UE 335 / Stipulating Parties / 300 Gardner – Jenks – Mullins – Bieber – Chriss – Brown

BEFORE THE PUBLIC UTILITY COMMISSION OF THE STATE OF OREGON

UE 335 General Rate Case

PORTLAND GENERAL ELECTRIC COMPANY

Joint Testimony in Support of the Second Partial Stipulation

Direct Testimony of

Marianne Gardner, OPUC Bob Jenks, CUB Bradley G. Mullins, AWEC Justin Bieber, Kroger Steve W. Chriss, Walmart Stefan Brown, PGE

August 29, 2018

UE 335 2019 General Rate Case – Joint Testimony in Support of Second Partial Stipulation

UE 335 / Stipulating Parties / 300 Gardner – Jenks – Mullins – Bieber – Chriss – Brown / i

Table of Contents

I.	Introduction	1
II.	Resolved Revenue Requirement Issues	4
List	of Exhibits	8

I. Introduction

Q.	Please state your names and positions.
A.	My name is Marianne Gardner. I am a Senior Revenue Requirement Analyst in the Energy
	Division at the Public Utility Commission of Oregon (OPUC). My qualifications appear in
	OPUC Exhibit 401.
	My name is Bob Jenks. I am the Executive Director of the Oregon Citizens' Utility Board
	(CUB). My qualifications appear in CUB Exhibit 201.
	My name is Bradley G. Mullins. I am an independent consultant representing the Alliance
	of Western Energy Consumers (AWEC). My qualifications appear in AWEC Exhibit 101.
	My name is Justin Bieber. I am a Senior Consultant with Energy Strategies, LLC and am
	testifying on behalf of Fred Meyer Stores and Quality Food Centers (Fred Meyer), Divisions
	of The Kroger Co. My qualifications appear in FM Exhibit 100.
	My name is Steve W. Chriss. I am Director, Energy and Strategy Analysis for Wal-Mart
	Stores, Inc. and Sam's West, Inc. (Walmart). My qualifications appear in Walmart Exhibit
	101.
	My name is Stefan Brown. I am Manager of Regulatory Affairs in Portland General
	Electric Company's (PGE's) Rates and Regulatory Affairs Department. My qualifications
	appear in Section III of Joint Testimony supporting the first partial stipulation in this docket.
Q.	What is the purpose of your testimony?
A.	Our purpose is to describe the June 18 and 19, 2018 Second Partial Stipulation (the
	Stipulation) reached among the OPUC Staff (Staff), CUB, AWEC, Fred Meyer, Walmart, and
	PGE (collectively, the Stipulating Parties or Parties) regarding certain revenue requirement
	issues in this docket (UE 335) as described below. While there are other parties to this case,
	A. Q.

we are not aware of any who oppose this Stipulation.

23

Q. What is the basis for the Stipulation?

A. PGE filed this general rate case on February 15, 2018. During the next three months, PGE responded to more than 500 data requests from Staff, CUB, AWEC, and other parties. On April 17, parties held a workshop to discuss issues and review various revenue requirement topics. On May 17, Staff provided an initial analysis of issues and the Stipulating Parties participated in Settlement Conferences on May 18, during which other parties identified additional issues. During those discussions, PGE accepted a number of Staff's proposals and offered modifications regarding other proposals. The Stipulating Parties also accepted several of PGE's suggestions, which represented compromises that parties deemed reasonable for settlement purposes. This settlement led to the First Partial Stipulation filed with the Commission on August 16, 2018.

Staff and Intervenors filed Opening Testimony on June 6, 2018, which discussed issues not settled in the first Settlement Conference. Parties participated in a second Settlement Conference on June 18 and 19, during which PGE offered modifications regarding some proposals and accepted others. The Stipulating Parties reached numerous compromises that parties deemed reasonable for settlement purposes. This settlement led to the Second Partial Stipulation encompassed herein.

Q. Please summarize the agreement contained in the revenue requirement portion of the Stipulation.

A. The Stipulation represents the settlement of several revenue requirement issues. A copy of the Stipulation is provided as Exhibit 301. Table 1 summarizes the settled issues with a short description. Exhibit 302 provides an updated revenue requirement incorporating the results of this Stipulation.

UE 335 / Stipulating Parties / 300 Gardner – Jenks – Mullins – Bieber – Chriss – Brown / 3

Table 1 (Stipulated issues with approximate adjustments)

Issue No.	Category	Description
S-6, S-9, S-10, S-12, S-15, S- 16, S-17, S-18, S-27, C-3, C-4, A-16	Bundled Settlement	Total Operations and Maintenance (O&M) cost reduction of \$3.4 million for Board of Director's Expense, Employee Benefit Administration, All Risk Property Insurance, Retained Losses, Meals and Entertainment, Travel Expense, Awards, Fee Free Bankcard, Other Revenue, Board of Director's Stock Incentive, Mass Transit Benefit, and Trojan Nuclear Decommissioning Trust. PGE will collect \$1.9 million for the Trojan Nuclear Decommissioning Trust beginning January 1, 2019.
A-11, A-13, A- 14, A-20	Accumulated Deferred Income Taxes (ADIT) and Boardman Severance Liability	To provide for consistent rate base treatment for these costs, Rate Base will be reduced by \$10.1 million for Accrued Vacation ADIT and Boardman Severance Liability. No adjustment to rate base for ADIT associated with Boardman Severance or Injuries and Damages.
S-5	Working Cash in Rate Base	A 3.827% working cash factor will be used.
S-26	Demand Response Flex Pricing	Reduce O&M expense by \$2.4 million.
A-3	Excess Deferred Federal Income Tax Correction	Increase Excess ADIT amortization by \$1.1 million. Corresponding decrease to ADIT liability by the same amount.
A-15	Depreciation Reserve	Increase accumulated depreciation by \$19.8 million.
A-18	Amortize Incentive Regulatory Liability	Reduce amortization expense by \$0.5 million.
C-2	Storm Accrual	Reduce proposed Level III storm costs by \$0.01 million.

Q. Does this Stipulation indicate that all parties agree on the calculations or bases employed

2 by other parties to determine each adjustment?

- 3 A. No. Although the Stipulating Parties may not necessarily agree on the calculations,
- 4 assumptions, or bases used to determine each adjustment, we believe the amounts represent a
- 5 reasonable financial settlement of the respective issues in this docket. The adjustments are in
- 6 the public interest and are consistent with rates that are fair, just, and reasonable.

7 Q. Does the Stipulation resolve all revenue requirement issues in this proceeding?

- 8 A. No. The Stipulation resolves only the issues associated with each of the categories as
- 9 specified.

II. Resolved Revenue Requirement Issues

- 1 Q. Please describe the Partial Bundled Stipulation.
- 2 A. The Stipulating Parties agree to bundle the following issues and reduce O&M Expense by
- \$3.4 million for settlement purposes: Board of Director's Expense, Employee Benefit
- 4 Administration, All Risk Property Insurance, Retained Losses, Meals and Entertainment,
- 5 Travel Expense, Awards, Fee Free Bankcard, Other Revenue, Board of Director's Stock
- Incentive, Mass Transit Benefit, and Trojan Nuclear Decommissioning Trust. The Parties
- also agreed that PGE will collect \$1.9 million for the Trojan Nuclear Decommissioning Trust,
- beginning on January 1, 2019.
- 9 Q. Please describe the Stipulation regarding ADIT and Boardman Severance Liability (A-
- 10 **11)**, (A-13), (A-14), (A-20).
- 11 A. PGE's initial filing included \$4.8 million in Rate Base for Accrued Vacation ADIT, \$2.8
- million for Boardman Severance ADIT, \$2.4 million for Injuries and Damages ADIT, and
- \$5.3 million in Rate Base for the Boardman Severance Liability. AWEC proposed
- disallowing the ADIT associated with Boardman Severance, Injuries and Damages, and
- Accrued Vacation, as well as reclassifying the Boardman Severance Liability into Rate Base.
- 16 Q. How do the Parties resolve this issue?
- 17 A. For settlement purposes and to provide for consistent rate base treatment of these costs, PGE
- agrees to accept AWEC's position on Accrued Vacation ADIT (A-11) and reduce Rate Base
- by \$4.8 million, as well as accept AWEC's position on Boardman Severance Liability (A-20)
- and reduce Rate Base by \$5.3 million for 2019. Additionally, AWEC agrees to accept PGE's
- position on Injuries and Damages ADIT (A-14) and Boardman Severance ADIT (A-13),
- resulting in no Rate Base adjustment.
- 23 Q. Please describe the Stipulation regarding Working Cash in Rate Base (S-5).

- A. PGE's initial filing included a Working Cash factor of 4.063% based upon an updated lead/lag
- study. Staff proposes averaging the Cash Working Capital (CWC) from Docket Nos. UE 294,
- 3 UE 319, and UE 335, which results in a CWC factor of 3.827%. The Parties agree that for
- 4 settlement purposes, a factor of 3.827 % will be used for 2019.
- 5 Q. Please describe the Stipulation regarding Demand Response Flex Pricing (S-26).
- 6 A. The Parties agree that PGE will remove \$2.4 million from O&M expense for the Flex Pricing
- Pilot (Flex) since it will not be ready to transition to a full program in 2019. The Flex program
- will be continued as a pilot and a deferral reauthorization has been filed for Docket No. UM
- 9 1708 to reflect this change.
- 10 Q. Please describe the Stipulation regarding the Excess ADIT Correction (A-3).
- 11 A. PGE's initial filing included an O&M expense of \$7 million for Excess ADIT. AWEC sent
- PGE a Data Request regarding the calculation of Excess ADIT and the amortization
- calculation (AWEC Data Request No. 017). PGE responded to this Data Request and
- provided a more recent estimate of the Excess ADIT. AWEC proposed their adjustment based
- upon this updated estimate. Parties agree that PGE will increase ADIT amortization by \$1.1
- million based on PGE's more recent estimate. There will also be a corresponding decrease to
- the ADIT liability by the same amount.
- 18 Q. Please describe the Stipulation regarding the Depreciation Reserve (A-15).
- 19 A. PGE's initial filing included a Depreciation Reserve forecast of \$4.76 billion. While
- answering AWEC Data Request No. 002, PGE discovered that there was a calculation error
- with the forecasted year-end 2018 depreciation reserve balance used in the filing. The forecast
- for the deprecation reserve should have been \$19.8 million more than the forecast provided,
- resulting in a depreciation reserve of \$4.78 billion. AWEC proposed that depreciation

- reserves should be increased by \$19.8 million to reflect the change and Parties agree with this
- 2 proposal.
- 3 Q. Please describe the Stipulation regarding Amortize Incentive Regulatory Liability (A-
- **4 18).**
- 5 A. PGE's initial filing inadvertently did not include the amortization for the \$10 million reduction
- to rate base settled in Docket No. UE 283 for improperly capitalized past incentive
- 7 expenditures. PGE reduced rate base, but inadvertently excluded the associated annual
- 8 amortization. This error was found, and a commitment made to correct it in PGE's response
- 9 to AWEC Data Request No. 121. Parties agree that PGE will reduce amortization expense by
- \$500 thousand to reflect the annual amortization of the capitalized incentive regulatory
- liability established in UE 283.
- 12 Q. Please describe the Stipulation regarding Storm Accrual Escalation (C-2).
- 13 A. PGE's initial filing for 2019 storm costs inadvertently used the incorrect Consumer Price
- Index For All Urban Consumers (CPI-U) growth rate of 2.58. CUB analyzed the escalation
- and discovered that the proper CPI-U growth rate should have been 2.14, resulting in a
- downward adjustment of \$10 thousand to PGE's proposed Level III storm costs. Parties agree
- to this downward adjustment to correct the escalation rate used in the initial filing for the
- storm restoration accrual.

19

- Q. What is your recommendation to the Commission regarding these adjustments?
- 20 A. The Parties recommend and request that the Commission approve these adjustments. Based
- on careful review of PGE's filing, consideration of PGE's responses to over 500 data requests,
- and thorough analysis of the issues, we believe these adjustments represent appropriate and
- reasonable resolutions of the respective issues in this docket. Retail prices reflecting these
- 24 adjustments will be fair, just, and reasonable.

- 1 Q. Does this conclude your testimony?
- 2 A. Yes.

UE 335 / Stipulating Parties / 300 Gardner – Jenks – Mullins – Bieber – Chriss – Brown / 8

List of Exhibits

PGE Exhibit	<u>Description</u>				
301	Copy of Partial Stipulation				
302	Updated Revenue Requirement				

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UE 335

In the Matter of

PORTLAND GENERAL ELECTRIC COMPANY

SECOND PARTIAL STIPULATION

Request for a General Rate Revision.

This Second Partial Stipulation ("Stipulation") is between Portland General Electric Company ("PGE"), Staff of the Public Utility Commission of Oregon ("Staff"), the Citizens' Utility Board of Oregon ("CUB"), the Alliance of Western Energy Consumers ("AWEC"), Fred Meyer Stores and Quality Food Centers, Division of The Kroger Co. ("Kroger"), and Wal-Mart Stores, Inc. and Sam's West, Inc. ("Walmart")(collectively, the "Stipulating Parties").

PGE previously filed a Partial Stipulation in this docket resolving certain issues raised in this general rate case. After reaching that agreement the parties continued settlement discussions, with settlement conferences held on June 18 and 19. No parties other than the Stipulating Parties, participated in the settlement discussions. As a result of those discussions, the Stipulating Parties have reached a compromise settlement resolving several additional issues, as set forth below.

TERMS OF SECOND PARTIAL STIPULATION

- 1. This Stipulation resolves only the general rate case issues described below.
- 2. Group 1 (S-6), (S-9), (S-10), (S-12), (S-15), (S-16), (S-17), (S-18), (S-27), (C-3), (C-4), (A-16). These issues are resolved as a group: Board of Director's Expense (S-6), Employee Benefit Administration (S-9), All Risk Property Insurance (S-10), Retained Losses (S-12),

Meals and Entertainment (S-15), Travel Expense (S-16), Awards (S-17), Fee Free Bankcard (S-18), Other Revenue (S-27), Board of Director's Stock Incentive (C-3), Mass Transit Benefit (C-4), and Trojan Nuclear Decommissioning Trust (A-16). For determining rates in this case:

- a. PGE's Operations and Maintenance ("O&M") costs will be reduced by \$3.4 million for the 2019 test year.
- b. PGE will set its annual collection rate for the Trojan Nuclear Decommissioning Trust at \$1.9 million beginning January 1, 2019.
- 3. Group 2 Accumulated Deferred Income Taxes (ADIT) and Boardman Severance Liability (A-11), (A-13), (A-14), (A-20).
 - a. Accrued Vacation ADIT (A-11): Test year rate base will be reduced by \$4.8 million.
 - b. Boardman Severance ADIT (A-13), and Injuries and Damages ADIT (A-13): The Stipulating Parties agree there will be no rate base reduction for these issues.
 - c. Boardman Severance Liability (A-20): Test year rate base will be reduced by \$5.3 million.
- 4. <u>Working Cash in Rate Base (S-5)</u>. Working cash will be calculated using a 3.827% working cash factor.
- 5. <u>Demand Response Flex Pricing (S-26)</u>. PGE will remove \$2.4 million from test year O&M expense for Flex Pricing. Flex Pricing will continue to run as a pilot, and the costs will be included in the deferral re-authorization request filed in Docket UM 1708 rather than in this general rate case.

- 6. Excess ADIT (A-3). Test year Excess ADIT amortization will be increased by \$1.1 million based on PGE's more recent estimate. There will be a corresponding decrease to the ADIT liability by the same amount.
- 7. <u>Depreciation Reserve (A-15)</u>. PGE will increase accumulated depreciation by \$19.8 million to correct an error in PGE's depreciation reserve balance.
- 8. <u>Amortization of Incentive Regulatory Liability (A-18)</u>. PGE will reduce amortization expense by \$0.5 million to reflect the annual amortization of the capitalized incentive regulatory liability as established in Docket No. UE 283.
- 9. <u>Storm Accrual Escalation (C-2)</u>. PGE will apply CUB's proposed \$10,000 adjustment to correct the escalation rate used in determining the storm restoration accrual.
- 10. The Stipulating Parties recommend and request that the Commission approve the adjustments and provisions described herein as appropriate and reasonable resolutions of the identified issues in this docket.
- 11. The Stipulating Parties agree that this Stipulation is in the public interest, and will contribute to rates that are fair, just and reasonable, consistent with the standard in ORS 756.040.
- 12. The Stipulating Parties agree that this Stipulation represents a compromise in the positions of the Stipulating Parties. Without the written consent of all of the Stipulating Parties, evidence of conduct or statements, including but not limited to term sheets or other documents created solely for use in settlement conferences in this docket, are confidential and not admissible in the instant or any subsequent proceeding, unless independently discoverable or offered for other purposes allowed under ORS 40.190.

- 13. The Stipulating Parties have negotiated this Stipulation as an integrated document. The Stipulating Parties, after consultation, may seek to obtain Commission approval of this Stipulation prior to evidentiary hearings. If the Commission rejects all or any material part of this Stipulation, or adds any material condition to any final order that is not consistent with this Stipulation, each Stipulating Party reserves its right: (i) to withdraw from the Stipulation, upon written notice to the Commission and the other Parties within five (5) business days of service of the final order that rejects this Stipulation, in whole or material part, or adds such material condition; (ii) pursuant to OAR 860-001-0350(9), to present evidence and argument on the record in support of the Stipulation, including the right to cross-examine witnesses, introduce evidence as deemed appropriate to respond fully to issues presented, and raise issues that are incorporated in the settlements embodied in this Stipulation; and (iii) pursuant to ORS 756.561 and OAR 860-001-0720, to seek rehearing or reconsideration, or pursuant to ORS 756.610 to appeal the Commission's final order. Nothing in this paragraph provides any Stipulating Party the right to withdraw from this Stipulation as a result of the Commission's resolution of issues that this Stipulation does not resolve.
- 14. This Stipulation will be offered into the record in this proceeding as evidence pursuant to OAR 860-001-0350(7). The Stipulating Parties agree to support this Stipulation throughout this proceeding and in any appeal, and provide witnesses to support this Stipulation (if specifically required by the Commission), and recommend that the Commission issue an order adopting the settlements contained herein. By entering into this Stipulation, no Stipulating Party shall be deemed to have approved, admitted or consented to the facts, principles, methods or theories employed by any other Stipulating

Party in arriving at the terms of this Stipulation. Except as provided in this Stipulation, no Stipulating Party shall be deemed to have agreed that any provision of this Stipulation is appropriate for resolving issues in any other proceeding.

15. This Stipulation may be signed in any number of counterparts, each of which will be an original for all purposes, but all of which taken together will constitute one and the same agreement.

DATED this 29th	day of August, 2018.	
		PORTLAND GENERAL ELECTRIC COMPANY
	-	STAFF OF THE PUBLIC UTILITY COMMISSION OF OREGON
		CITIZENS' UTILITY BOARD OF OREGON
		ALLIANCE OF WESTERN ENERGY CONSUMERS
		THE KROGER CO.
		WALMART

WALMART

DATED this $28^{4/3}$ day of August,	2018.
	, , , , , , , , , , , , , , , , , , ,
	PORTLAND GENERAL ELECTRIC COMPANY
	Sy Sa
	STAFF OF THE PUBLIC UTILITY COMMISSION OF OREGON
	CITIZENS' UTILITY BOARD OF OREGON
He .	ALLIANCE OF WESTERN
	ENERGY CONSUMERS
	THE KROGER CO.

DATED this Z1th day of August, 2018.	
	PORTLAND GENERAL ELECTRIC COMPANY
	STAFF OF THE PUBLIC UTILITY COMMISSION OF OREGON
	CITIZENS' UTILITY BOARD OF OREGON
	ALLIANCE OF WESTERN ENERGY CONSUMERS
-	THE KROGER CO.
-	WALMART

DATED this 28 th day of August, 2018.	
	PORTLAND GENERAL ELECTRIC COMPANY
	STAFF OF THE PUBLIC UTILITY COMMISSION OF OREGON
	CITIZENS' UTILITY BOARD OF OREGON
	ALLIANCE OF WESTERN ENERGY CONSUMERS
	THE KROGER CO.
	WALMART
	WALWANI

DATED this <u>29</u> day of August, 2018.	
	PORTLAND GENERAL ELECTRIC COMPANY
	STAFF OF THE PUBLIC UTILITY COMMISSION OF OREGON
	CITIZENS' UTILITY BOARD OF OREGON
	ALLIANCE OF WESTERN ENERGY CONSUMERS
	THE KROGER CO.
	WALMART

DATED this 28 th day of August, 2018	3.
	PORTLAND GENERAL ELECTRIC COMPANY
	STAFF OF THE PUBLIC UTILITY COMMISSION OF OREGON
	CITIZENS' UTILITY BOARD OF OREGON
	ALLIANCE OF WESTERN ENERGY CONSUMERS
	THE KROGER CO.
7	or Vicki M. Boldwin WALMART

Portland General Electric Company 2019 Revenue Requirement - Base Business (\$000)

					Total Increase:	Rev Req 54,526	Percent 3.00
	At Current Rates	July Load Forecast Delta	GRC Change for RROE	Proposed 2018	Non-NVPC Adjustments	NVPC Adjustments	Total Results
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Sales to Consumers Sales for Resale	1,798,713	19,582	66,326	1,884,622	(15,829)	4,029	1,872,82
3 Other Revenues	25,327			25,327	-	-	25,32
1 Total Operating Revenues	1,824,041		66,326	1,909,949	(15,829)	4,029	1,898,15
5 Net Variable Power Costs	375,309			375,309	-	3,887	379,19
Production O&M (excludes Trojan)	165,665			165,665	(1,652)	-	164,01
7 Trojan O&M 3 Transmission O&M	115 15,798			115 15,798	-	-	11 15,79
Distribution O&M	136,180			136,180	(858)	-	135,78
Customer & MBC O&M	78,739			78,739	(2,400)	-	76,33
Uncollectibles Expense 2 OPUC Fees	6,171 5,776		295 276	6,466 6,052	(52) (51)	13 13	6,11 6,01
B A&G, Ins/Bene., & Gen. Plant	174,655		270	174,655	(4,529)	-	170,12
Total Operating & Maintenance	958,407		571	958,978	(9,541)	3,913	953,03
Depreciation	305,531			305,531	-	-	305,53
Amortization	66,965			66,965	(500)	-	66,46
Property Tax	71,578			71,578	-	-	71,57
Payroll Tax Other Taxes	16,637 2,501			16,637 2,501	-	-	16,63 2,50
Franchise Fees	45,644		2,180	47,825	(402)	102	47,52
Utility Income Tax	62,226		22,571	84,797	(2,365)	3	82,69
Total Operating Expenses & Taxes Utility Operating Income	1,529,491 294,550		25,322 60,586	1,554,812 355,137	(12,807)	4,018	1,545,97 352,17
othicy Operating income	294,550		00,300	355,137	(3,022)	11	352,1
Average Rate Base				·			,
Avg. Gross Plant	10,221,818			10,221,818	- (40,000)	-	10,221,8
Avg. Accum. Deprec. / Amort Avg. Accum. Def Tax	(4,761,822) (679,665)			(4,761,822) (679,665)	(19,800) (3,737)	-	(4,781,6) (683,4)
Avg. Accum. Def ITC	-			-	-	-	-
Avg. Net Utility Plant	4,780,331		=	4,780,331	(23,537)	=	4,756,7
Misc. Deferred Debits	9,294			9,294	-	-	9,2
Operating Materials & Fuel Misc. Deferred Credits	78,945 (74,554)			78,945 (74,554)	(5,289)	-	78,94 (79,84
Working Cash	62,143		1,029	63,172	(490)	154	59,16
Average Rate Base	4,856,160		1,029	4,857,189	(29,316)	154	4,824,3
Rate of Return Implied Return on Equity	6.065% 7.008%			7.312% 9.500%		7.300% 9.500%	7.300 9.500
Effective Cost of Debt	5.123%		5.123%	5.123%	5.100%	5.100%	5.100
Effective Cost of Preferred	0.000%		0.000%	0.000%	0.000%	0.000%	0.000
Debt Share of Cap Structure	50.000%		50.000%	50.000%	50.000%	50.000%	50.000
Preferred Share of Cap Structure	0.000%		0.000%	0.000%	0.000%	0.000%	0.00
Weighted Cost of Debt	2.562%		2.562%	2.562%	2.550%	2.550%	2.550
Weighted Cost of Preferred Equity Share of Cap Structure	0.000% 50.000%		0.000% 50.000%	0.000% 50.000%	0.000% 50.000%	0.000% 50.000%	0.00 50.00
State Tax Rate	7.786%		7.786%	7.786%	7.786%	7.786%	7.78
Federal Tax Rate	21.000%		21.000%	21.000%	21.000%	21.000%	21.00
Composite Tax Rate Bad Debt Rate	27.151% 0.343%		27.151% 0.343%	27.151% 0.343%	27.151% 0.326%	27.151% 0.326%	27.15 0.32
Franchise Fee Rate	2.538%		2.538%	2.538%	2.538%	2.538%	2.53
Working Cash Factor	4.063%		4.063%	4.063%	3.827%	3.827%	3.82
Gross-Up Factor	1.373		1.373	1.373	1.373	1.373	1.3
ROE Target Grossed-Up COC	9.500% 9.082%		9.500% 9.082%	9.500% 9.082%	9.500% 9.070%	9.500% 9.070%	9.50 9.07
OPUC Fee Rate	9.082% 0.321%		9.082% 0.321%	9.082% 0.321%	9.070% 0.321%	9.070% 0.321%	0.32
Utility Income Taxes							
Book Revenues	1,824,041		85,908	1,909,949	(15,829)	4,029	1,898,1
Book Expenses	1,467,265		2,751	1,470,015	(10,443)	4,016	1,463,2
Interest Deduction Production Deduction	124,394		26	124,420	(748)	4	123,0:
Permanent Ms	(22,619)			(22,619)	-		(22,6
Deferred Ms	63,378		20.121	63,378	- (4.655)		63,37
Taxable Income	191,623		83,131	274,755	(4,639)	10	271,0
Current State Tax State Tax Credits	14,921		6,473	21,394	(361)	1	21,10
Net State Taxes	14,921		6,473	21,394	(361)	1	21,10
Federal Taxable Income	176,703		76,658	253,361	(4,278)	9	249,9
Current Federal Tax Federal Tax Credits	37,108 -		16,098	53,206 -	(898)	2	52,4
Excess ADIT Reversal (ARAM) Deferred Taxes	(7,010) 17,208		- 0	(7,010) 17,208	(1,105)		(8,1 17,2
Total Income Tax Expense	62,226		22,571	84,797	(2,365)	3	82,6
Regulated Net Income	170,156			230,716			229,1