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May 26, 2010

Via Electronic and U.S. Mail

Public Utility Commission
Attn: Filing Center
550 Capitol St. NE #215
P.O. Box 2148
Salem OR 97308-2148

Re: In the Matter of PACIFICORP Application to Implement the Provisions of Senate Bill 76. **Docket No. UE 219**

Dear Filing Center:

Enclosed please find an original and five copies of the Direct Testimony of Randall J. Falkenberg (ICNU/100) with Exhibit (ICNU/101) on behalf of the Industrial Customers of Northwest Utilities in the above-referenced docket.

Thank you for your attention to this matter.

Sincerely yours,

/s/Kelli R. Madden
Kelli R. Madden
Paralegal

Enclosures
cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Direct Testimony of Randall J. Falkenberg on behalf of the Industrial Customers of Northwest Utilities upon the parties, on the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid, and via electronic mail where paper service has been waived.

Dated at Portland, Oregon, this 26th day of May, 2010.

/s/Kelli R. Madden
Kelli R. Madden

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BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 219

In the Matter of	)
	)
PACIFIC POWER & LIGHT, dba PACIFICORP	)
	)
Application To Implement the Provisions of Senate Bill 76	)

DIRECT TESTIMONY OF

RANDALL J. FALKENBERG

ON BEHALF OF

THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

May 26, 2010

I. INTRODUCTION AND SUMMARY

Q. **PLEASE STATE YOUR NAME AND BUSINESS ADDRESS**.

A. Randall J. Falkenberg, PMB 362, 8343 Roswell Road, Atlanta, Georgia 30350.

Q. **PLEASE STATE YOUR OCCUPATION, EMPLOYMENT, AND ON WHOSE BEHALF YOU ARE TESTIFYING.**

A. I am a utility regulatory consultant and President of RFI Consulting, Inc. ("RFI"). I am appearing on behalf of the Industrial Customers of Northwest Utilities.

Q. **WHAT CONSULTING SERVICES ARE PROVIDED BY RFI**?

A. RFI provides consulting services related to electric utility system planning, energy cost recovery issues, revenue requirements, cost of service, and rate design.

Q. PLEASE SUMMARIZE YOUR QUALIFICATIONS AND APPEARANCES.

A. My qualifications and appearances are provided in Exhibit ICNU/101.

Q. **WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

A. My testimony addresses PacifiCorp's request that the Commission find Schedule 199 is fair, just and reasonable, along with certain other requests in this proceeding.

Q. PLEASE EXPLAIN PACIFICORP'S REQUEST IN THIS CASE.

A. PacifiCorp is requesting the Commission find that Schedule 199 is fair, just and reasonable. Schedule 199 is already implemented by the Company and is intended to collect $16.2 million per year to provide funding for a Klamath Dam removal trust fund resulting in a 1.6% overall increase in rates. These charges would amount to more than $100,000 for the average Schedule 48 customer. The Company also requests that the "subject to refund" provision currently included in Schedule 199 be removed and the Commission recognize that SB 76 has preempted the operation of the Commission property transfer statute, ORS §757.480.

Q. **PLEASE SUMMARIZE YOUR TESTIMONY.**

A. My conclusions and recommendations are as follows:

1. The basis for the charges to be collected from this proceeding are unique and do not represent ordinary or necessary costs of utility service in the usual sense. Rather, they represent futures costs that *may* occur if various regulatory and political approvals are obtained *and* the Klamath dams are actually removed many years into the future. However, political and regulatory approval in other states and Congress will determine the ultimate outcome of this issue. As the Commission cannot control or predict the decisions of regulators in other states, the U.S. Congress, California voters or the U.S. Department of the Interior these rates should remain subject to refund. The Commission should require the Company to track each customer's share of the trust fund in case refunds are required.

2. I recommend that the Commission require PacifiCorp to identify the Klamath surcharge on each customer's monthly power bill and send out bill stuffers explaining the reasons for this charge and the status of the trust fund on an annual basis. Customers should be made aware of the level and purpose of these charges.

3. The Schedule 199 surcharge assumed to be necessary to fund the Oregon contribution to the Klamath Trust Fund is based on interest rate assumptions below prevailing market levels. Recent testimony by PacifiCorp and other witnesses support higher interest rate assumptions and a lower surcharge. On this basis I recommend a reduction to the initial surcharge of $1.72 million.

4. The proposed surcharge tariff should reflect expected sales growth. I recommend that the Commission set the surcharge tariff to schedule automatic reductions to account for sales growth and require periodic reviews of the tariff and trust fund to reset set the rate as needed. Without this type of adjustment, PacifiCorp may be overcollecting in the early period of the ten year collection period.

5. I recommend the surcharge be collected on a similar basis as PacifiCorp's proposed rate spread in UE 217 (an equal percentage basis from all customer classes.) The UE 217 rate spread would minimize price impacts on customers while fairly reflecting cost of service and sending proper signals about increasing costs. The Company's proposed rate spread in this case would not promote these goals and is based on a faulty analysis, and unfairly harms industrial customers, a group with a notable decline in load.

II. KLAMATH DAM REMOVAL SURCHARGE ISSUES

Q. WHAT IS THE BASIS FOR THE CHARGES PROPOSED IN THIS CASE?

A. The charges to be levied in this case stem from a unique and unprecedented set of circumstances. Under SB 76, the OPUC is required to collect Oregon's share of $200 million in order to create a trust fund for removal of the Klamath River dams. In my experience removal of a vital, major hydroelectric power resource is unique and certainly runs contrary to the goals of increasing reliance on clean, cost effective renewable energy. Further, the method of funding this endeavor is unique. Ordinarily salvage value (whether negative or positive) is factored into deprecation rates and funded over the life of an asset. The conventional recovery method is far lower in cost than the funding method prescribed under SB 76 because the salvage value becomes a rate base deduction (or addition in the case of removal costs.) The traditional approach effectively funds the removal at the utility's cost of capital (8.38% in PacifiCorp's current rate case, UE 217) as opposed to an interest bearing account as required under SB 76.[1/] Further, as the system grows the cost of removal would be spread over a larger number of billing units, reducing the unit costs to customers. As compared to the ordinary ratemaking treatment, the total annual revenue requirement for assigned Oregon share is increased by more than 30% under the funding mechanism and other requirements of SB 76.

Q. WHY DO YOU CONTEND THAT THE COSTS UNDERLYING THESE CHARGES ARE NOT ORDINARY AND NECESSARY IN THE USUAL SENSE?

A. It is an ordinary requirement of utility ratemaking that any out of test year costs recovered in rates must be "known and measurable." In this case, there are a great number of regulatory and political hurdles this process must overcome before removal of

[1/] UE 217, PPL/300, Williams/3.

the Klamath dams occurs. While obviously necessary to comply with the requirements of SB 76, dam removal costs of this sort needn't be recovered in this manner, and recovery of these costs would not be limited to Oregon and California, as is assumed in SB 76 and the KHSA. Nonetheless, SB 76 does make specific requirements to override ordinary ratemaking principles.

Q. WHAT IS THE RELEVANCE OF THESE POINTS TO THE OUTCOME OF THIS PROCEEDING?

A. I make these points simply to demonstrate that this issue is not inconsequential to Oregon. While the surcharge as proposed is less than 2% of PacifiCorp's revenue requirements, the total cost to Oregon is higher than would have been the case, absent SB 76. Further, the costs to Oregon in the future may be much higher as replacement power costs are incurred, and various other consequences of removal of the Klamath projects become apparent. For these reasons, ICNU urges the Commission to recognize the significance and consequences of the decisions it renders in this case.

Q. WHAT IS YOUR RECOMMENDATION IN THIS REGARD?

A. The OPUC should require PacifiCorp to fully inform customers of the reasons for an impact of these charges via a surcharge on customer's bills and a bill stuffer explaining the facts I've just outlined. Customers deserve to be fully informed of this process.

Q. THE INITIAL SURCHARGE IS SUBJECT TO REFUND. PACIFICORP REQUESTS THAT THE COMMISSION REMOVE THE REFUND PROVISION.[2/] DO YOU AGREE?

A. No. There are a substantial number of regulatory and political approvals required before the KHSA goes into effect and the Klamath River dams are actually removed. The outcome depends on the final results of the U.S. Department of Interior scientific study.

[2/] UE 219, PPL/200 Kelly/7.

Assuming the study is objective, it would be premature to assume an outcome. Second, the Company also requests the Commission recognize that SB 76 has preempted the operation of the Commission property transfer statute, ORS **§** 757.480. This is a standard property transfer requirement and similar regulations are in place in other states. I am informed by counsel that Washington also has a similar requirement. It is likely that similar requests will need to be filed in other states, and one cannot predict the outcome of those requests. Further the KHSA is subject to Congressional approval, which should not be taken for granted given the national interest in renewable energy. Removal of a vital hydroelectric resource runs contrary to our national goals to increase reliance on clean, renewable energy. Finally, this entire issue is predicated on the assumption that California voters will approve a $250 million bond issuance to fund that state's share of the decommissioning costs. Given California's current financial circumstances and possible difficulty in selling those bonds, this part of the process is far from certain. Thus, the likelihood that these dams will actually be removed is unclear and these funds should not be used by PacifiCorp for other purposes. This is a significant rate increase for a particular purpose.

Q. ASSUMING A REFUND IS REQUIRED AT SOME POINT, WHAT FORM SHOULD IT TAKE?

A. SB 76 requires a non-bypassable charge be levied to collect Oregon's share of the trust fund. Just as customers are not allowed to "escape" from paying these charges, the Company should not be allowed to misallocate any refunds due to customers under these charges. Consequently, I recommend the Company be required to maintain records sufficient to provide each customer with an exact dollar refund of all charges collected (with interest) if the various regulatory and Congressional approvals are not obtained or the California referendum fails. This can be done by the Company setting up a tracking account to record each customer's contributions to the trust fund. Even customers who leave the system, or go out of business should be tracked so that appropriate refunds can be made in the event that the process is delayed or abandoned. At a minimum these charges should be tracked on a customer class basis.

Level of the Surcharge

Q. PLEASE EXPLAIN HOW THE COMPANY DETERMINED THE SURCHARGE IT IS REQUESTING IN THIS CASE?

A. The Company computed the surcharge based on projected 2011 sales levels using a constant annual collection amount at a level sufficient to recover Oregon's share of the $200 million trust fund by December 31, 2019. The Company assumed a 3.5% interest rate in this analysis.

Q. IS THE 3.5% INTEREST RATE REALISTIC?

A. It is well below the current rate for conservative interest bearing investments. In the Company's current general rate case, UE 217, the Company's return on equity witness, Dr. Samuel Hadaway, testifies that current single A utility bonds have a yield of 5.73% and that he expects an increase to 6.27% in the near future.[3/] Likewise, in testimony filed in the February 2010 Wyoming Docket No. 20000-352-ER-09, Michael Gorman reported a single A utility debt yield of 6.19%.[4/]

Q. IS THIS A REASONABLE FORECAST FOR USE IN THIS PROCEEDING?

A. Yes. SB 76 requires the funds be invested in an interest bearing account. A diversified portfolio of single A utility debt would be a conservative investment strategy comprised

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3/ UE 217, PPL/200 Hadaway/37, Table 4.

4/ Wyoming PSC Docket No. 20000-352-ER-09, Direct Testimony of Michael Gorman on Behalf of the Wyoming Industrial Energy Consumers, page 42.

of instruments well understood by the Commission. I assume a 6% return based on the figures quoted above, assuming a reasonable management fee for the trust fund. Use of a 6% annual interest rate will reduce the initial surcharge from $16.16 million to $14.44 million, a reduction of $1.72 million. This results in a 1.45% initial surcharge as opposed to the 1.63% average surcharge proposed by the Company. Given the difficult economic environment in Oregon, the Commission must take all steps possible to reduce the rate inputs to customers.

Q. WHAT IF INTEREST RATES INCREASE IN THE YEARS AHEAD. WOULDN'T THIS REDUCE THE MARKET VALUE OF THE LONGER TERM INVESTMENTS?

A. Increasing interest rates would likely reduce the cost of meeting the obligation substantially because it would increase the earnings of incremental contributions. Short-term rates are now at or near all-time lows based on the Federal Reserve Board's current policies. If short term rates rise, the Net Present Value of the funding obligation will decrease, rather than increase. However, future interest rates are unknown and it would be logical to plan on resetting the surcharge periodically to best reflect interest rate changes, for reasons I will discuss shortly.

Q. IS SALES GROWTH FACTORED INTO THE SURCHARGE CALCULATION?

A. No. However, the Company now forecasts sales growth slightly in excess of 1% per annum in its forecast of Oregon loads in its March 2010 IRP update. This sales growth will increase the level of collections under the surcharge each year and should be reflected in the rates charged.

Q. HOW DO YOU RECOMMEND THAT BE DONE?

A. The OPUC has various options. The Company proposes to self-monitor collections and sales growth[5/] and suggests it may request adjustments at some point in the future. This provides the Company too much latitude. Instead, I recommend the Commission schedule periodic adjustments to reflect changes in sales, interest rates and all of the other "known unknowns" related to this issue. The schedule of reductions related to sales growth should be built into the tariffs and provide for an annual decrease in the charges based on the sales growth rates used in the current IRP which is approximately 1% per annum overall.

<u>Rate Spread</u>

Q. DO YOU AGREE WITH THE COMPANY'S PROPOSED RATE SPREAD IN THIS CASE?

A. No. The Company proposes to charge Schedule 48 customers a disproportionate amount for these costs. The Company proposes a 2% surcharge for Schedule 48, as compared to an average increase of 1.6% overall and only 1.5% from Residential customers. I find this rather odd, as this is primarily a political decision and the Company is proposing to shield the only customers who have voting rights from some of these costs.

Q. WHAT IS YOUR RECOMMENDED RATE SPREAD?

A. I recommend an equal percentage increase for all customer classes. This is consistent with the methodology proposed by the Company in Docket UE 217, and would be a reasonable approach for this case. There is little reason to assume the Company should follow an equal percentage increase for its general rate case, but use a different method for this case.

[5/] UE 219, PPL/200 Kelly/8.

Q. HOW DOES THE COMPANY JUSTIFY ITS RATE SPREAD IN UE 217?

A. In that case, Mr. William Griffith testifies as follows:

> Based on the cost of service results and in order to achieve the Company's rate spread objectives in this case, the Company proposes a uniform net percentage increase to residential, general service, agricultural pumping, and large general service rate schedules. For lighting schedules, the Company proposes no net rate change. The Company's proposed rate spread strikes a balance between moderating rate impacts on customers, while sending proper price signals about increasing costs.

UE 217, PPL/1700 Griffith/6.

There is no reason why the same reasoning shouldn't apply in this case. However, there is no basis for excluding the lighting schedules from this charge. As the lighting schedules are a very small component of overall revenues, this change from the UE 217 methodology is insignificant.

Q. HOW DOES MS. KELLY PROPOSE TO DETERMINE THE RATE SPREAD?

A. Ms. Kelly proposes to spread the surcharge on the basis of total generation revenue requirements, with a floor of 1.5% and a cap of 2%.[6/] Total generation revenue requirements include both demand and energy related costs. Demand related costs are fixed costs of production, while energy related costs vary with consumer usage (e.g. fuel). Her proposal is flawed. Dam removal costs, if recovered via ordinary depreciation schedules, are independent of energy usage. In ordinary circumstances they would be considered demand related costs and should not be spread on the basis of energy usage. Second, these are fundamentally a future rather than present cost. In a future time period, the rate impact of this decision will be felt, and the low cost hydro energy will be replaced by much higher cost renewable energy. Nearly all forms of renewable energy (e.g., wind and solar) rely heavily on investment related costs. These are again, demand

6/ UE 219, PPL/200 Kelly/9.

related costs. Finally, as a matter of equity, all customers should share equally in the burdens of the removal of the Klamath projects. The Company proposal disproportionately allocates the costs to larger customers, particularly given the decreasing number and load of PacifiCorp's industrial customers.

As I noted above, these are not ordinary and necessary costs in the usual sense, so conventional cost of service reasoning has little bearing on the rate spread determination in this case. In reality, these costs are akin to a governmentally imposed tax, fiat or tribute, and should not be viewed as conventional ratemaking costs with conventional logic applied. The closest analog might be a Special Purpose Local Option Sales Tax ("SPLOST") dedicated to a specific purpose. As the SB 76 legislation refers to a revenue based test (the 2% rate cap), it would be most reasonable to treat this as a revenue tax and apply the same percentage increase to all customer classes. Consequently, I recommend a 1.45% initial surcharge be applied to all customer bills. Though purely by coincidence, this is essentially the same level as the Company's proposed surcharge for residential rate schedules. Consequently, the ICNU proposal can be adopted without any change to residential rates. If the Company's recommended surcharge level is approved then the charge should be 1.63% for all customer classes. If Ms. Kelly had used a floor of 1.63%, rather than 1.5%, her methodology would produce similar results.

Q. DO YOU HAVE ANY FURTHER THOUGHTS ON THE RATE SPREAD?

A. Yes, there is no support for penalizing industrial customers. Certainly, I am unaware of any legislative history of SB 76 to suggest that industrial customers would pay a disproportionately higher amount for the Klamath dam removal. This approach is inequitable, not found in the law or in its legislative history, and punitive to a group that is already in very hard economic times.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 219

In the Matter of	)
	)
PACIFIC POWER & LIGHT, dba	)
PACIFICORP	)
	)
Application To Implement the Provisions of	)
Senate Bill 76	)

ICNU/101

QUALIFICATIONS OF RANDALL J. FALKENBERG

May 26, 2010

QUALIFICATIONS OF RANDALL J. FALKENBERG, PRESIDENT

EDUCATIONAL BACKGROUND

I received my Bachelor of Science degree with Honors in Physics and a minor in mathematics from Indiana University. I received a Master of Science degree in Physics from the University of Minnesota. My thesis research was in nuclear theory. At Minnesota I also did graduate work in engineering economics and econometrics. I have completed advanced study in power system reliability analysis.

PROFESSIONAL EXPERIENCE

After graduating from the University of Minnesota in 1977, I was employed by Minnesota Power as a Rate Engineer. I designed and coordinated the Company's first load research program. I also performed load studies used in cost-of-service studies and assisted in rate design activities.

In 1978, I accepted the position of Research Analyst in the Marketing and Rates department of Puget Sound Power and Light Company. In that position, I prepared the two-year sales and revenue forecasts used in the Company's budgeting activities and developed methods to perform both near- and long-term load forecasting studies.

In 1979, I accepted the position of Consultant in the Utility Rate Department of Ebasco Service Inc. In 1980, I was promoted to Senior Consultant in the Energy Management Services Department. At Ebasco I performed and assisted in numerous studies in the areas of cost of service, load research, and utility planning. In particular, I was involved in studies concerning analysis of excess capacity, evaluation of the planning activities of a major utility on behalf of its public service commission, development of a methodology for computing avoided costs and cogeneration rates, long-term electricity price forecasts, and cost allocation studies.

At Ebasco, I specialized in the development of computer models used to simulate utility production costs, system reliability, and load patterns. I was the principal author of production costing software used by eighteen utility clients and public service commissions for evaluation of marginal costs, avoided costs and production costing analysis. I assisted over a dozen utilities in the performance of marginal and avoided cost studies related to the PURPA of 1978. In this capacity, I worked with utility planners and rate specialists in quantifying the rate and cost impact of generation expansion alternatives. This activity included estimating carrying costs, O&M expenses, and capital cost estimates for future generation.

In 1982 I accepted the position of Senior Consultant with Energy Management Associates, Inc. and was promoted to Lead Consultant in June 1983. At EMA I trained and consulted with planners and financial analysts at several utilities in applications of the PROMOD and PROSCREEN planning models. I assisted planners in applications of these models to the preparation of studies evaluating the revenue requirements

QUALIFICATIONS OF RANDALL J. FALKENBERG, PRESIDENT

and financial impact of generation expansion alternatives, alternate load growth patterns and alternate regulatory treatments of new baseload generation. I also assisted in EMA's educational seminars where utility personnel were trained in aspects of production cost modeling and other modern techniques of generation planning.

I became a Principal in Kennedy and Associates in 1984. Since then I have performed numerous economic studies and analyses of the expansion plans of several utilities. I have testified on several occasions regarding plant cancellation, power system reliability, phase-in of new generating plants, and the proper rate treatment of new generating capacity. In addition, I have been involved in many projects over the past several years concerning the modeling of market prices in various regional power markets.

In January 2000, I founded RFI Consulting, Inc. whose practice is comparable to that of my former firm, J. Kennedy and Associates, Inc.

The testimony that I present is based on widely accepted industry standard techniques and methodologies, and unless otherwise noted relies upon information obtained in discovery or other publicly available information sources of the type frequently cited and relied upon by electric utility industry experts. All of the analyses that I perform are consistent with my education, training and experience in the utility industry. Should the source of any information presented in my testimony be unclear to the reader, it will be provided it upon request by calling me at 770-379-0505.

PAPERS AND PRESENTATIONS

Mid-America Regulatory Commissioners Conference - June 1984: "Nuclear Plant Rate Shock - Is Phase-In the Answer"

Electric Consumers Resource Council - Annual Seminar, September 1986: "Rate Shock, Excess Capacity and Phase-in"

The Metallurgical Society - Annual Convention, February 1987: "The Impact of Electric Pricing Trends on the Aluminum Industry"

Public Utilities Fortnightly - "Future Electricity Supply Adequacy: The Sky Is Not Falling" What Others Think, January 5, 1989 Issue

Public Utilities Fortnightly - "PoolCo and Market Dominance", December 1995 Issue

QUALIFICATIONS OF RANDALL J. FALKENBERG, PRESIDENT

APPEARANCES

3/84	8924	KY	Airco Carbide	Louisville Gas & Electric	CWIP in rate base.
5/84	830470-EI	FL	Florida Industrial Power Users Group	Fla. Power Corp.	Phase-in of coal unit, fuel savings basis, cost allocation.
10/84	89-07-R	CT	Connecticut Ind. Energy Consumers	Connecticut Light & Power	Excess capacity.
11/84	R-842651	PA	Lehigh Valley	Pennsylvania Power Committee	Phase-in of nuclear unit. Power & Light Co.
2/85 cancellation of	I-840381	PA	Phila. Area Ind. Energy Users' Group	Electric Co.	Philadelphia Economics of nuclear generating units.
3/85	Case No. 9243	KY	Kentucky Industrial Utility Consumers	Louisville Gas & Electric Co.	Economics of cancelling fossil generating units.
3/85	R-842632	PA	West Penn Power Industrial Intervenors	West Penn Power Co.	Economics of pumped storage generating units, optimal res. margin, excess capacity.
3/85	3498-U	GA	Georgia Public Service Commission Staff	Georgia Power Co.	Nuclear unit cancellation, load and energy forecasting, generation economics.
5/85	84-768-E-42T	WV	West Virginia Multiple Intervenors	Monongahela Power Co.	Economics - pumped storage generating units, reserve margin, excess capacity.
7/85	E-7, SUB 391	NC	Carolina Industrial Group for Fair Utility Rates	Duke Power Co.	Nuclear economics, fuel cost projections.
7/85	9299	KY	Kentucky Industrial Utility Consumers	Union Light, Heat & Power Co.	Interruptible rate design.
8/85	84-249-U	AR	Arkansas Electric Energy Consumers	Arkansas Power & Light Co.	Prudence review.
1/86	85-09-12	CT	Connecticut Ind. Energy Consumers	Connecticut Light & Power Co.	Excess capacity, financial impact of phase-in nuclear plant.
1/86	R-850152	PA	Philadelphia Area Industrial Energy Users' Group	Philadelphia Electric Co.	Phase-in and economics of nuclear plant.
2/86	R-850220	PA	West Penn Power Industrial Intervenors	West Penn Power	Optimal reserve margins, prudence, off-system sales guarantee plan.
5/86	86-081-E-GI	WV	West Virginia Energy Users' Group	Monongahela Power Co.	Generation planning study , economics prudence of a pumped storage hydroelectric unit.
5/86	3554-U	GA	Attorney General & Georgia Public Service Commission Staff	Georgia Power Co.	Cancellation of nuclear plant.
9/86	29327/28	NY	Occidental Chemical Corp.	Niagara Mohawk Power Co.	Avoided cost, production cost models.

Expert Testimony Appearances
of
Randall J. Falkenberg

Date	Case	Jurisdict.	Party	Utility	Subject
9/86	E7- Sub 408	NC	NC Industrial Energy Committee	Duke Power Co.	Incentive fuel adjustment clause.
12/86	9437/ 613	KY	Attorney General of Kentucky	Big Rivers Elect. Corp.	Power system reliability analysis, rate treatment of excess capacity.
5/87	86-524- E-SC	WV	West Virginia Energy Users' Group	Monongahela Power	Economics and rate treatment of Bath County pumped storage County Pumped Storage Plant.
6/87	U-17282	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Prudence of River Bend Nuclear Plant.
6/87	PUC-87- 013-RD E002/E-015 -PA-86-722	MN	Eveleth Mines & USX Corp.	Minnesota Power/ Northern States	Sale of generating unit and reliability Power requirements.
7/87	Docket 9885	KY	Attorney General of Kentucky	Big Rivers Elec. Corp.	Financial workout plan for Big Rivers.
8/87	3673-U	GA	Georgia Public Service Commission Staff	Georgia Power Co.	Nuclear plant prudence audit, Vogtle buyback expenses.
10/87	R-850220	PA	WPP Industrial Intervenors	West Penn Power	Need for power and economics, County Pumped Storage Plant
10/87	870220-EI	FL	Occidental Chemical	Fla. Power Corp.	Cost allocation methods and interruptible rate design.
10/87	870220-EI	FL	Occidental Chemical	Fla. Power Corp.	Nuclear plant performance.
1/88	Case No. 9934	KY	Kentucky Industrial Utility Consumers	Louisville Gas & Electric Co.	Review of the current status of Trimble County Unit 1.
3/88	870189-EI	FL	Occidental Chemical Corp.	Fla. Power Corp.	Methodology for evaluating interruptible load.
5/88	Case No. 10217	KY	National Southwire Aluminum Co., ALCAN Alum Co.	Big Rivers Elec. Corp.	Debt restructuring agreement.
7/88	Case No. 325224	LA Div. I 19th Judicial District	Louisiana Public Service Commission Staff	Gulf States Utilities	Prudence of River Bend Nuclear Plant.
10/88	3780-U	GA	Georgia Public Service Commission Staff	Atlanta Gas Light Co.	Weather normalization gas sales and revenues.
10/88	3799-U	GA	Georgia Public Service Commission Staff	United Cities Gas Co.	Weather normalization of gas sales and revenues.
12/88	88-171- EL-AIR 88-170- EL-AIR	OH OH	Ohio Industrial Energy Consumers	Toledo Edison Co., Cleveland Electric Illuminating Co.	Power system reliability reserve margin.

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Date	Case	Jurisdict.	Party	Utility	Subject
1/89	I-880052	PA	Philadelphia Area Industrial Energy Users' Group	Philadelphia Electric Co.	Nuclear plant outage, replacement fuel cost recovery.
2/89	10300	KY	Green River Steel K	Kentucky Util.	Contract termination clause and interruptible rates.
3/89	P-870216 283/284/286	PA	Armco Advanced Materials Corp., Allegheny Ludlum Corp.	West Penn Power	Reserve margin, avoided costs.
5/89	3741-U	GA	Georgia Public Service Commission Staff	Georgia Power Co.	Prudence of fuel procurement.
8/89	3840-U	GA	Georgia Public Service Commission Staff	Georgia Power Co.	Need and economics coal & nuclear capacity, power system planning.
10/89	2087	NM	Attorney General of New Mexico	Public Service Co. of New Mexico	Power system planning, economic and reliability analysis, nuclear planning, prudence.
10/89	89-128-U	AR	Arkansas Electric Energy Consumers	Arkansas Power Light Co.	Economic impact of asset transfer and stipulation and settlement agreement.
11/89	R-891364	PA	Philadelphia Area Industrial Energy Users' Group	Philadelphia Electric Co.	Sale/leaseback nuclear plant, excess capacity, phase-in delay imprudence.
1/90	U-17282	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Sale/leaseback nuclear power plant.
4/90	89-1001-EL-AIR	OH	Industrial Energy Consumers	Ohio Edison Co.	Power supply reliability, excess capacity adjustment.
4/90	N/A	N.O.	New Orleans Business Counsel	New Orleans Public Service Co.	Municipalization of investor-owned utility, generation planning & reliability
7/90	3723-U	GA	Georgia Public Service Commission Staff	Atlanta Gas Light Co.	Weather normalization adjustment rider.
9/90	8278	MD	Maryland Industrial Group	Baltimore Gas & Electric Co.	Revenue requirements gas & electric, CWIP in rate base.
9/90	90-158	KY	Kentucky Industrial Utility Consumers	Louisville Gas & Electric Co.	Power system planning study.
12/90	U-9346	MI	Association of Businesses Advocating Tariff Equity (ABATE)	Consumers Power	DSM Policy Issues.
5/91	3979-U	GA	Georgia Public Service Commission Staff	Georgia Power Co.	DSM, load forecasting and IRP.
7/91	9945	TX	Office of Public Utility Counsel	El Paso Electric Co.	Power system planning, quantification of damages of imprudence, environmental cost of

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					electricity
8/91	4007-U	GA	Georgia Public Service Commission Staff	Georgia Power Co.	Integrated resource planning, regulatory risk assessment.
11/91	10200	TX	Office of Public	Texas-New Mexico Utility Counsel	Imprudence disallowance. Power Co.
12/91	U-17282	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Year-end sales and customer adjustment, jurisdictional allocation.
1/92	89-783-E-C	WVA	West Virginia Energy Users Group	Monongahela Power Co.	Avoided cost, reserve margin, power plant economics.
3/92	91-370	KY	Newport Steel Co.	Union Light, Heat & Power Co.	Interruptible rates, design, cost allocation.
5/92	91890	FL	Occidental Chemical Corp.	Fla. Power Corp.	Incentive regulation, jurisdictional separation, interruptible rate design.
6/92	4131-U	GA	Georgia Textile Manufacturers Assn.	Georgia Power Co.	Integrated resource planning, DSM.
9/92	920324	FL	Florida Industrial Power Users Group	Tampa Electric Co.	Cost allocation, interruptible rates decoupling and DSM.
10/92	4132-U	GA	Georgia Textile Manufacturers Assn.	Georgia Power Co.	Residential conservation program certification.
10/92	11000	TX	Office of Public Utility Counsel	Houston Lighting and Power Co.	Certification of utility cogeneration project.
11/92	U-19904	LA	Louisiana Public Service Commission Staff	Entergy/Gulf States Utilities (Direct)	Production cost savings from merger.
11/92	8469	MD	Westvaco Corp.	Potomac Edison Co.	Cost allocation, revenue distribution.
11/92	920606	FL	Florida Industrial Power Users Group	Statewide Rulemaking	Decoupling, demand-side management, conservation, Performance incentives.
12/92	R-009 22378	PA	Armco Advanced Materials	West Penn Power	Energy allocation of production costs.
1/93	8179	MD	Eastalco Aluminum/ Westvaco Corp.	Potomac Edison Co.	Economics of QF vs. combined cycle power plant.
2/93	92-E-0814 88-E-081	NY	Occidental Chemical Corp.	Niagara Mohawk Power Corp.	Special rates, wheeling.
3/93	U-19904	LA	Louisiana Public Service Commission Staff	Entergy/Gulf States Utilities (Surrebuttal)	Production cost savings from merger.
4/93	EC92 21000 ER92-806-000	FERC	Louisiana Public Service Commission Staff	Gulf States Utilities/Entergy	GSU Merger prodcution cost savings

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Date	Case	Jurisdict.	Party	Utility	Subject
6/93	930055-EU	FL	Florida Industrial Power Users' Group	Statewide Rulemaking	Stockholder incentives for off-system sales.
9/93	92-490, 92-490A, 90-360-C	KY	Kentucky Industrial Utility Customers & Attorney General	Big Rivers Elec. Corp.	Prudence of fuel procurement decisions.
9/93	4152-U	GA	Georgia Textile Manufacturers Assn.	Georgia Power Co.	Cost allocation of pollution control equipment.
4/94	E-015/ GR-94-001	MN	Large Power Intervenors	Minn. Power Co.	Analysis of revenue req. and cost allocation issues.
4/94	93-465	KY	Kentucky Industrial Utility Customers	Kentucky Utilities	Review and critique proposed environmental surcharge.
4/94	4895-U	GA	Georgia Textile Manufacturers Assn.	Georgia Power Co	Purchased power agreement and fuel adjustment clause.
4/94	E-015/ GR-94-001	MN	Large Power Intervenors	Minnesota Power Light Co.	Rev. requirements, incentive compensation.
7/94	94-0035-E-42T	WV	West Virginia Energy Users' Group	Monongahela Power Co.	Revenue annualization, ROE performance bonus, and cost allocation.
8/94	8652	MD	Westvaco Corp.	Potomac Edison Co.	Revenue requirements, ROE performance bonus, and revenue distribution.
1/95	94-332	KY	Kentucky Industrial Utility Customers	Louisville Gas & Electric Company	Environmental surcharge.
1/95	94-996-EL-AIR	OH	Industrial Energy Users of Ohio	Ohio Power Company	Cost-of-service, rate design, demand allocation of power
3/95	E999-CI	MN	Large Power Intervenor	Minnesota Public Utilities Comm.	Environmental Costs Of electricity
4/95	95-060	KY	Kentucky Industrial Utility Customers	Kentucky Utilities Company	Six month review of CAAA surcharge.
11/95	I-940032	PA	The Industrial Energy Consumers of Pennsylvania	Statewide - all utilities	Direct Access vs. Poolco, market power.
11/95	95-455	KY	Kentucky Industrial	Kentucky Utilities	Clean Air Act Surcharge,
12/95	95-455	KY	Kentucky Industrial Utility Customers	Louisville Gas & Electric Company	Clean Air Act Compliance Surcharge.
6/96	960409-EI	FL	Florida Industrial Power Users Group	Tampa Electric Co.	Polk County Power Plant Rate Treatment Issues.
3/97	R-973877	PA	PAIEUG.	PECO Energy	Stranded Costs & Market Prices.
3/97	970096-EQ	FL	FIPUG	Fla. Power Corp.	Buyout of QF Contract
6/97	R-973593	PA	PAIEUG	PECO Energy	Market Prices, Stranded Cost
7/97	R-973594	PA	PPLICA	PP&L	Market Prices, Stranded Cost

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Date	Case	Jurisdict.	Party	Utility	Subject
8/97	96-360-U	AR	AEEC	Entergy Ark. Inc.	Market Prices and Stranded Costs, Cost Allocation, Rate Design
10/97	6739-U	GA	GPSC Staff	Georgia Power	Planning Prudence of Pumped Storage Power Plant
10/97	R-974008 R-974009	PA	MIEUG PICA	Metropolitan Ed. PENELEC	Market Prices, Stranded Costs
11/97	R-973981	PA	WPII	West Penn Power	Market Prices, Stranded Costs
11/97	R-974104	PA	DII	Duquesne Light Co.	Market Prices, Stranded Costs
2/98	APSC 97451 97452 97454	AR	AEEC	Generic Docket	Regulated vs. Market Rates, Rate Unbundling, Timetable for Competition
7/98	APSC 87-166	AR	AEEC	Entergy Ark. Inc.	Nuclear decommissioning cost estimates & rate treatment.
9/98	97-035-01	UT	DPS and CCS	PacifiCorp	Net Power Cost Stipulation, Production Cost Model Audit
12/98	19270	TX	OPC	HL&P	Reliability, Load Forecasting
4/99	19512	TX	OPC	SPS	Fuel Reconciliation
4/99	99-02-05	CT	CIEC	CL&P	Stranded Costs, Market Prices
4/99	99-03-04	CT	CIEC	UI	Stranded Costs, Market Prices
6/99	20290	TX	OPC	CP&L	Fuel Reconciliation
7/99	99-03-36	CT	CIEC	CL&P	Interim Nuclear Recovery
7/99	98-0453	WV	WVEUG	AEP & APS	Stranded Costs, Market Prices
12/99	21111	TX	OPC	EGSI	Fuel Reconciliation
2/00	99-035-01	UT	CCS	PacifiCorp	Net Power Costs, Production Cost Modeling Issues
5/00	99-1658	OH	AK Steel	CG&E	Stranded Costs, Market Prices
6/00	UE-111	OR	ICNU	PacifiCorp	Net Power Costs, Production Cost Modeling Issues
9/00	22355	TX	OPC	Reliant Energy	Stranded cost
10/00	22350	TX	OPC	TXU Electric	Stranded cost
10/00	99-263-U	AR	Tyson Foods	SW Elec. Coop	Cost of Service
12/00	99-250-U	AR	Tyson Foods	Ozarks Elec. Coop	Cost of Service
01/01	00-099-U	AR	Tyson Foods	SWEPCO	Rate Unbundling
02/01	99-255-U	AR	Tyson Foods	Ark. Valley Coop	Rate Unbundling
03/01	UE-116	OR	ICNU	PacifiCorp	Net Power Costs
6/01	01-035-01	UT	DPS and CCS	PacifiCorp	Net Power Costs

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Date	Case	Jurisdict.	Party	Utility	Subject
7/01	A.01-03-026	CA	Roseburg FP	PacifiCorp	Net Power Costs
7/01	23550	TX	OPC	EGSI	Fuel Reconciliation
7/01	23950	TX	OPC	Reliant Energy	Price to beat fuel factor
8/01	24195	TX	OPC	CP&L	Price to beat fuel factor
8/01	24335	TX	OPC	WTU	Price to beat fuel factor
9/01	24449	TX	OPC	SWEPCO	Price to beat fuel factor
10/01	20000-EP 01-167	WY	WIEC	PacifiCorp	Power Cost Adjustment Excess Power Costs
2/02	UM-995	OR	ICNU	PacifiCorp	Cost of Hydro Deficit
2/02	00-01-37	UT Plant	CCS	PacifiCorp	Certification of Peaking
4/02	00-035-23	UT	CCS	PacifiCorp	Cost of Plant Outage, Excess Power Cost Stipulation.
4/02	01-084/296	AR	AEEC	Entergy Arkansas	Recovery of Ice Storm Costs
5/02	25802	TX	OPC	TXU Energy	Escalation of Fuel Factor
5/02	25840	TX	OPC	Reliant Energy	Escalation of Fuel Factor
5/02	25873	TX	OPC	Mutual Energy CPL	Escalation of Fuel Factor
5/02	25874	TX	OPC	Mutual Energy WTU	Escalation of Fuel Factor
5/02	25885	TX	OPC	First Choice	Escalation of Fuel Factor
7/02	UE-139	OR	ICNU	Portland General	Power Cost Modeling
8/02	UE-137	OP	ICNU	Portland General	Power Cost Adjustment Clause
10/02	RPU-02-03	IA	Maytag, et al	Interstate P&L	Hourly Cost of Service Model
11/02	20000-Er 02-184	WY	WIEC	PacifiCorp	Net Power Costs, Deferred Excess Power Cost
12/02	26933	TX	OPC	Reliant Energy	Escalation of Fuel Factor
12/02	26195	TX	OPC	Centerpoint Energy	Fuel Reconciliation
1/03	27167	TX	OPC	First Choice	Escalation of Fuel Factor
1/03	UE-134	OR	ICNU	PacifiCorp	West Valley CT Lease payment
1/03	27167	TX	OPC	First Choice	Escalation of Fuel Factor
1/03	26186	TX	OPC	SPS	Fuel Reconciliation
2/03	UE-02417	WA	ICNU	PacifiCorp	Rate Plan Stipulation, Deferred Power Costs
2/03	27320	TX	OPC	Reliant Energy	Escalation of Fuel Factor
2/03	27281	TX	OPC	TXU Energy	Escalation of Fuel Factor
2/03	27376	TX	OPC	CPL Retail Energy	Escalation of Fuel Factor

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Date	Case	Jurisdict.	Party	Utility	Subject
2/03	27377	TX	OPC	WTU Retail Energy	Escalation of Fuel Factor
3/03	27390	TX	OPC	First Choice	Escalation of Fuel Factor
4/03	27511	TX	OPC	First Choice	Escalation of Fuel Factor
4/03	27035	TX	OPC	AEP Texas Central	Fuel Reconciliation
05/03	03-028-U	AR	AEEC	Entergy Ark., Inc.	Power Sales Transaction
7/03	UE-149	OR	ICNU	Portland General	Power Cost Modeling
8/03	28191	TX	OPC	TXU Energy	Escalation of Fuel Factor
11/03	20000-ER -03-198	WY	WIEC	PacifiCorp	Net Power Costs
2/04	03-035-29	UT	CCS	PacifiCorp	Certification of CCCT Power Plant, RFP and Bid Evaluation
6/04	29526	TX	OPC	Centerpoint	Stranded cost true-up.
6/04	UE-161	OR	ICNU	Portland General	Power Cost Modeling
7/04	UM-1050	OR	ICNU	PacifiCorp	Jurisdictional Allocation
10/04	15392-U 15392-U	GA	Calpine	Georgia Power/ SEPCO	Fair Market Value of Combined Cycle Power Plant
12/04	04-035-42	UT	CCS		PacifiCorp Net power costs
02/05	UE-165	OP	ICNU	Portland General	Hydro Adjustment Clause
05/05	UE-170	OR	ICNU	PacifiCorp	Power Cost Modeling
7/05	UE-172	OR	ICNU	Portland General	Power Cost Modeling
08/05	UE-173	OR	ICNU	PacifiCorp	Power Cost Adjustment
8/05	UE-050482	WA	ICNU	Avista	Power Cost modeling, Energy Recovery Mechanism
8/05	31056	TX	OPC	AEP Texas Central	Stranded cost true-up.
11/05	UE-05684	WA	ICNU	PacifiCorp	Power Cost modeling, Jurisdictional Allocation, PCA
2/06	05-116-U	AR	AEEC	Entergy Arkansas	Fuel Cost Recovery
4/06	UE-060181	WA	ICNU	Avista	Energy Cost Recovery Mechanism
5/06	22403-U	GA	GPSC Staff	Georgia Power	Fuel Cost Recovery Audit
6/06	UM 1234	OR	ICNU	Portland General	Deferral of outage costs
6/06	UE 179	OR	ICNU	PacifiCorp	Power Costs, PCAM
7/06	UE 180	OR	ICNU	Portland General	Power Cost Modeling, PCAM
12/06	32766	TX	OPC	SPS	Fuel Reconciliation
1/07	23540-U	GA	GPSC Staff	Georgia Power	Fuel Cost Recovery Audit
2/07	06-101-U	AR	AEEC	Entergy Arkansas	Cost Allocation and Recovery
2/07	UE-061546	WA	ICNU/Public Counsel	PacifiCorp	Power Cost Modeling, Jurisdictional Allocation, PCA

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Date	Case	Jurisdict.	Party	Utility	Subject
2/07	32710	TX	OPC	EGSI	Fuel Reconciliation
6/07	UE 188	OR	ICNU	Portland General	Wind Generator Rate Surcharge
6/07	UE 191	OR	ICNU	PacifiCorp	Power Cost Modeling
6/07	UE 192	OR	ICNU	Portland General	Power Cost Modeling
9/07	UM 1330	OR	ICNU	PGE, PacifiCorp	Renewable Resource Tariff
10/07	06-152-U	AR	AEEC	EAI	CA Rider, Plant Acquisition
10/07	07-129-U	AR	AEEC	EAI	Annual Earnings Review Tariff
10/07	06-152-U	AR	AEEC	EAI	Purchase of combined cycle power plant.
04/08	26794	GA	GPSC Staff	Georgia Power	Fuel Cost Recovery Case
04/08	07-035-93	UT	CCS	PacifiCorp	Power Cost Modeling
07/08	UE 200	OR	ICNU	PacifiCorp	Renewable Adjustment Clause
08/08	20000-315 -EP-08	WY	WIEC	PacifiCorp	Power Cost Adjustment Mechanism
01/09	20000-333 -ER-08	WY	WIEC	PacifiCorp	Power Cost Modeling/Wind resource prudence
02/09	08-035-38	UT	CCS	PacifiCorp	Power Cost Modeling/Wind resource prudence
04/09	UM 1355	OR	ICNU	PGE/PacifiCorp	Outage Rate Modeling
04/09	UM 1396	OR	ICNU	PGE/PacifiCorp	Avoided Costs
06/09	UE 199	OR	ICNU	PacifiCorp	Power Cost Modeling
07/09	UE 207	OR	ICNU	PacifiCorp	Power Cost Modeling
07/09	UE 208	OR	ICNU	PGE	Power Cost Modeling
07/09	UE 210	OR	ICNU	PacifiCorp	Transition Adjustment Mechanism
10/09	UM 1442/ 1443	OR	ICNU	PGE/PacifiCorp	Avoided Costs
10/09	09-035-23	UT	OCS	PacifiCorp	Power Cost Modeling
12/09	UM 1465		ICNU	PacifiCorp	Power Cost Deferral
1/10	20000–352-ER-09	WY	WIEC	PacifiCorp	Power Costs, Wind Resources
2/10	09-084-U	AR	AEEC	Entergy AR	Rate Spread, Formula Rate Plan
3/10	20000-363-ep-10	WY	WIEC	PacifiCorp	PCAM
4/10	10-035-13	UT	OCS	PacifiCorp	Power impact of Major Plant Additions