



AMENDED TRUE-UP LETTER

Date: April 14, 2025

Oklahoma Corporation Commission
ATTN: Chairman Kim David
Will Rogers Memorial Building
2401 N Lincoln Blvd
Oklahoma City, OK 73105

Re: Amendment to SUO WESCRM True-Up Charge

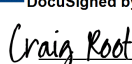
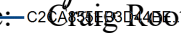
Dear Chairman David,

Pursuant to the requirements set forth in Cause No. PUD 202100087, on March 26, 2025, Summit Utilities of Oklahoma, Inc., filed its periodic adjustment to the Company's WESCRM Charge. After further review, the Company's March 26, 2025 adjustment does not include approximately \$266,000 in ODFA funding costs that were accrued for but not spent in prior filings. Since the WESCRM adjustment will not be implemented until May 1, 2025, SUO is filing this amendment to include those costs for implementation with the May 1 WESCRM charge.

The Company is resubmitting the True-Up Letter and Attachments to reflect the inclusion of the ODFA Funding costs as its Amended Filing.

Respectfully submitted,

Summit Utilities Oklahoma

DocuSigned by:
By: 
Name:  Craig Root
Title: Vice President and
Corporate Treasurer



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Date: April 14, 2025

Oklahoma Corporation Commission
ATTN: Chairman Kim David
Will Rogers Memorial Building
2401 N Lincoln Blvd
Oklahoma City, OK 73105

Re: Application of CenterPoint Energy Resources Corp. D/B/A/ CenterPoint Energy Oklahoma Gas for a Financing Order Approving Securitization of Costs Arising from the February 2021 Winter Weather Event pursuant to the February 2021 Regulated Utility Consumer Protection Act, Cause No. PUD 202100087

Dear Chairman David:

Pursuant to the Financing Order adopted on the 10th day of February, 2022 in *Application of CenterPoint Energy Resources Corp. D/B/A/ CenterPoint Energy Oklahoma Gas for a Financing Order Approving Securitization of Costs Arising from the February 2021 Winter Weather Event pursuant to the February 2021 Regulated Utility Consumer Protection Act*, Cause No. PUD 202100087 (the "Financing Order"), CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Oklahoma Gas (the "Utility"), as Servicer of the Ratepayer-Backed Bonds, or any successor Servicer on behalf of bond trustee as assignee of the ODFA shall apply [semi-annually] for a mandatory periodic adjustment to the WESCRM Charge. The Utility may apply for more frequent periodic adjustments in accordance with the Financing Order. Any capitalized terms not defined herein shall have the meanings ascribed thereto in the Financing Order or the February 2021 Regulated Utility Consumer Protection Act, 74 OKLA. STAT. §§ 9071-9081 (the "Act").

Each true-up adjustment shall be filed with the Commission not later than March 31 or September 30, as applicable, with the WESCRM Charge to be effective the first billing cycle of May or November, as applicable. The Commission staff will have 30 days after the date of the true-up adjustment filing in which to confirm the mathematical accuracy of the servicer's adjustment. However, any mathematical correction not made prior to the effective date of the WESCRM Charge will be made in future true-up adjustment filings and will not delay the effectiveness of the WESCRM Charge.

Using the formula approved by the Commission in the Financing Order, this filing modifies the variables used in the WESCRM Charge calculation and provides the resulting modified WESCRM Charge. Attachments 1, 2 and 3 show the resulting values of the Amended WESCRM Charge for each Customer class, as calculated in accordance with the Financing Order. The

assumptions underlying the current WESCRM Charge were filed by the Utility in its True-Up Letter dated September 25, 2024.

Respectfully submitted,

Summit Utilities Oklahoma

Signed by:
By: Bob Gunderman
Name: Bob Gunderman
Title: Executive Vice President and
Chief Financial Officer

Signed by:
By: Jane Park
Name: Jane Park
Title: Executive Vice President and
Chief Legal Officer

Attachments (4):

- Attachment 1: Amended Calculation of WESCRM Charges
- Attachment 2: Amended WESCRM Charge Calculations
- Attachment 3: Amended WESCRM Charge for Payment Period
- Attachment 4: SUO True-up WESCRM Charge Calculation 2025-03 AMENDED.xls

cc:

Commissioner Kim David, Oklahoma Corporation Commission
Commissioner Brian Bingman, Oklahoma Corporation Commission
Commissioner Todd Hiatt, Oklahoma Corporation Commission
Mark Argenbright, Director of the Public Utility Division, Oklahoma Corporation Commission

Geoffrey Rush, Public Utility Division, Oklahoma Corporation Commission
Michael Velez, Public Utility Division, Oklahoma Corporation Commission
Michael Davis, Oklahoma Development Finance Authority, as Issuer
Melissa Burgard, Oklahoma Development Finance Authority, as Issuer
Jeremy Stoner, Oklahoma Development Finance Authority, as Issuer

ATTACHMENT 1
AMENDED CALCULATION OF WESCRM CHARGES

| <u>Estimated Ongoing Financing Costs</u> | |
|---|---------------------|
| ODFA Administration Fees ^ | \$50,000.00 |
| ODFA Legal Fees and Expenses ^ | \$75,000.00 |
| ODFA Accounting Fees ^ | \$75,000.00 |
| Trustee's/Trustee's Counsel Fees and Expenses ^ | \$7,500.00 |
| Rating Agency Fees and Related Expenses ^ | \$32,000.00 |
| Rule 17g-5 Website ^ | \$4,132.00 |
| Miscellaneous ^ | \$50,000.00 |
| Dissemination Agent Fees ^ | \$5,000.00 |
| Total Non-Utility External Annual Ongoing Financing Costs | \$298,632.00 |
| | |
| Ongoing Servicer Fees (Utility as Servicer) | \$40,782.50 |
| Accounting Costs (External) ^ | \$125,000.00 |
| Total (Utility as Servicer) Estimated Annual Ongoing Financing Costs | \$464,414.50 |
| Ongoing Servicer Fees as % of original principal amount | 0.05% |
| Total (Utility as Servicer) Estimated Annual Ongoing Financing Costs as % of original principal amount | 0.57% |
| | |
| Ongoing Servicer Fees (Third-Party as Servicer - 0.60% of principal) | \$489,390.00 |
| Other External Ongoing Fees (total of lines marked with a ^ mark above) | \$423,632.00 |
| Total (Third-Party as Servicer) Estimated Ongoing Financing Costs | \$913,022.00 |

| Input Values for WESCRM Charges | |
|--|-------------|
| Projected revenues for payment period (See Attachment 2) | |
| Forecast uncollectibles for payment period | 1.29% |
| Average Days Sales Outstanding | 50.79 |
| | |
| A. Balance of Collection Account (Net of Capital Subaccount) (As of 03/25/2025 , which is the Calculation Cut-off Date) | \$4,842,386 |
| B. Projected WESCRM Charges Between Calculation Cut-off Date and Proposed Effective Date of True-Up Adjustment | \$753,134 |

| | |
|---|--------------------|
| C. Less: Scheduled Bond Payments Between Cut-Off Date and Proposed Effective Date of True-Up Adjustment | (\$4,083,661) |
| D. Anticipated Funds Available (Sum of A, B and C) | \$1,511,859 |
| | |
| E. Ratepayer-Backed Bond Principal | \$4,389,189 |
| F. Ratepayer-Backed Recovery Bond Interest | \$3,852,183 |
| G. Ongoing Financing Costs for the applicable payment period (See Table 1 above) | \$771,284 |
| H. Periodic Payment Requirement (Sum of E, F and G) | \$9,012,655 |
| Periodic Billing Requirement (Difference between H and D) | \$7,500,796 |

ATTACHMENT 2

AMENDED WESCRM CHARGE CALCULATIONS

Please see Attachment “SUO True-up WESCRM Charge Calculation 2025-03 AMENDED.xlsx” for the calculations and workpapers supporting the WESCRM charge calculations.

ATTACHMENT 3
AMENDED WESCRM CHARGE FOR PAYMENT PERIOD

| <u>Rate Class</u> | <u>WESCRM Charge</u> |
|--------------------------|-----------------------------|
| Residential | \$4.70 |
| GS1 | \$10.26 |
| CS1 | \$94.66 |
| LCS | \$4,473.56 |