

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 1330**

In the Matter of )

PUBLIC UTILITY COMMISSION OF )  
OREGON, )

Investigation of Automatic Adjustment )  
Clause pursuant to SB 838. )  
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OPENING TESTIMONY  
OF THE  
CITIZENS' UTILITY BOARD OF OREGON

September 28, 2007



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_____	)	

1           My name is Bob Jenks, and my qualifications are listed in CUB Exhibit 101.

2       **I. Introduction**

3           CUB was a strong advocate of SB 838, and supported the idea of allowing  
4 recovery of the cost of renewable generation through an automatic adjustment clause.  
5 For us, it seemed a simple matter of fairness. Utilities have automatic adjustment clauses  
6 to annually update their forecasted variable power costs (AUT and TAM). In the AUT  
7 and TAM proceedings we advocated for inclusion of the variable power costs associated  
8 with new renewable resources when they are forecast to come online. If the variable  
9 power benefits are included in a timely manner, then the fixed costs should also be  
10 included in a timely manner.

11           The purpose of this section of the bill is simple. It is to allow “timely” recovery  
12 of prudent costs associated with renewable generation. Fully litigated rate cases take

1 many months and involve a great many issues. Thermal generating units are large and  
2 expensive, and a utility will typically only build one every few years, if that. As applied  
3 to thermal generating units, the general rate case model works well to update a utility's  
4 ratebase and bring the new plant into rates. However, under SB 838, renewable resources  
5 are different. To meet SB 838, a utility may find that it is best to bring a series of smaller  
6 projects online spaced only a few months apart, rather than large projects spaced a few  
7 years apart. Requiring a utility to use general rate cases to recover its costs under these  
8 conditions could place a barrier in the way of cost recovery for the new renewable  
9 generation required under SB 838, which could create an incentive for a utility to take  
10 actions that are not the most prudent or cost effective when acquiring these resources.

11 The purpose of the SB 838 automatic adjustment clause, however, is not to allow  
12 recovery of imprudent or unreal costs. The SB 838 automatic adjustment clause is not  
13 intended to be a substitute for general rate cases. It is not designed to recover the costs of  
14 a renewable resource for the life of that resource, and it is also not intended to allow a  
15 utility to earn more than its authorized rate of return. The key here is to set up the rules  
16 so they allow for timely recovery of prudently-incurred costs, while maintaining just and  
17 reasonable rates. CUB believes that this can be done in a manner that is fair to customers  
18 and to utility shareholders.

## 19 **II. Design Of The SB 838 Adjustment Clause**

20 The following are design criteria we consider important for the SB 838 automatic  
21 adjustment clause, and are the criteria by which we address the utilities' proposals.

1 **A. Utilities Should Use The Same Mechanism**

2 In the utilities' opening filings describing their proposed automatic adjustment  
3 clause mechanisms, the two utilities describe very different paths. CUB would prefer a  
4 single mechanism for both utilities for the purposes of consistency, clarity, and ease of  
5 regulation.

6 **B. Simplicity**

7 The design of the SB 838 automatic adjustment clause should be simple, clear,  
8 and, to the extent possible, provide for a non-contentious process. The Oregon regulatory  
9 process now includes annual power cost updates for both PacifiCorp and PGE (the TAM  
10 and AUT respectively), as well as a power cost adjustment mechanism for PGE. This is  
11 in addition to regular deferrals, single issue rate cases, and special filings, such as PGE's  
12 proposed advanced metering project. It would not serve the SB 838 intent of timely  
13 recovery of prudently-incurred costs for renewable resources to design a process that is  
14 complex or inherently contested.

15 A critical component of simplicity is a clear definition of the parameters of the  
16 mechanism. As we have seen from the annual power cost update mechanisms for PGE  
17 and PacifiCorp, the regulatory process is immeasurably facilitated by a list of very  
18 specific items that are to be included and a clear boundary around that list. However the  
19 Commission chooses to proceed, we recommend avoiding any open-ended items or  
20 definitions.

21 **C. Annual Update**

22 It is critically important that we annually update the costs associated with  
23 renewable resources that are not yet included in general rates and that are being tracked

1 through the SB 838 adjustment clause. This must include updating the loads that are  
2 being charged for these costs. Every year, as customers pay off the capital costs of a  
3 resource, the automatic adjustment clause must reflect this lower cost for each resource,  
4 and, as loads grow, the automatic adjustment clause must reflect this larger revenue base;  
5 otherwise, the utility would systematically and increasingly overcharge customers over  
6 time through this mechanism.

7         Allowing a utility to include a new renewable investment in rates through an  
8 automatic adjustment clause without an annual update would allow the utility to over-  
9 earn on that investment until the next general rate case, because, even as customers paid  
10 off the asset's capital costs each year, they would continue to pay the same, unamortized  
11 capital costs through the automatic adjustment clause. In the meantime, the utility would  
12 not be faced with fuel cost increases for that plant, and would be collecting additional  
13 revenue with load growth. The result is that the utility would be less and less inclined to  
14 file a general rate case through which the utility's costs and revenues could be brought  
15 back into balance.

#### 16 **D. Fixed Costs In Rates**

17         At the time of inclusion in rates, the fixed costs of a renewable investment should  
18 be the lower of either actual costs, or those ruled as prudent in the Commission's order  
19 authorizing those costs. This is important on two accounts. First, it isn't appropriate to  
20 overcharge customers for costs we know to be lower than what would be included in  
21 rates. While forecasting will never be an exact science, allowing utilities to overcharge  
22 on a resource's ratebase violates the "used and useful" principle. A utility should not be  
23 allowed to earn a return on money that was not actually invested. Second, should the

1 fixed costs be higher than were forecast, those higher costs have neither been examined  
2 by Staff and the parties, nor deemed prudent by the Commission. Including such costs in  
3 rates in either case would not be appropriate.

4 **E. Earnings Review**

5 An earnings review is an important consumer safeguard, given the regulatory shift  
6 in resource recovery that was enacted with SB 838. Under these circumstances, where  
7 utilities are able to bring certain new resources into rates without a general rate case or  
8 examination of other costs, it is important to monitor a utility's overall rates more  
9 frequently to ensure that rates are just and reasonable, and that the utility is not earning an  
10 unreasonably high rate of return.

11 Ordinarily, when a utility brings a large new plant online, it files a general rate  
12 case. If the utility is over-earning (caused by increased revenues, reduced costs, or a  
13 combination of the two), this over-earning will absorb some of the cost of the new plant.  
14 Rates will increase by less than the revenue requirement associated with the new plant,  
15 and a new earnings forecast will be established. The SB 838 automatic adjustment clause  
16 changes this process. A utility that is over-earning, but has brought a new plant online,  
17 no longer has any incentive to file a general rate case, but can instead add new renewable  
18 resources through the SB 838 adjustment clause. This means that the utility's over-  
19 earning would not offset the new cost of the plant, and the rate increase associated with  
20 the new investment would be greater than is necessary for the utility to earn its authorized  
21 rate of return.

22 The Commission still has the mandate to ensure just and reasonable rates, so there  
23 must be built into this automatic adjustment process an earnings review to ensure that the

1 SB 838 adjustment clause does not provide an incentive for utilities to avoid general rate  
2 cases that would establish lower rate levels than what would result from filing only under  
3 the SB 838 adjustment clause.

### 4 **III. The Utility Proposals**

5 PGE and PacifiCorp filed two very different proposals. We begin by comparing  
6 their proposals to our design criteria and considering some other issues raised by their  
7 proposals.

#### 8 **A. The PacifiCorp Proposal**

9 PacifiCorp proposes a single, annual automatic adjustment filing for all applicable  
10 new renewable resources concurrent with its annual TAM filing, which contributes to  
11 meeting the criterion of simplicity. PPL/100/Kelly/4. In addition, PacifiCorp's proposal  
12 includes an annual update, with a recalculation of the revenue requirement of any  
13 resource not yet incorporated into general rates through a general rate case.  
14 PPL/100/Kelly/6.

15 On the other hand, PacifiCorp does not address what happens when a resource is  
16 to be included in rates, but the actual ratebase of that resource is less than what was  
17 forecast. An important design criterion is that we cannot charge customers more than a  
18 resource's actual ratebase. Finally, PacifiCorp opposes an earnings review as part of this  
19 mechanism, while CUB believes an earnings review is essential to ensure just and  
20 reasonable rates. PacifiCorp argues against an earnings review, stating that:

21 An earnings review could thwart the clear intent of the legislature to  
22 provide for timely cost recovery of renewable energy investments.

23 PPL/100/Kelly/8.

1           There is nothing about an earnings review that would either thwart the  
2 legislature's intent or interfere with timely cost recovery of renewable energy  
3 investments. The legislature's intent for timely recovery of renewable energy  
4 investments will proceed, unhindered, through the automatic adjustment clause. The  
5 earnings review would simply be a check on a utility's earnings to ensure that the  
6 introduction of new capital investments into rates, without concurrent examination of  
7 other costs, does not result in overall rates that are not just and reasonable.

8           We would also note that PacifiCorp's reference to the agreement between CUB  
9 and the Company in UE 191 (PPL/100/Kelly/8) is irrelevant here. PacifiCorp states:

10           [T]he Company and the Citizens' Utility Board recently reached  
11 agreement in Docket UE 91 regarding the development of a process for  
12 monitoring the level of generation costs in rates and updating the  
13 Embedded Cost Differential of the Revised Protocol as necessary. This  
14 agreement was designed to respond to concerns regarding the potential  
15 impacts of automatic adjustment mechanisms in Oregon.

16 PPL/100/Kelly/8-9.

17           First, the earnings review is necessary for all utilities, not just PacifiCorp.  
18 Second, in UE 191 we agreed to establish a process which has not yet begun, let alone  
19 concluded. Third, the Embedded Cost Differential is a mechanism for multi-  
20 jurisdictional allocation, and has nothing to do with the impact on a utility's earnings  
21 resulting from a mechanism mandated by the Oregon legislature. Finally, we would note  
22 that PacifiCorp's opposition to an earnings review is a little unsettling; unless the  
23 Company expects to over-earn under this or any other regulatory mechanism, this  
24 important design criterion of the SB 838 automatic adjustment clause should be easy to  
25 accept.



1 **IV. The PGE Proposal**

2 PGE's proposal does not fare well as measured by our design criteria. It is not  
3 clear that PGE's proposal meets any of our preferred design elements. Even were this the  
4 mechanism used by both utilities, the timing of the filings would inherently be random.  
5 PGE's proposed mechanism is complex; involves a number of variables both within the  
6 automatic adjustment clause, as well as in the utility's general rates; does not recognize  
7 the importance of annually updating the costs that are isolated in the adjustment clause;  
8 and does not provide for any kind of earnings review. As with PacifiCorp's proposal,  
9 PGE's proposal does not address the importance of including the lower of actual or  
10 Commission-approved fixed costs in rates.

11 **A. PGE Mechanism Is Complex**

12 PGE proposes a plan where the utility would make a separate filing for each  
13 renewable resource at least 6 months before the forecast online date. PGE/100/Dahlgren-  
14 Cody/7. This in itself creates complexity, as there may be more than one filing in a given  
15 year, and then no filings the year after. On top of this, PGE proposes a deferral process  
16 whereby the online date of a single wind turbine could be tracked. When planning for a  
17 plant to come online, PGE would address a plant's variable power costs by forecasting  
18 power costs in its annual power cost update as though the electricity from that plant were  
19 actually coming from the market, *i.e.*, PGE would charge customers based on a market  
20 forecast, without any showing that a prudent utility would leave that position open to  
21 market prices. Then, once the plant actually came online, delayed or not, PGE proposes  
22 to credit customers for the power as measured by a market price forecast of the output of  
23 the plant. Beyond the complexity this adds, using two different market forecasts to

1 calculate the variable power cost “charge” to customers and the “credit” creates a  
2 potential mismatch that we discuss below.

3 PGE opposes the annual update to the fixed costs of the resource in the automatic  
4 adjustment clause. *Id.* at 6. PGE clearly proposes to over-earn on the fixed costs of each  
5 renewable resource after its first year under the mechanism until the utility decides to file  
6 a general rate case, five years passes, or the Commission initiates a show-cause  
7 proceeding. *Ibid.* On an individual resource basis, this is unfair and possibly unlawful.  
8 On a cumulative basis, this becomes a huge regulatory problem. If allowed to pursue this  
9 route, PGE would create its own incentive to not file for a general rate case for five years,  
10 when it would have to file one, whether it needed one or not. CUB’s proposed earnings  
11 review, described below, is a much more direct and timely way of ensuring that the costs  
12 charged to customers through the SB 838 adjustment clause do not put rates too far out of  
13 balance, and would not require the utility to file a rate case if one were not necessary.

#### 14 **B. Mismatch In Market Price Forecasts**

15 One concern is PGE’s use of different market prices in its proposed automatic  
16 adjustment clause as opposed to its AUT. While PGE does not explicitly say that these  
17 are different forecasts, the cases would be timed differently, so we assume that they are  
18 different market forecasts.

19 Rather than produce the best forecast of variable power costs based on the likely  
20 online date of that facility, PGE proposes that, when setting variable power cost rates  
21 through the AUT, we ignore any plant that is not yet completed. Instead, we would allow  
22 PGE’s MONET model to purchase market power to fill the position that the utility  
23 actually expects to be filled by the new resource.

1           When the new resource comes online, PGE proposes, as a credit in the automatic  
2 adjustment clause, using the forecasted market value of the power that is expected from  
3 the resource. The problem with this approach is that this new market price forecast is not  
4 what customers' rates at that time would have been based on. Customer rates would have  
5 been based on the AUT market price forecast. The new resource would allow the utility  
6 to avoid these placeholder market purchases that had been included in the AUT forecast.  
7 If the market price increased, customers would benefit. If the market price decreased, the  
8 utility would benefit.

9           For example, consider a wind facility that PGE expects to come online June 1<sup>st</sup>.  
10 In its AUT, the Company would ignore the expected output from the wind facility, and  
11 instead have its MONET model purchase market power at the forward price curve for the  
12 load to be served by the facility. Under the PGE proposal, when the wind facility comes  
13 online, customers would then be credited with the value of the power from that facility  
14 based on a new market forecast. If the original market price forecast from the AUT were  
15 \$50/MWh, but the new forecast were \$60/MWh, customers would be charged \$50/MWh  
16 for the power that is expected to be produced from the wind facility in the AUT, but  
17 would receive a credit of \$60/MWh for the power that is expected to be produced from  
18 the wind facility through the automatic adjustment clause. If the market forecast price  
19 goes down, the opposite would happen.

20           CUB's preference is to include the new resource, both its costs and benefits, in the  
21 AUT forecast. However, if this is rejected, we should use the same market price forecast  
22 in the AUT as is used in the SB 838 adjustment clause. In the AUT, if customers are  
23 charged \$50/MWh for market power that the Company actually expects to produce with

1 the wind facility, then this is the power that will be offset when the plant comes online,  
2 and should be the value of the credit customers receive. This is a more straightforward  
3 approach than using two different market price forecasts from two different points in  
4 time.

## 5 **V. CUB's Proposal**

6 Based on our design criteria, we propose the following basic outline.

### 7 **A. An Annual Filing With An Annual Update**

8 We agree with PacifiCorp that it makes sense to line up the annual power cost  
9 update with the SB 838 automatic adjustment clause. We support the PacifiCorp  
10 proposal to have a single filing that includes a plant that is expected to be online at the  
11 beginning of the test year, with the rate adjustment for the renewable resource going into  
12 effect on January 1<sup>st</sup> each year. We also agree with PacifiCorp that the costs tracked  
13 through the SB 838 adjustment clause should be updated each year.

14 PGE's proposal to bring a resource into rates the day after it comes online would  
15 cause a problem, because the plant's output is not included in rates through PGE's AUT,  
16 so there would be a mismatch between fixed costs and variable costs. To fix this  
17 mismatch, PGE creates a different mismatch, one between two different forward market  
18 price forecasts, as we describe earlier. We believe that having an annual process like the  
19 one proposed by PacifiCorp would work for both utilities, and we recommend that the  
20 Commission adopt such. If the Commission rejects this idea for PGE, we propose that  
21 PGE be limited to one filing per year, that the filing be limited to facilities whose forecast  
22 is included in the AUT, and that PGE be required to update the costs tracked by the  
23 SB 838 adjustment clause each January 1<sup>st</sup> with the new AUT rates.

1 **B. Clearly Define What Is To Be Included In The Automatic Adjustment Clause**

2 PacifiCorp includes production tax credits in its proposal while PGE proposes to  
3 include income taxes. We are not sure if there is any difference in what the utilities are  
4 proposing with respect to taxes. It is not immediately clear from the utilities' proposals  
5 exactly which variables would be included and which would not. However, to ensure  
6 that this process is straightforward, we believe that the costs to be included in the  
7 automatic adjustment clause should be clearly defined from the start.

8 **C. Customers Should Only Be Charged For Actual Fixed Costs**

9 Before customers are charged for a renewable resource, the utility should be  
10 required to file an update to its original forecast for the SB 838 adjustment clause that  
11 documents the actual cost of the resource. If the actual fixed costs of the plant are less  
12 than was forecast to be included in rates, customer rates should reflect the actual amount.  
13 There is no basis to charge customers for fixed costs that do not actually exist. Should  
14 the fixed costs of a resource be greater than what was forecast, however, customers  
15 should only be charged the cost that was forecast, as that was the cost that was examined  
16 and ruled prudent by the Commission.

17 **D. Earnings Review**

18 CUB has identified two approaches to an earnings review that could be adopted as  
19 part of this process and that are consistent with the legislative intent of allowing timely  
20 recovery of prudently-incurred costs. We make these proposals in general terms in this  
21 Testimony, and plan to discuss and develop them with other parties in settlement  
22 discussions.

1           The first approach is to allow the Commission to limit the length of time that a  
2 utility can recover costs through the automatic adjustment clause. PGE suggests a 5-year  
3 limit for any given resource, which would ensure periodic rate cases.  
4 PGE/100/Dahlgren-Cody/6. We disfavor an automatic 5-year deadline per resource,  
5 because rates could be unreasonable before that deadline, or the deadline could require a  
6 rate case when rate levels are reasonable. Instead, we propose that the Commission  
7 consider placing a deadline on the automatic adjustment clause when it establishes the  
8 costs in the SB 838 adjustment clause or when it reviews those costs annually.

9           This would allow parties to review the utility's earnings, and argue that a utility is  
10 over-earning and that the automatic adjustment clause is leading to rates that are higher  
11 than they should be. The Commission could then put a deadline of at least 1 year on the  
12 automatic adjustment clause. This would protect the utility by providing it enough time  
13 to file a general rate case to bring those costs into general rates, but would not prevent the  
14 utility from using the automatic adjustment clause to get timely recovery of its costs  
15 (including filing for a new renewable resource through the SB 838 adjustment clause);  
16 thus, it would ensure that the balance of costs and revenues in overall rates does not tilt  
17 away from rates that are just and reasonable.

18           The second approach is one that is similar to the earnings review and sharing that  
19 has historically been part of the Purchased Gas Adjustment Mechanism. The idea is that  
20 the use of automatic adjustment clauses allow gas utilities to avoid rate cases for many  
21 years. As their service territory grows, they add profitable customers and begin to over-  
22 earn, thereby triggering an earnings sharing mechanism. We would propose using the

1 PCA earnings deadband of 100 basis points above a utility's authorized return on equity  
2 and requiring a 50/50 sharing of earning above this amount.

### 3 **VI. Conclusion**

4 Following are the design criteria we recommend that the Commission use in  
5 evaluating and adopting a SB 838 automatic adjustment clause:

- 6 • The utilities should use the same mechanism;
- 7 • The process should be kept as simple as is possible, with clearly-defined  
8 variables and explicit boundaries around them;
- 9 • The costs that are tracked through the SB 838 clause should be annually  
10 updated;
- 11 • The mechanism should not charge customers for ratebase costs that were either  
12 not spent or not ruled prudent by the Commission; and
- 13 • An earnings review is an essential component of this new process to ensure  
14 that rates continue to be just and reasonable as new resources are brought into  
15 rates without a concurrent examination of the utility's other costs.

16 While these criteria generally speak for themselves, CUB proposes the following  
17 basic outline for a SB 838 automatic adjustment clause, which we plan to develop  
18 through settlement and discussions with the other parties. The SB 838 automatic  
19 adjustment filing should be made concurrently with a utility's annual power cost update  
20 for renewable resources that are forecast to be online by January 1<sup>st</sup> of the year in  
21 question, such that the costs and benefits of the new resource will be included in rates  
22 together and at the same time as rates are to be updated through the AUT and TAM. The  
23 SB 838 automatic adjustment filing should also include an updated forecast of costs  
24 already being tracked through the SB 838 adjustment clause, such that those changes can  
25 be reflected in rates for the January 1<sup>st</sup> rate change.

1           Before the January 1<sup>st</sup> rate change, the utility must demonstrate that the actual  
2 capital costs of a new resource that is to be included in rates are not less than what was  
3 forecast. Should they be so, then the pending rate change must be updated to reflect the  
4 actual capital costs. Finally, an earnings review is an important safeguard to ensure just  
5 and reasonable rates with this significant change to the regulatory process of bringing  
6 new capital investments into rates.



## WITNESS QUALIFICATION STATEMENT

**NAME:** Bob Jenks

**EMPLOYER:** Citizens' Utility Board of Oregon

**TITLE:** Executive Director

**ADDRESS:** 610 SW Broadway, Suite 308  
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**EDUCATION:** Bachelor of Science, Economics  
Willamette University, Salem, OR

**EXPERIENCE:** Provided testimony or comments in a variety of OPUC dockets, including UE 88, UE 92, UM 903, UM 918, UE 102, UP 168, UT 125, UT 141, UE 115, UE 116, UE 137, UE 139, UE 161, UE 165, UE 167, UE 170, UE 172, UE 173, UG 152, UM 995, UM 1050, UM 1071, UM 1147, UM 1121, UM 1206, and UM 1209. Participated in the development of a variety of Least Cost Plans and PUC Settlement Conferences. Provided testimony to Oregon Legislative Committees on consumer issues relating to energy and telecommunications. Lobbied the Oregon Congressional delegation on behalf of CUB and the National Association of State Utility Consumer Advocates.

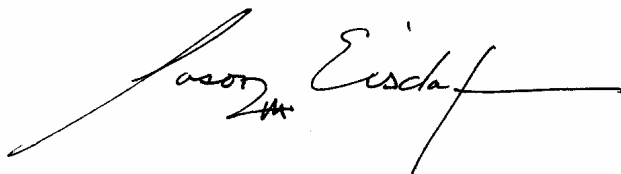
Between 1982 and 1991, worked for the Oregon State Public Interest Research Group, the Massachusetts Public Interest Research Group, and the Fund for Public Interest Research on a variety of public policy issues.

**MEMBERSHIP:** National Association of State Utility Consumer Advocates  
Board of Directors, OSPIRG Citizen Lobby  
Telecommunications Policy Committee, Consumer Federation of America  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 28<sup>th</sup> day of September, 2007, I served the foregoing Opening Testimony of the Citizens' Utility Board of Oregon in docket UM 1330 upon each party listed below, by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending 6 copies by U.S. mail, postage prepaid, to the Commission's Salem offices.

Respectfully submitted,



Jason Eisdorfer Attorney #92292  
The Citizens' Utility Board of Oregon

**W=Waive Paper service, C=Confidential, HC=Highly Confidential**

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