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October 7, 2013

VIA EMAIL AND U.S. MAIL

PUC Filing Center
Public Utility Commission of Oregon
PO Box 1088
Salem, OR 97308-1088

Re: Docket UM 1635 – Northwest Natural Gas Company's Mechanism for Recovery of Environmental Remediation Costs

Attention Filing Center:

Enclosed for filing are printed and electronic copies of the Joint Parties' Revised Responses to Bench Requests issued on September 17, 2013. These revised responses correct errors that we recently identified in the original responses, which were filed on September 20, 2013. In particular, the workpapers have been revised for 2012 amounts in the earnings test scenario section (lines 36 to 53) of each tab. The original amounts reflected 10.2 as the reference ROE, rather than the weighted average 10.08 resulting from the November 1, 2012 rate case effective date. Additionally, the WACOG sharing amount for 2012 had not been entered, and it is used for each scenario on the "writeoff if WACOG sharing excluded from all earnings tests" line. For ease of reference, we are re-filing the entire excel file.

Also, please note that we have identified an error in the cover letter accompanying the initial filing. On page 2, in the first full paragraph, the letter states that the updated total deferral period expense and interest is \$93.4 million. The correct amount is provided in the spreadsheets as \$94.3 million.

Very truly yours,

A handwritten signature in black ink, appearing to read "Lisa Rackner".

Lisa Rackner

Enclosures

cc: Service List

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CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in Docket UM 1635 on the following named person(s) on the date indicated below by email addressed to said person(s) at his or her last-known address(es) indicated below.

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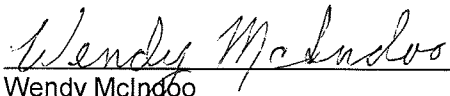
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DATED: October 7, 2013



Wendy McIndoo
Office Manager

Future Earnings Test Proposed Methodology Applied to Past Results

	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
ROE - Earnings Test	8.05%	9.49%	9.77%	10.31%	10.17%	10.05%	11.21%	11.10%	11.19%	9.87%	
A - Insurance not Included											
SRRM Credit - Company Responsibility	\$0	\$27	\$257	\$1,322	\$622	\$526	\$8,283	\$6,593	\$7,261	\$439	\$25,330
SRRM Amortization - Customer Responsibility	\$1,034	\$2,178	\$8,952	\$5,238	\$8,140	\$7,639	\$1,684	\$7,081	\$8,059	\$18,983	\$68,989
ROE given SRRM	8.05%	9.48%	9.73%	10.15%	10.10%	9.99%	10.25%	10.24%	10.25%	9.82%	
B.a. Equal 10 year application of Insurance											
SRRM Credit - Company Responsibility	\$0	\$0	\$257	\$1,322	\$622	\$526	\$5,896	\$6,593	\$7,261	\$439	\$22,916
SRRM Amortization - Customer Responsibility	(\$3,036)	(\$1,866)	\$4,882	\$1,168	\$4,070	\$3,569	\$0	\$3,011	\$3,989	\$14,913	\$30,699
ROE given SRRM	8.05%	9.49%	9.73%	10.15%	10.10%	9.99%	10.53%	10.24%	10.25%	9.82%	
B.b. Insurance proportional to Expense											
SRRM Credit - Company Responsibility	\$0	\$27	\$257	\$1,322	\$622	\$526	\$7,986	\$6,593	\$7,261	\$439	\$25,033
SRRM Amortization - Customer Responsibility	(\$3,036)	(\$1,866)	\$4,882	\$1,168	\$4,070	\$3,569	\$0	\$3,011	\$3,989	\$14,913	\$30,699
ROE given SRRM	8.05%	9.48%	9.73%	10.15%	10.10%	9.99%	10.29%	10.24%	10.25%	9.82%	
B.c. Insurance applied to year of receipt											
SRRM Credit - Company Responsibility	\$0	\$27	\$257	\$1,322	\$622	\$526	\$8,283	\$6,593	\$7,261	\$439	\$25,330
SRRM Amortization - Customer Responsibility	\$1,034	\$2,178	\$8,952	\$5,238	\$8,140	\$7,639	\$1,684	\$7,081	\$4,410	\$14,913	\$61,269
ROE given SRRM	8.05%	9.48%	9.73%	10.15%	10.10%	9.99%	10.25%	10.24%	10.25%	9.82%	

Insurance Spread: None

	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012		
Per Results of Operations ("ROO") as filed: data is from filed ROOs, column c (after Type I normalizing adjustments), there are slight rounding differences												
Net Operating Revenue	\$61,541	\$71,694	\$78,821	\$82,753	\$83,957	\$83,918	\$89,513	\$84,845	\$86,680	\$82,251		
Total Rate Base	\$814,052	\$858,497	\$940,148	\$958,767	\$975,963	\$978,907	\$986,180	\$967,308	\$993,165	\$1,028,353		
Return on Rate Base	7.56%	8.35%	8.38%	8.63%	8.60%	8.57%	9.08%	8.77%	8.73%	8.00%		
Return on Equity	8.05%	9.49%	9.77%	10.31%	10.17%	10.05%	11.21%	11.10%	11.19%	9.87%		
Authorized ROE	10.20%	10.20%	10.20%	10.20%	10.20%	10.20%	10.20%	10.20%	10.20%	10.08%	see note 1	
ROE Threshold for each year's Spring Earnings Test	13.27%	13.27%	13.32%	13.44%	13.40%	13.14%	11.54%	11.02%	10.92%	10.92%		
Environmental costs:											Totals	
Environmental deferrals (as actually recorded each year)	\$1,034	\$2,205	\$9,209	\$5,290	\$6,754	\$5,415	\$6,464	\$9,231	\$9,762	\$15,571	\$70,934	see note 2
Interest on deferrals (as actually recorded each year)	\$0	\$0	\$0	\$1,270	\$2,008	\$2,750	\$3,503	\$4,444	\$5,559	\$3,852	\$23,385	
Total Environmental deferrals with interest	\$1,034	\$2,205	\$9,209	\$6,560	\$8,762	\$8,165	\$9,967	\$13,675	\$15,320	\$19,423	\$94,319	
Insurance proceeds		0									0	
Net Environmental costs	\$1,034	\$2,205	\$9,209	\$6,560	\$8,762	\$8,165	\$9,967	\$13,675	\$15,320	\$19,423	\$94,319	
Environmental Deferrals Earnings Test Scenarios: these scenarios consider the pre-tax amount exceeding an example threshold ROE, and calculate the amount of environmental costs that would be written off if the test is interpreted that exceeding the threshold results in a writeoff of costs to the extent that earnings exceeded the threshold. Under this interpretation, the writeoff is the lesser of the pre-tax amount exceeding threshold ROE or the actual environmental spent.												
											Totals	of enviro cost
Pre tax amount of ROE compared to 10.2%	(\$14,492)	(\$5,379)	(\$3,535)	\$878	(\$233)	(\$1,327)	\$8,719	\$6,940	\$7,643	(\$1,707)	(\$2,493)	
write off to extent of earnings exceeded 10.2% deadband	\$0	\$0	\$0	\$878	\$0	\$0	\$8,719	\$6,940	\$7,643	\$0	\$24,180	25.6%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$0	\$878	\$0	\$6,166	\$0	\$5,889	\$5,172	\$0	\$18,105	19.2%
using deadband that existed in relevant Spring Earnings Test [a]												
write off to extent of earnings exceeded deadband	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$599	\$2,081	\$0	\$2,680	2.8%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0.0%
100 bps deadband												
write off to extent of earnings exceeded 11.2% deadband	\$0	\$0	\$0	\$0	\$0	\$0	\$115	\$0	\$0	\$0	\$115	0.1%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0.0%
50 bps deadband												
write off to extent of earnings exceeded 10.7% deadband	\$0	\$0	\$0	\$0	\$0	\$0	\$4,417	\$3,074	\$3,780	\$0	\$11,271	12.0%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$0	\$0	\$0	\$1,775	\$0	\$2,022	\$1,309	\$0	\$5,107	5.4%
-50 bps deadband												
write off to extent of earnings exceeded 9.7% deadband	\$0	\$0	\$536	\$5,008	\$4,067	\$3,064	\$9,967	\$10,807	\$11,506	\$2,360	\$47,314	50.2%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$536	\$5,008	\$4,067	\$8,165	\$0	\$9,756	\$9,035	\$0	\$36,567	38.8%
-100 bps deadband												
write off to extent of earnings exceeded 9.2% deadband	\$0	\$2,151	\$4,606	\$6,560	\$8,367	\$7,454	\$9,967	\$13,675	\$15,320	\$6,426	\$74,527	79.0%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$2,151	\$4,606	\$6,560	\$8,367	\$8,165	\$1,377	\$13,622	\$12,898	\$2,615	\$60,362	64.0%
Variable bps deadbands:												
100												
write off to extent of earnings exceeded 11.2% deadband	\$0	\$0	\$0	\$0	\$0	\$0	\$115	\$0	\$0	\$0	\$115	0.1%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0.0%
-100												
write off to extent of earnings exceeded 9.2% deadband	\$0	\$2,151	\$4,606	\$6,560	\$8,367	\$7,454	\$9,967	\$13,675	\$15,320	\$6,426	\$74,527	79.0%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$2,151	\$4,606	\$6,560	\$8,367	\$8,165	\$1,377	\$13,622	\$12,898	\$2,615	\$60,362	64.0%
SRRM Application of Insurance Proceeds per Stipulation												
SRRM Credit - Company Responsibility	\$0	\$27	\$257	\$1,322	\$622	\$526	\$8,283	\$6,593	\$7,261	\$439	\$25,330	
SRRM Amortization - Customer Responsibility	\$1,034	\$2,178	\$8,952	\$5,238	\$6,140	\$7,639	\$1,684	\$7,081	\$8,059	\$18,983	\$68,989	
ROE given SRRM application	8.05%	9.48%	9.73%	10.15%	10.10%	9.99%	10.25%	10.24%	10.25%	9.82%		
SRRM Band - ROE less 75 bps up to ROE	\$0	\$27	\$257	\$620	\$622	\$526	\$645	\$580	\$579	\$439		
SRRM Band - ROE to 50 bps over ROE				\$702			\$3,442	\$3,093	\$3,090			
SRRM Band - Over 50 bps over ROE							\$4,196	\$2,920	\$3,591			

Insurance Spread: Equal over 10 years

	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012		
Per Results of Operations ("ROO") as filed: data is from filed ROOs, column c (after Type I normalizing adjustments), there are slight rounding differences												
Net Operating Revenue	\$61,541	\$71,694	\$78,821	\$82,753	\$83,957	\$83,918	\$89,513	\$84,845	\$86,680	\$82,251		
Total Rate Base	\$814,052	\$858,497	\$940,148	\$958,767	\$975,963	\$978,907	\$986,180	\$967,308	\$993,165	\$1,028,353		
Return on Rate Base	7.56%	8.35%	8.38%	8.63%	8.60%	8.57%	9.08%	8.77%	8.73%	8.00%		
Return on Equity	8.05%	9.49%	9.77%	10.31%	10.17%	10.05%	11.21%	11.10%	11.19%	9.87%		

Authorized ROE	10.20%	10.20%	10.20%	10.20%	10.20%	10.20%	10.20%	10.20%	10.20%	10.08%		
ROE Threshold for each year's Spring Earnings Test	13.27%	13.27%	13.32%	13.44%	13.40%	13.14%	11.54%	11.02%	10.92%	10.92%		
Environmental costs:											Totals	
Environmental deferrals (as actually recorded each year)	\$1,034	\$2,205	\$9,209	\$5,290	\$6,754	\$5,415	\$6,464	\$9,231	\$9,762	\$15,571	\$70,934	
Interest on deferrals (as actually recorded each year)	\$0	\$0	\$0	\$1,270	\$2,008	\$2,750	\$3,503	\$4,444	\$5,559	\$3,852	\$23,385	
Total Environmental deferrals with interest	\$1,034	\$2,205	\$9,209	\$6,560	\$8,762	\$8,165	\$9,967	\$13,675	\$15,320	\$19,423	\$94,319	
Insurance proceeds	(4,070)	(4,070)	(4,070)	(4,070)	(4,070)	(4,070)	(4,070)	(4,070)	(4,070)	(4,070)	(40,704)	
Net Environmental costs	(\$3,036)	(\$1,866)	\$5,139	\$2,490	\$4,692	\$4,095	\$5,896	\$9,604	\$11,250	\$15,352	\$53,615	
Environmental Deferrals Earnings Test Scenarios: these scenarios consider the pre-tax amount exceeding an example threshold ROE, and calculate the amount of environmental costs that would be written off if the test is interpreted that exceeding the threshold results in a writeoff of costs to the extent that earnings exceeded the threshold. Under this interpretation, the writeoff is the lesser of the pre-tax amount exceeding threshold ROE or the actual environmental spent.												
Pre tax amount of ROE compared to 10.2%	(\$14,492)	(\$5,379)	(\$3,535)	\$878	(\$233)	(\$1,327)	\$8,719	\$6,940	\$7,643	(\$1,707)	Totals (\$2,493)	writeoff as % of enviro cost
write off to extent of earnings exceeded 10.2% deadband	\$0	\$0	\$0	\$878	\$0	\$0	\$5,896	\$6,940	\$7,643	\$0	\$21,358	39.8%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$0	\$878	\$0	\$4,095	\$0	\$5,889	\$5,172	\$0	\$16,033	29.9%
using deadband that existed in relevant Spring Earnings Test [a]												
write off to extent of earnings exceeded deadband	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$599	\$2,081	\$0	\$2,680	5.0%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0.0%
100 bps deadband												
write off to extent of earnings exceeded 11.2% deadband	\$0	\$0	\$0	\$0	\$0	\$0	\$115	\$0	\$0	\$0	\$115	0.2%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0.0%
50 bps deadband												
write off to extent of earnings exceeded 10.7% deadband	\$0	\$0	\$0	\$0	\$0	\$0	\$4,417	\$3,074	\$3,780	\$0	\$11,271	21.0%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$0	\$0	\$0	\$1,775	\$0	\$2,022	\$1,309	\$0	\$5,107	9.5%
-50 bps deadband												
write off to extent of earnings exceeded 9.2% deadband	\$0	\$0	\$536	\$2,490	\$4,067	\$3,064	\$5,896	\$9,604	\$11,250	\$2,360	\$39,266	73.2%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$536	\$2,490	\$4,067	\$4,095	\$0	\$9,604	\$9,035	\$0	\$29,826	55.6%
-100 bps deadband												
write off to extent of earnings exceeded 9.2% deadband	\$0	\$0	\$4,606	\$2,490	\$4,692	\$4,095	\$5,896	\$9,604	\$11,250	\$6,426	\$49,059	91.5%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$4,606	\$2,490	\$4,692	\$4,095	\$1,377	\$9,604	\$11,250	\$2,615	\$40,729	76.0%
Variable bps deadbands:												
100												
write off to extent of earnings exceeded 11.2% deadband	\$0	\$0	\$0	\$0	\$0	\$0	\$115	\$0	\$0	\$0	\$115	0.2%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0.0%
-100												
write off to extent of earnings exceeded 9.2% deadband	\$0	\$0	\$4,606	\$2,490	\$4,692	\$4,095	\$5,896	\$9,604	\$11,250	\$6,426	\$49,059	91.5%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$4,606	\$2,490	\$4,692	\$4,095	\$1,377	\$9,604	\$11,250	\$2,615	\$40,729	76.0%
SRRM Application of Insurance Proceeds per Stipulation	(\$4,070)	(\$4,070)	(\$4,070)	(\$4,070)	(\$4,070)	(\$4,070)	(\$4,070)	(\$4,070)	(\$4,070)	(\$4,070)	(\$40,704)	
SRRM Credit - Company Responsibility	\$0	\$0	\$257	\$1,322	\$622	\$526	\$5,896	\$6,593	\$7,261	\$439	\$22,916	
SRRM Amortization - Customer Responsibility	(\$3,036)	(\$1,866)	\$4,882	\$1,168	\$4,070	\$3,569	\$0	\$3,011	\$3,989	\$14,913	\$30,699	
ROE given SRRM application	8.05%	9.49%	9.73%	10.15%	10.10%	9.99%	10.53%	10.24%	10.25%	9.82%		
SRRM Band - ROE less 75 bps up to ROE	\$0	\$0	\$257	\$620	\$622	\$526	\$645	\$580	\$579	\$439		
SRRM Band - ROE to 50 bps over ROE				\$702			\$3,442	\$3,093	\$3,090			
SRRM Band - Over 50 bps over ROE							\$1,809	\$2,920	\$3,591			

Insurance Spread: % of Expense

	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012		
Per Results of Operations ("ROO") as filed: data is from filed ROOs, column c (after Type I normalizing adjustments), there are slight rounding differences												
Net Operating Revenue	\$61,541	\$71,694	\$78,821	\$82,753	\$83,957	\$83,918	\$89,513	\$84,845	\$86,680	\$82,251		
Total Rate Base	\$814,052	\$858,497	\$940,148	\$958,767	\$975,963	\$978,907	\$986,180	\$967,308	\$993,165	\$1,028,353		
Return on Rate Base	7.56%	8.35%	8.38%	8.63%	8.60%	8.57%	9.08%	8.77%	8.73%	8.00%		
Return on Equity	8.05%	9.49%	9.77%	10.31%	10.17%	10.05%	11.21%	11.10%	11.19%	9.87%		

Authorized ROE	10.20%	10.20%	10.20%	10.20%	10.20%	10.20%	10.20%	10.20%	10.20%	10.08%		
ROE Threshold for each year's Spring Earnings Test	13.27%	13.27%	13.32%	13.44%	13.40%	13.14%	11.54%	11.02%	10.92%	10.92%		
Environmental costs:											Totals	
Environmental deferrals (as actually recorded each year)	\$1,034	\$2,205	\$9,209	\$5,290	\$6,754	\$5,415	\$6,464	\$9,231	\$9,762	\$15,571	\$70,934	
Interest on deferrals (as actually recorded each year)	\$0	\$0	\$0	\$1,270	\$2,008	\$2,750	\$3,503	\$4,444	\$5,559	\$3,852	\$23,385	
Total Environmental deferrals with interest	\$1,034	\$2,205	\$9,209	\$6,560	\$8,762	\$8,165	\$9,967	\$13,675	\$15,320	\$19,423	\$94,319	
Insurance proceeds	(446)	(951)	(3,974)	(2,831)	(3,781)	(3,524)	(4,301)	(5,901)	(6,612)	(8,382)	(40,704)	
Net Environmental costs	\$588	\$1,253	\$5,235	\$3,729	\$4,981	\$4,641	\$5,665	\$7,773	\$8,709	\$11,041	\$53,615	
Environmental Deferrals Earnings Test Scenarios: these scenarios consider the pre-tax amount exceeding an example threshold ROE, and calculate the amount of environmental costs that would be written off if the test is interpreted that exceeding the threshold results in a writeoff of costs to the extent that earnings exceeded the threshold. Under this interpretation, the writeoff is the lesser of the pre-tax amount exceeding threshold ROE or the actual environmental spent.												
Pre tax amount of ROE compared to 10.2%											Totals	writeoff as %
write off to extent of earnings exceeded 10.2% deadband	\$0	\$0	\$0	\$878	\$0	\$0	\$5,665	\$6,940	\$7,643	\$0	\$21,127	39.4%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$0	\$878	\$0	\$4,641	\$0	\$5,889	\$5,172	\$0	\$16,580	30.9%
using deadband that existed in relevant Spring Earnings Test [a]												
write off to extent of earnings exceeded deadband	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$599	\$2,081	\$0	\$2,680	5.0%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0.0%
100 bps deadband												
write off to extent of earnings exceeded 11.2% deadband	\$0	\$0	\$0	\$0	\$0	\$0	\$115	\$0	\$0	\$0	\$115	0.2%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0.0%
50 bps deadband												
write off to extent of earnings exceeded 10.7% deadband	\$0	\$0	\$0	\$0	\$0	\$0	\$4,417	\$3,074	\$3,780	\$0	\$11,271	21.0%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$0	\$0	\$0	\$1,775	\$0	\$2,022	\$1,309	\$0	\$5,107	9.5%
-50 bps deadband												
write off to extent of earnings exceeded 9.2% deadband	\$0	\$0	\$536	\$3,729	\$4,067	\$3,064	\$5,665	\$7,773	\$8,709	\$2,360	\$35,903	67.0%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$536	\$3,729	\$4,067	\$4,641	\$0	\$7,773	\$8,709	\$0	\$29,455	54.9%
-100 bps deadband												
write off to extent of earnings exceeded 9.2% deadband	\$0	\$1,253	\$4,606	\$3,729	\$4,981	\$4,641	\$5,665	\$7,773	\$8,709	\$6,426	\$47,785	89.1%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$1,253	\$4,606	\$3,729	\$4,981	\$4,641	\$1,377	\$7,773	\$8,709	\$2,615	\$39,685	74.0%
Variable bps deadbands:												
100												
write off to extent of earnings exceeded 11.2% deadband	\$0	\$0	\$0	\$0	\$0	\$0	\$115	\$0	\$0	\$0	\$115	0.2%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0.0%
-100												
write off to extent of earnings exceeded 9.2% deadband	\$0	\$1,253	\$4,606	\$3,729	\$4,981	\$4,641	\$5,665	\$7,773	\$8,709	\$6,426	\$47,785	89.1%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$1,253	\$4,606	\$3,729	\$4,981	\$4,641	\$1,377	\$7,773	\$8,709	\$2,615	\$39,685	74.0%
SRRM Application of Insurance Proceeds per Stipulation	(\$45)	(\$140)	(\$537)	(\$820)	(\$1,198)	(\$1,551)	(\$1,981)	(\$2,571)	(\$3,232)	(\$4,070)		
SRRM Credit - Company Responsibility	\$0	\$27	\$257	\$1,322	\$622	\$526	\$7,986	\$6,593	\$7,261	\$439	\$25,033	
SRRM Amortization - Customer Responsibility	(\$3,036)	(\$1,866)	\$4,882	\$1,168	\$4,070	\$3,569	\$0	\$3,011	\$3,989	\$14,913	\$30,699	
ROE given SRRM application	8.05%	9.48%	9.73%	10.15%	10.10%	9.99%	10.29%	10.24%	10.25%	9.82%		
SRRM Band - ROE less 75 bps up to ROE	\$0	\$27	\$257	\$620	\$622	\$526	\$645	\$580	\$579	\$439		
SRRM Band - ROE to 50 bps over ROE				\$702			\$3,442	\$3,093	\$3,090			
SRRM Band - Over 50 bps over ROE							\$3,899	\$2,920	\$3,591			

Insurance Spread: yr of reimbursement

	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012		
Per Results of Operations ("ROO") as filed: data is from filed ROOs, column c (after Type I normalizing adjustments), there are slight rounding differences												
Net Operating Revenue	\$61,541	\$71,694	\$78,821	\$82,753	\$83,957	\$83,918	\$89,513	\$84,845	\$86,680	\$82,251		
Total Rate Base	\$814,052	\$858,497	\$940,148	\$958,767	\$975,963	\$978,907	\$986,180	\$967,308	\$993,165	\$1,028,353		
Return on Rate Base	7.56%	8.35%	8.38%	8.63%	8.60%	8.57%	9.08%	8.77%	8.73%	8.00%		
Return on Equity	8.05%	9.49%	9.77%	10.31%	10.17%	10.05%	11.21%	11.10%	11.19%	9.87%		

Authorized ROE	10.20%	10.20%	10.20%	10.20%	10.20%	10.20%	10.20%	10.20%	10.20%	10.08%		
ROE Threshold for each year's Spring Earnings Test	13.27%	13.27%	13.32%	13.44%	13.40%	13.14%	11.54%	11.02%	10.92%	10.92%		
Environmental costs:											Totals	
Environmental deferrals (as actually recorded each year)	\$1,034	\$2,205	\$9,209	\$5,290	\$6,754	\$5,415	\$6,464	\$9,231	\$9,762	\$15,571	\$70,934	
Interest on deferrals (as actually recorded each year)	\$0	\$0	\$0	\$1,270	\$2,008	\$2,750	\$3,503	\$4,444	\$5,559	\$3,852	\$23,385	
Total Environmental deferrals with interest	\$1,034	\$2,205	\$9,209	\$6,560	\$8,762	\$8,165	\$9,967	\$13,675	\$15,320	\$19,423	\$94,319	
Insurance proceeds										(36,497)	(4,207)	
Net Environmental costs	\$1,034	\$2,205	\$9,209	\$6,560	\$8,762	\$8,165	\$9,967	\$13,675	(\$21,177)	\$15,215	\$53,615	
Environmental Deferrals Earnings Test Scenarios: these scenarios consider the pre-tax amount exceeding an example threshold ROE, and calculate the amount of environmental costs that would be written off if the test is interpreted that exceeding the threshold results in a writeoff of costs to the extent that earnings exceeded the threshold. Under this interpretation, the writeoff is the lesser of the pre-tax amount exceeding threshold ROE or the actual environmental spent.												
Pre tax amount of ROE compared to 10.2%	(\$14,492)	(\$5,379)	(\$3,535)	\$878	(\$233)	(\$1,327)	\$8,719	\$6,940	\$7,643	(\$1,707)	Totals (\$2,493)	writeoff as % of enviro cost
write off to extent of earnings exceeded 10.2% deadband	\$0	\$0	\$0	\$878	\$0	\$0	\$8,719	\$6,940	\$0	\$0	\$16,537	30.8%
<input type="checkbox"/> writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$0	\$878	\$0	\$6,166	\$0	\$5,889	\$0	\$0	\$12,932	24.1%
using deadband that existed in relevant Spring Earnings Test [a]												
write off to extent of earnings exceeded deadband	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$599	\$0	\$0	\$599	1.1%
<input type="checkbox"/> writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0.0%
100 bps deadband												
write off to extent of earnings exceeded 11.2% deadband	\$0	\$0	\$0	\$0	\$0	\$0	\$115	\$0	\$0	\$0	\$115	0.2%
<input type="checkbox"/> writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0.0%
50 bps deadband												
write off to extent of earnings exceeded 10.7% deadband	\$0	\$0	\$0	\$0	\$0	\$0	\$4,417	\$3,074	\$0	\$0	\$7,491	14.0%
<input type="checkbox"/> writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$0	\$0	\$0	\$1,775	\$0	\$2,022	\$0	\$0	\$3,797	7.1%
-50 bps deadband												
write off to extent of earnings exceeded 9.2% deadband	\$0	\$0	\$536	\$5,008	\$4,067	\$3,064	\$9,967	\$10,807	\$0	\$2,360	\$35,808	66.8%
<input type="checkbox"/> writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$536	\$5,008	\$4,067	\$8,165	\$0	\$9,756	\$0	\$0	\$27,531	51.3%
-100 bps deadband												
write off to extent of earnings exceeded 9.2% deadband	\$0	\$2,151	\$4,606	\$6,560	\$8,367	\$7,454	\$9,967	\$13,675	\$0	\$6,426	\$59,206	110.4%
<input type="checkbox"/> writeoff if WACOG sharing excluded from all earnings tests	\$0	\$2,151	\$4,606	\$6,560	\$8,367	\$8,165	\$1,377	\$13,622	\$0	\$2,615	\$47,464	88.5%
Variable bps deadbands:												
100												
write off to extent of earnings exceeded 11.2% deadband	\$0	\$0	\$0	\$0	\$0	\$0	\$115	\$0	\$0	\$0	\$115	0.2%
<input type="checkbox"/> writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0.0%
-100												
write off to extent of earnings exceeded 9.2% deadband	\$0	\$2,151	\$4,606	\$6,560	\$8,367	\$7,454	\$9,967	\$13,675	\$0	\$6,426	\$59,206	110.4%
<input type="checkbox"/> writeoff if WACOG sharing excluded from all earnings tests	\$0	\$2,151	\$4,606	\$6,560	\$8,367	\$8,165	\$1,377	\$13,622	\$0	\$2,615	\$47,464	88.5%
SRRM Application of Insurance Proceeds per Stipulation	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	(\$3,650)	(\$4,070)	(\$7,720)	
SRRM Credit - Company Responsibility	\$0	\$27	\$257	\$1,322	\$622	\$526	\$8,283	\$6,593	\$7,261	\$439	\$25,330	
SRRM Amortization - Customer Responsibility	\$1,034	\$2,178	\$8,952	\$5,238	\$1,140	\$7,639	\$1,684	\$7,081	\$4,410	\$14,913	\$61,269	
ROE given SRRM application	8.05%	9.48%	9.73%	10.15%	10.10%	9.99%	10.25%	10.24%	10.25%	9.82%		
SRRM Band - ROE less 75 bps up to ROE	\$0	\$27	\$257	\$620	\$622	\$526	\$645	\$580	\$579	\$439		
SRRM Band - ROE to 50 bps over ROE				\$702			\$3,442	\$3,093	\$3,090			
SRRM Band - Over 50 bps over ROE							\$4,196	\$2,920	\$3,591			

Insurance Spread: None entered - open for testing

	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012		
Per Results of Operations ("ROO") as filed: data is from filed ROOs, column c (after Type I normalizing adjustments), there are slight rounding differences												
Net Operating Revenue	\$61,541	\$71,694	\$78,821	\$82,753	\$83,957	\$83,918	\$89,513	\$84,845	\$86,680	\$82,251		
Total Rate Base	\$814,052	\$858,497	\$940,148	\$958,767	\$975,963	\$978,907	\$986,180	\$967,308	\$993,165	\$1,028,353		
Return on Rate Base	7.56%	8.35%	8.38%	8.63%	8.60%	8.57%	9.08%	8.77%	8.73%	8.00%		
Return on Equity	8.05%	9.49%	9.77%	10.31%	10.17%	10.05%	11.21%	11.10%	11.19%	9.87%		
Authorized ROE	10.20%	10.20%	10.20%	10.20%	10.20%	10.20%	10.20%	10.20%	10.20%	10.08%		
ROE Threshold for each year's Spring Earnings Test	13.27%	13.27%	13.32%	13.44%	13.40%	13.14%	11.54%	11.02%	10.92%	10.92%		
Environmental costs:											Totals	
Environmental deferrals (as actually recorded each year)	\$1,034	\$2,205	\$9,209	\$5,290	\$6,754	\$5,415	\$6,464	\$9,231	\$9,762	\$15,571	\$70,934	
Interest on deferrals (as actually recorded each year)	\$0	\$0	\$0	\$1,270	\$2,008	\$2,750	\$3,503	\$4,444	\$5,559	\$3,852	\$23,385	
Total Environmental deferrals with interest	\$1,034	\$2,205	\$9,209	\$6,560	\$8,762	\$8,165	\$9,967	\$13,675	\$15,320	\$19,423	\$94,319	
Insurance proceeds											0	
Net Environmental costs	\$1,034	\$2,205	\$9,209	\$6,560	\$8,762	\$8,165	\$9,967	\$13,675	\$15,320	\$19,423	\$94,319	
Environmental Deferrals Earnings Test Scenarios: these scenarios consider the pre-tax amount exceeding an example threshold ROE, and calculate the amount of environmental costs that would be written off if the test is interpreted that exceeding the threshold results in a writeoff of costs to the extent that earnings exceeded the threshold. Under this interpretation, the writeoff is the lesser of the pre-tax amount exceeding threshold ROE or the actual environmental spent.												
Pre tax amount of ROE compared to 10.2%	(\$14,492)	(\$5,379)	(\$3,535)	\$878	(\$233)	(\$1,327)	\$8,719	\$6,940	\$7,643	(\$1,707)	Totals (\$2,493)	of enviro cost
write off to extent of earnings exceeded 10.2% deadband	\$0	\$0	\$0	\$878	\$0	\$0	\$8,719	\$6,940	\$7,643	\$0	\$24,180	25.6%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$0	\$878	\$0	\$6,166	\$0	\$5,889	\$5,172	\$0	\$18,105	19.2%
using deadband that existed in relevant Spring Earnings Test [a]												
write off to extent of earnings exceeded deadband	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$599	\$2,081	\$0	\$2,680	2.8%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0.0%
100 bps deadband												
write off to extent of earnings exceeded 11.2% deadband	\$0	\$0	\$0	\$0	\$0	\$0	\$115	\$0	\$0	\$0	\$115	0.1%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0.0%
50 bps deadband												
write off to extent of earnings exceeded 10.7% deadband	\$0	\$0	\$0	\$0	\$0	\$0	\$4,417	\$3,074	\$3,780	\$0	\$11,271	12.0%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$0	\$0	\$0	\$1,775	\$0	\$2,022	\$1,309	\$0	\$5,107	5.4%
-50 bps deadband												
write off to extent of earnings exceeded 9.7% deadband	\$0	\$0	\$536	\$5,008	\$4,067	\$3,064	\$9,967	\$10,807	\$11,506	\$2,360	\$47,314	50.2%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$536	\$5,008	\$4,067	\$8,165	\$0	\$9,756	\$9,035	\$0	\$36,567	38.8%
-100 bps deadband												
write off to extent of earnings exceeded 9.2% deadband	\$0	\$2,151	\$4,606	\$6,560	\$8,367	\$7,454	\$9,967	\$13,675	\$15,320	\$6,426	\$74,527	79.0%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$2,151	\$4,606	\$6,560	\$8,367	\$8,165	\$1,377	\$13,622	\$12,898	\$2,615	\$60,362	64.0%
Variable bps deadbands:												
100												
write off to extent of earnings exceeded 11.2% deadband	\$0	\$0	\$0	\$0	\$0	\$0	\$115	\$0	\$0	\$0	\$115	0.1%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0.0%
-100												
write off to extent of earnings exceeded 9.2% deadband	\$0	\$2,151	\$4,606	\$6,560	\$8,367	\$7,454	\$9,967	\$13,675	\$15,320	\$6,426	\$74,527	79.0%
□ writeoff if WACOG sharing excluded from all earnings tests	\$0	\$2,151	\$4,606	\$6,560	\$8,367	\$8,165	\$1,377	\$13,622	\$12,898	\$2,615	\$60,362	64.0%
SRRM Application of Insurance Proceeds per Stipulation	per line 22	per line 22	per line 22	per line 22	per line 22	per line 22	per line 22	per line 22	per line 22	per line 22	per line 22	
SRRM Credit - Company Responsibility	\$0	\$27	\$257	\$1,322	\$622	\$526	\$8,283	\$6,593	\$7,261	\$439	\$25,330	
SRRM Amortization - Customer Responsibility	\$1,034	\$2,178	\$8,952	\$5,238	\$8,140	\$7,639	\$1,684	\$7,081	\$8,059	\$18,983	\$68,989	
ROE given SRRM application	8.05%	9.48%	9.73%	10.15%	10.10%	9.99%	10.25%	10.24%	10.25%	9.82%		
SRRM Band - ROE less 75 bps up to ROE	\$0	\$27	\$257	\$620	\$622	\$526	\$645	\$580	\$579	\$439		
SRRM Band - ROE to 50 bps over ROE				\$702			\$3,442	\$3,093	\$3,090			
SRRM Band - Over 50 bps over ROE							\$4,196	\$2,920	\$3,591			