



# Citizens' Utility Board of Oregon

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February 2, 2016

Public Utility Commission of Oregon  
Filing Center  
201 High St. SE, Suite 100  
P.O. Box 1088  
Salem, OR 97308

Re: UM 1623 – CUB Opening Testimony Errata Filing

The Citizens' Utility Board of Oregon files herewith two corrections to its originally submitted Opening Testimony filed on January 22, 2016. Figure 2 on page 14 has been corrected and two sentences on page 16 have been deleted. CUB notes that the first of the two deleted sentences on page 16 contained un-redacted confidential information, and therefore requests that its original testimony filing stay removed from the OPUC website and replaced with the corrected version attached. CUB further requests that the parties to this docket delete from electronic files and shred any paper copies of page 16 of CUB's original filing.

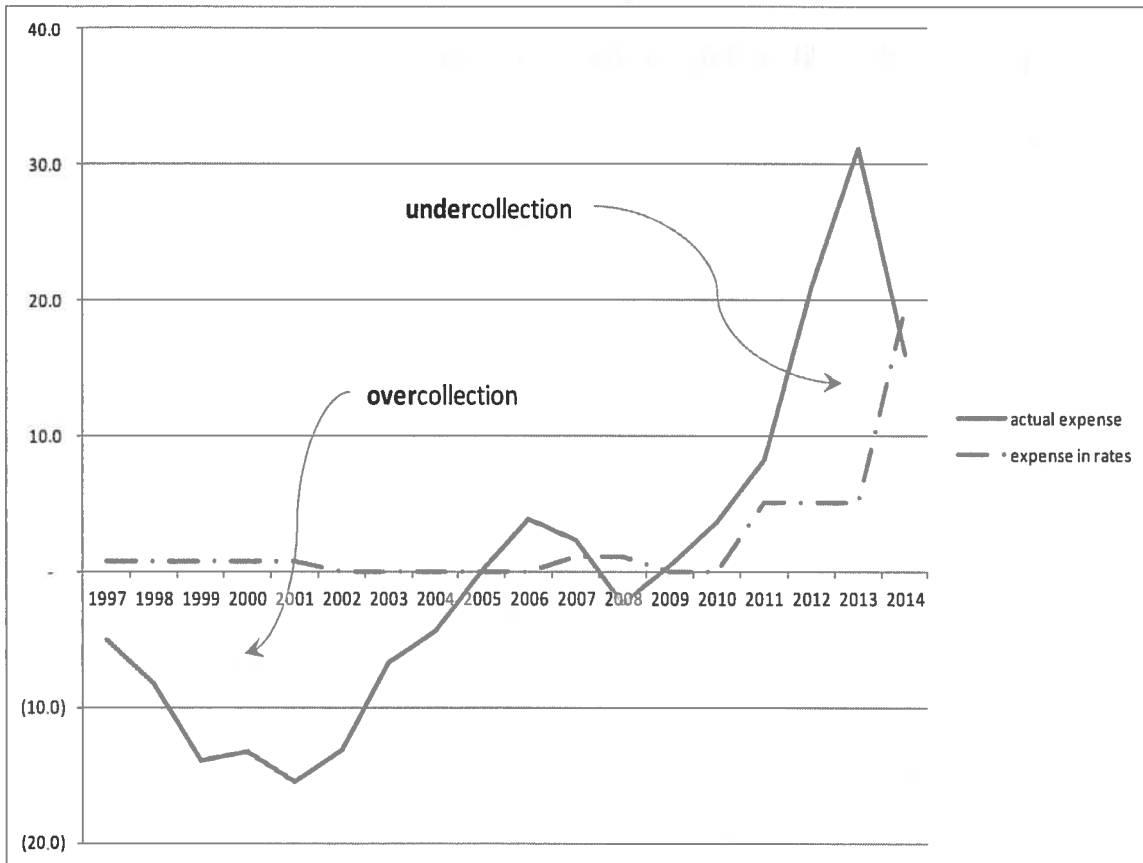
Please contact me if you have any questions with this filing.

Respectfully submitted,

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1 under-recovery by \$13.5 million.<sup>39</sup> Then they over recovered by \$3.5 million.<sup>40</sup> Then  
2 they under recovered by \$3.6 million<sup>41</sup>--the the last two ups and downs are the ones they  
3 removed. What we see here is a natural fluctuation around the actuarially forecasted (at  
4 the time of the rate case) FAS 87 expense. There is not a trend, but literally a fluctuation  
5 around the mean, so to speak:

6 **Figure 2:**



7

8 The Company may argue that even with the ability to file rate-cases, and the re-  
9 forecast of FAS 87 expense for each rate case, that the forecast is slow to catch up with  
10 the rapid movement of the market. This is more to the point. As mentioned above, FAS

<sup>39</sup> UM 1623/PGE/101/Batzler-Hager/1.

<sup>40</sup> UM 1623/PGE/100/Batzler-Hager/5.

<sup>41</sup> UM 1623/PGE/100/Batzler-Hager/5.

1           2013 that greatly exceed the amounts set in rates, prior to their  
2           occurrence.<sup>43</sup>

3           The exact dollar amount of the ex-post discrepancy may not have been known ex-ante.

4           However, this is not the entire picture. During this time, the Company has set, in rates, a

5           recurring \$13.8 million per year.<sup>44</sup> With pension fund performance improving, actual

6           pension expense could quickly fall below that set in rates.

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<sup>43</sup> PGE UM 1623/100/Batzler-Hager/2.

<sup>44</sup> UM 1623 – CUB Exhibit 102.