

May 15, 2014

# VIA ELECTRONIC FILING AND OVERNIGHT DELIVERY

Public Utility Commission of Oregon 3930 Fairview Industrial Dr. SE Salem, OR 97302

Attn: Filing Center

# RE: UE 2013 Power Cost Adjustment Mechanism

PacifiCorp d/b/a Pacific Power (PacifiCorp) encloses the original and three copies of its 2013 Power Cost Adjustment Mechanism (PCAM) filing. In Order No. 12-493, the Public Utility Commission of Oregon (Commission) approved a PCAM to allow the Company to recover the difference between actual net power costs (NPC) incurred to serve customers and the base NPC established in the Company's annual transition adjustment mechanism (TAM) filing. The amount recovered from or refunded to customers for a given year is subject to the following parameters:

- Asymmetrical Deadband—Any NPC difference between negative \$15 million and positive \$30 million will be absorbed by the Company.
- Sharing Band—Any NPC difference above or below the deadband will be shared 90 percent by customers and 10 percent by the Company.
- Earnings Test—If the Company's earned return on equity (ROE) is within plus or minus 100 basis points of the allowed ROE, there will be no recovery from or refund to customers.
- Amortization Cap—The amortization of deferred amounts are capped at six percent of the revenue for the preceding calendar year.

Included as Attachment A is a summary of the calculation of the Company's PCAM for calendar year 2013, and additional descriptions of the calculation are provided below. Detailed workpapers supporting Attachment A are provided separately on the enclosed CD.<sup>1</sup> For calendar year 2013, adjusted actual NPC were \$1.62 billion on a total-company basis, approximately \$150.9 million higher than the base NPC of \$1.47 billion established in the 2013 TAM (docket UE 245). On an Oregon-allocated basis, actual NPC exceeded base NPC by approximately \$33.6 million. After application of the deadband and sharing band, the Company would recover approximately \$3.3 million. Application of the earnings test, however, results in no recovery in the 2013 PCAM because the Company's earnings for calendar year 2013 are within 100 basis points of its authorized ROE. Attachment B shows the calculation of the Company's earned ROE for calendar year 2013.

<sup>&</sup>lt;sup>1</sup> Confidential workpapers are provided to the Commission under OAR 860-01-0070.

Docket No. UE\_\_\_\_ Public Utility Commission of Oregon May 15, 2014 Page 2

# **PCAM Calculation**

On a monthly basis, actual NPC are compared to base NPC on a per-unit basis. Any differences in the system per-unit cost are multiplied by the actual megawatt hours of Oregon retail sales in that month to determine Oregon's share of any differential. The calculation uses the formula below:

 $(NPC_a \div Load_a)$  -  $(NPC_b \div Load_b)$  =System Per Unit Cost Differential

System Per Unit Cost Differential  $\times$  Load<sub>o</sub>+(SR<sub>a</sub>- SR<sub>b</sub>)=NPC Differential

Where:

NPC<sub>a</sub> =Total Company Adjusted Actual NPC (Excluding Situs Resources)
Load<sub>a</sub> = Actual System Retail Load
NPC<sub>b</sub> = Total Company Base NPC (Excluding Situs Resources)
Load<sub>b</sub> = Base System Retail Load
Load<sub>o</sub> = Actual Oregon Retail Load
SR<sub>a</sub> = Actual Situs Resource Value
SR<sub>b</sub> = Forecasted Situs Resource Value

The cumulative differential (under- or over-recovery) is first compared against the asymmetrical deadband. Cumulative amounts in excess of the asymmetrical deadband are then subject to the sharing band (90 percent customers, 10 percent company). Monthly balances accrue interest at the Company's authorized rate of return in Oregon for 2013. The final step is to apply the earnings test to determine if any amount is eligible for recovery from or refund to customers. To the extent earnings are within plus or minus 100 basis points of the authorized ROE, no recovery or refund is allowed under the approved PCAM design.

Actual NPC are compiled using amounts booked to FERC accounts 447, 501, 503, 547, 555, and 565, in a manner consistent with the calculation of NPC as modeled by the Company's Generation and Regulation Initiative Decision Tools model (GRID) in the Company's annual TAM filings. Actual NPC is adjusted to remove accounting entries booked that relate to operations before implementation of the PCAM in January 2013. The Company also adjusts actual NPC to reflect the ratemaking treatment of several items, including:

- Sacramento Municipal Utility District (SMUD) wholesale sales contract revenues;
- The exclusion of Rolling Hills wind farm from Oregon rates (consistent with UE 200);
- Reductions to coal costs for management overtime, 50 percent of management incentive compensation, and legal fees related to fines and citations;
- Buy-through of economic curtailment by interruptible industrial customers; and
- Revenue from a contract related to the Leaning Juniper wind resource.

Docket No. UE\_\_\_\_ Public Utility Commission of Oregon May 15, 2014 Page 3

The PCAM includes a true up of the value of energy from solar facilities procured to satisfy the solar capacity standard in ORS 757.370. Consistent with the Commission-approved 2010 Protocol inter-jurisdictional allocation methodology, these resources are situs-assigned to Oregon. Base NPC established in the TAM includes a situs credit for the value of the solar energy. In the PCAM, the actual value of the solar energy is compared to the prior forecast, and the difference is included in the balancing account. This treatment is necessary to ensure 100 percent of the energy benefits are assigned to Oregon customers, rather than allocated system-wide.

As described earlier, on an Oregon-allocated basis, actual NPC exceeded base NPC by approximately \$33.6 million. After application of the deadband, sharing band, and earnings test, no recovery from or refund to customers is necessary. Because Schedule 206, the Power Cost Adjustment Mechanism, is currently set at zero cents per kilowatt hour for all schedules, no change is required at this time.

If you have questions about this filing, please contact Natasha Siores, Director of Regulatory Affairs & Revenue Requirement, at (503) 813-6583.

Sincerely,

R. Bryce Dalley Vice President, Regulation

Enclosures

Cc: Service List UE 263 Service List UE 264

### **CERTIFICATE OF SERVICE**

I certify that I served a true and correct copy of Pacific Power's 2013 Power Cost Adjustment Mechanism on the parties listed below via electronic mail and/or US mail in compliance with OAR 860-001-0180.

UE 263

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Dated this 15<sup>th</sup> day of May, 2014.

Carrie Meyer Supervisor, Regulatory Operations

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Dated this 15<sup>th</sup> of May, 2014.

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MAN Carrie Meyer

Supervisor, Regulatory Operations

# ATTACHMENT A

# POWER COST ADJUSTMENT MECHANISM CALCULATION

#### Oregon Power Cost Adjustment Mechanism January 1, 2013 - December 31, 2013 Attachment A - Power Cost Adjustment Mechanism Calculation

| Line<br>No.   | Reference                               | Jan-13          | Feb-13          | Mar-13          | Apr-13          | May-13          | Jun-13          | Jul-13          | Aug-13          | Sep-13          | Oct-13          | Nov-13          | Dec-13          | Tota       |
|---|---|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|------------|
| ctual:  |   |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |            |
| 1 Total Company NPC   | Conf W/P (2.1)                          | \$ 134,449,266  | \$ 116,261,201  | \$ 124,035,334  | \$ 111,401,734  | \$ 120,685,092  | \$ 130,462,808  | \$ 176,347,986  | \$ 157,866,341  | \$ 138,234,172  | \$ 124,152,145  | \$ 124,533,177  | \$ 165,743,005  | \$ 1,624,1 |
| 2 Actual Retail Load  | W/P (4.1)                               | 5,089,393       | 4,262,779       | 4,362,081       | 4,128,233       | 4,381,187       | 4,709,345       | 5,258,821       | 5,010,098       | 4,368,519       | 4,352,112       | 4,472,615       | 5,162,810       | 55,5       |
| 3 Total Company NPC \$/MWH                                  | Line 1 / Line 2                         | \$ 26.42        | \$ 27.27        | \$ 28.43        | \$ 26.99        | \$ 27.55        | \$ 27.70        | \$ 33.53        | \$ 31.51        | \$ 31.64        | \$ 28.53        | \$ 27.84        | \$ 32.10        | \$         |
| ase:  |   |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |            |
| 4 NPC   | Conf W/P (3.1)                          |                 | \$ 108,528,921  | \$ 119,166,574  |                 |                 |                 |                 | \$ 148,691,009  | \$ 128,052,922  |                 | \$ 116,492,332  |                 | \$ 1,472,7 |
| 2 Base Retail Load  | W/P (4.1)                               | 4,789,160       | 4,250,300       | 4,526,630       | 4,293,540       | 4,496,810       | 4,444,500       | 5,096,190       | 5,053,360       | 4,439,460       | 4,463,730       | 4,502,620       | 4,803,130       | 55,1       |
| 6 Base OR \$/MWh  | Line 4 / Line 5                         | \$ 25.26        | \$ 25.53        | \$ 26.33        | \$ 26.37        | \$ 26.30        | \$ 25.25        | \$ 28.66        | \$ 29.42        | \$ 28.84        | \$ 26.84        | \$ 25.87        | \$ 25.24        | \$         |
| 7 NPC Differential \$/MWh                                   | Line 3 - Line 6                         | \$ 1.16         | \$ 1.74         | \$ 2.11         | \$ 0.62         | \$ 1.25         | \$ 2.45         | \$ 4.87         | \$ 2.09         | \$ 2.80         | \$ 1.69         | \$ 1.97         | \$ 6.86         | \$         |
| 8 Oregon Retail Load  | W/P (4.1)                               | 1,315,179       | 1,046,376       | 1,059,688       | 982,806         | 994,042         | 983,008         | 1,171,858       | 1,074,565       | 985,360         | 1,048,672       | 1,087,949       | 1,340,464       | 13,0       |
| ferral:   |   |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |            |
| 9 Monthly NPC Differential - Above or<br>(Below) Base       | Line 8 * Line 7                         | \$ 1,521,819    | \$ 1,819,812    | \$ 2,235,125    | \$ 606,722      | \$ 1,241,741    | \$ 2,409,699    | \$ 5,709,499    | \$ 2,240,949    | \$ 2,758,024    | \$ 1,767,170    | \$ 2,144,739    | \$ 9,197,333    | \$ 33,6    |
| Situs Resource True-Up:                                     |   |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |            |
| 10 Black Cap Actual   | Conf W/P (2.2)                          | \$ (2,785)      |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 | \$ (1      |
| 1 Black Cap Forecast  | 2012 TAM                                | \$ (4,646)      |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 | \$ (1      |
| 2 Total Situs Resource True-Up                              | Line 10 - Line 11                       | \$ 1,861        | \$ 763          | \$ (2,708)      | \$ (1,668)      | \$ (3,959)      | \$ (6,809)      | \$ (4,602)      | \$ 1,782        | \$ 5,639        | \$ (1,045)      | \$ 231          | \$ (3,648)      | #\$ (      |
| Total Monthly Differential - Above or<br>(Below) Base       | Line 9 + Line 12                        | \$ 1,523,680    | \$ 1,820,575    | \$ 2,232,418    | \$ 605,054      | \$ 1,237,782    | \$ 2,402,890    | \$ 5,704,898    | \$ 2,242,731    | \$ 2,763,663    | \$ 1,766,125    | \$ 2,144,970    | \$ 9,193,685    | \$ 33,6    |
| 4 Cumulative Differential - Above or (Below)<br>base        |   | \$ 1,523,680    | \$ 3,344,254    | \$ 5,576,672    | \$ 6,181,726    | \$ 7,419,508    | \$ 9,822,398    | \$ 15,527,296   | \$ 17,770,027   | \$ 20,533,690   | \$ 22,299,815   | \$ 24,444,785   | \$ 33,638,470   |            |
| 15 Positive Deadband - ABOVE Base                           | Order. 12-493                           | \$ 30,000,000   | \$ 30,000,000   | \$ 30,000,000   | \$ 30,000,000   | \$ 30,000,000   | \$ 30,000,000   | \$ 30,000,000   | \$ 30,000,000   | \$ 30,000,000   | \$ 30,000,000   | \$ 30,000,000   | \$ 30,000,000   | \$ 30,0    |
| 6 Negative Deadband - BELOW Base                            | Order. 12-493                           | \$ (15,000,000) | \$ (15,000,000) | \$ (15,000,000) | \$ (15,000,000) | \$ (15,000,000) | \$ (15,000,000) | \$ (15,000,000) | \$ (15,000,000) | \$ (15,000,000) | \$ (15,000,000) | \$ (15,000,000) | \$ (15,000,000) | \$ (15,0   |
| 17 Amount Deferrable - ABOVE Deadband                       |   | \$-             | \$-             | \$-             | \$-             | \$-             | \$-             | <b>\$</b> -     | \$-             | \$-             | \$-             | \$-             | \$ 3,638,470    | \$ 3,6     |
| 18 Amount Deferrable - BELOW Deadband                       |   | \$ -            | \$ -            | \$ -            | \$ -            | \$ -            | \$ -            | \$ -            | \$-             | \$ -            | \$ -            | \$ -            | \$ -            | \$         |
| 9 Total Incremental Deferrable                              | Line 17 + Line 18                       | \$ -            | \$-             | \$-             | \$-             | \$-             | \$ -            | \$ -            | \$ -            | \$-             | \$-             | \$-             | \$ 3,638,470    | \$ 3,6     |
| 20 Total Incremental Deferral After 90%/10%<br>Sharing Band | Line 19 * 90%                           | \$~~            | \$-             | \$-             | \$-             | \$-             | \$-             | \$-             | \$-             | \$-             | \$-             | \$-             | \$ 3,274,623    | \$ 3,2     |
| ergy Balancing Account:                                     |   |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |            |
| 21 Monthly Interest Rate                                    | Note 1                                  | 0.64%           | 0.64%           | 0.64%           | 0.64%           | 0.64%           | 0.64%           | 0.64%           | 0.64%           | 0.64%           | 0.64%           |                 |                 |            |
| 22 Beginning Balance  | Prior Month Line 25                     | \$ -            | \$-             | \$-             |                 | \$-             | \$-             | \$-             | \$-             | \$-             | \$~             | \$-             | \$-             | \$         |
| 23 Incremental Deferral                                     | Line 20                                 | \$-             | \$-             | \$-             | \$-             | \$-             | \$-             | \$-             | \$-             | <b>\$</b> -     | \$-             | \$-             | \$ 3,274,623    | \$ 3,2     |
| 4 Interest  | Line 21 * ( Line 22 + 50% x<br>Line 23) | \$-             | \$-             | \$-             | \$-             | \$-             | \$              | \$-             | \$-             | \$-             | \$ -            | \$-             | \$ 10,398       | \$         |
| 5 Ending Balance  | ∑ Lines 22:24                           | \$-             | \$-             | \$-             | \$-             | \$-             | \$-             | \$ -            | \$ -            | \$ -            | \$-             | \$-             | \$ 3,285,021    | \$ 3,2     |
| nings Test:   |   |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |            |
| 6 Earned Return on Equity                                   | Attach B                                |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |            |
| 7 Allowed Return on Equity                                  | UE 246                                  |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |            |
| 8 100bp ROE Revenue Requirement                             |   |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 | \$ 32,7    |
| 9 Allowed Deferral After Earning Test                       |   |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 | \$         |
| •   |   |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 | \$         |
| 0 Total Deferred  |   |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 |                 | ð.         |

Note 1: 7.621% annual interst rate based on Oregon approved rate of return

ATTACHMENT B RESULTS OF OPERATIONS DECEMBER 2013

#### PACIFICORP State of Oregon

Actual, Adjusted & Normalized Results of Operations - 2010 Protocol

**Results of Operations December 2013** 

## EXCLUDING TYPE 1 ADJUSTMENTS FOR NORMALIZING HYDRO & WEATHER

|          |   | (1)<br>Unadjusted<br>Results            | (2)<br>Type 1<br>Adjustments     | (3)<br>Total Adjusted<br>Actual Results | (4)<br>Type 1 NPC<br>Adjustments | (5)<br>Total Adjusted Actual Results<br>Less Type 1 NPC Adjustments |
|----------|---|---|----------------------------------|---|----------------------------------|---|
| 1        | Operating Revenues:                               | Results                                 | Aujustments                      | Actual Results                          | Adjustments                      | Less Type I NFC Aujustments   |
| 2        | General Business Revenues                         | 1,251,008,728                           | (51,747,443)                     | 1,199,261,285                           | 25,169,138                       | 1,224,430,423   |
| 3        | Interdepartmental                                 |   |                                  | -                                       |                                  | -   |
| 4        | Special Sales                                     | 80,150,268                              | -                                | 80,150,268                              |                                  | 80,150,268  |
| 5        | Other Operating Revenues                          | 47,988,391                              | (8,311,551)                      | 39,676,840                              |                                  | 39,676,840  |
| 6        | Total Operating Revenues                          | 1,379,147,387                           | (60,058,994)                     | 1,319,088,393                           | 25,169,138                       | 1,344,257,531   |
| 7        |   | • · · · · · · · · · · · · · · · · · · · |                                  |   |                                  |   |
| 8        | Operating Expenses:                               |   |                                  |   |                                  |   |
| 9        | Steam Production                                  | 278,626,450                             | 1,865,747                        | 280,492,197                             |                                  | 280,492,197   |
| 10       | Nuclear Production                                | -                                       | -                                | -                                       |                                  | -   |
| 11       | Hydro Production                                  | 10,233,023                              | (17,632)                         | 10,215,391                              |                                  | 10,215,391  |
| 12       | Other Power Supply                                | 269,116,030                             | (17,230,787)                     | 251,885,243                             | 17,234,056                       | 269,119,299   |
| 13       | Transmission                                      | 50,007,807                              | (357,417)                        | 49,650,390                              |                                  | 49,650,390  |
| 14       | Distribution                                      | 68,954,070                              | (533)                            | 68,953,537                              |                                  | 68,953,537  |
| 15       | Customer Accounting                               | 31,582,009                              | (54,965)                         | 31,527,044                              |                                  | 31,527,044  |
| 16       | Customer Service                                  | 29,932,419                              | (26,450,535)                     | 3,481,885                               |                                  | 3,481,885   |
| 17       | Sales   | -                                       | -                                | -                                       |                                  | -   |
| 18       | Administrative & General                          | 49,624,465                              | (709,885)                        | 48,914,580                              |                                  | 48,914,580  |
| XX       |   |   |                                  |   |                                  |   |
| 19       | Total O&M Expenses                                | 788,076,274                             | (42,956,006)                     | 745,120,268                             | 17,234,056                       | 762,354,323   |
| XX       |   |   | 10.046.445                       | 477 702 402                             |                                  | 177 702 102   |
| 20       | Depreciation                                      | 158,756,659                             | 18,946,445                       | 177,703,103                             |                                  | 177,703,103   |
| 21       | Amortization                                      | 12,161,436                              | 907,634                          | 13,069,069                              |                                  | 13,069,069  |
| 22       | Taxes Other Than Income                           | 65,248,483                              | -                                | 65,248,483                              | 2 6 47 452                       | 65,248,483  |
| 23       | Income Taxes - Federal                            | 34,222,515                              | (11,306,097)                     | 22,916,417                              | 2,647,452                        | 25,563,870  |
| 24       | Income Taxes - State                              | 7,040,332                               | (1,536,311)                      | 5,504,022                               | 359,745                          | 5,863,766   |
| 25       | Income Taxes - Def Net                            | 46,332,354                              | 1,882,018                        | 48,214,372                              |                                  | 48,214,372  |
| 26       | Investment Tax Credit Adj.                        | -                                       | -                                | -                                       |                                  | -   |
| 27       | Misc Revenue & Expense                            | 39,895                                  | (72,735)                         | (32,840)                                |                                  | (32,840)  |
| XX       | Tatal Quanting Funances                           | 1 111 077 047                           | (24 125 054)                     | 1 077 743 903                           | 20 241 252                       | 1,097,984,146   |
| 28       | Total Operating Expenses:                         | 1,111,877,947                           | (34,135,054)                     | 1,077,742,893                           | 20,241,253                       | 1,057,584,140   |
| 29       |   | 267 260 440                             | (75 022 040)                     | 241 245 500                             | 4 007 090                        | 346 373 395   |
| 30       | Operating Rev For Return:                         | 267,269,440                             | (25,923,940)                     | 241,345,500                             | 4,927,886                        | 246,273,385   |
| 31       | Bala Davas  |   |                                  |   |                                  |   |
| 32       | Rate Base:  | 6 400 000 070                           | 1 474 370                        | 6 400 674 657                           |                                  | 6 400 674 657   |
| 33       | Electric Plant In Service                         | 6,428,200,278                           | 1,474,379                        | 6,429,674,657                           |                                  | 6,429,674,657   |
| 34<br>35 | Plant Held for Future Use<br>Misc Deferred Debits | 14,480,934                              | (14,480,934)                     | (0)<br>22,152,819                       |                                  | (0)<br>22,152,819   |
| 35<br>36 | Elec Plant Acq Adj                                | 22,152,819<br>10,987,378                | - 0                              | 10,987,378                              |                                  | 10,987,378  |
| 37       | Nuclear Fuel                                      |   | -                                | 10,987,378                              |                                  | 10,907,978  |
| 38       | Prepayments                                       | 8,996,984                               | _                                | 8,996,984                               |                                  | 8,996,984   |
| 39       | Fuel Stock  | 63,366,915                              |                                  | 63,366,915                              |                                  | 63,366,915  |
| 40       | Material & Supplies                               | 59,030,921                              | -                                | 59,030,921                              |                                  | 59,030,921  |
| 41       | Working Capital                                   | 21,125,873                              | (1,225,751)                      | 19,900,121                              | 444,650                          | 20,344,771  |
| 42       | Working capital<br>Weatherization Loans           | (1,191)                                 | (1,223,731)                      | (1,191)                                 | 11,050                           | (1,191)   |
| 43       | Misc Rate Base                                    | -                                       | _                                | (1/1)1)                                 |                                  | (1/1)1/   |
| xx       | Filse Rate Babe                                   |   |                                  |   |                                  |   |
| 44       | Total Electric Plant:                             | 6,628,340,911                           | (14,232,307)                     | 6,614,108,605                           | 444,650                          | 6,614,553,254   |
| 45       |   | 0102010 101011                          | (,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, |   | ,                                | _,52,,550,201   |
| 46       | Rate Base Deductions:                             |   |                                  |   |                                  |   |
| 47       | Accum Prov For Deprec                             | (2,183,676,087)                         | (53,400,478)                     | (2,237,076,565)                         |                                  | (2,237,076,565)   |
| 48       | Accum Prov For Amort                              | (139,124,828)                           | (2,222,598)                      | (141,347,427)                           |                                  | (141,347,427)   |
| 49       | Accum Def Income Tax                              | (990,747,501)                           | (5,188,075)                      | (995,935,576)                           |                                  | (995,935,576)   |
| 50       | Unamortized ITC                                   | (1,158,146)                             | -                                | (1,158,146)                             |                                  | (1,158,146)   |
| 51       | Customer Adv For Const                            | (8,206,850)                             | 3,729,705                        | (4,477,144)                             |                                  | (4,477,144)   |
| 52       | Customer Service Deposits                         |   | -                                | -                                       |                                  | -   |
| 53       | Misc Rate Base Deductions                         | (21,718,999)                            | -                                | (21,718,999)                            |                                  | (21,718,999)  |
| 54       |   |   |                                  |   |                                  |   |
| 55       | Total Rate Base Deductions                        | (3,344,632,411)                         | (57,081,446)                     | (3,401,713,857)                         | -                                | (3,401,713,857)   |
| 56       |   |   |                                  |   |                                  |   |
| 57       | Total Rate Base:                                  | 3,283,708,500                           | (71,313,752)                     | 3,212,394,748                           | 444,650                          | 3,212,839,397   |
| 58       |   |   |                                  |   |                                  |   |
| 59       | Return on Rate Base                               | 8.139%                                  |                                  | 7.513%                                  |                                  | 7.665%  |
| xx       |   |   |                                  |   |                                  |   |
| 60       | Return on Equity                                  | 10.701%                                 | -1.194%                          | 9.506%                                  |                                  | 9.797%  |

(1) Type 1 adjustments involve normalization for out of period historic and unusual items that occur during the test period.