



U.S. DEPARTMENT OF ENERGY

Office of Inspector General

DOE-OIG-26-48

September 25, 2026

The Southwestern Federal Power System's Fiscal Year 2025 Combined Financial Statements Audit



AUDIT REPORT



Department of Energy
Washington, DC 20585

September 25, 2026

**MEMORANDUM FOR THE ACTING ADMINISTRATOR AND CHIEF EXECUTIVE
OFFICER, SOUTHWESTERN POWER ADMINISTRATION**

**SUBJECT: Audit Report: *The Southwestern Federal Power System's Fiscal Year 2025
Combined Financial Statements Audit***

The Office of Inspector General (OIG) contracted with the independent public accounting firm of KPMG LLP (KPMG) to conduct the audit, subject to our review. KPMG was responsible for expressing an opinion on the Southwestern Federal Power System's (SWFPS) combined financial statements and reporting on applicable internal controls and compliance with laws and regulations.

KPMG concluded that the financial statements present fairly, in all material respects, the financial position of SWFPS as of September 30, 2025, and 2024, and the results of its operations and its cash flows for the years then ended, in accordance with U.S. generally accepted accounting principles. As part of this review, auditors considered SWFPS' internal control over financial reporting and identified a deficiency in internal control that they considered to be a significant deficiency.

KPMG is responsible for the attached audit report dated August 24, 2026, and the conclusions expressed therein. The OIG did not express an independent opinion on SWFPS' financial statements.

We appreciated the cooperation of your staff during the audit.

A handwritten signature in blue ink, appearing to read "MD", is located below the text of the letter.

Matthew D. Dove
Assistant Inspector General
for Audits
Office of Inspector General

cc: Deputy Secretary
Chief of Staff
Senior Vice President and Chief Operating Officer, Southwestern Power Administration, SW
Acting Chief Financial Officer, Southwestern Power Administration, SW

DOE-OIG-26-48

DOE OIG HIGHLIGHTS

The Southwestern Federal Power System's Fiscal Year 2025 Combined Financial Statements Audit

Why The Audit Was Performed

This audit was performed by the independent public accounting firm of KPMG LLP (KPMG) on behalf of the Department of Energy Office of Inspector General.

The audit's objective was to obtain reasonable assurance about whether the financial statements, as a whole, were free from material misstatement, whether due to fraud or error, and to issue an auditors' report that included an opinion.

The Office of Inspector General monitored audit progress and reviewed the audit report and related documentation. This review disclosed no instances where KPMG did not comply, in all material respects, with generally accepted government auditing standards.

What the Audit Found

KPMG audited the combined balance sheets of the Department's Southwestern Federal Power Systems (SWFPS) as of September 30, 2025, and 2024, and the related combined statements of changes in capitalization, revenues and expenses, and cash flows for the years then ended, and the related notes to the combined financial statements.

KPMG concluded that the financial statements present fairly, in all material respects, the financial position of SWFPS as of September 30, 2025, and 2024, and the results of its operations and its cash flows for the years then ended, in accordance with U.S. generally accepted accounting principles. KPMG also considered SWFPS' internal control over financial reporting as part of its review and continued to identify a significant deficiency over entity-level controls related to the lack of formal policies, procedures, or documented responsibilities used to generate SWFPS' financial statements. KPMG tested for compliance with certain provisions of laws, regulations, contracts, and grant agreements that could have a direct material effect on the financial statements. The results of the auditors' review disclosed no instances of noncompliance or other matters required to be reported under Government Auditing Standards, applicable Office of Management and Budget guidance, or the *Federal Financial Management Improvement Act of 1996*.

What the Audit Recommends

The Office of Inspector General issued Notices of Findings and Recommendations to management throughout the audit. All findings and recommendations will be detailed in a separate management letter that will be provided to the Southwestern Power Administration. There are no formal recommendations that need to be tracked in the Departmental Audit Report Tracking System. An additional response is not required.



SOUTHWESTERN FEDERAL POWER SYSTEM

Combined Financial Statements

September 30, 2025 and 2024



KPMG LLP
Suite 800
1225 17th Street
Denver, CO 80202-5598

Independent Auditors' Report

The Inspector General, United States Department of Energy and
The Administrator, Southwestern Power Administration:

Report on the Audit of the Combined Financial Statements

Opinion

We have audited the combined financial statements of the Southwestern Federal Power System (SWFPS), which comprise the combined balance sheets as of September 30, 2025 and 2024, and the related combined statements of changes in capitalization, revenues and expenses, and cash flows for the years then ended, and the related notes to the combined financial statements. The combined financial statements include the financial information of the Southwestern Power Administration (Southwestern), a component of the U.S. Department of Energy, and the U.S. Department of War, Army Corps of Engineers (the Corps), for which Southwestern markets and transmits power.

In our opinion, the accompanying combined financial statements present fairly, in all material respects, the financial position of the SWFPS as of September 30, 2025 and 2024, and the results of its operations and its cash flows for the years then ended in accordance with U.S. generally accepted accounting principles.

Basis for Opinion

We conducted our audits in accordance with auditing standards generally accepted in the United States of America (GAAS) and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Our responsibilities under those standards are further described in the Auditors' Responsibilities for the Audit of the Combined Financial Statements section of our report. We are required to be independent of the SWFPS and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audits. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Responsibilities of Management for the Combined Financial Statements

Management is responsible for the preparation and fair presentation of the combined financial statements in accordance with U.S. generally accepted accounting principles, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of combined financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the combined financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the SWFPS's ability to continue as a going concern for one year after the date that the combined financial statements are available to be issued.

Auditors' Responsibilities for the Audit of the Combined Financial Statements

Our objectives are to obtain reasonable assurance about whether the combined financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditors' report that includes our opinion. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with GAAS and *Government Auditing Standards* will always detect a material misstatement when it exists. The risk of not detecting a material

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misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the combined financial statements.

In performing an audit in accordance with GAAS and *Government Auditing Standards*, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the combined financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the combined financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the SWFPS's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the combined financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about the SWFPS's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control related matters that we identified during the audit.

Supplementary Information

Our audits were conducted for the purpose of forming an opinion on the combined financial statements as a whole. The supplementary information in schedules 1 through 4 is presented for purposes of additional analysis and is not a required part of the combined financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the combined financial statements. The information has been subjected to the auditing procedures applied in the audits of the combined financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the combined financial statements or to the combined financial statements themselves, and other additional procedures in accordance with GAAS. In our opinion, the information is fairly stated in all material respects in relation to the combined financial statements as a whole.

Other Reporting Required by *Government Auditing Standards*

Report on Internal Control Over Financial Reporting

In planning and performing our audit of the combined financial statements as of and for the year ended September 30, 2025, we considered the SWFPS's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the combined financial statements, but not for the purpose of expressing an opinion on the effectiveness of the SWFPS's internal control. Accordingly, we do not express an opinion on the effectiveness of the SWFPS's internal control.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct,



misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis. A significant deficiency is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies, and therefore material weaknesses or significant deficiencies may exist that were not identified. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. We did identify a deficiency in internal control, described in the accompanying Exhibit I, that we consider to be a significant deficiency.

Report on Compliance and Other Matters

As part of obtaining reasonable assurance about whether the SWFPS's combined financial statements as of and for the year ended September 30, 2025 are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the combined financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

SWFPS's Response to Findings

Government Auditing Standards requires the auditor to perform limited procedures on the SWFPS's responses to the findings identified in our audit and described in the accompanying Exhibit I. The SWFPS's response was not subjected to the other audit procedures applied in the audit of the combined financial statements and, accordingly, we express no opinion on the response.

Purpose of the Other Reporting Required by Government Auditing Standards

The purpose of the communication described in the Report on Internal Control Over Financial Reporting and the Report on Compliance and Other Matters sections is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the SWFPS's internal control or compliance. This communication is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the SWFPS's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

KPMG LLP

Denver, Colorado
August 24, 2026

**Department of Energy
Southwestern Federal Power System
Independent Auditors' Report
Internal Control Over Financial Reporting**

**Exhibit I
SIGNIFICANT DEFICIENCY**

24-SWFPS-ELC-FSA-01 – Deficiency in Entity Level Controls – Communication

Background

The Southwestern Federal Power System (SWFPS) is comprised of the Southwestern Power Administration (SWPA), a component of the Department of Energy, and the Department of the Army, U.S. Army Corps of Engineers (Corps), a component of the Department of War (DOW). SWPA is responsible for marketing and transmitting the hydroelectric power generated by the Corps within SWPA's marketing areas and is responsible for the preparation and presentation of the SWFPS combined financial statements.

The hydroelectric power dams that the Southwestern Division of the Corps own are operated by six districts: Tulsa, Oklahoma; Little Rock, Arkansas; Kansas City, Missouri; St. Louis, Missouri; Vicksburg, Mississippi; and Fort Worth, Texas. Each hydroelectric project within these districts is a multi-purpose dam, with costs allocated to both power and non-power purposes such as flood control, irrigation, recreation, and wildlife conservation. For financial reporting purposes, each Corps district prepares power reports by individual power generating project that contain a statement of assets and liabilities (balance sheet) and statement of revenues and expenses (income statement). The power reports provided by the Corps are consolidated by Southwestern for financial reporting in the combined financial statements.

Condition

During FY 2024, we identified deficiencies related to the financial information the Corps exchanged with Southwestern. Through inquiries with management to better understand the root-cause of the issue, we noted that, although Southwestern and the Corps communicate throughout the year, there are no formal policies, procedures, or documented responsibilities that define financial reporting roles, review expectations, and communication channels between the components. Specifically, we noted the following:

- While Southwestern is responsible for the preparation and presentation of the SWFPS combined financial statements, Southwestern management has not established formal policies or procedures requiring the Corps to provide data that is complete and accurate.
- Southwestern has not implemented a review framework for Corps' data. Although ad hoc reviews and inquiries occur, no documented review criteria exists. There is no consistent follow-up on anomalous items and no audit trail demonstrating that the Corps' information is systematically and formally reviewed and validated.
- SWFPS management has not established consistent, documented communication channels, reporting lines, or a responsibility matrix across Southwestern and the related Corps districts and centers. As a result, it is unclear who is accountable for specific data elements or who should be contacted when reporting issues arise.

Criteria

The U.S. Government Accountability Office (GAO) *Standards for Internal Control in the Federal Government* (Green Book) sets the standards for an effective internal control system and provides an overall framework for designing, implementing, and operating effective internal control systems. Relevant criteria include the following principles:

- Green Book, Principle 14, *Communicate Internally*, paragraph 14.02-14.03, 14.05
- Green Book, Principle 3, *Establish Structure, Responsibility, and Authority*, paragraph 3.02, 3.04

Cause and Effect

SWFPS management has not formalized governance over inter-component financial reporting between Southwestern and the Corps. Specifically, management did not establish documented policies, procedures, roles, review criteria, or communication protocols that define responsibilities and expectations for the preparation, validation, and transmission of Corps' data used in the combined financial statements. This gap has allowed reliance on informal, ad hoc communications and inconsistent review practices rather than repeatable, controlled processes.

As a result, the failure to establish an organization structure and communicate effectively internally, or across components, increases the risk of misstatement in the combined financial statements of the SWFPS.

Recommendations

We recommend that the Acting Chief Financial Officer, Southwestern:

1. Define documented review criteria and thresholds for follow-up (e.g., materiality, variance percentage, exception types) related to financial data/information the Corps provides to Southwestern for inclusion in the SWFPS combined financial statements. Require standardized review procedures for anomalous items and a sign-off process by designated reviewers.
2. Develop a formal agreement among Corps districts and centers to provide clear guidance on responsibilities, ensure controls over the completeness and accuracy of data, and establish consistent policies and procedures over financial reporting. Policies should define required controls, acceptable file formats, submission deadlines, and documentation standards.
3. Collaborate with the Corps to define clear reporting lines to ensure that management roles are properly identified across the system.

FY25 Status

In FY 2024, management indicated that a Memorandum of Understanding exists between Southwestern and the Corps that outlines obligations and responsibilities with respect to the SWFPS financial procedures and accounting reporting requirements, including the Corps' financial reporting responsibilities to Southwestern. This agreement, however, is outdated, and Southwestern acknowledged the need to refine this agreement to clarify guidance and expectations for the data that the Corps provides for the SWFPS combined financial statements. Because corrective actions are still ongoing, with planned completion by September 30, 2027, this finding will remain open until all corrective actions are fully implemented.

Management's Response

Management concurs with the finding. Southwestern and the Corps partially concur with the above recommendations and will work collaboratively to define responsibilities and expectations for the preparation, validation, and transmission of Corps' data used in the combined financial statements. Specifically, both agencies will: (1) define documented review criteria and thresholds for follow-up related to financial data/information provided by the Corps for inclusion in the SWFPS combined financial statements and require standardized review procedures for anomalous items and establish a sign-off process by designated reviewers, (2) define clear reporting lines to ensure that management roles are properly identified across the system, (3) develop a formal agreement among Corps districts and centers to provide clear guidance on responsibilities, ensure controls over the completeness and accuracy of data, and establish consistent policies and procedures over financial reporting. A memorandum of understanding (formal agreement) exists between Southwestern and the Corps, outlining obligations and responsibilities in regards to the SWFPS financial procedures and accounting reporting requirements, including the Corps' financial reporting responsibilities to Southwestern. However, Southwestern recognizes the need to refine this agreement to clarify guidance and expectations for the data the Corps provides for the combined financial statements. The target completion date for implementing these actions is September 30, 2027.

SOUTHWESTERN FEDERAL POWER SYSTEM

Combined Balance Sheets

September 30, 2025 and 2024

Assets	2025	2024
Plant in service	\$ 2,399,539,895	2,336,533,767
Accumulated depreciation	(1,114,402,985)	(1,081,749,695)
Construction work in progress	151,782,634	137,138,603
Net utility plant	1,436,919,544	1,391,922,675
Cash	899,017,272	849,647,511
Funds held in escrow (note 1(d))	225,001,583	200,924,816
Cash and funds held in escrow	1,124,018,855	1,050,572,327
Accounts receivable	19,271,321	15,021,130
Materials and supplies, at average cost	4,710,841	4,392,894
Banking exchange receivables	346,419	226,023
Deferred workers' compensation (note 4)	21,748,132	21,659,961
Other assets	302,493	360,711
Total assets	\$ 2,607,317,605	2,484,155,721
Liabilities and Capitalization		
Liabilities:		
Accounts payable and accrued liabilities	\$ 24,962,672	20,131,917
Advances for construction	2,031,060	5,624,784
Accrued workers' compensation	22,585,551	22,798,679
Purchased power and banking exchange deferral (note 4)	9,013,749	19,780,049
Hydropower water storage reallocation deferral (note 4)	59,048,855	58,499,525
Total liabilities	117,641,887	126,834,954
Capitalization:		
Payable to U.S. Treasury	1,687,953,951	1,579,749,832
Accumulated net revenues	801,721,767	777,570,935
Total capitalization	2,489,675,718	2,357,320,767
Commitments and contingencies (notes 6 and 7)		
Total liabilities and capitalization	\$ 2,607,317,605	2,484,155,721

See accompanying notes to combined financial statements.

SOUTHWESTERN FEDERAL POWER SYSTEM
Combined Statements of Changes in Capitalization
Years ended September 30, 2025 and 2024

	<u>Payable to U.S. Treasury</u>	<u>Accumulated net revenues</u>	<u>Total capitalization</u>
Total capitalization as of September 30, 2023	\$ 1,453,403,843	776,192,779	2,229,596,622
Additions:			
Congressional appropriations	111,106,378	—	111,106,378
Interest on payable to U.S. Treasury and other	9,727,666	—	9,727,666
Transfers of property and services, net	13,114,761	—	13,114,761
Total additions to capitalization	<u>133,948,805</u>	<u>—</u>	<u>133,948,805</u>
Deductions:			
Payments to U.S. Treasury	<u>(7,602,816)</u>	<u>—</u>	<u>(7,602,816)</u>
Total deductions to capitalization	<u>(7,602,816)</u>	<u>—</u>	<u>(7,602,816)</u>
Net revenues for the year ended September 30, 2024	<u>—</u>	<u>1,378,156</u>	<u>1,378,156</u>
Total capitalization as of September 30, 2024	1,579,749,832	777,570,935	2,357,320,767
Additions:			
Congressional appropriations	97,012,080	1,263,000	98,275,080
Interest on payable to U.S. Treasury and other	9,239,927	—	9,239,927
Transfers of property and services, net	12,300,683	—	12,300,683
Total additions to capitalization	<u>118,552,690</u>	<u>1,263,000</u>	<u>119,815,690</u>
Deductions:			
Payments to U.S. Treasury	<u>(10,348,571)</u>	<u>—</u>	<u>(10,348,571)</u>
Total deductions to capitalization	<u>(10,348,571)</u>	<u>—</u>	<u>(10,348,571)</u>
Net revenues for the year ended September 30, 2025	<u>—</u>	<u>22,887,832</u>	<u>22,887,832</u>
Total capitalization as of September 30, 2025	\$ <u>1,687,953,951</u>	<u>801,721,767</u>	<u>2,489,675,718</u>

See accompanying notes to combined financial statements.

SOUTHWESTERN FEDERAL POWER SYSTEM

Combined Statements of Revenues and Expenses

Years ended September 30, 2025 and 2024

	<u>2025</u>	<u>2024</u>
Operating revenues:		
Sales of electric power	\$ 199,566,334	166,396,610
Transmission and other operating revenues	<u>31,213,379</u>	<u>31,683,411</u>
Total operating revenues before deferrals	230,779,713	198,080,021
Net purchased power and banking exchange deferral	<u>11,539,353</u>	<u>21,568,991</u>
Total operating revenues	242,319,066	219,649,012
Non-reimbursable revenues	<u>12,062,401</u>	<u>10,639,187</u>
Total revenues	<u>254,381,467</u>	<u>230,288,199</u>
Operating expenses:		
Operation and maintenance	139,617,866	132,401,747
Purchased power and banking exchange	30,160,753	40,174,070
Depreciation and amortization	44,391,561	38,352,003
Transmission service charges by others	24,783	40,896
Non-reimbursable expenses	<u>7,922,655</u>	<u>8,005,860</u>
Total operating expenses	<u>222,117,618</u>	<u>218,974,576</u>
Net operating revenues	<u>32,263,849</u>	<u>11,313,623</u>
Interest expense:		
Interest on payable to U.S. Treasury and other	12,454,110	13,183,548
Allowance for funds used during construction	<u>(3,078,093)</u>	<u>(3,248,081)</u>
Net interest expense	<u>9,376,017</u>	<u>9,935,467</u>
Net revenues	<u>\$ 22,887,832</u>	<u>1,378,156</u>

See accompanying notes to combined financial statements.

SOUTHWESTERN FEDERAL POWER SYSTEM

Combined Statements of Cash Flows

Years ended September 30, 2025 and 2024

	<u>2025</u>	<u>2024</u>
Cash flows from operating activities:		
Net revenues	\$ 22,887,832	1,378,156
Adjustments to reconcile net revenues to net cash provided by operating activities:		
Depreciation and amortization	44,391,561	38,352,003
Loss on retirement of plant in service	2,165,672	597,596
Benefit expense paid by other Federal agencies	8,742,473	7,232,542
Interest on payable to U.S. Treasury and other	9,376,017	9,935,467
Deferred workers' compensation	(88,171)	91,936
(Increase) decrease in assets:		
Accounts receivable	(4,250,191)	1,458,694
Materials and supplies	(317,947)	(616,078)
Banking exchange receivables	(120,396)	(150,381)
Other assets	58,218	(291,738)
Increase (decrease) in liabilities:		
Accounts payable and accrued liabilities	4,830,755	1,419,319
Accrued workers' compensation	(213,128)	298,696
Purchased power and banking exchange deferral	(11,393,844)	(21,757,432)
Advances for construction	(3,593,724)	1,216,527
Net cash provided by operating activities	<u>72,475,127</u>	<u>39,165,307</u>
Cash flows used in investing activities:		
Additions to utility plant	<u>(88,476,009)</u>	<u>(73,997,360)</u>
Cash flows from financing activities:		
Congressional appropriations	98,275,080	111,106,378
Payments to U.S. Treasury	(10,348,571)	(7,602,816)
Transfers of property and services, net	3,558,210	5,882,219
Hydropower water storage reallocation deferral	<u>(2,037,309)</u>	<u>(1,998,772)</u>
Net cash provided by financing activities	<u>89,447,410</u>	<u>107,387,009</u>
Net increase in cash and funds held in escrow	73,446,528	72,554,956
Cash and funds held in escrow, beginning of year	<u>1,050,572,327</u>	<u>978,017,371</u>
Cash and funds held in escrow, end of year	<u>\$ 1,124,018,855</u>	<u>1,050,572,327</u>
Supplemental cash flow information:		
Interest charged to construction	\$ 3,078,093	3,248,081
Interest deferred on regulatory liabilities	3,214,183	3,455,882

See accompanying notes to combined financial statements.

SOUTHWESTERN FEDERAL POWER SYSTEM

Notes to Combined Financial Statements

September 30, 2025 and 2024

(1) Summary of Significant Accounting Policies

(a) General Information and Basis of Preparation of Combined Financial Statements

The Southwestern Federal Power System (SWFPS) financial statements combine all of the activities associated with the generation, transmission, and disposition of all Federal power marketed under Section 5 of the Flood Control Act of 1944 (the Flood Control Act) by the Southwestern Power Administration (Southwestern), an agency of the U.S. Department of Energy (DOE). The accompanying combined financial statements include the accounts of Southwestern and the related hydroelectric generating facilities and power operations of the U.S. Army Corps of Engineers (Corps), a component of the U.S. Department of War (DOW), for which Southwestern markets and transmits the power. Southwestern and the Corps are separately managed and financed, and each maintains their own accounting records. For purposes of financial and operational reporting, the facilities and related operations of Southwestern and the Corps (power purpose) are combined as SWFPS.

The Corps has constructed and operates hydroelectric generating facilities in the states of Arkansas, Missouri, Oklahoma, and Texas. Operating expenses and net assets of multipurpose Corps projects are allocated to power and non-power purposes (primarily recreation and flood control). Only the portion of such project costs and net assets allocated to power are included in the combined financial statements. Southwestern, as designated by the Secretary of Energy, transmits and markets power generated from these hydroelectric generating facilities.

SWFPS is subject to the accounting regulations of the Federal Energy Regulatory Commission (FERC). Accounts are maintained in accordance with accounting principles generally accepted in the United States of America (U.S. GAAP) as established by the Financial Accounting Standards Board (FASB), the uniform system of accounts prescribed for electric utilities by the FERC, the accounting practices and standards established by the DOE and DOW, and the requirements of specific legislation and executive directives issued by government agencies. All material intra-entity balances and transactions are eliminated. SWFPS's combined financial statements follow the accounting and reporting guidance contained in FASB Accounting Standards Codification (ASC) Topic 980, *Regulated Operations*. Allocation of costs and revenues to accounting periods for rate-making and regulatory purposes may differ from bases generally applied by non-regulated companies. Such allocations to meet regulatory accounting requirements are considered to be U.S. GAAP for regulated utilities, provided that there is a demonstrable ability to recover any deferred costs in future rates and such costs or revenues are accounted for as regulatory assets or liabilities.

(b) Confirmation and Approval of New Rates

SWFPS is not a public utility within the jurisdiction of the FERC under the Federal Power Act. Under a Delegation Order issued by the Secretary of Energy, the Administrator of Southwestern has the authority to develop power and transmission rates for SWFPS and place the rates into effect on an interim basis. The FERC has the exclusive authority to confirm, approve, and place into effect on a final basis, to remand, or to disapprove rates developed by the Administrator.

The FERC's review is limited to (1) whether the rates are the lowest possible consistent with sound business principles, (2) whether the revenue levels generated are sufficient to recover the costs of producing and transmitting electric energy, including repayment within the period permitted by law, and

SOUTHWESTERN FEDERAL POWER SYSTEM

Notes to Combined Financial Statements

September 30, 2025 and 2024

(3) the assumptions and projections used in developing the rates component. The FERC shall reject decisions of the Administrator only if it finds them to be arbitrary, capricious, or in violation of the law.

As of September 30, 2025 and 2024, there were no revenues subject to a refund.

The rates in effect as of September 30, 2025 are summarized as follows:

The Integrated System rate schedules were placed into effect June 1, 2025 and were confirmed and approved by the FERC on June 27, 2025. These rate schedules incorporated a 22.8% revenue increase for the period June 1, 2025 through September 30, 2027, or until superseded by a new rate schedule.

The Sam Rayburn Dam project rate was placed into effect October 1, 2024 and was confirmed and approved by the FERC on November 22, 2024. This rate increase incorporated a 21.1% revenue increase for the period October 1, 2024 through September 30, 2027, or until superseded by a new rate schedule.

The Robert Douglas Willis (RD Willis) project rate was placed into effect January 1, 2016 and was confirmed and approved by the FERC on June 15, 2016. The rate increase incorporated an 8.6% revenue increase for the period January 1, 2016 through September 30, 2019, or until superseded by a new rate schedule. This rate schedule was extended through September 30, 2021 by the Assistant Secretary, Office of Electricity, through September 30, 2023 by the Administrator, Southwestern, and temporarily extended by the Administrator to remain in effect through September 30, 2025. Subsequent to fiscal year 2025 year-end, a new RD Willis project rate was placed into effect October 1, 2025 and was confirmed and approved by the FERC on October 15, 2025. The rate increase incorporated a 28.6% revenue increase for the period October 1, 2025 through September 30, 2027, or until superseded by a new rate schedule.

(c) *Utility Plant and Depreciation*

Utility plant includes items such as dams, spillways, generators, turbines, substations and related components (generating facilities), and transmission lines and related components. Utility plant is stated at original cost, net of contributions by external entities. Property transferred from other government agencies is transferred at net book value. Cost includes direct labor and material, payments to contractors, indirect charges for engineering, supervision and similar overhead items, and an allowance for funds used during construction. The costs of additions and betterments are capitalized. Repairs and minor replacements are charged to operation and maintenance expense. The net cost of utility plant retired, together with removal costs less salvage, is recorded to accumulated depreciation when the property is removed from service.

The policy of Southwestern and the Corps is to move capitalized costs into completed utility plant at the time a project or feature of a project is deemed to be substantially complete. A project is substantially complete when it is providing benefits and services for the intended purpose and is generating project purpose revenue, where applicable.

Depreciation on utility plant is computed on a straight-line basis over the estimated service lives of the various classes of property. Depreciation on utility plant assets is computed using the straight-line

SOUTHWESTERN FEDERAL POWER SYSTEM

Notes to Combined Financial Statements

September 30, 2025 and 2024

method over the estimated service lives ranging from 5 to 50 years for transmission assets and 5 to 100 years for generation assets.

Most completed utility plant is recovered through the rates regardless of whether an asset is abandoned, loses value, is disposed of significantly before the end of its estimated useful life or is destroyed. Consequently, the cash flow is not impacted regardless of the condition of the asset.

(d) Cash and Funds Held in Escrow

Cash represents the unexpended balance of funds authorized by Congress, customer advances, and spectrum relocation funds, held at the U.S. Department of the Treasury (U.S. Treasury), and allocations of the amount of funds required to satisfy current hydroelectric power obligations.

Funds held in escrow represents the unexpended balance of cash and cash equivalents held in a bank trust escrow account under alternative financing agreements (note 5 (b)) with certain customers and are restricted specifically to fund operation, maintenance, rehabilitation, and modernization activities at hydroelectric generating facilities of the Corps in SWFPS's marketing region. Under the agreements, funds deposited to the escrow account by customers are credited by Southwestern against accounts receivable for power, energy, and other services sold to the customer. The escrowed funds are transferred to the Corps as agreed to between Southwestern, the Corps, the Southwestern Power Resources Association, and the customers.

(e) Congressional Appropriations

Southwestern and the Corps receive congressional appropriations through the DOE and the DOW, respectively, to finance their operations. A portion of Southwestern's appropriations is offset by the use of receipts collected from the sale of Federal hydroelectric power, resulting in a net zero appropriation. The Corps also receives appropriations to finance construction of its hydroelectric projects. In accordance with the Flood Control Act, Southwestern is responsible for repayment to the Federal government, with interest, of its appropriations, and the portion of congressional appropriations allocated to the Corps for construction and operations of the power projects.

Congressional appropriations received by the Corps are authorized and allocated to individual projects. It is the intent of the Corps' project management to distribute congressional appropriations in amounts approximating estimated current year expenses and to adjust the distribution as necessary within the limits of the transfer authority residing at the district level. Project costs that are not specific to a project purpose are distributed between power and non-power purposes based on project cost allocation.

(f) Operating Revenues

The SWFPS recognizes operating revenues in accordance with ASU No. 2014-09, *Revenue from Contracts with Customers* (ASC Topic 606), which requires a company to recognize revenue when the company transfers control of promised goods or services to the customer.

SOUTHWESTERN FEDERAL POWER SYSTEM

Notes to Combined Financial Statements

September 30, 2025 and 2024

Under the provisions of Topic 606, the SWFPS has elected the following practical expedients:

- Recognize revenue in the amount SWFPS has the right to invoice a customer.
- Apply the standard to a portfolio of contracts with similar characteristics, as the effects of applying the guidance to the portfolio would not differ materially from applying this guidance to the individual contracts.

Operating revenues are recorded on the basis of service rendered. Rates are established under requirements of the Flood Control Act, related legislation and executive departmental directives, and are to provide sufficient revenues to meet all required repayment of system costs, including operation and maintenance expenses less depreciation, interest, and payment to the U.S. Treasury for the Payable to U.S. Treasury in utility plant. Rates are intended to provide for recovery of the investment in transmission and generating facilities not to exceed 50 years from the date placed in service, while operation and maintenance costs and interest on Payable to U.S. Treasury are intended to be recovered annually.

As set forth in note 1(c), assets are being depreciated for financial reporting purposes using the straight-line method over their estimated service lives. Accordingly, annual depreciation charges are not matched with the recovery of the related capital costs and will, in the case of generating facilities, continue beyond the period within which such costs will have been recovered through rates.

While energy and transmission rates are established to recover the costs of operating the power projects, rates are also required to be at the lowest possible level, consistent with sound business principles. Over the life of the power system, accumulated net revenues represent differences between the timing of the recognition of expenses and related revenues, resulting primarily from the difference between the recognition of depreciation and the related recovery of the U.S. Treasury's investment in utility plant. SWFPS is, in effect, a Federal entity; thus, at any given time, the accumulated net revenues, to the extent available, are committed to the repayment of the Payable to U.S. Treasury.

The practices followed by Southwestern and the Corps are in conformity with the accounting practices and standards established by DOE and DOW and the requirements of specific legislation and executive directives issued by government agencies. Based upon guidelines established in DOE Order RA 6120.2, revenues distributed to the Corps cover annual operating expenses, including interest, with the remainder applied to the unpaid generation and transmission investment.

In addition to providing electric power and energy, Southwestern provides scheduling, billing, and other ancillary services. Southwestern may provide multiple services to any one customer. Services qualify as separate performance obligations under ASU No. 2014-09 with distinguishable rates, terms, and delivery schedules. Services are provided to meet customer load requirements and revenues are recognized when services are provided.

(g) Regulatory Assets and Liabilities (note 4)

Regulatory assets and liabilities result from rate actions of Southwestern's Administrator and other regulatory agencies. These assets and liabilities arise from specific costs and revenues that would have been included in the determination of net revenue in one period but are deferred until a different period for purposes of developing rates to charge for services, per the requirements of ASC Topic 980, *Regulated Operations*. SWFPS defers transactions as regulatory assets and liabilities so that costs will

SOUTHWESTERN FEDERAL POWER SYSTEM

Notes to Combined Financial Statements

September 30, 2025 and 2024

be recovered during the periods when the costs are scheduled to be paid, which ensures the matching of revenues and expenses. The assets and liabilities below are regulatory in nature:

Deferred Workers' Compensation

Workers' compensation consists of two elements: actuarial liability associated with workers' compensation cases incurred for which additional claims may still be made in the future (future claims) and a liability for expenses associated with actual claims incurred and paid by the Department of Labor (DOL), the program administrator, whom SWFPS must reimburse. DOL, DOE, and DOW determined Southwestern and the Corps' actuarial liability associated with workers' compensation cases. The actuarial liability for future claims is determined using historical benefit payment patterns and the U.S. Treasury discount rates.

The recovery of these future claims is deferred for purposes of the rate-making process until such time as the future claims are actually submitted and paid by the DOL. Therefore, the recognition of the expenses associated with this actuarially determined liability has been recorded as deferred workers' compensation in the combined balance sheets in accordance with ASC Topic 980 to reflect the effects of the rate-making process. SWFPS does not earn a rate of return on the deferred workers' compensation regulatory asset.

Denison Hydropower Water Storage Reallocation

Section 838 of P.L. 99-662 (Section 838) authorized the Corps to reallocate hydropower storage to water supply storage at Lake Texoma, in increments as needed, up to 150,000 acre-feet for users in the State of Texas and up to 150,000 acre-feet for users in the State of Oklahoma. Section 838 directed that the Corps would provide credits to Southwestern equal to the replacement cost of the hydropower lost as a result of the reallocations, and Southwestern would reimburse the preference customers (Denison allottees) for an amount equal to the customers' replacement cost of the hydropower lost as a result of the reallocations.

In fiscal year 2010, the Corps executed water supply contracts for the 150,000 acre-feet of storage authorized for customers in the State of Texas by Section 838. According to a June 2010 agreement between Southwestern and the Corps, the Corps agreed to deposit all cost of storage payments for storage reallocated under Section 838 into the U.S. Treasury and to provide credits in the same amount to the hydropower income account. The total amount received of \$58,786,011 was deferred by Southwestern for the provision of the reimbursement to the Denison allottees and Southwestern for future hydropower storage revenues foregone. The reallocation deferral accrued interest at 4.50% and 4.00% of the outstanding balance for the years ended September 30, 2025 and 2024, respectively, based on law, administrative order, or administrative policy. Cumulative interest deferred totaled \$26,791,624 and \$24,204,985 and the unpaid principal balance deferred totaled \$32,257,231 and \$34,291,173 for the years ended September 30, 2025 and 2024, respectively.

A September 2010 agreement between Southwestern and the Denison allottees provided the initial hydropower replacement cost as determined by Southwestern and the methodology for providing the reimbursement to the Denison allottees as authorized under Section 838. Beginning with the invoice for the October 2010 service month, reimbursement pursuant to Section 838 began as a credit on the Denison allottees' monthly invoices. Reimbursement to the Denison allottees and distribution of revenue foregone to Southwestern's integrated system will continue as long as there is a reallocation

SOUTHWESTERN FEDERAL POWER SYSTEM

Notes to Combined Financial Statements

September 30, 2025 and 2024

deferred balance of funds, subject to provisions established in the aforementioned agreements between Southwestern and the Corps and between Southwestern and the Denison allottees.

Purchased Power and Banking Exchange Deferral

SWFPS utilizes a separate rate component (purchased power adder) to recover the estimated cost of purchased power based upon the average purchased power costs expected to occur in the future. If the actual expenses of purchased power exceed the revenue generated from this adder, the cost is deferred for future recovery through the rates. Likewise, if the expense is less than the adder, the excess revenue is deferred. From time to time, SWFPS may utilize a separate rate component (adder adjustment) to manage additional purchased power expenses or excess revenues, respectively. The net purchased power deferral accrued interest at 4.50% and 4.00% and of the outstanding balance for the years ended September 30, 2025 and 2024, respectively, based on law, administrative order, or administrative policy. Interest expense deferred on the outstanding balance totaled \$627,544 and \$1,167,527 for the years ended September 30, 2025 and 2024, respectively.

SWFPS has arrangements with certain customers in which excess power available on the power system is banked with the customer until needed by the power system and the customer has power available. The power system records a receivable for the power banked at the cost specified in the marketing arrangement, under the provisions of ASC Topic 845, *Nonmonetary Transactions*. The net revenue or expense associated with banking activity is deferred until the power is returned or delivered.

(h) Accounts Receivable

SWFPS's accounts receivable consist generally of receivables for power and energy sold to its customers who are primarily public bodies and cooperatives. SWFPS maintains an allowance for credit losses for estimated losses inherent in its accounts receivables portfolio. SWFPS reviews its allowance for credit losses monthly. Uncollectible balances are fully reserved. Account balances are charged off against the allowance after all means of collection have been exhausted and the potential for recovery is considered remote. As of September 30, 2025 and 2024, there is no allowance for uncollectible accounts.

Southwestern's billing methods include net billing. Net billing is an agreement between Southwestern and a customer, whereby the customer's power invoice is credited and the funds received from the sale of power are used to fund transmission and generation activities. Net billing is discussed more fully in note 5(b). Under Southwestern billing methods, purchase and sale transactions are reported "gross" in the combined financial statements.

(i) Concentration of Credit Risk

Financial instruments, which potentially subject SWFPS to credit risk, include accounts receivable for customer purchases of power, transmission, or other products and services. These receivables are primarily with a group of diverse customers that are generally stable and established organizations and do not represent a significant credit risk. Although SWFPS is affected by the business environment of the utility industry, management does not believe a significant risk of loss from a concentration of credit exists.

SOUTHWESTERN FEDERAL POWER SYSTEM

Notes to Combined Financial Statements

September 30, 2025 and 2024

(j) Interest on Payable to U.S. Treasury

Interest on payable to U.S. Treasury is a cost mandated by the Secretary of Energy and by the FERC. SWFPS computes interest in accordance with DOE Order RA 6120.2, which provides that interest be computed on the remaining investment after revenues have been applied to recovery of costs during the year, any prior year unpaid costs, and also to unpaid Federal investment at the applicable interest rate.

(k) Allowance for Funds Used During Construction

The FERC Uniform System of Accounts defines Allowance for Funds Used During Construction as the net costs for the period of borrowed funds used for construction purposes and a reasonable rate on other funds when so used. While cash is not realized currently from this allowance, it is realized under the rate-making process over the repayment life of the related property through increased revenues resulting from a higher recoverable investment. The interest rates used were 4.50% and 4.00% for the years ended September 30, 2025 and 2024, respectively, based on law, administrative order, or administrative policy.

(l) Retirement Benefits

SWFPS employees participate in one of the following contributory defined benefit plans: the Civil Service Retirement System (CSRS) or Federal Employees Retirement System (FERS). Agency contributions are based on eligible employee compensation and are submitted to benefit program trust funds administered by the Office of Personnel Management (OPM). Based on statutory contribution rates, the fiscal years 2025 and 2024 cost factors under CSRS were 59.3% and 56.5%, respectively, of basic pay. The cost factors under FERS for fiscal years 2025 and 2024 were 26.2% and 24.7%, respectively, of basic pay. The contribution levels, however, are legislatively mandated and do not reflect the current full cost requirements to fund the plans. Costs incurred by OPM on behalf of SWFPS are included as transfers of property and services, net, within the Payable to U.S. Treasury on the combined balance sheets.

Other retirement benefits administered by OPM include the Federal Employees Health Benefits Program (FEHB) and the Federal Employees Group Life Insurance Program (FEGLI). FEHB is calculated at \$11,028 and \$9,445 per enrolled employee, for fiscal years 2025 and 2024, respectively, and FEGLI is based on 0.02% of basic pay for each employee enrolled in these programs.

In addition to the amounts contributed to the CSRS and FERS as stated previously, SWFPS recorded an expense for the pension and other postretirement benefits in the combined financial statements of \$9,282,307 and \$8,121,101 for the years ended September 30, 2025 and 2024, respectively. These amounts reflect the contributions made on behalf of SWFPS by OPM to the benefit program trust funds.

As a Federal agency, all post-retirement activity is managed by OPM, therefore, neither the assets of the plans nor the actuarial data with respect to the accumulated plan benefits relative to Southwestern and the Corps employees are included in this report.

SOUTHWESTERN FEDERAL POWER SYSTEM

Notes to Combined Financial Statements

September 30, 2025 and 2024

(m) Transfers of Property and Services, Net

Transfers of property and services, net, is a component of total capitalization that represents the cumulative receipt of transfers of assets or costs offset by the cumulative disbursement of revenue transfers. Transfers are recognized upon physical delivery of the asset or performance of the service. Transfers occur between projects, project types, and other Federal entities. Transfers between Southwestern and the Corps eliminate upon combination.

(n) Income Taxes

As agencies of the U.S. Government, Southwestern and the Corps are exempt from all income taxes imposed by any governing body, whether it is a Federal, state, or commonwealth of the United States.

(o) Use of Estimates

The preparation of the combined financial statements in conformity with U.S. GAAP requires management of SWFPS to make estimates and assumptions that affect the reported amounts of assets and liabilities, the disclosure of contingent assets and liabilities at the date of the financial statements, and the reported amounts of revenues and expenses during the reporting period. Due to uncertainties inherent in the estimation process, actual results could differ from those estimates.

(p) Non-Reimbursable Activities

Non-reimbursable activities for the years ended September 30, 2025 and 2024 consist of the following:

	<u>2025</u>	<u>2024</u>
Non-reimbursable revenues:		
Non-Federal project revenue	\$ 1,177,016	498,186
Federal project revenue	2,833,493	1,266,591
Escrow interest revenue	<u>8,051,892</u>	<u>8,874,410</u>
Total non-reimbursable revenues	\$ <u>12,062,401</u>	<u>10,639,187</u>
Non-reimbursable expenses:		
Non-Federal project expense	\$ 1,177,016	498,186
Federal project expense	2,833,493	1,266,591
White River Minimum Flows Project expense	3,611,389	4,502,463
Spectrum Relocation Fund expense	<u>300,757</u>	<u>1,738,620</u>
Total non-reimbursable expenses	\$ <u>7,922,655</u>	<u>8,005,860</u>

Federal and Non-Federal Projects

Southwestern has agreements with Federal and non-Federal entities to provide services on a cost basis. Non-Federal entities are required to provide advance payment for Southwestern's services. The operating revenues and expenses related to these services are excluded from the rate-making process. A portion of cash and advances for construction in the accompanying combined financial statements relate to these activities.

SOUTHWESTERN FEDERAL POWER SYSTEM

Notes to Combined Financial Statements

September 30, 2025 and 2024

Escrow Interest Revenue

Interest revenue represents the interest earned on funds held in escrow. These funds due from escrow are authorized specifically to fund operation, maintenance, rehabilitation, and modernization activities at hydroelectric generating facilities of the Corps in SWFPS's marketing region.

White River Minimum Flows Project

In accordance with Section 132 of P.L. 109-103, Southwestern implemented the offset to the minimum flows project in fiscal year 2010. Section 132 provided that losses to Federal hydropower shall be offset by a reduction in the costs allocated to the Federal hydropower purpose. Southwestern determined the Federal hydropower impacts to include lost on-peak energy and capacity, lost off-peak energy, increased costs due to dissolved oxygen impacts, and increased maintenance costs at Bull Shoals. This activity is non-reimbursable through the rate-making process.

Spectrum Relocation Fund

In December 2004, the U.S. Congress passed and the President signed the Commercial Spectrum Enhancement Act (CSEA, Title II of P.L. 108-494), creating the Spectrum Relocation Fund to streamline the relocation of Federal systems from existing spectrum bands to accommodate commercial use by facilitating reimbursement to affected agencies of relocation costs. In fiscal years 2025, 2023, 2012, 2009, and 2007, Southwestern received \$1,263,000, \$4,000,000, \$17,000,000, \$17,730,000, and \$8,091,360, respectively, in spectrum relocation funds, as approved by the Office of Management and Budget, and as reported to the Congress. Expenses incurred represent labor, construction contracts, travel, and other administrative costs. This activity is non-reimbursable through the rate-making process and is recorded as congressional appropriations directly to accumulated net revenues within the combined statements of changes in capitalization.

(q) Derivative and Hedging Activities

Southwestern analyzes derivative financial instruments under ASC Topic 815, *Derivatives and Hedging*. This standard requires that all derivative instruments, as defined by ASC Topic 815, be recorded on the combined balance sheets at fair value, unless exempted. Changes in a derivative instrument's fair value must be recognized currently in the combined statement of revenues and expenses, unless the derivative has been designated in a qualifying hedging relationship. The application of hedge accounting allows a derivative instrument's gains and losses to offset related results of the hedged item in the combined statements of revenues and expenses to the extent effective. ASC Topic 815 requires that the hedging relationship be highly effective and that an organization formally designate a hedging relationship at the inception of the contract to apply hedge accounting.

Southwestern enters into contracts for the sale of electricity for use in its business operations. ASC Topic 815 requires Southwestern to evaluate these contracts to determine whether the contracts are derivatives. Certain contracts that literally meet the definition of a derivative may be exempted from ASC Topic 815 as normal purchases or normal sales. Normal purchases and sales are contracts that provide for the purchase or sale of something other than a financial instrument or derivative instrument that will be delivered in quantities expected to be used or sold over a reasonable period of time in the normal course of business. Contracts that meet the requirements of normal purchases or sales are documented and exempted from the accounting and reporting requirements of ASC Topic 815.

SOUTHWESTERN FEDERAL POWER SYSTEM

Notes to Combined Financial Statements

September 30, 2025 and 2024

Southwestern's policy is to fulfill all derivative and hedging contracts by providing power to a third party as provided for in each contract. Southwestern's policy does not authorize the use of derivative or hedging instruments for speculative purposes such as hedging electricity pricing fluctuations beyond Southwestern's estimated capability to deliver power. Accordingly, Southwestern evaluates all of its contracts to determine if they are derivatives and, if applicable, to ensure that they qualify and meet the normal purchases and normal sales designation requirements under ASC Topic 815. Normal purchases and normal sales contracts are accounted for as executory contracts as required under U.S. GAAP. As of September 30, 2025 and 2024, Southwestern has no contracts accounted for at fair value as all derivatives qualify as normal purchases and normal sales.

(2) Disaggregated Revenue

Disaggregated revenues as of September 30, 2025 and 2024 consists of the following:

	<u>2025</u>	<u>2024</u>
Disaggregated revenues:		
Sale of Federal electric power	\$ 198,660,099	165,596,871
Non-Federal transmission services	19,473,757	22,357,878
Ancillary services	785,839	654,368
Other revenues	<u>11,860,018</u>	<u>9,470,904</u>
Total operating revenue before deferrals	\$ <u>230,779,713</u>	<u>198,080,021</u>

Revenue from Contracts with Customers

Southwestern provides wholesale Federal electric power (energy and capacity) to preference power customers under long-term firm and non-firm contracts. Southwestern establishes power rates for these contracts in a formal rate setting process. Excess energy is sold at established power rates. Federal electric power revenues are recognized over time as the customer receives and consumes the benefits. Federal electric power revenues are billed monthly based on meter readings and contracted allocations and estimated unbilled electric power revenues are accrued at the end of each reporting period. Revenues can vary from period to period due to hydropower plant availability, hydrological conditions, and customer usage requirements.

Non-Federal transmission service revenues consist primarily of revenue for transmission of non-Federal power on Southwestern's transmission system. Transmission rates are established through a formal rate setting process and revenues are recognized over time as capacity and electric transmission is made available. Transmission services are billed monthly and estimated unbilled transmission services are accrued at the end of each reporting period.

Ancillary services ensure transmission grid reliability and include items such as scheduling, system control, dispatch, balancing reserves and other services. Ancillary revenue is recognized over time as services are provided. Ancillary services are billed monthly and estimated unbilled ancillary services are accrued at the end of the reporting period.

Other revenues consist of headwater benefits, hydropower benefits foregone revenues and miscellaneous revenues from the Corps attributable to the power function, as well as market participant agreement

SOUTHWESTERN FEDERAL POWER SYSTEM

Notes to Combined Financial Statements

September 30, 2025 and 2024

revenues for the sale of power from Blakely Mountain and DeGray into the Midcontinent Independent System Operator (MISO) market plus miscellaneous revenues for Southwestern. These revenues are recognized upon receipt.

(3) Utility Plant

Utility plant as of September 30, 2025 and 2024 consists of the following:

	<u>2025</u>	<u>2024</u>
Plant in service:		
Generating facilities	\$ 1,813,866,249	1,778,467,029
Transmission facilities	<u>585,673,646</u>	<u>558,066,738</u>
	2,399,539,895	2,336,533,767
Less accumulated depreciation	<u>(1,114,402,985)</u>	<u>(1,081,749,695)</u>
Construction work in progress:		
Generating facilities	128,876,559	105,253,130
Transmission facilities	<u>22,906,075</u>	<u>31,885,473</u>
	151,782,634	137,138,603
Net utility plant	<u>\$ 1,436,919,544</u>	<u>1,391,922,675</u>

During annual site inventories, the Corps and Southwestern identified certain items that were no longer usable, destroyed, or permanently removed from service and thus should be retired. Accordingly, SWFPS recognized total utility plant retirements of \$13,806,393 and \$7,285,976 for the fiscal years ended September 30, 2025 and 2024, respectively.

In accordance with FERC guidelines, SWFPS excludes contributed plant within the combined balance sheets to eliminate the impact on power rates. As of September 30, 2025 and 2024, contributed plant, net, used in SWFPS's operations totaled \$23,003,072.

(4) Regulatory Assets and Liabilities

Regulatory assets and liabilities as of September 30, 2025 and 2024 consist of the following:

	<u>2025</u>	<u>2024</u>
Regulatory assets:		
Deferred workers' compensation	\$ <u>21,748,132</u>	<u>21,659,961</u>
Regulatory liabilities:		
Purchased power and banking exchange deferral	\$ 9,013,749	19,780,049
Hydropower water storage reallocation deferral	<u>59,048,855</u>	<u>58,499,525</u>
Total	<u>\$ 68,062,604</u>	<u>78,279,574</u>

SOUTHWESTERN FEDERAL POWER SYSTEM

Notes to Combined Financial Statements

September 30, 2025 and 2024

Southwestern's purchased power and banking exchange deferral account represents the deferral of net revenues or expenses associated with net purchased power and banking exchange activities as follows:

	Purchased power and banking exchange deferral
September 30, 2023	\$ (40,369,954)
Purchased power adder revenue	(14,346,459)
Purchased power expense	36,098,919
Net banking exchange	(183,469)
Net purchased power and banking exchange deferral	21,568,991
Interest on deferred activities and other	(979,086)
September 30, 2024	(19,780,049)
Purchased power adder revenue	(15,792,940)
Purchased power expense	27,436,331
Net banking exchange	(104,038)
Net purchased power and banking exchange deferral	11,539,353
Interest on deferred activities and other	(773,053)
September 30, 2025	\$ (9,013,749)

(5) Financing Sources

SWFPS's financing sources include annual appropriations, Federal power receipts, and alternative financing arrangements to fund its operations.

(a) Payable to U.S. Treasury

Construction and operation of Southwestern's transmission system and the Corps' generating facilities and operations are financed through congressional appropriations. The exceptions are capital assets and maintenance activities funded through the alternative financing arrangements and the funding by non-Federal parties of the construction of the RD Willis project. The U.S. Government's investment in each generating project and each year's investment in the transmission system are to be repaid to the U.S. Treasury over a period not to exceed 50 years from the time the facility is placed in service. There is no requirement for repayment of a specific amount on an annual basis.

Annual revenues are first applied to the current year operating expenses (less depreciation) and interest expense. All annual amounts for such expenses have been paid through fiscal year 2025. Remaining revenues are to be first applied to repayment of operating deficits (which include all expenses except depreciation), if any, and then to repayment of the Payable to U.S. Treasury. To the extent possible, while still complying with the repayment period established for each increment of investment and unless otherwise required by legislation, repayment of the investment is to be accomplished by a repayment of the highest interest-bearing investment first. Interest rates applied to

SOUTHWESTERN FEDERAL POWER SYSTEM

Notes to Combined Financial Statements

September 30, 2025 and 2024

the unamortized investment of the U.S. Government in Southwestern's transmission system and the Corps' hydroelectric generating facilities range from 1.63% to 4.50% for unpaid facilities in service prior to and including fiscal year 2025 (4.50%). The rates have been set by law, by administrative order pursuant to law, or by administrative policies using the U.S. Senate Document No. 97 formula for the fiscal year during which the appropriations were requested.

(b) Alternative Financing

Due to fluctuations in the amount of annual appropriations received to fund operations, maintenance, rehabilitation, and modernization of SWFPS facilities, SWFPS has established an alternative financing program under reimbursable authority regulations. Under agreements with customers to finance projects, which benefit SWFPS, funds received from the sale of power are net billed, allowing a portion of the funds to be utilized to finance agreed-upon projects. Under the agreements with certain customers, alternative financing restricted specifically to fund operation, maintenance, rehabilitation, and modernization activities at the hydroelectric generating facilities is held in escrow (note 1(d)).

(6) Commitments and Contingencies

(a) General

Southwestern sells its marketable power to customers under long-term power sales contracts of 15 years, the majority of which require Southwestern to provide 1,200 kilowatt hours per kilowatt of peaking contract demand per year, subject to scheduling constraints outlined in each customer's contract. If sufficient power is unavailable to Southwestern from Corps' hydroelectric facilities to meet these commitments, Southwestern may be required to purchase power from other sources to meet these commitments. The cost to purchase such power is recovered through the purchased power adder discussed more fully in note 1(g).

(b) Legal

SWFPS has exposure to certain claims and legal actions arising in the ordinary course of business. In management's opinion, any resulting actions will not have a material adverse effect on the financial condition or results of operations of SWFPS as of September 30, 2025 and 2024.

(7) Leases

Southwestern maintained a 191-month Occupancy Agreement for office space with the General Services Administration (GSA), commencing January 19, 2018 and scheduled to terminate December 31, 2033. The underlying lease agreement between GSA and the building owner was a 20-year lease, with a 10-year firm term, followed by an optional termination period during the second 10 years. This lease commenced January 1, 2014 and was also scheduled to end December 31, 2033.

In August 2019, Southwestern purchased a new headquarters facility in Tulsa, Oklahoma, with an anticipated occupancy date of January 1, 2025. Under the terms of the Occupancy Agreement, Southwestern was authorized to relinquish space upon four months' advance notice to GSA. Accordingly, Southwestern terminated its Occupancy Agreement effective January 31, 2025, in preparation for relocation to its newly acquired, agency-owned headquarters.

Rent expenses for operating leases totaled \$127,457 and \$387,364 for the fiscal years ended September 30, 2025 and 2024, respectively.

SOUTHWESTERN FEDERAL POWER SYSTEM

Notes to Combined Financial Statements

September 30, 2025 and 2024

(8) Related Parties

As components of the DOE and the DOW, these departments are considered related parties to Southwestern and the Corps. Southwestern has certain agreements with DOW components to provide electric power, transmission services, and other services. As of September 30, 2025 and 2024, amounts outstanding in accounts receivable relating to DOW components totaled \$364,295 and \$285,345, respectively. For the years ended September 30, 2025 and 2024, total operating revenues earned from DOW components totaled \$4,437,551 and \$3,737,458, respectively.

(9) Subsequent Events

SWFPS has evaluated subsequent events from the balance sheet date through August 24, 2026, the date the combined financial statements were available to be issued, and no subsequent events were identified.

Schedule 1

SOUTHWESTERN FEDERAL POWER SYSTEM

Combining Schedule of Balance Sheet Data

September 30, 2025

Assets	Southwestern	Corps	Total
Plant in service	\$ 585,673,646	1,813,866,249	2,399,539,895
Accumulated depreciation	(339,717,173)	(774,685,812)	(1,114,402,985)
Construction work in progress	22,906,075	128,876,559	151,782,634
Net utility plant	268,862,548	1,168,056,996	1,436,919,544
Cash	403,583,286	495,433,986	899,017,272
Funds held in escrow	161,184,272	63,817,311	225,001,583
Accounts receivable	18,800,971	470,350	19,271,321
Materials and supplies, at average cost	4,710,841	—	4,710,841
Banking exchange receivables	346,419	—	346,419
Deferred workers' compensation	1,358,817	20,389,315	21,748,132
Other assets	302,493	—	302,493
Total assets	\$ 859,149,647	1,748,167,958	2,607,317,605
Liabilities and Capitalization			
Liabilities:			
Accounts payable and accrued liabilities	\$ 14,182,955	10,779,717	24,962,672
Advances for construction	2,031,060	—	2,031,060
Accrued workers' compensation	1,656,402	20,929,149	22,585,551
Purchased power and banking exchange deferral	9,013,749	—	9,013,749
Hydropower water storage reallocation deferral	59,048,855	—	59,048,855
Total liabilities	85,933,021	31,708,866	117,641,887
Capitalization:			
Payable to U.S. Treasury	622,819,245	1,065,134,706	1,687,953,951
Accumulated net revenues	150,397,381	651,324,386	801,721,767
Total capitalization	773,216,626	1,716,459,092	2,489,675,718
Total liabilities and capitalization	\$ 859,149,647	1,748,167,958	2,607,317,605

See accompanying independent auditors' report.

Schedule 1

SOUTHWESTERN FEDERAL POWER SYSTEM

Combining Schedule of Balance Sheet Data

September 30, 2024

Assets	Southwestern	Corps	Total
Plant in service	\$ 558,066,738	1,778,467,029	2,336,533,767
Accumulated depreciation	(327,027,451)	(754,722,244)	(1,081,749,695)
Construction work in progress	31,885,473	105,253,130	137,138,603
Net utility plant	262,924,760	1,128,997,915	1,391,922,675
Cash	379,264,644	470,382,867	849,647,511
Funds held in escrow	155,365,114	45,559,702	200,924,816
Accounts receivable	14,574,558	446,572	15,021,130
Materials and supplies, at average cost	4,392,894	—	4,392,894
Banking exchange receivables	226,023	—	226,023
Deferred workers' compensation	1,177,019	20,482,942	21,659,961
Other assets	360,711	—	360,711
Total assets	\$ 818,285,723	1,665,869,998	2,484,155,721
Liabilities and Capitalization			
Liabilities:			
Accounts payable and accrued liabilities	\$ 12,833,365	7,298,552	20,131,917
Advances for construction	5,624,784	—	5,624,784
Accrued workers' compensation	1,427,178	21,371,501	22,798,679
Purchased power and banking exchange deferral	19,780,049	—	19,780,049
Hydropower water storage reallocation deferral	58,499,525	—	58,499,525
Total liabilities	98,164,901	28,670,053	126,834,954
Capitalization:			
Payable to U.S. Treasury	583,731,935	996,017,897	1,579,749,832
Accumulated net revenues	136,388,887	641,182,048	777,570,935
Total capitalization	720,120,822	1,637,199,945	2,357,320,767
Total liabilities and capitalization	\$ 818,285,723	1,665,869,998	2,484,155,721

See accompanying independent auditors' report.

Schedule 2

SOUTHWESTERN FEDERAL POWER SYSTEM
Combining Schedule of Changes in Capitalization Data
Years ended September 30, 2025 and 2024

	Southwestern payable to U.S. Treasury	Southwestern accumulated net revenues (deficit)	Southwestern total capitalization	Corps payable to U.S. Treasury	Corps accumulated net revenues (deficit)	Corps total capitalization	Total capitalization
Total capitalization as of September 30, 2023	501,540,347	124,112,986	625,653,333	951,863,496	652,079,793	1,603,943,289	2,229,596,622
Additions:							
Congressional appropriations	11,440,000	—	11,440,000	99,666,378	—	99,666,378	111,106,378
Interest on payable to U.S. Treasury and other	(1,021,583)	—	(1,021,583)	10,749,249	—	10,749,249	9,727,666
Transfers of property and services, net	(33,682,080)	—	(33,682,080)	46,796,841	—	46,796,841	13,114,761
Total additions to capitalization	(23,263,663)	—	(23,263,663)	157,212,468	—	157,212,468	133,948,805
Deductions:							
Payments to U.S. Treasury	105,455,251	—	105,455,251	(113,058,067)	—	(113,058,067)	(7,602,816)
Total deductions to capitalization	105,455,251	—	105,455,251	(113,058,067)	—	(113,058,067)	(7,602,816)
Net revenues for the year ended September 30, 2024	—	12,275,901	12,275,901	—	(10,897,745)	(10,897,745)	1,378,156
Total capitalization as of September 30, 2024	\$ 583,731,935	136,388,887	720,120,822	996,017,897	641,182,048	1,637,199,945	2,357,320,767
Additions:							
Congressional appropriations	11,440,000	1,263,000	12,703,000	85,572,080	—	85,572,080	98,275,080
Interest on payable to U.S. Treasury and other	(1,026,671)	—	(1,026,671)	10,266,598	—	10,266,598	9,239,927
Transfers of property and services, net	(101,776,282)	—	(101,776,282)	114,076,965	—	114,076,965	12,300,683
Total additions to capitalization	(91,362,953)	1,263,000	(90,099,953)	209,915,643	—	209,915,643	119,815,690
Deductions:							
Payments to U.S. Treasury	130,450,263	—	130,450,263	(140,798,834)	—	(140,798,834)	(10,348,571)
Total deductions to capitalization	130,450,263	—	130,450,263	(140,798,834)	—	(140,798,834)	(10,348,571)
Net revenues for the year ended September 30, 2025	—	12,745,494	12,745,494	—	10,142,338	10,142,338	22,887,832
Total capitalization as of September 30, 2025	\$ 622,819,245	150,397,381	773,216,626	1,065,134,706	651,324,386	1,716,459,092	2,489,675,718

See accompanying independent auditors' report.

Schedule 3

SOUTHWESTERN FEDERAL POWER SYSTEM
Combining Schedule of Revenues and Expenses Data
Year ended September 30, 2025

	<u>Southwestern</u>	<u>Corps</u>	<u>Total</u>
Operating revenues:			
Sales of electric power	\$ 199,566,334	—	199,566,334
Transmission and other operating revenues	<u>27,695,456</u>	<u>3,517,923</u>	<u>31,213,379</u>
Total operating revenues before deferrals	227,261,790	3,517,923	230,779,713
Net purchased power and banking exchange deferral	11,539,353	—	11,539,353
Revenue distributed to Corps	<u>(133,514,619)</u>	<u>133,514,619</u>	<u>—</u>
Total operating revenues	105,286,524	137,032,542	242,319,066
Non-reimbursable revenues	<u>10,304,792</u>	<u>1,757,609</u>	<u>12,062,401</u>
Total revenues	<u>115,591,316</u>	<u>138,790,151</u>	<u>254,381,467</u>
Operating expenses:			
Operation and maintenance	48,597,309	91,020,557	139,617,866
Purchased power and banking exchange	30,160,753	—	30,160,753
Depreciation and amortization	14,635,973	29,755,588	44,391,561
Transmission service charges by others	24,783	—	24,783
Non-reimbursable expenses	<u>7,922,655</u>	<u>—</u>	<u>7,922,655</u>
Total operating expenses	<u>101,341,473</u>	<u>120,776,145</u>	<u>222,117,618</u>
Net operating revenues (losses)	<u>14,249,843</u>	<u>18,014,006</u>	<u>32,263,849</u>
Interest expense:			
Interest on payable to U.S. Treasury and other	2,187,512	10,266,598	12,454,110
Allowance for funds used during construction	<u>(683,163)</u>	<u>(2,394,930)</u>	<u>(3,078,093)</u>
Net interest expense	<u>1,504,349</u>	<u>7,871,668</u>	<u>9,376,017</u>
Net revenues (losses)	<u>\$ 12,745,494</u>	<u>10,142,338</u>	<u>22,887,832</u>

See accompanying independent auditors' report.

Schedule 3

SOUTHWESTERN FEDERAL POWER SYSTEM
Combining Schedule of Revenues and Expenses Data
Year ended September 30, 2024

	<u>Southwestern</u>	<u>Corps</u>	<u>Total</u>
Operating revenues:			
Sales of electric power	\$ 166,396,610	—	166,396,610
Transmission and other operating revenues	<u>29,055,391</u>	<u>2,628,020</u>	<u>31,683,411</u>
Total operating revenues before deferrals	195,452,001	2,628,020	198,080,021
Net purchased power and banking exchange deferral	21,568,991	—	21,568,991
Revenue distributed to Corps	<u>(105,466,591)</u>	<u>105,466,591</u>	<u>—</u>
Total operating revenues	111,554,401	108,094,611	219,649,012
Non-reimbursable revenues	<u>9,315,236</u>	<u>1,323,951</u>	<u>10,639,187</u>
Total revenues	<u>120,869,637</u>	<u>109,418,562</u>	<u>230,288,199</u>
Operating expenses:			
Operation and maintenance	47,120,412	85,281,335	132,401,747
Purchased power and banking exchange	40,174,070	—	40,174,070
Depreciation and amortization	11,920,228	26,431,775	38,352,003
Transmission service charges by others	40,896	—	40,896
Non-reimbursable expenses	<u>8,005,860</u>	<u>—</u>	<u>8,005,860</u>
Total operating expenses	<u>107,261,466</u>	<u>111,713,110</u>	<u>218,974,576</u>
Net operating revenues (losses)	<u>13,608,171</u>	<u>(2,294,548)</u>	<u>11,313,623</u>
Interest expense:			
Interest on payable to U.S. Treasury and other	2,434,299	10,749,249	13,183,548
Allowance for funds used during construction	<u>(1,102,029)</u>	<u>(2,146,052)</u>	<u>(3,248,081)</u>
Net interest expense	1,332,270	8,603,197	9,935,467
Net revenues (losses)	<u>\$ 12,275,901</u>	<u>(10,897,745)</u>	<u>1,378,156</u>

See accompanying independent auditors' report.

Schedule 4

SOUTHWESTERN FEDERAL POWER SYSTEM

Combining Schedule of Cash Flows Data

Year ended September 30, 2025

	Southwestern	Corps	Total
Cash flows from operating activities:			
Net revenues (losses)	\$ 12,745,494	10,142,338	22,887,832
Adjustments to reconcile net revenues to net cash provided by (used in) operating activities:			
Revenue distributed to Corps	133,514,619	(133,514,619)	—
Depreciation and amortization	14,635,973	29,755,588	44,391,561
(Gain) loss on retirement of plant in service	(282,146)	2,447,818	2,165,672
Benefit expense paid by other Federal agencies	3,028,611	5,713,862	8,742,473
Interest on payable to U.S. Treasury and other	1,504,349	7,871,668	9,376,017
Deferred workers' compensation	(181,798)	93,627	(88,171)
(Increase) decrease in assets:			
Accounts receivable	(4,226,413)	(23,778)	(4,250,191)
Materials and supplies	(317,947)	—	(317,947)
Banking exchange receivables	(120,396)	—	(120,396)
Other assets	58,218	—	58,218
Increase (decrease) in liabilities:			
Accounts payable and accrued liabilities	1,349,590	3,481,165	4,830,755
Accrued workers' compensation	229,224	(442,352)	(213,128)
Purchased power and banking exchange deferral	(11,393,844)	—	(11,393,844)
Advances for construction	(3,593,724)	—	(3,593,724)
Net cash provided by (used in) operating activities	146,949,810	(74,474,683)	72,475,127
Cash flows used in investing activities:			
Additions to utility plant	(19,608,452)	(68,867,557)	(88,476,009)
Cash flows from financing activities:			
Congressional appropriations	12,703,000	85,572,080	98,275,080
Payments to U.S. Treasury	130,450,263	(140,798,834)	(10,348,571)
Revenue distributed to Corps	(133,514,619)	133,514,619	—
Transfers of property and services, net	(104,804,893)	108,363,103	3,558,210
Hydropower water storage reallocation deferral	(2,037,309)	—	(2,037,309)
Net cash (used in) provided by financing activities	(97,203,558)	186,650,968	89,447,410
Net increase in cash and funds held in escrow	30,137,800	43,308,728	73,446,528
Cash and funds held in escrow, beginning of year	534,629,758	515,942,569	1,050,572,327
Cash and funds held in escrow, end of year	\$ 564,767,558	559,251,297	1,124,018,855
Supplemental cash flow information:			
Interest charged to construction	\$ 683,163	2,394,930	3,078,093
Interest deferred on regulatory liabilities	3,214,183	—	3,214,183

See accompanying independent auditors' report.

SOUTHWESTERN FEDERAL POWER SYSTEM

Schedule 4

Combining Schedule of Cash Flows Data

Year ended September 30, 2024

	Southwestern	Corps	Total
Cash flows from operating activities:			
Net revenues (losses)	\$ 12,275,901	(10,897,745)	1,378,156
Adjustments to reconcile net revenues to net cash provided by (used in) operating activities:			
Revenue distributed to Corps	105,466,591	(105,466,591)	—
Depreciation and amortization	11,920,228	26,431,775	38,352,003
(Gain) loss on retirement of plant in service	3,264,371	(2,666,775)	597,596
Benefit expense paid by other Federal agencies	2,411,288	4,821,254	7,232,542
Interest on payable to U.S. Treasury and other	1,332,270	8,603,197	9,935,467
Deferred workers' compensation	(238,136)	330,072	91,936
(Increase) decrease in assets:			
Accounts receivable	1,406,342	52,352	1,458,694
Materials and supplies	(684,990)	68,912	(616,078)
Banking exchange receivables	(150,381)	—	(150,381)
Other assets	(291,738)	—	(291,738)
Increase (decrease) in liabilities:			
Accounts payable and accrued liabilities	2,280,600	(861,281)	1,419,319
Accrued workers' compensation	289,045	9,651	298,696
Purchased power and banking exchange deferral	(21,757,432)	—	(21,757,432)
Advances for construction	1,216,527	—	1,216,527
Net cash provided by (used in) operating activities	118,740,486	(79,575,179)	39,165,307
Cash flows used in investing activities:			
Additions to utility plant	(26,239,986)	(47,757,374)	(73,997,360)
Cash flows from financing activities:			
Congressional appropriations	11,440,000	99,666,378	111,106,378
Payments to U.S. Treasury	105,455,251	(113,058,067)	(7,602,816)
Revenue distributed to Corps	(105,466,591)	105,466,591	—
Transfers of property and services, net	(36,093,368)	41,975,587	5,882,219
Hydropower water storage reallocation deferral	(1,998,772)	—	(1,998,772)
Net cash (used in) provided by financing activities	(26,663,480)	134,050,489	107,387,009
Net increase in cash and funds held in escrow	65,837,020	6,717,936	72,554,956
Cash and funds held in escrow, beginning of year	468,792,738	509,224,633	978,017,371
Cash and funds held in escrow, end of year	\$ 534,629,758	515,942,569	1,050,572,327
Supplemental cash flow information:			
Interest charged to construction	\$ 1,102,029	2,146,052	3,248,081
Interest deferred on regulatory liabilities	3,455,882	—	3,455,882

See accompanying independent auditors' report.

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