PGE

Portland General Electric Company
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September 28, 2006

Filing Center
Public Utility Commission of Oregon
550 Capitol St NE, Suite 215
Salem, OR 97301

Re: Minor Corrections to PGE Rebuttal Exhibits

Filing Center:

During the course of reviewing our rebuttal testimony and preparing our responses to data requests, we discovered several errata. The corrections are minor and do not affect our estimates for power costs or for cost of capital. The corrections are as follows:

- PGE Exhibit 1800, page 30, line 17. "Section III of PGE Exhibit 2000" should be "Section IV of PGE Exhibit 2000."
- PGE Exhibit 2000, page 65, line 13. The phrase "52%, towards the lower end of the BBB+ S&P range" should read "56%, below the lower end of the BBB+ S&P range."
- PGE Exhibit 2000, page A-4, line 18. The phrase "page $$" should be "(Section V B 4)".
- PGE Exhibit 2101, page 1. Footnote "d/" should be footnote "c/."
- PGE Exhibit 2106, page 1. "Rebuttal Table 9" referenced in the title should be "PGE Exhibit 2105."
- PGE Exhibit 2023, page 2, footnote 1. "PGE Exhibit &&" should be "PGE Exhibit 2020."
- PGE Exhibit 2023, page 3 is misplaced. It should be PGE Exhibit 2014, page 7.

Replacement pages are attached. Should you have any questions, please contact me at 503-464-7580.

Sincerely,

Patrick G Hager III

Patrick G. Hager
Manager, Regulatory Affairs

cc: UE-180 / UE-181 / UE-184 Service List

Encl.

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Q. Do the Commission orders indicate, and the parties suggest, a connection between cost of capital and the regulatory framework for NVPC?

A. Yes. For example, in Order No. 05-1261, the Commission stated that "adoption of the two-part mechanism outlined here may well shift risks to customers that they have not borne under the sporadic use of deferrals and PCAs in the past. If so, we will consider the reduced risk for the company in setting ROE in the future." CUB's testimony asserts that: "If the Company would like a regulatory framework that eliminates uncertainty and risk, then its return on equity should be adjusted to that of Treasury bills, about 5%." (CUB/200, Jenks-Brown/7).

It is interesting to note that the parties' view of the effect of a NVPC regulatory framework on cost of capital appears only to work one way: frameworks that bring rates closer to actual cost of service reduce cost of capital while frameworks that allow significant variations between assumed, forecast test year NVPC and actual NVPC do not increase cost of capital. This seems unlikely, and the parties present no such evidence.

Q. Do many of the utilities the parties use as "comparable" for purposes of cost of capital analysis have NVPC regulatory frameworks similar to what PGE proposes?

A. Yes. Section IV of PGE Exhibit 2000 discusses Staff's inclusion of utilities that have PCAs in its sample. PGE Exhibit 2000 concludes that PGE's cost of capital, including required return on equity, is higher without our proposed regulatory framework.

Q. Would reducing PGE's NVPC cost of service risk benefit customers?

A. Yes, it could. Leaving this risk with PGE will raise the fixed costs of new investment in the system. These costs, once incurred, are not avoidable. Incurring higher fixed costs to avoid

Q. Which specific circumstances cause you to recommend maintaining PGE's current equity ratio into 2007?

A. We listed these circumstances in our direct testimony and summarized them above in Section IV. Mr. Gorman does not believe that PGE needs to maintain an equity ratio higher than his comparable sample, implying that PGE does not have more risk. This is incorrect. For example, PGE's revenue requirement for 2007 is more than 50% net variable power costs. In addition, PGE is required by Commission order to maintain at least 48% equity. And, finally, PGE must maintain its investment grade unsecured rating in order to maintain its access to wholesale energy markets, for unresolved litigation, and SB 408-related issues. Removing the amount of equity that Mr. Gorman suggests would remove the necessary flexibility that is afforded to PGE under its current equity ratio. Indeed, at a 50% long-term debt ratio and a 6% debt imputation due to its purchased power, PGE's debt ratio would reside at 56%, below the lower end of the BBB+ S&P range.

Q. Mr. Gorman states that the increase in PGE's common equity balance "appears related to Enron's ownership." Do you agree?

A. No. As we stated in our direct testimony, PGE was relieved of its obligation to pay dividends to Enron for a period of time, increasing our liquidity and our common equity and our ability to fund our capital expenditures. However, PGE did pay a $150 million dividend to Enron in 2005. PGE continued with its current common equity level because of the factors that we discussed in our direct testimony, such as the deterioration of the financial and wholesale energy markets for electric utilities. Indeed, PGE's earnings during the 2001-2005 period were substantially below its authorized ROE.

See Griliches, Intriligator. Handbook of Econometrics: Volume 1. North-Holland Publishing Company, New York: 1983

Concerns with R-square values:

The r-square of the two models do not match. How can you say the models are equivalent?

Due to the manner in which R-square is calculated, there is a mismatch.

R-square = 1 – (Sum of Squared Residuals [RSS]) / (Total Sum of Squares [TSS])

Given that:

Total Sum of Squares = Estimated Sum of Squares [ESS] + RSS

The R-square is, in fact:

R-square = 1 – RSS / (ESS + RSS)

The difference between the two models lies in the ESS calculation.

$$ESS = \Sigma (y_{estimated} - y_{average})^2$$

where $y_{estimated} = \alpha + \beta * X$

However, ESS is biased due to the method we used. As we showed earlier, the estimated β is off by one as compared between models. Therefore the estimated y values are different and the ESS will differ between models. Therefore, we need a different measure of fit.

Akaike Information Criteria (AIC) is analogous to R-square when applied to single-variable regressions, as seen earlier in testimony (Sectionn V B 4). Hence, we can use it as a reasonable proxy for fit. AIC is calculated as follows:

$$AIC = T * \ln (RSS) + 2*K$$

Where T is the number of observations and K is the number of explanatory variables.

The following page demonstrates that, in fact, the two variants of the Risk Positioning model are equivalent from the AIC standpoint.

Comparison of Risk Factors for PGE, NW Natural and Mr. Morgan's Electric Utilities Sample

	S&P Business Profile[a/]	Value Line Beta[b/]	Value Line Safety Rank[b/]	S&P Bond Rating[c/]	Percentage of Purchased Power[b/]
Mr. Morgan's Electric Utilty Sample					
1 Alliant Energy	5	0.90	3	A-	33%
2 AEP	2	1.25	3	BBB	na
3 Consol Edison	2	0.70	1	A	100%
4 Empire District	6	0.80	3	BBB+	30%
5 Energy East Corp.	3	0.90	2	BBB+	100%
6 IDACORP, Inc.	5	1.00	3	A-	22%
7 MGE Energy Inc.	4	0.70	1	AA-	37%
8 NSTAR	1	0.80	1	A+	na
9 OGE Energy	4	0.75	2	BBB+	12%
10 Progress Energy	5	0.85	2	BBB	0%
11 Southern Co.	4	0.65	1	A	5%
12 Wisconsin Energy	5	0.80	2	A-	18%
13 WPS Resources	4	0.80	2	A+	36%
14 Xcel Energy	5	0.90	2	A-	30%
Average	3.9	0.84	2.0	A-	35%
PGE	5	na	na	BBB+	49%
NW Natural	1	0.75	1	AA-	--

Sources and Notes:

a/ From Staff/1003 Morgan/119 to 124. A business profile of 1 is the least risky.

b/ From Staff/ 1003 Morgan/56 to112.

c/ AUS Utilty Reports, August 2006, except PGE. PGE as reported in Staff/1003 Morgan/124..

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Mr. Morgan's DCF Analysis as Modififed with Assumptions for PGE Exhibit 2105 but with First Stage Ending in 2010

	Year	[1] Year-end Book Value	[2] Retention Ratio	[3] DPS growth	[4] EPS growth	[5a] Retained Earnings per Share	[5b] Gain from Sales of Stock Above Book Value	[6] Total Increment to Book Value	[7] Market Price	[8] M/B	[9] ROE	[10] Cash Flow From Stock Transfer	[11] Cash Flow from Dividends	[12] Total Cash Flow
	2005-a/	$20.13							$33.79	1.73		-$33.79		-$33.79
	2006-a/	$20.98	0.343	$1.47	$2.24				$36.30	1.73	10.88%		$1.47	$1.47
First	2007	$22.00	0.378	$1.51	$2.43	$0.92	$0.10	$1.02	$38.06	1.73	11.38%		$1.51	$1.51
Stage	2008	$23.19	0.412	$1.56	$2.65	$1.09	$0.10	$1.19	$40.12	1.73	11.78%		$1.56	$1.56
	2009	$24.58	0.443	$1.61	$2.88	$1.28	$0.11	$1.39	$42.52	1.73	12.13%		$1.61	$1.61
	2010	$26.17	0.473	$1.65	$3.14	$1.48	$0.11	$1.60	$45.28	1.73	12.42%		$1.65	$1.65
	2011	$27.89	0.473	$1.72	$3.27	$1.59	$0.12	$1.71	$48.25	1.73	12.50%		$1.72	$1.72
6.55%	2012	$29.71	0.473	$1.84	$3.49	$1.70	$0.13	$1.83	$51.41	1.73	12.50%		$1.84	$1.84
	2013	$31.66	0.473	$1.96	$3.71	$1.81	$0.14	$1.95	$54.77	1.73	12.50%		$1.96	$1.96
	2014	$33.73	0.473	$2.09	$3.96	$1.93	$0.15	$2.07	$58.36	1.73	12.50%		$2.09	$2.09
	2015	$35.94	0.473	$2.22	$4.22	$2.05	$0.16	$2.21	$62.18	1.73	12.50%		$2.22	$2.22
6.55%	2016	$38.29	0.473	$2.37	$4.49	$2.19	$0.17	$2.35	$66.25	1.73	12.50%		$2.37	$2.37
	2017	$40.80	0.473	$2.52	$4.79	$2.33	$0.18	$2.51	$70.59	1.73	12.50%		$2.52	$2.52
	2018	$43.47	0.473	$2.69	$5.10	$2.48	$0.19	$2.67	$75.21	1.73	12.50%		$2.69	$2.69
	2019	$46.32	0.473	$2.86	$5.43	$2.64	$0.20	$2.85	$80.13	1.73	12.50%		$2.86	$2.86
	2020	$49.35	0.473	$3.05	$5.79	$2.82	$0.22	$3.03	$85.38	1.73	12.50%		$3.05	$3.05
	2021	$52.59	0.473	$3.25	$6.17	$3.00	$0.23	$3.23	$90.97	1.73	12.50%		$3.25	$3.25
	2022	$56.03	0.473	$3.46	$6.57	$3.20	$0.24	$3.44	$96.93	1.73	12.50%		$3.46	$3.46
	2023	$59.70	0.473	$3.69	$7.00	$3.41	$0.26	$3.67	$103.28	1.73	12.50%		$3.69	$3.69
Second	2024	$63.61	0.473	$3.93	$7.46	$3.63	$0.28	$3.91	$110.04	1.73	12.50%		$3.93	$3.93
Stage	2025	$67.77	0.473	$4.19	$7.95	$3.87	$0.30	$4.16	$117.24	1.73	12.50%		$4.19	$4.19
	2026	$72.21	0.473	$4.46	$8.47	$4.12	$0.32	$4.44	$124.92	1.73	12.50%		$4.46	$4.46
	2027	$76.94	0.473	$4.76	$9.03	$4.39	$0.34	$4.73	$133.10	1.73	12.50%		$4.76	$4.76
	2028	$81.97	0.473	$5.07	$9.62	$4.68	$0.36	$5.04	$141.81	1.73	12.50%		$5.07	$5.07
	2029	$87.34	0.473	$5.40	$10.25	$4.99	$0.38	$5.37	$151.10	1.73	12.50%		$5.40	$5.40
	2030	$93.06	0.473	$5.75	$10.92	$5.31	$0.41	$5.72	$160.99	1.73	12.50%		$5.75	$5.75
	2031	$99.15	0.473	$6.13	$11.63	$5.66	$0.43	$6.09	$171.53	1.73	12.50%		$6.13	$6.13
	2032	$105.65	0.473	$6.53	$12.39	$6.03	$0.46	$6.49	$182.77	1.73	12.50%		$6.53	$6.53
	2033	$112.56	0.473	$6.96	$13.21	$6.43	$0.49	$6.92	$194.73	1.73	12.50%		$6.96	$6.96
	2034	$119.93	0.473	$7.41	$14.07	$6.85	$0.52	$7.37	$207.48	1.73	12.50%		$7.41	$7.41
	2035	$127.79	0.473	$7.90	$14.99	$7.30	$0.56	$7.85	$221.07	1.73	12.50%		$7.90	$7.90
	2036	$136.15	0.473	$8.42	$15.97	$7.77	$0.59	$8.37	$235.55	1.73	12.50%		$8.42	$8.42
	2037	$145.07	0.473	$8.97	$17.02	$8.28	$0.63	$8.92	$250.97	1.73	12.50%		$8.97	$8.97
	2038	$154.57	0.473	$9.56	$18.13	$8.82	$0.67	$9.50	$267.40	1.73	12.50%		$9.56	$9.56
	2039	$164.69	0.473	$10.18	$19.32	$9.40	$0.72	$10.12	$284.91	1.73	12.50%		$10.18	$10.18
	2040	$175.47	0.473	$10.85	$20.59	$10.02	$0.77	$10.78	$303.57	1.73	12.50%		$10.85	$10.85
	2041	$186.96	0.473	$11.56	$21.93	$10.67	$0.82	$11.49	$323.44	1.73	12.50%		$11.56	$11.56
	2042	$199.20	0.473	$12.32	$23.37	$11.37	$0.87	$12.24	$344.62	1.73	12.50%		$12.32	$12.32
	2043	$212.25	0.473	$13.12	$24.90	$12.12	$0.93	$13.04	$367.19	1.73	12.50%		$13.12	$13.12
	2044	$226.14	0.473	$13.98	$26.53	$12.91	$0.99	$13.90	$391.23	1.73	12.50%		$13.98	$13.98
3rd Stage	2045	$240.95	0.473	$14.90	$28.27	$13.76	$1.05	$14.81	$416.85	1.73	12.50%	$416.85	$14.90	$431.74

Internal Rate of Return	10.31%

Notes and Sources for Each Column

a/ Initial values for 2005 and 2006 in all columns are from Staff/1002 Morgan/6.
[1] Book Value from prior year plus increment in colum [6].
[2] First stage values derived from estimated EPS and DPS. Second stage assumes value from 2010 continues.
[3] First stage growth of 3% from Staff/1002 Morgan/6. Values in stage 2 are derived from EPS and Retention ratio.
[4] First stage assumes investors expect the same pattern of EPS growth in 2006-2010 as the average of changes in EPS realized by utilities in Mr. Morgan's sample during 2001-2005. Second stage EPS growth is computed by multiplying values in column [1] by column [9].
[5a] BR growth computed by subtracting DPS from EPS. Adjusted in Second Stage for 12.5% ROE being return on year-end equity.
[5b] SV growth is determined by multiplying estimated sv growth by beginning book value to be conservative.
[6] The sum of columns [5a] and [5b].
[7] Col [1] times col. [10].
[8] From Staff 1002 Morgan/6
[9] First stage ROE is derived. Second stage ROE is the ROE forecasted by Value Line for the East (Staff/1003 Morgan/97), the Central (Staff 1003 Morgan/98) and the West (Staff/1003 Morgan/96).
[10] Inputs are negative when stock is purchased and positive when it is sold.
[11] Column [3]
[12] Sum of columns 10 and 11.

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determinations." In response to PGE Data Request No. 065, Staff stated that they are "**not aware of specific published literature** upon which the statement was based."

[1] OPUC Responses to PGE Data Requests are PGE Exhibit 2020

			Moody's Index for:		**Above (Below)**	
Month/Year	**Issue**	**Effective All-In Debt Rate**	**Aa**	**Baa**	**Aa**	**Baa**
October 2002	FMB 8.125%	8.421%	7.07%	8.00%	135	42
October 2002	FMB 5.6675%	7.420%	7.07%	8.00%	35	(58)
April 2003	FMB 5.279%	6.434%	6.47%	6.94%	(4)	(51)
August 2003	FMB 5.625%	6.266%	6.48%	7.08%	(21)	(81)
August 2003	FMB 6.750%	7.220%	6.48%	7.08%	74	14
August 2003	FMB 6.875%	7.282%	6.48%	7.08%	80	20

			S&P's Index for:		**Above (Below)**	
Month/Year	**Issue**	**Effective All-In Debt Rate**	**A**	**BBB**	**A**	**BBB**
October 2002	FMB 8.125%	8.421%	7.01%	8.62%	141	(20)
October 2002	FMB 5.6675%	7.420%	7.01%	8.62%	41	(120)
April 2003	FMB 5.279%	6.434%	5.71%	6.82%	72	(39)
August 2003	FMB 5.625%	6.266%	6.06%	6.74%	21	(47)
August 2003	FMB 6.750%	7.220%	6.06%	6.74%	116	48
August 2003	FMB 6.875%	7.282%	6.06%	6.74%	122	54

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