

BOEHM, KURTZ & LOWRY

ATTORNEYS AT LAW
36 EAST SEVENTH STREET
SUITE 1510
CINCINNATI, OHIO 45202
TELEPHONE (513) 421-2255
TELECOPIER (513) 421-2764

Via Electronic Mail - puc.filingcenter@state.or.us

June 15, 2015

Public Utility Commission of Oregon
3930 Fairview Industrial Dr., SE
Salem, Oregon 97302-1166
Attn: Filing Center

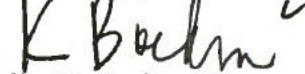
Re: Case No. UE-294

Dear Sir or Madam:

Please find attached the OPENING TESTIMONY AND EXHIBITS OF NEAL TOWNSEND on behalf of the FRED MEYER STORES AND QUALITY FOOD CENTERS, DIVISIONS OF THE KROGER CO. for filing in the above referenced matter.

Copies have been served on all parties of record. Please place this document of file.

Very truly yours,



Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY

KJBkew
Enclosure
cc: Certificate of Service

**BEFORE THE PUBLIC UTILITY COMMISSION
OF THE STATE OF OREGON**

UE 294

In the Matter of)
)
PORTLAND GENERAL ELECTRIC)
COMPANY)
)
Request for a General Rate Revision.)

**OPENING TESTIMONY OF
NEAL TOWNSEND
ON BEHALF OF
FRED MEYER STORES**

JUNE 15, 2015

1 **OPENING TESTIMONY OF NEAL TOWNSEND**

2

3 **Introduction**

4 **Q. Please state your name and business address.**

5 A. My name is Neal Townsend. My business address is 215 South State Street, Suite
6 200, Salt Lake City, Utah 84111.

7

8 **Q. By whom are you employed and in what capacity?**

9 A. I am a Principal at Energy Strategies, LLC. Energy Strategies is a private
10 consulting firm specializing in economic and policy analysis applicable to energy
11 production, transportation, and consumption.

12

13 **Q. On whose behalf are you testifying in this proceeding?**

14 A. My testimony is being sponsored by Fred Meyer Stores and Quality Food Centers
15 ("Fred Meyer"), divisions of The Kroger Co. Kroger receives most of its service
16 from Portland General Electric ("PGE") under Schedules 485 and 585. For ease
17 of exposition, I will refer to Schedule 85 and its Direct Access counterparts,
18 Schedules 485 and 585, collectively as the Schedule 85 rate group.

19

20 **Q. Please describe your educational background.**

21 A. I received an MBA from the University of New Mexico in 1996. I also earned a
22 B.S. degree in Mechanical Engineering from the University of Texas at Austin in
23 1984.

1 **Q. Please describe your professional experience and background.**

2 A. I have provided regulatory and technical support on a variety of energy projects at
3 Energy Strategies since I joined the firm in 2001. Prior to my employment at
4 Energy Strategies, I was employed by the Utah Division of Public Utilities as a
5 Rate Analyst from 1998 to 2001. I have also worked in the aerospace, oil and
6 natural gas industries.

7
8 **Q. Have you previously testified before this Commission?**

9 A. Yes. I filed joint testimony in support of the stipulation in PGE's 2013 general
10 rate case, Docket No. UE-262. I also filed direct and joint testimony in support of
11 the stipulation in Pacific Power's 2012 general rate case, Docket No. UE-246, and
12 joint testimony in support of the stipulation in Pacific Power's 2010 general rate
13 case, Docket No. UE-217.

14
15 **Q. Have you testified before utility regulatory commissions in other states?**

16 A. Yes. I have testified in utility regulatory proceedings before the Arkansas Public
17 Service Commission, the Illinois Commerce Commission, the Indiana Utility
18 Regulatory Commission, the Kentucky Public Service Commission, the Michigan
19 Public Service Commission, the Public Utilities Commission of Ohio, the Public
20 Utility Commission of Texas, the Utah Public Service Commission, the Virginia
21 Corporation Commission, and the Public Service Commission of West Virginia.
22 A more detailed description of my qualifications is contained in Attachment A,
23 attached to this testimony.

1 **Overview and Conclusions**

2 **Q. What is the purpose of your opening testimony in this proceeding?**

3 A. My testimony addresses PGE's proposed rate spread as well as the distribution
4 charges for customers taking service under the Schedule 85 rate group.

5

6 **Q. What are your primary conclusions and recommendations to the**
7 **Commission on these subjects?**

8 A. PGE's proposal for rate spread, or class revenue allocation, is reasonable at the
9 Company's requested revenue requirement. I recommend that the Schedules 38
10 and 49 subsidy amount borne by the Schedule 85 rate group be no higher than that
11 proposed by PGE.

12 Regarding the Schedule 85 rate group distribution charges, at this time, I believe
13 it is reasonable to largely maintain the differentials in distribution demand charges
14 between the Schedule 85 rate group customers served at secondary and primary
15 voltage as proposed by PGE. However, I recommend that a further evaluation in
16 the differences in the cost to serve these two groups of customers be conducted in
17 PGE's next rate case. This analysis should take into account the ongoing
18 operations and maintenance expenses associated with the portion of Company
19 distribution facilities that primary voltage customers do not utilize that should not
20 be included in primary customer rates.

21

1 **Rate Spread**

2 **Q. What general guidelines should be employed in spreading any change in**
3 **rates?**

4 A. In determining rate spread, or revenue apportionment, it is important to align rates
5 with cost causation, to the greatest extent practicable. Properly aligning rates with
6 the costs caused by each customer group is essential for ensuring fairness, as it
7 minimizes cross subsidies among customers. It also sends proper price signals,
8 which improves efficiency in resource utilization.

9 At the same time, it can be appropriate to mitigate the impact of moving
10 immediately to cost-based rates for customer groups that would experience
11 significant rate increases from doing so by employing the ratemaking principle of
12 gradualism. When employing this principle, it is important to adopt a long-term
13 strategy of moving in the direction of cost causation, and to avoid practices that
14 result in permanent cross-subsidies from other customers.

15
16 **Q. What general approach has PGE used in spreading its proposed rate**
17 **increase?**

18 A. With the exception of PGE's proposed rate mitigation that limits the base rate
19 increase for Schedules 38 and 49 customers¹ to 12 percent before including Carty
20 Generating Station, PGE is proposing rates that are very close to class cost of
21 service. According to the Direct Testimony of PGE witness Marc Cody, PGE has
22 proposed that the Schedules 83 and 85 rate groups bear the cost of the subsidies

¹ Schedule 38 is Large Nonresidential Optional Time-of-Day Standard Service and Schedule 49 is Large Nonresidential Irrigation and Drainage Pumping Standard Service.

1 through the Customer Impact Offset, in proportion to the historical consumption
2 of Schedule 49 customers sized below or above 200 kW.²

3
4 **Q. What is your general assessment of PGE's proposed rate spread?**

5 A. I believe that PGE's proposed rate spread is reasonable at the Company's
6 requested revenue requirement. Further, to the extent that PGE's proposed
7 revenue requirement is reduced by the Commission, I recommend that class
8 revenue requirement should remain closely aligned with cost of service at the
9 lower revenue level.

10 I accept the Company's proposed allocation of the Schedules 38 and 49 subsidies
11 as reasonable for the purposes of this case. I recommend that the Schedules 38
12 and 49 subsidy amount borne by the Schedule 85 rate group be no higher than that
13 proposed by PGE. Mr. Cody's proposal for allocating the subsidy cost between
14 Schedules 83 and 85 is reasonable. The Company's approach allocates the
15 subsidy cost between Schedules 83 and 85 based on the 2014 consumption by
16 Schedule 49 customers sized below or above 200 kW, so that subsidy costs are
17 borne by the non-irrigation rate schedule that Schedule 49 customers might
18 otherwise be served on based on load size.

19 In the event PGE's proposed revenue requirement is reduced by the Commission,
20 that may allow for a reduction in the subsidy amount while continuing to limit the
21 base rate increase for Schedules 38 and 49 to 12 percent before consideration of
22 Carty.

² Direct Testimony of Marc Cody, pp. 25-26.

1 **Schedule 85 – Distribution Charges for Primary and Secondary Service**

2 **Q. By way of background, please describe the type of service provided by**
3 **Schedule 85-S and 85-P.**

4 A. Schedule 85 applies to Standard Service provided to Large Non-Residential
5 Customers – customers whose billing demands generally are greater than 200 kW,
6 but have not exceeded 4,000 kW more than once in the past thirteen months.
7 Schedule 85-S is used for customers taking service at secondary voltage, whereas
8 Schedule 85-P is used for customers taking service at primary voltage. In
9 addition, Schedule 85 has counterpart Direct Access rate schedules, Schedule 485
10 (Multi-Year Opt-Out) and Schedule 585 (annual Direct Access). The Distribution
11 Charges for Schedules 85-S, 485-S, and 585-S are identical, and the Distribution
12 Charges for Schedules 85-P, 485-P, and 585-P are identical.

13
14 **Q. What distribution charge increases has PGE proposed for the Schedule 85**
15 **rate group?**

16 A. For secondary service, PGE is proposing no change to the Facility Capacity
17 charges, and an increase to the On-Peak Demand Charge of \$0.26/kW or 12.3%.
18 For primary service, PGE is proposing to increase the Facility Capacity charges
19 by \$0.01/kW, and the On-Peak Demand Charge is proposed to increase by
20 \$0.26/kW or 12.6%.

21
22 **Q. What appears to be the basis for the differentiation between PGE’s proposed**
23 **primary and secondary distribution rates?**

1 A. Based on my review of PGE’s testimony and workpapers, and confirmed by PGE
2 in discovery³, the sole difference between the Facility Capacity and On-Peak
3 Demand charges for secondary and primary service is estimated peak demand
4 losses. Mr. Cody, on page 17 of his Direct Testimony, explains, “[t]he difference
5 between secondary and primary voltage Facility Capacity Charges reflect the
6 difference in estimated peak demand losses for the respective delivery voltages”
7 and, “I calculate the demand charge difference based on the difference in peak
8 demand losses of the respective delivery voltages.”

9

10 **Q. Do you believe that PGE’s proposed distribution rate design for the Schedule**
11 **85 rate group is reasonable for this case?**

12 A. Yes. PGE has proposed to largely maintain the rate differential between primary
13 and secondary voltage rates, which I believe is reasonable for the purposes of this
14 case. However, I recommend that the Company conduct a further evaluation of
15 the differences in the cost to serve these two groups of customers when preparing
16 its next general rate case.

17

18 **Q. Please elaborate on the differences in the cost to serve primary and**
19 **secondary voltage customers.**

20 A. Primary customers require fewer Company-owned distribution facilities such as
21 service lines than secondary customers. PGE has acknowledged in discovery that
22 there are historical costs related to secondary voltage overhead conductors (FERC

³ PGE Response to Fred Meyer Data Request No. 009, included in Exhibit FM 101.

1 Account 365).⁴ Such facilities do not serve primary voltage customers. However,
2 PGE explained that since its current construction and design standards comprise
3 underground facilities with a minimal amount of secondary conductors, it does
4 not separately allocate these secondary voltage facilities through its marginal cost
5 study.

6 Despite the utilization of a marginal cost study, I believe that consideration should
7 be given to the ongoing operations and maintenance expense associated with
8 secondary voltage overhead and underground conductors and devices. According
9 to PGE's response to Fred Meyer Data Request No. 013, PGE's overhead
10 conductors are comprised of approximately 22% secondary voltage circuit miles
11 and 78% primary voltage circuit miles. PGE's underground conductors are
12 comprised of 7% secondary voltage circuit miles and 93% primary voltage circuit
13 miles. The secondary voltage conductors serve only secondary customers, while
14 the primary voltage conductors serve both secondary and primary customers.
15 Thus, none of the marginal costs associated with operating and maintaining these
16 secondary conductors are attributable to primary voltage customers. In the future,
17 this differentiation should be reflected in the cost of service study and none of the
18 costs associated with operating and maintaining secondary conductors should be
19 allocated to primary voltage customers.

⁴ PGE Response to Fred Meyer Data Request 010, included in Exhibit FM 101.

1 **Q. What is your recommendation on this issue?**

2 A. At this time, I believe it is reasonable to largely maintain the differentials in
3 demand charges between secondary and primary service as proposed by PGE
4 until a further evaluation of the differences in the cost to serve these two groups
5 of customers can be conducted in PGE's next rate case. The analysis should take
6 into account the ongoing operations and maintenance expenses associated with
7 the portion of Company distribution facility investment that primary voltage
8 customers do not utilize that should not be included in primary customer rates.

9

10 **Q. Does this conclude your opening testimony?**

11 A. Yes, it does.

June 1, 2015

TO: Kevin Higgins
Energy Strategies, LLC (Fred Meyer)

FROM: Patrick Hager
Manager, Regulatory Affairs

PORTLAND GENERAL ELECTRIC
UE 294
PGE Response to Fred Meyer Data Request No. 009
Dated May 19, 2015

Request:

Please confirm that the sole basis for the difference between the proposed Primary and Secondary 85/485 Facilities capacity charges and Demand Charges is peak demand losses. If denied, please explain what other factors are utilized in the derivation of the rate differential between the 85/485 Primary and Secondary distribution rates.

Response:

For a prospective Schedule 85/485 customer contemplating whether to receive service at either secondary or primary voltage service, PGE maintains that it is important to provide the prospective customer the appropriate price signal based on PGE's future costs to serve. For this prospective Schedule 85/485 customer, and for existing Schedule 85/485 customers who may subsequently change their delivery voltage depending on delivery voltage price differentials, there is no cost difference between secondary and primary voltage customers when PGE provides shared subtransmission, substation, and primary voltage facilities to customers. Hence, PGE differentiates the delivery voltage prices related to these shared facilities by the differential in demand losses.

The cost differences that PGE experiences in providing service to Schedule 85/485 customers at either secondary or primary delivery voltage occur downstream from primary voltage facilities and are reflected in the costs of providing meters to the respective delivery voltages and the costs of providing a line transformer and service lateral to secondary voltage customers. For primary voltage customers, the marginal cost of service study estimates the engineering expense, materials, and labor costs to connect the customer facilities to the distribution feeder. The

engineering expense is the majority of the interconnection cost, with the remaining cost consisting of a small amount of wire and conduit necessary to connect the customer to the distribution feeder.

The respective costs of the meters, connect costs, and transformer and service costs are categorized as customer costs and included in the proposed Schedule 85/485 monthly basic charges.

For more information please see PGE Exhibit 1400, pages 17-18 and PGE Response to Fred Meyer Data Request No 6.

June 1, 2015

TO: Kevin Higgins
Energy Strategies, LLC (Fred Meyer)

FROM: Patrick Hager
Manager, Regulatory Affairs

**PORTLAND GENERAL ELECTRIC
UE 294
PGE Response to Fred Meyer Data Request No. 010
Dated May 19, 2015**

Request:

Please refer to the FERC Uniform System of Accounts descriptions of Account 365 Overhead conductors and devices and Account 369 Services.

- a. Based on the FERC USofA descriptions, please confirm that PGE's system includes FERC Account 365 Overhead conductors that have passed through secondary transformers (i.e. secondary voltage overhead conductors that would not be classified as Account 369 Services because they are on the utility side of the last distribution pole of the overhead system.)**
- b. Please explain why PGE believes it is appropriate for Primary customers to be allocated costs associated with FERC Account 365 conductors that serve only Secondary voltage customers.**

Response:

- a. For purposes of this response, PGE has not conducted a survey of all overhead conductors to determine what portion of costs are related to primary or secondary voltage conductors. There are historical costs of secondary voltage conductors contained in FERC account 365. Generally these conductors serve smaller customers such as residential and small commercial.
- b. PGE objects to this request on the basis that it implies that PGE directly allocated secondary voltage facilities to primary voltage customers. It also could be

construed to imply that PGE is either performing or should perform an embedded cost study that directly allocates costs to individual rate schedules and delivery voltages based on specific FERC accounts. Subject to and without waving its objection, PGE responds as follows:

In UE 294, as in numerous previous general ratemaking dockets, PGE allocates total distribution costs on a marginal cost basis taking into consideration current distribution construction and design standards applied to individual rate schedule characteristics. Generally these construction and design standards comprise underground facilities with a minimal amount of secondary conductors.

June 2, 2015

TO: Kevin Higgins
Energy Strategies, LLC (Fred Meyer)

FROM: Patrick Hager
Manager, Regulatory Affairs

**PORTLAND GENERAL ELECTRIC
UE 294
PGE Response to Fred Meyer Data Request No. 013
Dated May 19, 2015**

Request:

For PGE's system, please provide an approximation of:

- a. The number of circuit miles of secondary voltage overhead conductors and devices.**
- b. The number of circuit miles of primary voltage overhead conductors and devices.**
- c. The number of circuit miles of secondary voltage underground conductors and devices.**
- d. The number of circuit miles of primary voltage underground conductors and devices.**

Response:

The distances in circuit miles on PGE's distribution system for the requested conductor types are as follows:

- a. 2,361.95 – Secondary Voltage Overhead
- b. 8,261.60 – Primary Voltage Overhead
- c. 541.97 – Secondary Voltage Underground
- d. 7,688.93 – Primary Voltage Underground

ATTACHMENT A

ATTACHMENT A

Resume

Neal Townsend
Energy Strategies, LLC
215 S. State Street, Suite 200
Salt Lake City, Utah 84111

Work Experience:

Principal, Energy Strategies, LLC (2014 – Present).

Director, Energy Strategies, LLC (2012 – 2014).

Sr. Consultant, Energy Strategies, LLC (2001 – 2012).

Rate Analyst, State of Utah, Division of Public Utilities (1997 – 2001).

Other

Systems Engineer, Morton Thiokol, Inc.

Assistant Engineer, Schafer Engineering.

Graduate/Research Assistant, University of New Mexico.

Education:

University of New Mexico, Masters of Business Administration, 1996.

University of Texas, Austin, Bachelor of Science in Mechanical Engineering, 1984.

Publications:

Kevin C. Higgins, Neal Townsend, and Susannah Vale, “Utility-Related Statutory and Regulatory Barriers,” Chapter 6 in Coastal Wind: Energy for North Carolina’s Future. University of North Carolina, Chapel Hill: 2009.

ATTACHMENT A

Regulatory Testimony:

State of Arkansas

<u>Docket #</u>	<u>Title</u>	<u>Activity</u>
10-010-U & 10-010-R	In the Matter of the Application of Energy Arkansas, Inc. for Approval of Changes in Rates for Retail Electric Service	AFUDC Policy
10-010-U & 10-010-R	In the Matter of a Notice of Inquiry into Energy Efficiency	DSM Self Direction Opt-Out Rules
	In the Matter of the Institution of a Rulemaking to Adopt Amendments to the Commission's Rules on Conservation & Energy Efficiency to Allow Self-Directed Programs for Large Consumers	

State of Illinois

<u>Docket #</u>	<u>Title</u>	<u>Activity</u>
13-0387	Commonwealth Edison Company Tariff Filing to Present the Illinois Commerce Commission with an Opportunity to Consider Revenue Neutral Tariff Changes Related to Rate Design Authorized by Subsection 16-108.5(e) of the Public Utilities Act	Rate Spread, Rate Design
10-0467	Commonwealth Edison Company Proposed General Increase in Electric Rates	Rate Spread, Rate Design

ATTACHMENT A

State of Indiana

<u>Cause #</u>	<u>Title</u>	<u>Activity</u>
44075	Petition of Indiana Michigan Power Company, an Indiana Corporation, for Authority to Increase its Rates and Charges for Electric Utility Service, for Approval of: Revised Depreciation Rates; Accounting Relief; Inclusion in Basic Rates and Charges of the Costs of Qualified Pollution Control Property; Modifications to Rate Adjustment Mechanisms; and Major Storm Reserve; and for Approval of New Schedules of Rates, Rules and Regulations	Rate Design, Class Cost of Service

State of Kentucky

<u>Case #</u>	<u>Title</u>	<u>Activity</u>
2014-00371	Application of Kentucky Utilities Company for an Adjustment of Electric Rates	Revenue Requirement Adjustments
2014-00372	Application of Louisville Gas and Electric Company for an Adjustment of its Electric and Gas Rates	Revenue Requirement Adjustments
2009-00548	Application of Kentucky Utilities Company for an Adjustment of Base Rates	Rate Spread, Rate Design
2009-00549	Application of Louisville Gas and Electric Company for an Adjustment of its Electric and Gas Base Rates	Rate Spread, Rate Design

ATTACHMENT A

State of Michigan

<u>Case #</u>	<u>Title</u>	<u>Activity</u>
U-17767	In the matter of the Application of DTE ELECTRIC COMPANY for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of electric energy, and for miscellaneous accounting authority.	Revenue Requirement Issues, Class Cost of Service, Rate Design
U-17735	In the Matter of the Application of Consumers Energy Company for Authority to Increase its Rates for the Generation and Distribution of Electricity and for Other Relief	Investment Recovery Mechanism, Decoupling, Class Cost of Service, Rate Design
U-17087	In the Matter of the Application of Consumers Energy Company for Authority to Increase its Rates for the Generation and Distribution of Electricity and for Other Relief	Class Cost of Service, Rate Spread, Decoupling, Rate Design
U-16794	In the Matter of the Application of Consumers Energy Company for Authority to Increase its Rates for the Generation and Distribution of Electricity and for Other Relief	Rate Spread, Revenue Decoupling, Rate Design, Load Aggregation,

ATTACHMENT A

<u>Case #</u>	<u>Title</u>	<u>Activity</u>
U-16472 & U-16489	In the Matter of the Application of the Detroit Edison Company for Authority to Increase its Rates, Amend its Rate Schedules and Rules Governing the Distribution and Supply of Electric Energy, and for Miscellaneous Accounting Authority	Rate Increase Mitigation Proposals, Bonus Tax, Depreciation, Rate Spread, Decoupling, Load Aggregation, Surcharge Proposal, Environmental Cost Recovery, Revenue Tracker
	In the Matter of the Application of the Detroit Edison Company for Approval to Defer Certain Pension and Post-Employment Benefits for Future Amortization and Recovery	
U-16191	In the Matter of the Application of Consumers Energy Company for Authority to Increase its Rates for the Generation and Distribution of Electricity and for Other Relief	Pension Tracker, Class Cost of Service, Decoupling, Rate Spread, Tariff Language
U-15645	In the Matter of the Application of Consumers Energy Company for Authority to Increase its Rates for the Generation and Distribution of Electricity and for Other Relief	Class Cost of Service, Rate Spread

ATTACHMENT A

State of Ohio

<u>Case #</u>	<u>Title</u>	<u>Activity</u>
12-1682-EL-AIR, 12-1683-EL-ATA & 12-1684-EL-AAM	In the Matter of the Application of Duke Energy Ohio, Inc., for an Increase in Electric Distribution Rates	Class Cost of Service, Rate Spread
	In the Matter of the Application of Duke Energy Ohio, Inc., for Tariff Approval	
	In the Matter of the Application of Duke Energy Ohio, Inc., for Approval to Change Accounting Methods	
12-1685-GA-AIR, 12-1686-GA-ATA & 12-1687-GA-ALT 12-1688-GA-AAM	In the Matter of the Application of Duke Energy Ohio, Inc., for an Increase in Gas Rates	Recovery of Environmental Remediation Expenses
	In the Matter of the Application of Duke Energy Ohio, Inc., for Tariff Approval	
	In the Matter of the Application of Duke Energy Ohio, Inc., for Approval of an Alternative Rate Plan for Gas Distribution Service	
	In the Matter of the Application of Duke Energy Ohio, Inc., for Approval to Change Accounting Methods	

State of Oregon

<u>Docket #</u>	<u>Title</u>	<u>Activity</u>
UE-262	In the Matter of Portland General Electric Company Request for a General Rate Revision	Support of Stipulation

ATTACHMENT A

<u>Docket #</u>	<u>Title</u>	<u>Activity</u>
UE-246	In the Matter of PacifiCorp's Filing of Revised Tariff Schedules for Electric Service in Oregon	Rate Design, Energy Cost Adjustment Mechanism, Support of Stipulation
UE-217	In the Matter of PacifiCorp's Filing of Revised Tariff Schedules for Electric Service in Oregon	Support of Stipulation

State of Texas

<u>Docket #</u>	<u>Title</u>	<u>Activity</u>
38951	Application of Energy Texas, Inc. for Approval of Competitive Generation Service Tariff (Issues Severed from Docket No. 37744)	Recovery of Stranded Costs

State of Utah

<u>Docket #</u>	<u>Title</u>	<u>Activity</u>
13-035-184	In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations	Class Cost of Service, Rate Spread, Rate Design
13-057-05	In the Matter of the Application of Questar Gas Company to Increase Distribution Rates and Charges and Make Tariff Modifications	Class Cost of Service, Rate Spread, Rate Design
13-035-02	In the Matter of the Application of Rocky Mountain Power for Authority to Change its Depreciation Rates Effective January 1, 2014	Depreciation Policy

ATTACHMENT A

<u>Docket #</u>	<u>Title</u>	<u>Activity</u>
11-035-200	In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations	Class Cost of Service, Rate Spread, Rate Design
09-035-23	In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations	Rate Design, Revenue Decoupling
09-035-T08	In the Matter of Rocky Mountain Power Advice No. 09-08, seeking an Adjustment to the DSM Tariff Rider, Schedule 193	Support of Stipulation
04-035-42	In the Matter of the Application of PacifiCorp For Approval of its Proposed Electric Rate Schedules and Electric Service Regulations	Derivation of Prudence Disallowance
03-035-14	In the Matter of the Application of PacifiCorp For Approval of an IRP Based Avoided Cost Methodology For QF Projects Larger than 1 MW	Derivation of Methodology for Establishing QF Avoided Cost Pricing
02-035-04	In the Matter of the Application of PacifiCorp for an Investigation of Inter-Jurisdictional Issues	Support of Settlement Agreement

ATTACHMENT A

99-057-20	In the Matter of the Application of Questar Gas Company for an Increase in Rates and Charges	Revenue Requirement and Class Cost of Service Modeling, Proposed CO ₂ Plant Disallowance Mechanism
99-035-10	In the Matter of the Application of PacifiCorp For Approval of its Proposed Electric Rate Schedules and Electric Service Regulations	Interjurisdictional Cost Allocation and Class Cost of Service Modeling
98-057-12	In the Matter of the Application of Questar Gas Company for Approval of a Natural Gas Processing Agreement	Assessment of Application, Revenue Requirement Modeling

State of Virginia

<u>Case #</u>	<u>Title</u>	<u>Activity</u>
PUE-2013-00020	Application of Virginia Electric and Power Company for a 2013 Biennial Review of the Rates, Terms and Conditions for the Provision of Generation, Distribution and Transmission Services Pursuant to § 56-585.1 A of the Code of Virginia	Rate Design
PUE-2012-00072	Application of Virginia Electric and Power Company for Revision of Rate Adjustment Clause: Rider B, Biomass Conversions of the Altavista, Hopewell, and Southampton Power Stations, for the Rate Year Commencing April 1, 2013	Rate Design
PUE-2012-00071	Application of Virginia Electric and Power Company for Revision of Rate Adjustment Clause: Rider S, Virginia City Hybrid Energy Center, for the Rate Year Commencing April 1, 2013 and April 1, 2014	Rate Design

ATTACHMENT A

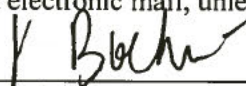
<u>Case #</u>	<u>Title</u>	<u>Activity</u>
PUE-2012-00067	Application of Virginia Electric and Power Company for Revision of Rate Adjustment Clause: Rider W, Warren County Power Station, for the Rate Year Commencing April 1,2013	Rate Design
PUE-2011-00042	In the Matter of the Application of Virginia Electric and Power Company for Approval and Certification of the Proposed Warren County Power Station, Electric Generation and Related Transmission Facilities under §§ 56-580 D, 56-265.2 and 56-46.1 of the Code of Virginia and for Approval of a Rate Adjustment Clause, Designated Rider W, under § 56-585.1 A 6 of the Code of Virginia	Rate Design

State of West Virginia

<u>Case #</u>	<u>Title</u>	<u>Activity</u>
09-1352-E-42T	Monongahela Power Company and the Potomac Edison Company, both d/b/a Allegheny Power Rule 42T Tariff Filing to Increase Rates and Charges	Rate Spread, Rate Design

CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served via electronic mail, unless otherwise noted, this 15th day of June, 2015.


Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.

CITIZENS' UTILITY BOARD OF OREGON

OPUC DOCKETS 610 SW BROADWAY, STE 400
PORTLAND OR 97205
dockets@oregoncub.org

ROBERT JENKS (C) 610 SW BROADWAY, STE 400
PORTLAND OR 97205
bob@oregoncub.org

SOMMER TEMPLET (C) 610 SW BROADWAY, STE. 400
PORTLAND OR 97205
sommer@oregoncub.org

CLEANTECH LAW PARTNERS PC

DIANE HENKELS (C) 420 SW WASHINGTON ST STE 400
PORTLAND OR 97204
dhenkels@cleantechlaw.com

DAVISON VAN CLEVE PC

S BRADLEY VAN CLEVE (C) 333 SW TAYLOR - STE 400
PORTLAND OR 97204
bvc@dvclaw.com

DAVISON VAN CLEVE, PC

TYLER C PEPPE (C) 333 SW TAYLOR SUITE 400
PORTLAND OR 97204
tcp@dvclaw.com

MOUNTAIN WEST ANALYTICS

BRADLEY MULLINS (C) 333 SW TAYLOR STE 400
PORTLAND OR 97204
brmullins@mwanalytics.com

NOBLE AMERICAS ENERGY SOLUTIONS, LLC

GREG BASS 401 WEST A ST., STE. 500
SAN DIEGO CA 92101
gbass@noblesolutions.com

NW ENERGY COALITION

WENDY GERLITZ 1205 SE FLAVEL
PORTLAND OR 97202
wendy@nwenergy.org

PACIFIC POWER

ERIN APPERSON 825 NE MULTNOMAH STE 800
PORTLAND OR 97232
erin.apperson@pacificcorp.com

PACIFICORP, DBA PACIFIC POWER

OREGON DOCKETS

825 NE MULTNOMAH ST, STE 2000
PORTLAND OR 97232
oregondockets@pacificorp.com

PORTLAND GENERAL ELECTRIC

DOUGLAS C TINGEY (C)

121 SW SALMON 1WTC1301
PORTLAND OR 97204
doug.tingey@pgn.com

JAY TINKER (C)

121 SW SALMON ST 1WTC-0702
PORTLAND OR 97204
pge.opuc.filings@pgn.com

PUBLIC UTILITY COMMISSION OF OREGON

JUDY JOHNSON (C)

PO BOX 1088
SALEM OR 97308-1088
judy.johnson@state.or.us

PUC STAFF - DEPARTMENT OF JUSTICE

JOHANNA
RIEMENSCHNEIDER (C)

BUSINESS ACTIVITIES SECTION
1162 COURT ST NE
SALEM OR 97301-4796
johanna.riemenschneider@doj.state.or.us

RICHARDSON ADAMS, PLLC

GREGORY M. ADAMS

PO BOX 7218
BOISE ID 83702
greg@richardsonadams.com

SMALL BUSINESS UTILITY ADVOCATES

JAMES BIRKELUND (C)

548 MARKET ST STE 11200
SAN FRANCISCO CA 94104
james@utilityadvocates.org