

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Division's Annual)
Annual Review and Evaluation of)
Electric Lifeline Program, HELP) Docket No. 03-035-01

In the Matter of HELP, Electric)
Lifeline Evaluation) Docket No. 04-035-21

**Rebuttal Testimony of
Abdinasir M. Abdulle
Division of Public Utilities**

October 14, 2005

Q. Are you the same Abdinasir Abdulle that filed direct testimony in this case?

A. Yes, I am.

Q. What is the purpose of your surrebuttal testimony?

A. The purpose of surrebuttal testimony is to address some of the results that Mr. Mecham's presented in his direct testimony.

Q. Mr. Mecham asserts that Quantec used a sample. Is this correct?

A. No. To the best of my knowledge Quantec used the entire population adjusted for those participants with missing data.

Q. If Quantec used the whole population, why did its results deviated from that shown by the entire PacifiCorp data as indicated by Mr. Mecham?

A. Mr. Mecham's claim that his results are based on the entire PacifiCorp data (population) is not true. On pages 26 and 27 of his direct testimony he has three figures. In each of these figures he indicated that he used the data for the two years ending September 2004. That means the data he used is from October 2001 to September 2004. He did not use the data for the first year of the program (October 2000 to September 2001).

Therefore, the deviation of Quantec's results from that of Mr. Mecham can be explained, partly, by Mr. Mecham using a subset of the available data whereas Quantec used the whole population. In addition, the data that Mr. Mecham used to calculate the percent changes in arrearages and shutoffs are completely wrong.

Q. What is wrong with the arrearages data Mr. Mecham used?

A. Mr. Mecham used the arrears data provided by PacifiCorp to the Division and the Commission in its reporting for the Low Income Lifeline Program under Docket No. 00-035-T07 (DPU Exhibit 1). In its report, PacifiCorp provides arrears for the months of March, June, September, and December. It does not provide values for arrearages for the remaining months.

Q. How did Mr. Mecham handled the missing information?

A. Mr. Mecham just filled the empty cells. For January and February, he filled with the March number, for April and May, he used the number for June, for July and August he used the number for September, and for October and November, he used the number for December (DPU Exhibit 1). This supposedly gave him a complete data with no missing values.

Q. Did Mr. Mecham used the data in which the missing values were filled to calculate the percent change in arrears?

A. Yes. DPU Exhibit 1 shows the arrears data that PacifiCorp provided for the two years ending September 2004 and the arrears data that Mr. Mecham used. At the bottom of the Exhibit, I reproduced Mr. Mecham's results using his arrears data.

Q. What is the significance of this?

A. The results that Mr. Mecham produced using his arrears data is completely wrong and is based on fabricated data. This is not a proper way of handling data.

Q. What is wrong with the shutoffs data Mr. Mecham used?

A. Attached is DPU Exhibit 2 which shows the termination notices and actual terminations data that PacifiCorp provided to the Division and Commission under Docket No. 00-035-T07. The exhibit clearly shows that Mr. Mecham did not use the actual shutoffs data provided by PacifiCorp. Instead he used notices data to calculate the change in actual shutoffs. DPU Exhibit 2 shows his results and how he arrived to those results.

Q. What of implication of this?

A. Mr. Mecham's results are entirely unacceptable. Termination notices are not the same as actual terminations (shutoffs). Not all customers who receive a termination notices actually get disconnected.

Q. What is your conclusion regarding the results presented by Mr. Mecham in his direct testimony?

A. Mr. Mecham's results are just plain wrong. It is based on either fabricated data or the wrong variable.

Q. Does this conclude your testimony?

A. Yes. It does.