71	\$657,418.26

In WITNESS HEREOF, the undersigned has duly executed and delivered this Monthly Servicer's Certificate on the 10th day of July 2023.

SUMMIT UTILITIES OKLAHOMA, INC., as Servicer

By 
 Name: Robert E. Gunderman
 Title: Executive Vice President and
 Chief Financial Officer

MONTHLY SERVICER'S CERTIFICATE

Oklahoma Development Finance Authority Ratepayer-Backed Bonds
 (Summit Utilities Oklahoma, Inc.)
Series 2022 (Federally Taxable)

Servicer: Summit Utilities Oklahoma, Inc.

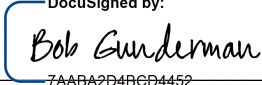
Pursuant to Section 3.01(b)(i) of the Securitization Property Servicing Agreement, dated as of October 19, 2022 (the "Servicing Agreement"), between SUMMIT UTILITIES OKLAHOMA, INC., as Servicer, and THE OKLAHOMA DEVELOPMENT FINANCE AUTHORITY, the Servicer does hereby certify as follows:

For period beginning July 1, 2023 and July 31, 2023:

<u>Customer Class</u>	<u>Tariff</u>	<u>Amount Collected</u>	<u>Amount Remitted</u>
Customer Class 1	Residential Service	\$489,196.32	\$472,334.53
Customer Class 2	General Firm Sales Service (GS1)	\$101,339.64	\$97,450.50
Customer Class 3	Commercial Firm Sales Service (CS1)	\$116,905.52	\$106,157.79
Customer Class 4	Large Firm Sales Service (LS1)	\$13,797.38	\$13,797.38
Total		\$721,238.86	\$689,740.20

In WITNESS HEREOF, the undersigned has duly executed and delivered this Monthly Servicer's Certificate on the 16th day of August 2023.

SUMMIT UTILITIES OKLAHOMA, INC., as Servicer

DocuSigned by:

 By _____
 Name: Robert E. Gunderman
 Title: Executive Vice President and
 Chief Financial Officer

MONTHLY SERVICER'S CERTIFICATE

Oklahoma Development Finance Authority Ratepayer-Backed Bonds
 (Summit Utilities Oklahoma, Inc.)
Series 2022 (Federally Taxable)

Servicer: Summit Utilities Oklahoma, Inc.

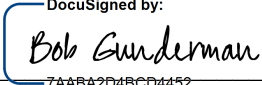
Pursuant to Section 3.01(b)(i) of the Securitization Property Servicing Agreement, dated as of October 19, 2022 (the "Servicing Agreement"), between SUMMIT UTILITIES OKLAHOMA, INC., as Servicer, and THE OKLAHOMA DEVELOPMENT FINANCE AUTHORITY, the Servicer does hereby certify as follows:

For period beginning August 1, 2023 and August 31, 2023:

<u>Customer Class</u>	<u>Tariff</u>	<u>Amount Collected</u>	<u>Amount Remitted</u>
Customer Class 1	Residential Service	\$557,858.10	\$568,549.82
Customer Class 2	General Firm Sales Service (GS1)	\$112,342.68	\$115,134.21
Customer Class 3	Commercial Firm Sales Service (CS1)	\$118,984.88	\$126,960.05
Customer Class 4	Large Firm Sales Service (LS1)	\$8,722.00	\$4,361.00
Total		\$797,907.66	\$815,005.08

In WITNESS HEREOF, the undersigned has duly executed and delivered this Monthly Servicer's Certificate on the 7th day of September 2023.

SUMMIT UTILITIES OKLAHOMA, INC., as Servicer

DocuSigned by:
 By 
 Name: Robert E. Gunderman
 Title: Executive Vice President and
 Chief Financial Officer

MONTHLY SERVICER'S CERTIFICATE

Oklahoma Development Finance Authority Ratepayer-Backed Bonds
 (Summit Utilities Oklahoma, Inc.)
Series 2022 (Federally Taxable)

Servicer: Summit Utilities Oklahoma, Inc.

Pursuant to Section 3.01(b)(i) of the Securitization Property Servicing Agreement, dated as of October 19, 2022 (the "Servicing Agreement"), between SUMMIT UTILITIES OKLAHOMA, INC., as Servicer, and THE OKLAHOMA DEVELOPMENT FINANCE AUTHORITY, the Servicer does hereby certify as follows:

For period beginning September 1, 2023, and ending September 30, 2023:

<u>Customer Class</u>	<u>Tariff</u>	<u>Amount Collected</u>	<u>Amount Remitted</u>
Customer Class 1	Residential Service	\$452,392.86	\$461,214.02
Customer Class 2	General Firm Sales Service (GS1)	\$96,626.22	\$96,510.26
Customer Class 3	Commercial Firm Sales Service (CS1)	\$102,404.43	\$98,253.87
Customer Class 4	Large Firm Sales Service (LS1)	\$0.00	\$4,361.00
Total		\$651,423.51	\$660,339.15

In WITNESS HEREOF, the undersigned has duly executed and delivered this Monthly Servicer's Certificate on the 5th day of October 2023.

SUMMIT UTILITIES OKLAHOMA, INC., as Servicer

DocuSigned by:
 By Robert E. Gunderman
 Name: Robert E. Gunderman
 Title: Executive Vice President and
 Chief Financial Officer

MONTHLY SERVICER'S CERTIFICATE

Oklahoma Development Finance Authority Ratepayer-Backed Bonds
 (Summit Utilities Oklahoma, Inc.)
Series 2022 (Federally Taxable)

Servicer: Summit Utilities Oklahoma, Inc.

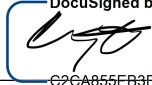
Pursuant to Section 3.01(b)(i) of the Securitization Property Servicing Agreement, dated as of October 19, 2022 (the "Servicing Agreement"), between SUMMIT UTILITIES OKLAHOMA, INC., as Servicer, and THE OKLAHOMA DEVELOPMENT FINANCE AUTHORITY, the Servicer does hereby certify as follows:

For period beginning October 1, 2023, and ending October 31, 2023:

<u>Customer Class</u>	<u>Tariff</u>	<u>Amount Collected</u>	<u>Amount Remitted</u>
Customer Class 1	Residential Service	\$513,788.04	\$500,763.88
Customer Class 2	General Firm Sales Service (GS1)	\$111,721.45	\$110,150.83
Customer Class 3	Commercial Firm Sales Service (CS1)	\$124,169.78	\$127,270.52
Customer Class 4	Large Firm Sales Service (LS1)	\$8,722.00	\$8,722.00
Total		\$758,401.27	\$746,907.23

In WITNESS HEREOF, the undersigned has duly executed and delivered this Monthly Servicer's Certificate on the 15th day of November 2023.

SUMMIT UTILITIES OKLAHOMA, INC., as Servicer

DocuSigned by:

 By _____
 Name: Craig R. Root
 Title: Authorized Officer

MONTHLY SERVICER'S CERTIFICATE

Oklahoma Development Finance Authority Ratepayer-Backed Bonds
 (Summit Utilities Oklahoma, Inc.)
Series 2022 (Federally Taxable)

Servicer: Summit Utilities Oklahoma, Inc.

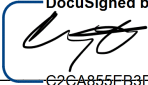
Pursuant to Section 3.01(b)(i) of the Securitization Property Servicing Agreement, dated as of October 19, 2022 (the "Servicing Agreement"), between SUMMIT UTILITIES OKLAHOMA, INC., as Servicer, and THE OKLAHOMA DEVELOPMENT FINANCE AUTHORITY, the Servicer does hereby certify as follows:

For period beginning November 1, 2023, and ending November 30, 2023:

<u>Customer Class</u>	<u>Tariff</u>	<u>Amount Collected</u>	<u>Amount Remitted</u>
Customer Class 1	Residential Service	\$423,858.12	\$439,948.54
Customer Class 2	General Firm Sales Service (GS1)	\$94,003.18	\$94,942.30
Customer Class 3	Commercial Firm Sales Service (CS1)	\$110,348.87	\$109,475.84
Customer Class 4	Large Firm Sales Service (LS1)	\$0.00	\$0.00
Total		\$628,210.17	\$644,366.68

In WITNESS HEREOF, the undersigned has duly executed and delivered this Monthly Servicer's Certificate on the 8th day of December 2023.

SUMMIT UTILITIES OKLAHOMA, INC., as Servicer

By  DocuSigned by:
 Name: Craig R. Root
 Title: Authorized Officer

MONTHLY SERVICER'S CERTIFICATE

Oklahoma Development Finance Authority Ratepayer-Backed Bonds
(Summit Utilities Oklahoma, Inc.)
Series 2022 (Federally Taxable)

Servicer: Summit Utilities Oklahoma, Inc.

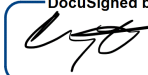
Pursuant to Section 3.01(b)(i) of the Securitization Property Servicing Agreement, dated as of October 19, 2022 (the "Servicing Agreement"), between SUMMIT UTILITIES OKLAHOMA, INC., as Servicer, and THE OKLAHOMA DEVELOPMENT FINANCE AUTHORITY, the Servicer does hereby certify as follows:

For period beginning December 1, 2023, and ending December 31, 2023:

<u>Customer Class</u>	<u>Tariff</u>	<u>Amount Collected</u>	<u>Amount Remitted</u>
Customer Class 1	Residential Service	\$382,365.67	\$370,197.84
Customer Class 2	General Firm Sales Service (GS1)	\$89,776.09	\$87,427.89
Customer Class 3	Commercial Firm Sales Service (CS1)	\$100,086.80	\$94,951.80
Customer Class 4	Large Firm Sales Service (LS1)	\$4,417.42	\$4,417.42
Total		\$576,645.98	\$556,994.95

In WITNESS HEREOF, the undersigned has duly executed and delivered this Monthly Servicer's Certificate on the 16th day of January 2024.

SUMMIT UTILITIES OKLAHOMA, INC., as Servicer

DocuSigned by:

 By _____
 Name: Craig R. Root
 Title: Authorized Officer

SUO WESCRM Payments by Rate Category
1/1/23 to 1/31/23

Securitization paid date	All
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Row Labels	Distinct Count of Customer Account #	Sum of Securitization paid amount
OK02 Residential Rate Cat.	74,729	534,465.95
OK02 Residential Service Private Line	37	301.44
OK02 General Service Rate Cat.	8,037	139,414.33
OK02 Commercial Service Rate Cat.	954	158,765.56
OK02 Residential Rate Cat. VFPO	21	139.16
OK02 Commercial Service Private Line	3	420.36
OK02 General Service Private Line	5	80.64
Grand Total	83,786	833,587.44

SUO WESCRM Payments by Rate Category
2/1/23 to 2/28/23

Row Labels	Distinct Count of Customer Account #	Sum of Securitization paid amount
OK02 Residential Rate Cat.	65,844	\$369,478.76
OK02 Residential Rate Cat. VFPO	19	\$82.69
OK02 Residential Service Private Line	34	\$201.98
OK02 General Service Rate Cat.	7,351	\$98,045.39
OK02 General Service Private Line	4	\$46.08
OK02 Commercial Service Rate Cat.	879	\$117,668.54
OK02 Commercial Service Private Line	1	\$105.09
OK02 Large Commercial Rate Cat.	1	\$10,150.76
Grand Total	74,133	\$595,779.29

SUO WESCRM Payments by Rate Category
3/1/23 to 3/31/23

Row Labels	Sum of Securitization paid amount
OK02 Residential Rate Cat.	431,808.03
OK02 Residential Service Private Line	169.29
OK02 Residential Rate Cat. VFPO	175.87
OK02 General Service Rate Cat.	109,397.08
OK02 General Service Private Line	34.56
OK02 Commercial Service Rate Cat.	128,260.40
OK02 Commercial Service Private Line	525.45
Grand Total	670,370.68

SUO WESCRM Payments by Rate Category
4/1/2023 to 4/30/2023

Row Labels	Sum of Securitization paid amount
OK02 Residential Rate Cat.	\$383,693.85
OK02 Residential Service Private Line	\$228.84
OK02 Residential Rate Cat. VFPO	\$208.59
OK02 General Service Rate Cat.	\$99,871.29
OK02 General Service Private Line	\$92.16
OK02 Commercial Service Rate Cat.	\$123,269.84
OK02 Commercial Service Private Line	\$525.45
OK02 Large Commercial Rate Cat.	\$15,226.14
Grand Total	\$623,116.16

SUO WESCRM Payments by Date**5/1/2023 to 5/31/2023**

Values		
Rate Category Description	Count of Customer Account #	Sum of Securitization paid amount
OK02 Commercial Service Private Line	6	\$735.63
OK02 Commercial Service Rate Cat.	1,423	\$141,648.44
OK02 General Service Private Line	4	\$46.08
OK02 General Service Rate Cat.	10,615	\$116,390.87
OK02 Large Commercial Rate Cat.	2	\$10,150.76
OK02 Residential Rate Cat.	93,349	\$497,142.70
OK02 Residential Rate Cat. VFPO	55	\$310.87
OK02 Residential Service Private Line	40	\$273.35
Grand Total	105,494	\$766,698.70

SUO WESCRM Payments by Date
6/1/2023 to 6/30/2023

Row Labels	Sum of Customer Count	Sum of Securitization paid amount
OK02 Commercial Service Private Line	3	\$315.27
OK02 Commercial Service Rate Cat.	1,054	\$100,662.19
OK02 General Service Private Line	7	\$69.12
OK02 General Service Rate Cat.	8,557	\$93,410.06
OK02 Residential Rate Cat.	82,148	\$442,607.72
OK02 Residential Rate Cat. VFPO	42	\$289.67
OK02 Residential Service Private Line	36	\$255.68
Grand Total	91,847	\$637,609.71

SUO WESCRM Payments by Date
7/1/2023 to 7/31/2023

Row Labels	Sum of Securitization paid amount	Sum of Customer Count
OK02 Commercial Service Private Line	516.04	11
OK02 Commercial Service Rate Cat.	116,389.48	1,220
OK02 Company Use	(90.20)	8
OK02 General Service Private Line	33.58	13
OK02 General Service Rate Cat.	101,306.06	9,212
OK02 Large Commercial Rate Cat.	13,797.38	3
OK02 Residential Rate Cat.	488,769.06	85,693
OK02 Residential Rate Cat. VFPO	395.15	47
OK02 Residential Service Private Line	122.31	142
Grand Total	721,238.86	96,349

SUO WESCRM Payments by Date
8/1/2023 to 8/31/2023

Company Code	1117
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Row Labels	Sum of Securitization paid amount	Sum of Customer Count
#	(302.76)	40
OK02 Commercial Service Private Line	421.94	5
OK02 Commercial Service Rate Cat.	118,562.94	1,281
OK02 General Service Private Line	45.84	5
OK02 General Service Rate Cat.	112,296.84	10,307
OK02 Large Commercial Rate Cat.	8,722.00	2
OK02 Residential Rate Cat.	557,282.66	101,994
OK02 Residential Rate Cat. VFPO	423.40	51
OK02 Residential Service Private Line	454.80	67
Grand Total	797,907.66	113,752

SUO WESCRM Payments by Date
9/1/2023 to 9/30/2023

Company Code	1117
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Row Labels	Sum of Securitization paid amount	Sum of Customer Count
#	(190.48)	36
OK02 Commercial Service Private Line	(18.82)	7
OK02 Commercial Service Rate Cat.	102,423.25	1093
OK02 General Service Private Line	84.32	8
OK02 General Service Rate Cat.	96,541.90	8964
OK02 Large Commercial Rate Cat.	0.00	3
OK02 Residential Rate Cat.	451,964.87	84,886
OK02 Residential Rate Cat. VFPO	330.67	43
OK02 Residential Service Private Line	287.80	40
Grand Total	651,423.51	95,080

SUO WESCRM Payments by Date
10/1/2023 to 10/31/2023

Company Code	1117
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Row Labels	Sum of Securitization paid amount	Sum of Customer Count
#	(214.58)	45
OK02 Commercial Service Private Line	1,071.30	5
OK02 Commercial Service Rate Cat.	123,098.48	1,287
OK02 General Service Private Line	52.70	5
OK02 General Service Rate Cat.	111,668.75	10,359
OK02 Large Commercial Rate Cat.	8,722.00	2
OK02 Residential Rate Cat.	513,305.97	98,119
OK02 Residential Rate Cat. VFPO	461.30	59
OK02 Residential Service Private Line	235.35	35
Grand Total	758,401.27	109,916

SUO WESCRM Payments by Date**11/1/2023 to 11/30/2023**

Securitization paid date	(All)
Company Code	1117

Row Labels	Sum of Securitization paid amount	Sum of Customer Count
#	(119.43)	26
OK02 Commercial Service Private Line	281.72	3
OK02 Commercial Service Rate Cat.	110,067.15	1,199
OK02 General Service Private Line	42.16	4
OK02 General Service Rate Cat.	93,961.02	9,205
OK02 Residential Rate Cat.	423,539.65	88,603
OK02 Residential Rate Cat. VFPO	251.16	41
OK02 Residential Service Private Line	186.74	36
Grand Total	628,210.17	99,117

SUO WESCRM Payments by Date
12/1/2023 to 12/31/2023

Company Code	1117
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Row Labels	Sum of Securitization paid amount	Sum of Customer Count
#	(36.29)	8
OK02 Commercial Service Private Line	271.08	3
OK02 Commercial Service Rate Cat.	99,815.72	1,124
OK02 General Service Private Line	49.40	5
OK02 General Service Rate Cat.	89,726.69	9,142
OK02 Large Commercial Rate Cat.	4,417.42	1
OK02 Residential Rate Cat.	381,759.26	88,479
OK02 Residential Rate Cat. VFPO	449.83	95
OK02 Residential Service Private Line	192.87	44
Grand Total	576,645.98	98,901