

## **CVP Cost Allocation Study (CAS) Methodology and Preliminary Results**

The CVP Cost Allocation Study used a two cost allocation and two-period repayment approach. The first period (Period 1) utilized the cost allocation factors which were based on the 1975 cost allocation. Period 1 represents historic operation and benefits. The second period (Period 2) was based on cost allocation factors that reflect expected future operation and benefits analyzed in this CAS. The CVP CAS is a merger of the two periods.

The Period 2 allocation steps are summarized below.

- Identify costs to be allocated.
- Allocate costs to authorized project purposes.
- Calculate repayment responsibilities for each project purpose.

The following is a description of the methodology used for each of these steps.

The 2013 CVP financial statements provided the actual costs to be allocated in both Period 1 and Period 2. The Separable Cost-Remaining Benefits (SCRB) method was used as the starting point to allocate costs according to existing legislation, agreements, and policies. However, because the repayment responsibilities of certain CVP costs have been directly assigned either through legislation and/or agreement, those costs cannot be allocated using the SCRБ allocation. Doing so would allocate those costs differently than the legislation or agreement requires.

Consequently, where Congress has provided clear direction regarding the reimbursement of specific project features, or where Reclamation has entered into agreements regarding repayment, the costs of such features were deducted prior to implementing the SCRБ process. These direct assigned costs were added later to the appropriate project purposes (or sub-purposes) according to the legislation or agreements.

After completing the adjustments described above, the remaining costs were allocated to the authorized project purposes of the CVP using the SCRБ method. The SCRБ method requires estimation of the benefits for each project purpose and the costs for each of the single purpose alternatives that would provide the same benefits. The lesser of the present values of the annual benefits estimated for each purpose or the cost of the single purpose alternative providing comparable benefits sets the limit of the amount that can be allocated to a particular project purpose. This is defined as the justifiable expenditure for each project purpose.

The next step in the SCRБ procedure is to identify the separable cost for each project purpose. The separable cost of a purpose is the difference in the total multipurpose project cost and the cost of the project without a particular purpose included (multipurpose project without). The separable costs for each project purpose are then deducted from the justifiable expenditures for each purpose to derive the remaining justifiable expenditures.

The remaining joint costs of the project are the total project costs less the total separable costs. Remaining joint costs are prorated to each project purpose based on the percentage share of the remaining justifiable expenditures. In a typical Reclamation cost allocation the separable and remaining joint costs for each project purpose are summed to derive the total cost allocated to each purpose.

The results of the SCRB procedure are shown in Table 1. The joint cost factors (shown as percentages) under the heading entitled “Remaining Justifiable Expenditure Percentage by Purpose” are the only numbers from the SCRB process that will be used later in the CVP CAS.

To accommodate Reclamation’s future rate setting process the costs in Period 2 were allocated separately, by facility, rather than aggregated for the total project, as is typically done for most Reclamation cost allocation studies. Allocation factors were estimated for each facility using the cost estimates prepared for the Period 2 allocation and the joint cost factors derived from the SCRB process. The allocation factors were used to allocate total cost to the authorized purposes for each facility.

The Period 2 allocation factors distribute the total cost of each facility, including both those costs that are specific to individual purposes (separable factors), as well as the proportional allocation of remaining joint costs among multiple purposes (joint factors). These allocation factors were estimated using the steps described below.

First the remaining joint costs by facility were estimated by subtracting the sum of the separable costs from the total cost to be allocated by facility. The remaining joint costs were then allocated to the authorized purposes using the remaining joint costs percentages which were calculated in the SCRB process. Next, the total allocated costs by authorized purposes were estimated for each facility by summing the separable costs and that portion of joint costs allocated to the purpose. Finally, the allocation factor was derived by dividing the total cost allocated to each purpose by the total cost of the feature.

The allocation factors are specific to each facility based on the estimated cost data and the SCRB prepared for Period 2. These factors will remain constant for the Period 2 allocation.

It should be noted that in the SCRB methodology, the benefits and all project costs should be on a comparable time basis. The CVP has been under construction for many years so the plant in service costs in the financial statements have widely varying cost basis. For this reason all project costs and benefits were indexed to 2013 price levels for the purposes of estimating the joint cost factors in the SCRB table.

Unindexed costs which appear in the 2013 financial statements were used to determine repayment responsibilities. The total allocated cost (unindexed) by facility were multiplied by the allocation factors to distribute the cost among the authorized purposes. Repayment responsibilities for costs allocated to each authorized project purpose were determined separately for each purpose through the sub-allocation process.

## **Sub-Allocation and Calculating Repayment Responsibilities – Period 2**

### **Water Supply**

The process used in Period 2 to sub-allocate water supply costs for repayment purposes is comparable to the process used in Period 1. Water supply costs were sub-allocated to irrigation, municipal and industrial, wildlife refuge, and B2 functions in Period 2. Period 1 sub-allocated

water supply related costs to the same purposes with the exception of B2. B2 releases that were included in the water supply purpose relate to releases under excess conditions that could not be recaptured for other purposes such as water quality. In other words, only those B2 releases that flow to the ocean because they could not be used for any other purpose were included as part of the water supply purpose.

The water supply costs in Period 2, like Period 1, were sub-allocated to each function on the basis of water use. Water supply delivery distributions were estimated by facility. A number of facilities share the same water delivery distributions because they supply the same benefits with respect to water. The water supply distribution areas are essentially the same for both Period 1 and Period 2 allocations.

The data used to estimate the water delivery distributions differ between Periods 1 and 2 with respect to the hydrology assumptions. Because Period 2 is a prospective analysis the water delivery data is based on CalSim2 modeling. Whereas Period 1 water deliveries are based on both historical delivery data and projected deliveries.

The historical record of CVP water deliveries cannot be used to characterize the water supply purpose of the project because demand has increased over time due to the progressive buildout of project facilities and because basin wide regulatory requirements have evolved over time. The CalSim2 planning model was used to represent Period 2 hydrology under current operations for a wide variety of hydrologic conditions and current regulatory constraints.

## **Power**

The power costs were sub-allocated between commercial and project use power in both Period 1 and 2. Similar to the water supply sub-allocation, Period 1 and 2 differ with respect to hydrology assumptions. Period 2 sub-allocates between commercial and project power based on LTGEN modeling results which were based on Calsim2 modeling. For the purposes of Period 2, the project power generation at San Luis (O'Neill and Giannelli pump-generation units) was removed from the project use total in order to appropriately assign a portion of the costs of other power generating facilities to the water supply purpose.

## **Refuge and B2**

The Period 2 allocation assumed that Refuge (Level 2 and incremental Level 4), and B2 (releases under excess conditions that could not be recaptured for other purposes) were part of the Water Supply purpose. Calsim2 provided delivery data for Refuge Level 2 water which was further broken down into Level 1 refuge water and incremental Level 2 refuge water. Level 1 was split out based on the quantities specified in the 1989 *Report on Refuge Water Supply Investigations*. Incremental Level 4 refuge deliveries were estimated based on a 10 year average of Incremental Level 4 historic delivery data. B2 water releases were based on data provided in the Central Valley Operations Office accounting records.

Costs allocated to Incremental 2 refuge water and B2 water were considered reimbursable in the Period 2 allocation. These costs were allocated based on the proportion of reimbursable costs which include irrigation, M&I, and commercial power. This break down was accomplished

using the proportion of project costs allocated to each of the reimbursable sub-purposes through the sub-allocation process of Water Supply and Power, as described above.

### **Direct Assigned Costs**

After the sub-allocation process was completed the direct assigned costs were added back into the analysis. These direct assigned costs were allocated to the appropriate reimbursable or non-reimbursable sub-purpose based on legislation and/or agreements.

The results of the CVP CAS allocation of SCRB costs and additional Direct Assigned costs are shown in Table 2.

### **CVP Cost Allocation Study Merge**

The CVP Cost Allocation is a merger of the results from Periods 1 and 2. The two periods are merged based on an equal weighting (50 percent Period 1 and 50 percent Period 2). This provides an allocation of CVP construction and direct assigned costs to repayment responsibilities. IDC will be merged with Period 1 after the IDC is re-estimated for Period 2. OM&R isn't necessary to merge because OM&R costs are prospective costs. OM&R costs will be allocated in the future based on the Period 2 allocation assumptions.

Reclamation prepares an annual update to the interim allocation of the CVP for plant-in-service and operations and maintenance (O&M). The 2013 annual plant and service allocation was the basis for the allocation of the cost associated with construction and IDC for Period 1 used in the merge.

### **Results**

The results of the two cost allocation and two-period repayment merge of construction costs are shown in Table 3. The table shows the total allocation for each period, the weighting calculation and finally the merged results. The sub-total of Authorized Purposes and Sub-Purposes are equal for both Periods because the same costs are allocated in each period, however the costs are distributed differently due the assumptions used in Period 1 (historic) vs. those used in Period 2 (prospective). The adjustments and exceptions are equal in both Period 1 and 2. The total allocated costs in the two cost allocation two period repayment merge equals \$3,900,200,311.

The merge of interest during construction (IDC) costs is shown in Table 4. This merge will be completed after the CVP CAS study is complete and IDC is estimated for repayment purposes for Period 2.

The summary of repayment responsibilities for construction costs are shown in Table 5 for both periods and the merge.

Finally the summary of costs allocated to the reimbursable purposes (construction costs only) are shown for the Merge and Periods 1 and 2 in Table 6.

Reclamation will continue to allocate O&M costs on an annual basis, however the allocation will be based on Period 2 allocation factors for each facility, as appropriate.

It should be noted that the results shown in Tables 5 and Tables 6 will vary from year to year if Reclamation continues to use a dynamic process where water deliveries and power generation assumptions used in the sub-allocation vary every year. These sub-allocation assumptions may be based on a combination of actual observed water deliveries and projected water deliveries as is the current practice.

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**Table 1 - SCRB Table (Indexed to 2013 dollars)**

Costs to be Allocated		Indexed							
	<b>Total</b>	\$17,008,208,668							
	<b>Construction</b>	\$11,189,566,923							
	<b>IDC</b>	\$477,365,105							
	<b>OM&amp;R</b>	\$5,341,276,640							
	<b>Water Supply</b>	<b>Power</b>	<b>Flood Control</b>	<b>Fish and Wildlife</b>	<b>Recreation</b>	<b>Navigation</b>	<b>Water Quality</b>	<b>Total</b>	
<b>Benefits</b>	\$22,706,638,408	\$5,882,278,267	\$37,992,213,836	\$0	\$0	\$0	\$1,457,558,518	\$68,038,689,029	
<b>Single Purpose Alternative Costs</b>									
	<b>Total</b>	\$10,312,240,120	\$8,342,022,404	\$4,302,406,347	\$0	\$0	\$0	\$2,839,668,513	\$25,796,337,384
	<b>Construction</b>	\$8,188,740,449	\$1,618,518,440	\$3,754,439,785	\$0	\$0	\$0	\$2,441,543,801	\$16,003,242,475
	<b>IDC</b>	\$338,047,078	\$76,656,293	\$152,091,449	\$0	\$0	\$0	\$99,964,303	\$666,759,123
	<b>OM&amp;R</b>	\$1,785,452,593	\$6,646,847,671	\$395,875,113	\$0	\$0	\$0	\$298,160,409	\$9,126,335,786
<b>Justifiable Expenditure (Lesser of Benefits or SPA Costs)</b>									
		\$10,312,240,120	\$5,882,278,267	\$4,302,406,347	\$0	\$0	\$0	\$1,457,558,518	\$21,954,483,252
<b>Separable Costs (Total Multipurpose Cost minus Multipurpose w/o each purpose)</b>									
	<b>Total</b>	\$6,083,361,580	\$4,566,036,948	\$155,692,693	\$0	\$15,141,033	\$0	\$0	\$10,820,232,254
	<b>Construction</b>	\$4,476,094,663	\$2,034,035,666	\$136,098,155	\$0	\$13,909,812	\$0	\$0	\$6,660,138,296
	<b>IDC</b>	\$174,616,065	\$120,787,985	\$6,964,575	\$0	\$179,740	\$0	\$0	\$302,548,365
	<b>OM&amp;R</b>	\$1,432,650,852	\$2,411,213,297	\$12,629,963	\$0	\$1,051,481	\$0	\$0	\$3,857,545,593
<b>Remaining Justifiable Expenditure (Justifiable Expenditure minus Separable Costs)</b>									
		\$4,228,878,540	\$1,316,241,319	\$4,146,713,654	\$0	\$0	\$0	\$1,457,558,518	\$11,149,392,031
<b>Remaining Justifiable Expenditure Percentage by Purpose</b>									
		37.92923%	11.80550%	37.19228%	0.000%	0.000%	0.000%	13.072990%	100.000000%

**Table 2 - Period 2 Allocation Summary (Unindexed SCRIB and Direct Assigned costs)**

Purpose	Construction	IDC	OM&R	Total
<b>Irrigation</b>				
Water Supply	\$862,612,650	\$61,777,325	\$1,570,997,671	\$2,495,387,646
Project Power	\$122,836,129	\$9,706,587	\$426,148,277	\$558,690,993
CVPIA - Water Supply - Refuge reimbursable (incremental level 2)	\$40,675,142	\$3,509,514	\$55,636,460	\$99,821,116
CVPIA - Water Supply -B2	\$2,833,815	\$123,022	\$966,965	\$3,923,802
CVPIA - Project Power - Refuge reimbursable (incremental level 2)	\$6,002,228	\$465,056	\$16,549,649	\$23,016,933
<b>SCRIB Allocation Total</b>	<b>\$1,034,959,964</b>	<b>\$75,581,504</b>	<b>\$2,070,299,022</b>	<b>\$3,180,840,490</b>
Direct Assigned Reimbursable				
Reimbursable - SOD	\$3,017,064			\$3,017,064
Reimbursable - Other	\$8,615,625			\$8,615,625
Repayment Contract	\$360,699,603			\$360,699,603
<b>Direct Assigned Total</b>	<b>\$372,332,292</b>			<b>\$372,332,292</b>
<b>Irrigation Total</b>	<b>\$1,407,292,256</b>	<b>\$75,581,504</b>	<b>\$2,070,299,022</b>	<b>\$3,553,172,782</b>
<b>Municipal and Industrial</b>				
Water Supply	\$109,423,605	\$6,463,779	\$237,792,763	\$353,680,147
Project Power	\$23,879,033	\$1,886,937	\$82,842,151	\$108,608,121
CVPIA - Water Supply - Refuge reimbursable (incremental level 2)	\$5,502,170	\$409,982	\$8,932,240	\$14,844,392
CVPIA - Water Supply -B2	\$383,333	\$14,372	\$155,241	\$552,946
CVPIA - Project Power - Refuge reimbursable (incremental level 2)	\$811,928	\$54,326	\$2,656,988	\$3,523,242
<b>SCRIB Allocation Total</b>	<b>\$140,000,069</b>	<b>\$8,829,396</b>	<b>\$332,379,383</b>	<b>\$481,208,848</b>
Direct Assigned Reimbursable				
Reimbursable - SOD	\$570,349			\$570,349
Reimbursable - Other	\$1,165,445			\$1,165,445
Repayment Contract	\$225,503,215			\$225,503,215
<b>Direct Assigned Total</b>	<b>\$227,239,009</b>			<b>\$227,239,009</b>
<b>M&amp;I Total</b>	<b>\$367,239,078</b>	<b>\$8,829,396</b>	<b>\$332,379,383</b>	<b>\$708,447,857</b>
<b>Power</b>				
Commerical	\$581,972,098	\$45,987,802	\$2,019,002,044	\$2,646,961,944
CVPIA - Water Supply - Refuge reimbursable (incremental level 2)	\$24,021,339	\$2,257,781	\$56,245,331	\$82,524,451
CVPIA - Water Supply -B2	\$1,673,553	\$79,145	\$977,546	\$2,730,244
CVPIA - Project Power - Refuge reimbursable (incremental level 2)	\$3,544,710	\$299,184	\$16,730,765	\$20,574,659
<b>SCRIB Allocation Total</b>	<b>\$611,211,700</b>	<b>\$48,623,912</b>	<b>\$2,092,955,686</b>	<b>\$2,752,791,298</b>
Direct Assigned Reimbursable				
Reimbursable - SOD	\$1,184,217			\$1,184,217
Reimbursable - Other	\$5,088,092			\$5,088,092
Repayment Contract	\$8,568,500			\$8,568,500
<b>Direct Assigned Total</b>	<b>\$14,840,809</b>			<b>\$14,840,809</b>
<b>Power Total</b>	<b>\$626,052,509</b>	<b>\$48,623,912</b>	<b>\$2,092,955,686</b>	<b>\$2,767,632,107</b>
<b>Non-Reimbursable Refuge</b>				
CVPIA - Non-Reimbursable Refuge (Level 1) - Water Supply	\$21,052,024	\$1,302,304	\$46,527,554	\$68,881,882
CVPIA - Non-Reimbursable Refuge (Level 1) - Power	\$3,939,773	\$311,321	\$13,668,020	\$17,919,114
Non-Reimbursable Incremental Level 4 Water Supply	\$7,134,691	\$378,627	\$17,186,827	\$24,700,145
Non-Reimbursable Incremental Level 4 Power	\$2,530,024	\$199,924	\$8,777,262	\$11,507,210
<b>CVPIA Non-Reimbursable Refuge Total</b>	<b>\$34,656,512</b>	<b>\$2,192,176</b>	<b>\$86,159,663</b>	<b>\$123,008,351</b>
<b>Flood Control</b>				
<b>Flood Control Total</b>	<b>\$303,144,686</b>	<b>\$15,267,115</b>	<b>\$564,463,369</b>	<b>\$882,875,170</b>
<b>Fish and Wildlife</b>				
<b>Fish and Wildlife Total</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>
<b>Recreation</b>				
<b>Recreation Total</b>	<b>\$5,742,471</b>	<b>\$90,666</b>	<b>\$1,051,481</b>	<b>\$6,884,618</b>
<b>Navigation</b>				
<b>Navigation Total</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>
<b>Water Quality</b>				
<b>Water Quality Total</b>	<b>\$101,689,062</b>	<b>\$5,128,781</b>	<b>\$193,968,010</b>	<b>\$300,785,853</b>
<b>Non-Reimbursable Direct Assigned</b>				
Federal				
Federal - SOD	\$27,039,235			\$27,039,235
Federal - Other	\$170,339,103			\$170,339,103
<b>Total Non-Reimbursable Federal</b>	<b>\$197,378,338</b>			<b>\$197,378,338</b>
State of CA				
State of CA - Other	\$248,310,255			\$248,310,255
<b>Total Non-Reimbursable State of CA</b>	<b>\$248,310,255</b>			<b>\$248,310,255</b>
State of CA and Local	\$4,467,386			\$4,467,386
<b>Total Non-Reimbursable State of CA/Local</b>	<b>\$4,467,386</b>			<b>\$4,467,386</b>
Federal - Deferred Use				
<b>Total Deferred Use</b>	<b>\$56,875,000</b>			<b>\$56,875,000</b>
<b>Total Allocated SCRIB Costs</b>	<b>\$2,231,404,464</b>	<b>\$155,713,550</b>	<b>\$5,341,276,614</b>	<b>\$7,728,394,628</b>
<b>Total Direct Assigned Costs</b>	<b>\$1,121,443,089</b>			<b>\$1,121,443,089</b>
<b>Total Allocated Costs</b>	<b>\$3,352,847,553</b>	<b>\$155,713,550</b>	<b>\$5,341,276,614</b>	<b>\$8,849,837,717</b>

**Table 3 - Period 1 and Period 2 Merge - Construction**

Category	Construction Merge		50%	50%	Total Merge
	Period 1	Period 2	Period 1	Period 2	
<b>Authorized Purposes &amp; Sub-Purposes</b>					
Water Supply - Irrigation	\$1,539,507,365	\$1,407,292,256	\$769,753,683	\$703,646,128	\$1,473,399,811
Water Supply - M&I	\$334,530,154	\$367,239,078	\$167,265,077	\$183,619,539	\$350,884,616
Power - Commercial	\$682,817,011	\$626,052,509	\$341,408,506	\$313,026,255	\$654,434,761
Flood Control	\$139,282,872	\$303,144,686	\$69,641,436	\$151,572,343	\$221,213,779
Water Quality	\$5,607,545	\$101,689,062	\$2,803,773	\$50,844,531	\$53,648,304
Recreation	\$74,998,433	\$5,742,471	\$37,499,217	\$2,871,236	\$40,370,453
Fish & Wildlife (allocated to repayment categories)					
Navigation	\$6,423,948	\$0	\$3,211,974	\$0	\$3,211,974
<b>Non-Reimbursable (Other)</b>					
Federal Taxpayer	\$258,046,528	\$229,618,671	\$129,023,264	\$114,809,336	\$243,832,600
State of CA	\$250,429,656	\$250,726,434	\$125,214,828	\$125,363,217	\$250,578,045
State/Local	\$4,329,037	\$4,467,386	\$2,164,519	\$2,233,693	\$4,398,212
<b>Other</b>					
Deferred Use	\$56,875,000	\$56,875,000	\$28,437,500	\$28,437,500	\$56,875,000
<b>Sub-Total</b>	<b>\$3,352,847,549</b>	<b>\$3,352,847,553</b>	<b>\$1,676,423,777</b>	<b>\$1,676,423,778</b>	<b>\$3,352,847,555</b>
<b>Adjustments &amp; Exceptions</b>					
CVPIA	\$340,872,120	\$340,872,120	\$170,436,060	\$170,436,060	\$340,872,120
Safety of Dams - Not in Repayment	\$120,512,509	\$120,512,509	\$60,256,255	\$60,256,255	\$120,512,510
Repayment Obligations Assumed					
Irrigation	\$19,686,165	\$19,686,165	\$9,843,083	\$9,843,083	\$19,686,166
M&I	\$447,937	\$447,937	\$223,969	\$223,969	\$447,938
<b>WAPA Retired Assets</b>					
Irrigation	\$8,464,815	\$8,464,815	\$4,232,408	\$4,232,408	\$8,464,816
M&I	\$1,207,155	\$1,207,155	\$603,578	\$603,578	\$1,207,156
Commercial Power	\$35,649,679	\$35,649,679	\$17,824,840	\$17,824,840	\$35,649,680
Federal Taxpayer	\$213,468	\$213,468	\$106,734	\$106,734	\$213,468
State of CA	\$16,115	\$16,115	\$8,058	\$8,058	\$16,116
<b>Colorado-Oregon Transmission Project</b>	<b>\$20,282,786</b>	<b>\$20,282,786</b>	<b>\$10,141,393</b>	<b>\$10,141,393</b>	<b>\$20,282,786</b>
<b>Sub-Total</b>	<b>\$547,352,749</b>	<b>\$547,352,749</b>	<b>\$273,676,378</b>	<b>\$273,676,378</b>	<b>\$547,352,756</b>
<b>Total Cost</b>	<b>\$3,900,200,298</b>	<b>\$3,900,200,302</b>	<b>\$1,950,100,155</b>	<b>\$1,950,100,156</b>	<b>\$3,900,200,311</b>

**Table 4 – Period 1 and Period 2 Merge – IDC**

Category	50% Period 1	50% Period 2	Total Merge
M&I	\$20,692,560	To be determined	To be determined
Commerical Power	\$27,377,970	To be determined	To be determined
Federal	\$15,557,295	To be determined	To be determined
	<b>\$63,627,825</b>		

**Table 5 – Summary of Repayment – Construction (no IDC)**

	Period 1	Period 1 – Percent of Total	Period 2	Period 2 – Percent of Total	Period 2 Change from Period 1	Merge	Merge – Percent of Total	Merge Change from Period 1
Irrigation	\$1,567,658,345	40.19%	\$1,435,443,236	36.80%	-\$132,215,109	\$1,501,550,793	38.50%	-\$66,107,552
M&I	\$336,185,246	8.62%	\$368,894,170	9.46%	\$32,708,924	\$352,539,710	9.04%	\$16,354,464
Commercial Power	\$738,749,476	18.94%	\$681,984,974	17.49%	-\$56,764,502	\$710,367,227	18.21%	-\$28,382,249
Non-Reimbursable	\$739,347,602	18.96%	\$895,618,293	22.96%	\$156,270,691	\$817,482,951	20.96%	\$78,135,349
CVPIA	\$340,872,120	8.74%	\$340,872,120	8.74%	\$0	\$340,872,120	8.74%	\$0
Deferred Use	\$56,875,000	1.46%	\$56,875,000	1.46%	\$0	\$56,875,000	1.46%	\$0
Not in Repayment	\$120,512,509	3.09%	\$120,512,509	3.09%	\$0	\$120,512,510	3.09%	\$0
<b>Total</b>	<b>\$3,900,200,298</b>		<b>\$3,900,200,302</b>			<b>\$3,900,200,311</b>		

**Table 6 – Reimbursable Comparison – Construction (no IDC)**

Reimbursable Categories	Period 1	Percent of Total Reimbursable Categories	Period 2	Percent of Total Reimbursable Categories	Merge	Percent of Total Reimbursable Categories
Irrigation	\$1,567,658,345	59.32%	\$1,435,443,236	57.73%	\$1,501,550,793	58.55%
M&I	\$336,185,246	12.72%	\$368,894,170	14.84%	\$352,539,710	13.75%
Commercial Power	\$738,749,476	27.96%	\$681,984,974	27.43%	\$710,367,227	27.70%
<b>Total</b>	<b>\$2,642,593,067</b>		<b>\$2,486,322,380</b>		<b>\$2,564,457,730</b>	