

### **Portland General Electric Company**

Legal Department 121 SW Salmon Street • Portland, Oregon 97204 (503) 464-8926 • Facsimile (503) 464-2200 **Douglas C. Tingey** Assistant General Counsel

June 9, 2010

Via Electronic Filing and U.S. Mail

Oregon Public Utility Commission Attention: Filing Center PO Box 2148 Salem OR 97308-2148

Re:

**UE 215** 

Attention Filing Center:

Enclosed for filing in the above-captioned docket are signatory pages to Order No. 10-056 ("Order") of Portland General Electric. This document is being filed by electronic mail with the Filing Center.

The following are qualified under Paragraph 3(a) of the Order as authors, addressees, or originators of confidential information, and under Paragraph 3(e) and Paragraph 10 of the Order as recipients of confidential information:

Steven M. Fetter, President, Regulation UnFettered Thomas M. Zepp, Vice President, Utility Resources, Inc.

The address for Mr. Fetter is:

Regulation UnFettered 1489 West Warm Springs Road Suite 110 Henderson, NV 89014

The address for Mr. Zepp is:

Utility Resources, Inc. 1500 Liberty Street, Suite 250 Salem, OR 97302 Please stamp the extra copy of this letter and return it in the self-addressed envelope provided.

Thank you in advance for your assistance.

Sincerely,

DOUGLAS C. TINGEY

Assistant General Counsel

DCT:cbm Enclosures

cc: UE 215 Service List

# SIGNATORY PAGE UB 215

8-1-7m	6/8/10
Signature & Printed	Date
Signature & Printed	Date
Signature & Printed	Date
Signature & Printed	Date
,	
	APPENDIX B

#### STEVEN M. FETTER

1489 W. Warm Springs Rd. – Ste. 110 Henderson, NV 89014 732-693-2349 RegUnF@Gmail.com www.RegUnF.com

Education

University of Michigan Law School, J.D. 1979

Bar Memberships: U.S. Supreme Court, New York, Michigan

University of Michigan, A.B. (Communications) 1974

April 2002 - Present

President - REGULATION UnFETTERED - Henderson, NV

Founder of advisory firm providing regulatory, legislative, financial, legal and strategic planning advisory services for the energy, water and telecommunications sectors, including public utility commissions and consumer advocates; federal and state testimony; credit rating advisory services; negotiation, arbitration and mediation services; skills training in ethics, negotiation, and management efficiency.

 Service on Boards of Directors of: CH Energy Group (Lead Independent Director; Chairman, Governance and Nominating Committee; Member, Audit; Previous Chairman, Audit Committee and Compensation Committee), National Regulatory Research Institute, Keystone Energy Board, and Regulatory Information Technology Consortium; Member, Wall Street Utility Group; Participant, Keystone Center Dialogues on RTOs and on Financial Trading and Energy Markets.

October 1993 - April 2002

Group Head and Managing Director; Senior Director -- Global Power Group, Fitch IBCA Duff & Phelps -- New York/Chicago

Manager of 18-employee (\$15 million revenue) group responsible for credit research and rating of fixed income securities of U.S. and foreign electric and natural gas companies and project finance; Member, Fitch Utility Securitization Team.

- Led an effort to restructure the global power group that in three years time resulted in 75% new personnel and over 100% increase in revenues, transforming a group operating at a substantial deficit into a team-oriented profit center through a combination of revenue growth and expense reduction.
- Achieved national recognition as a speaker and commentator evaluating the effects of regulatory developments on the financial condition of the utility sector and individual companies; Cited by Institutional Investor (9/97) as one of top utility analysts at rating agencies; Frequently quoted in national newspapers and trade publications including The New York Times, The Wall Street Journal, International Herald Tribune, Los Angeles Times, Atlanta Journal-Constitution, Forbes and Energy Daily; Featured speaker at conferences sponsored by Edison Electric Institute, Nuclear Energy Institute, American Gas Assn., Natural Gas Supply Assn., National Assn. of Regulatory Utility Commissioners (NARUC), Canadian Electricity Assn.; Frequent invitations to testify before U.S. Senate (on C-Span) and House of Representatives, and state legislatures and utility commissions.
- Participant, Keystone Center Dialogue on Regional Transmission Organizations; Member, International Advisory Council, Eisenhower Fellowships; Author, "A Rating Agency's Perspective on Regulatory Reform," book chapter published by Public Utilities Reports, Summer 1995; Advisory Committee, <u>Public Utilities Fortnightly</u>.

March 1994 - April 2002

Consultant -- NYNEX -- New York, Ameritech -- Chicago, Weatherwise USA -- Pittsburgh

Provided testimony before the Federal Communications Commission and state public utility commissions; Formulated and taught specialized ethics and negotiation skills training program for employees in positions of a sensitive nature due to responsibilities involving interface with government officials, marketing, sales or purchasing; Developed amendments to NYNEX Code of Business Conduct.

October 1987 - October 1993

Chairman; Commissioner -- Michigan Public Service Commission -- Lansing

Administrator of \$15-million agency responsible for regulating Michigan's public utilities, telecommunications services, and intrastate trucking, and establishing an effective state energy policy; Appointed by Democratic Governor James Blanchard; Promoted to Chairman by Republican Governor John Engler (1991) and reappointed (1993).

- Initiated case-handling guideline that eliminated agency backlog for first time in 23 years while
  reorganizing to downsize agency from 240 employees to 205 and eliminate top tier of management;
  MPSC received national recognition for fashioning incentive plans in all regulated industries based on
  performance, service quality, and infrastructure improvement.
- Closely involved in formulation and passage of regulatory reform law (Michigan Telecommunications
  Act of 1991) that has served as a model for other states; Rejuvenated dormant twelve-year effort and
  successfully lobbied the Michigan Legislature to exempt the Commission from the Open Meetings Act,
  a controversial step that shifted power from the career staff to the three commissioners.
- Elected Chairman of the Board of the National Regulatory Research Institute (at Ohio State
  University); Adjunct Professor of Legislation, American University's Washington College of Law and
  Thomas M. Cooley Law School; Member of NARUC Executive, Gas, and International Relations
  Committees, Steering Committee of U.S. Environmental Protection Agency/State of Michigan Relative
  Risk Analysis Project, and Federal Energy Regulatory Commission Task Force on Natural Gas
  Deliverability; Eisenhower Exchange Fellow to Japan and NARUC Fellow to the Kennedy School of
  Government; Ethics Lecturer for NARUC.

August 1985 - October 1987

Acting Associate Deputy Under Secretary of Labor; Executive Assistant to the Deputy Under Secretary -- U.S. Department of Labor -- Washington DC

Member of three-person management team directing the activities of 60-employee agency responsible for promoting use of labor-management cooperation programs. Supervised a legal team in a study of the effects of U.S. labor laws on labor-management cooperation that has received national recognition and been frequently cited in law reviews (U.S. Labor Law and the Future of Labor-Management Cooperation, w/S. Schlossberg, 1986).

January 1983 - August 1985

Senate Majority General Counsel; Chief Republican Counsel -- Michigan Senate -- Lansing

Legal Advisor to the Majority Republican Caucus and Secretary of the Senate; Created and directed 7employee Office of Majority General Counsel; Counsel, Senate Rules and Ethics Committees; Appointed to the Michigan Criminal Justice Commission, Ann Arbor Human Rights Commission and Washtenaw County Consumer Mediation Committee.

March 1982 - January 1983

Assistant Legal Counsel -- Michigan Governor William Milliken -- Lansing

Legal and Labor Advisor (member of collective bargaining team); Director, Extradition and Clemency; Appointed to Michigan Supreme Court Sentencing Guidelines Committee, Prison Overcrowding Project,

Coordination of Law Enforcement Services Task Force.

October 1979 - March 1982

### Appellate Litigation Attorney -- National Labor Relations Board -- Washington DC

#### Other Significant Speeches and Publications

- The "A" Rating (Edison Electric Institute Perspectives, May/June 2009)
- Perspective: Don't Fence Me Out (Public Utilities Fortnightly, October 2004)
- Climate Change and the Electric Power Sector: What Role for the Global Financial Community (during Fourth Session of UN Framework Convention on Climate Change Conference of Parties, Buenos Aires, Argentina, November 3, 1998)(unpublished)
- Regulation UnFettered: The Fray By the Bay, Revisited (<u>National Regulatory Research Institute</u> <u>Quarterly Bulletin</u>, December 1997)
- The Feds Can Lead...By Getting Out of the Way (Public Utilities Fortnightly, June 1, 1996)
- Ethical Considerations Within Utility Regulation, w/M. Cummins (<u>National Regulatory Research Institute Quarterly Bulletin</u>, December 1993)
- Legal Challenges to Employee Participation Programs (American Bar Association, Atlanta, Georgia, August 1991) (unpublished)
- Proprietary Information, Confidentiality, and Regulation's Continuing Information Needs: A State Commissioner's Perspective (Washington Legal Foundation, July 1990)

#### Representative Current and Former Clients of Regulation UnFettered include:

- Accenture
- Accenture Sweden
- Alliant Energy
- American Electric Power
- Ameritech (now SBC/AT&T)
- Aquila
- Arizona Public Service
- Baltimore Gas & Electric
- Carlyle Group
- Central Vermont Public Service
- Cincinnati Gas & Electric
- Cinergy
- City of Tallahassee
- Commonwealth Edison
- Con Edison
- Delmarva Power & Light
- DTE Energy
- Duke Energy Carolinas NC
- Duke Energy Carolinas -- SC
- Duke Energy Indiana
- Dynegy
- Edison Electric Institute
- Empire District Electric
- Energy East
- Entergy Arkansas
- Entergy Gulf States
- · Entergy Gulf States Louisiana
- Entergy Louisiana
- Entergy New Orleans
- Entergy Services
- Entergy Texas
- Fitch Ratings
- Florida Municipal Power Agency
- Georgia Power
- Goldman Sachs
- Great Plains Energy
- Hawaiian Electric Co.
- HSH Nordbank AG

- Iberdrola S.A.
- Indiana Energy Assn
- Indiana Michigan Power
- JEA
- Kinder Morgan
- Kohlberg Kravis & Roberts
- Macquarie Securities
- Maine Public Advocate
- Maine Public Utilities Commission
- Mississippi Power
- Nevada Power
- New York State Electric & Gas
- North Shore Gas
- Northern Indiana Public Service
- NYNEX (now Verizon)
- OG&E Shareholders Association
- Pacific Gas & Electric
- · Peoples Gas Light and Coke
- Potomac Electric Power
- Progress Energy Florida
- PSI Energy
- Public Service Co New Mexico
- Reedy Creek Improvement Dist.
- Rochester Gas & Electric
- Savannah Electric
- Sierra Pacific Power
- Sierra Pacific Resources
- Southern Company
- Southwest Gas
- Texas Pacific Group
- TXU
- Union Light, Heat and Power
- Vanguard
- Vectren
- Vermont Dept. of Public Service
- Vermont Public Service Board
- Weatherwise USA

## ORDER NO. 10-056

# SIGNATORY PAGE UE 215

# III. Persons Qualified pursuant to Paragraph 3(e) and Paragraph 10.

I have read the General Protective Order, agree to be bound by the terms of the order, and will provide the information identified in paragraph 10.

Signature & Printed  THOMAS M. ZEPP	June 9, 2010 Date
Signature & Printed	Date
Signature & Printed	Date
Signature & Printed	Date

#### THOMAS M. ZEPP

Vice President Utility Resources, Inc.

#### **EDUCATION**

University of Florida

Ph.D. Economics M.A. Economics

Wofford College

A.B. Economics (Magna Cum Laude, Phi Beta Kappa)

#### SELECTED CONSULTING EXPERIENCE

#### - Finance

Sponsored testimony on the cost of capital faced by electric utilities in court cases and before regulatory commissions in Alaska, Arizona, Idaho, Illinois, Nevada, Oregon, and Washington.

Sponsored testimony on the cost of capital faced by natural gas utilities before regulatory commissions in Illinois, Oregon, Washington and Wyoming.

Sponsored testimony on the cost of capital faced by water utilities before regulatory commissions in Alaska, Arizona, California, Hawaii, Kentucky, Montana, New Mexico, Oregon, and Tennessee.

Estimated costs of capital for Bell Operating Companies and General Telephone local companies in Illinois, Nevada, Oregon and Washington.

Presented estimates of cost of capital of U. S. railroads to the Interstate Commerce Commission.

Estimated cost of capital for a large insurance company.

Presented testimony on the cost of capital of hospitals on behalf of Washington State Hospital Commission.

#### - Court Proceedings

Expert witness in Umatilla County, Oregon, Circuit Court on the harms to PacifiCorp and benefits to the City of Hermiston of a condemnation of property in the City of Hermiston.

Expert witness in Linn County, Oregon, Circuit Court regarding the harms to an electric utility compared to the benefits of two mills and a People's Utility District of an annexation resulting in a condemnation of electric facilities.

Expert witness in Superior Court of California regarding the value of water company facilities that were made inoperative or otherwise reduced in value after a sanitation district duplicated those facilities.

Expert witness in an Oregon District Court on the present value of economic benefits/harms of transferring hydroelectric plants from Pacific Power & Light Company to a PUD in Oregon.

Rebuttal witness for the Illinois Attorney General in a court appeal on the cost of capital and need for a stay in rates for an electric utility.

Estimated the present value of severance damages resulting from condemnation of a distribution system in California.

Determined the value of facilities to be taken by a City from Strawberry Electric Service District in Utah.

Witness in an Oregon District Court on rates that would have been charged by electric utilities if markets had been more competitive.

Presented an affidavit in Federal Court in Georgia on the cost of service of a municipal water utility.

#### - Other Energy and Water Studies

Sponsored expert testimony on potential export revenues for BC Hydro to the British Columbia Utility Commission based upon analysis of Canadian and Pacific Northwest hydroelectric records.

Analyzed the costs and benefits of improved efficiency of a BPA system dam based upon the Northwest System Analysis Model and export prices on behalf of Hitachi America.

Presented testimony on the appropriate cost of service methodology to be used to determine electric rates to the Public Utilities Board of the Great Northwest Territories, Canada.

Estimated avoided costs for two Pacific Northwest electric utilities on behalf of the City of Portland, Oregon and Northwest Natural Gas Company.

#### - Telecommunications and Cable

Prepared a Declaration on appropriate fees for the use of rights of way in Portland, Oregon on behalf of Electric Lightwave, Inc.

Testified on behalf of New Edge and Advanced TelCom Group, Inc. regarding Nevada Bell's proposed nonrecurring charges to be assessed to CLECs for certain loop conditioning activities.

Prepared cost estimates and testified on economic principles and costs of paging on behalf of AirTouch Paging in Colorado and Washington.

Testified on economic principles and costs of wireless service on behalf of AT&T Wireless Services in arbitrations with U S WEST in Colorado, Minnesota, Oregon, and Washington.

Testified on economic principles on behalf of AT&T in arbitrations with GTE in Oklahoma and Oregon.

Testified on behalf of Frontier Telemanagement regarding U S WEST's proposal to withdraw Centrex service after the 1996 Federal Act was passed.

Testified on economic principles and an analysis of U S WEST cost studies on behalf of AT&T Communications and MCIMetro in arbitrations and permanent cost dockets in nine states.

Prepared analyses of local costs of telecommunication service and presented testimony on appropriate rates in Idaho, Nevada, Oregon and Washington.

Sponsored testimony in support of resale of local telecommunications services in California, Iowa, Minnesota, Oregon and Washington.

Presented testimony on the benefits of intraLATA competition in Nebraska.

Presented analyses of private line costs and appropriate rates in Colorado, Idaho, Oregon and Washington.

Estimated costs of local telephone service for a study commissioned by the Oregon legislature.

Reviewed cost studies and negotiated Enhanced 9-1-1 rates with Washington telecommunications companies on behalf of the State of Washington.

Prepared econometric estimates of telephone usage costs and sponsored testimony on appropriate cost-based usage rates.

Sponsored testimony on the appropriate costs and prices for pole attachments in Washington.

#### **PREVIOUS POSITIONS**

Zinder Companies, Inc.

Senior Consultant

Oregon Public Utility Commissioner

Senior Economist

Central Michigan University

Assistant Professor of Econometrics

Armstrong State College and Savannah State College, the Joint Graduate Program

Assistant Professor of Business and Economics

University of Florida

Instructor

#### PROFESSIONAL AFFILIATIONS AND ACTIVITIES

Published papers in <u>Water, Financial Management, The Quarterly Review of Economics and Finance</u> and <u>Explorations in Economic History</u>.

Read papers at the Southern Economic Association meetings.

Invited lecturer at Stanford University seminar.

Invited Speaker at the 2002 Pacific NW Regional Economic Conference and at the 57<sup>th</sup> Annual Western Conference of Public Service Commissioners

Member, American Economic Association

Journal Referee for Financial Management

Past Member, NARUC Subcommittee on Economics

# Old Cases 2003 to 2010

<u>Year</u>	Governing <u>Bodv</u>	Docket title and <u>number</u>	Party Sponsoring Zepp <u>Testimony</u>
2010	Oregon PUC	UE 215	Portland General Electric
2009	Regulatory Commision of Alaska	TA3 - 573	Black Bear Lake Hydro, Inc.
2009	California PUC	Application 09-05-001, et. al.	San Gabriel Valley Water
2009	California PUC	Application 09-05-001, et. al.	Park Water
2007	California PUC	A.07-07-003	San Gabriel Valley Water
2009	Regulatory Commision of Alaska	U-09-090 filed July 6, 2009	Alaska Power Company
Nov 2008	Regulatory Commision of Alaska	U-08-157 / U-08-158	Anchorage Water and Wastewater Utility
August 2009	Arizona Corporation Commission	Docket No. W-01445A-08-0440	Arizona Water
August 2008	Arizona Corporation Commission	Docket No. W-01445A-08-0440	Arizona Water
2008	California PUC	Appication 08-05-002, et. al.	Golden State Water
2008	Arizona Corporation Commission	Remand from Arizona Court of Appeals, No. 1 CA-CC 05-0002	Chaparral City Water
2007	Arizona Corporation Commission	Remand from Arizona Court of Appeals, No. 1 CA-CC 05-0002	Chaparral City Water
2008	Oregon PUC	UE 197	Portland General Electric
2007	California PUC	A. 07-01-009	Golden State Water
2006	Oregon Puc	UE 180/ UE 181/ UE 184	Portland General Electric
2007	California PUC	A08-01-002	Park Water
2006	California PUC	A.06-02-023	Golden State Water
2003	California PUC	A.02-11-007	Southern California Water
2007	California PUC	A.07-03-019	San Jose Water

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2005	California PUC	A.06-02-014	San Jose Water
2005	California PUC	A.05-08-034	Suburban Water
2005	California PUC	A.05-08-021	San Gabriel Valley Water
2004	California PUC	A.04-09-005	San Gabriel Valley Water
2003	California PUC	A.02-11-044	San Gabriel Valley Water
2006	California PUC	A.06-07-002	Valencia Water Company
2005	California PUC	A.06-01-004	Park Water
2004	California PUC	A.05-02-005	Park Water
2003	California PUC	A.03-04-015	Park Water
2005	California PUC	A.05-02-012	California American Water
2004	California PUC	A.04-04-040	California American Water
2003	California PUC	A.03-07-036	California American Water
2003	California PUC	A.02-09-030	California American Water
2007	New Mexico Public Regulation Commission	Case No. 06-00208-UT	New Mexico Utilities, Inc.
2006	New Mexico Public Regulation Commission	Case No. 06-00208-UT	New Mexico American Water
2003	New Mexico Public Regulation Commission	Case No. 06-00208-UT	New Mexico American Water
2003	PUC of Hawai'i	Docket 03-0025	Hawaii-American Water
2003	West Virginia PSC	Rate Case 03-0353-W-42T	West Virginia American Water
2006	Regulatory Commision of Alaska	U-06-138	Anchorage Water and Wastewater Utility
2005	Regulatory Commision of Alaska	Petition	ML&P
2005	Regulatory Commision		

	of Alaska	U-04-22/U-04-23	AWWU
2005 2007	Regulatory Commision of Alaska	U-06-045/U-05-103	AWWU
2002	Regulatory Commision of Alaska	U-99-139	ML&P
2006	Arizona Corporation Commission	Docket W-02113A-04-0616	Chaparral City Water
2004	Arizona Corporation Commission	Docket W-01445A-04-0650	Arizona Water
2002	Arizona Corporation Commission	Docket W-01445A-02-0619	Arizona Water
2002	Arizona Corporation Commission	Docket WS-01303A-02-0867 et al	Arizona-American Water
2004	Arizona Corporation Commission	Docket E-01345A-03-0437	Arizona Public Service
2007	Montana District Court Helena, Montana	PPL Montana et.al. v. State of Montana	Avista Corporation

Recommended ROE	Authorized ROE	Was Case <u>Litigated?</u>
11.00%	pending	
15.00%	12.50%	settled
12.95%	pending	yes
13.00%	pending	yes
12.10%	10.50%	yes
15.30%	pending	
12.50%	11.01%	yes
12.40%	pending	yes
12.40%	pending	yes
11.1% to 12.4%	10.20%	yes
FVRB ROE method no change in ROE	pending	yes
7.6% ROR on Fair Value Rate Base	pending	yes
10.7% to 11.5%	settled	settled
11.25%	na	na
ROE> 10.75%	10.10%	yes
12.00%	10.15%	settled
11.20%	na	na
old case	old case	old case
WRAM testimony	na	na

11.20%	na	na
11.02% to 11.87%	na	na
12.00%	na	na
old case	old case	old case
old case	old case	old case
11.75%	na	na
11.50%	na	na
old case	old case	old case
old case	old case	old case
	na	na
old case	old case	old case
old case	old case	old case
old case	old case	old case
11.25%	na	na
11.50%	, na	na
11.3% to 11.8%	na	na
10.90%	10.60%	settled
Economic Principles	na	na
	na	na
	na	na

	na	na
	na	na
old case	old case	old case
	na	na
11.25%	na	na
11.9% to 12.9%	na	na
old case	old case	old case
rebuttal	10.25%	
deposition	na	settled

#### CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **SIGNATORY PAGES** to be served by electronic mail to those parties whose email addresses appear on the attached service list and by method specified, postage prepaid and properly addressed, to those parties on the attached service list who have not waived paper service from OPUC Docket No. UE 215.

Dated at Portland, Oregon, this 9<sup>th</sup> day of June, 2010.

OUGLAS C. TINGEY, OSB # 044366

Assistant General Counsel

Portland General Electric Company

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