BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Authority to Increase Its Retail Electric Utility Service Rates in Utah and for Approval of Its Proposed Electric Service Schedules and Electric	)))))	**Docket No. 10-035-124** **DPU Exhibit No. 17.0DC-COS** **Corrected** **Direct Testimony and Exhibits**

FOR THE DIVISION OF PUBLIC UTILITIES

DEPARTMENT OF COMMERCE

STATE OF UTAH

Cost of Service

Corrected Direct Testimony of

Abdinasir Abdulle, PhD

June 8, 2011

I. INTRODUCTION

Q. Please state your name and occupation?

A. My name is Abdinasir Abdulle. I am employed by the Utah Division of Public Utilities (Division) as a Technical Consultant.

Q. What is your business address?

A. Heber M. Wells Office Building, 160 East 300 South, Salt Lake City, Utah, 84114.

Q. On whose behalf are you testifying?

A. The Division.

Q. What is the purpose of your direct testimony?

A. I am correcting the Division's recommended rate spread and design. The Division's direct testimony on spread and design did not include the effects of two adjustments: the MSP and Apex adjustments proposed by Division witnesses. The rate spread was developed by Ms. Lee Smith on behalf of the Division. It is this spread that is being used as the basis of the Division's rate design proposals. These corrections begin with the rate design section of this testimony at line 253.

My testimony also discusses issues related to the cost of distribution service drops, the residential minimum charges, and a billing charge for master metered multi-family dwellings proposed by Mr. Griffith of Rocky Mountain Power (Company). However, there are no corrections to these parts of my testimony.

II. COST OF DISTRIBUTION SERVICE DROPS

Q. Would you provide the background for the issue concerning the cost of distribution service drops?

A. Yes. In Docket No. 09-035-23, the Office of Consumer Services (OCS or Office) raised an issue with the allocation of the cost of distribution service drops. The Office maintained that the allocation factor used to allocate cost of distribution service drops does not reflect sharing of service drops, since it assumes each residential customer requires its own service line and ignores the sharing of services by customers in multi-family residential buildings. In its Report and Order on Revenue Requirement, Cost of Service and Spread of Rates, dated February 18, 2010, the Commission directed the Division to conduct a comprehensive analysis of this issue, including the history and magnitude of the issue, and to recommend solutions that may provide a reasonable outcome. This testimony will serve as the Division's response to the above Commission direction and to the Company's proposed cost of service drop allocation in its Docket No. 10-035-124 class cost of service study.

Q. How are the costs associated with the distribution service drops allocated currently?

A. The Company currently allocates, as it has been doing in many rate cases, the costs associated with service drops based on the contribution of each class to the jurisdictional service drops cost factor (F70). The service drops cost for each class was calculated by multiplying the class average number of customers by the class average newly installed service drop cost.

Q. Is there a problem with this method?

A. Yes. As was indicated in the Direct Testimony of Mr. Chernick, the Office's witness in Docket No. 09-035-23, the method equates the number of service drops to the number of customers. For residential and some commercial customers, that is not necessarily the case. Residential customers living in multi-family buildings and small commercial customers occupying one commercial building share service drops. This indicates that the number of residential and small commercial service drops is less than their respective number of customers. Thus, equating the number of service drops with the number of customers would overestimate the class share of the jurisdictional distribution service drop cost.

Q. Is there a problem with the class average newly installed service drops?

A. No. The cost of a newly installed service drop is determined by a number of factors including but not limited to conductor type, size, and length. Shared service drops use larger conductors that are more expensive than those for single customers. The size of the conductor, and therefore the cost of the service drop, is proportional to the number of customers sharing the service drop. Regarding the type of conductor, for an apartment complex, a copper wire is used for apartment complexes whereas an aluminum wire is used for single homes. The cost of these wires differs from one another. Therefore, the Division believes that the average newly installed service drop cost captures the cost impact of these factors and should not be an issue.

Q. Has any remedy to this problem been proposed by any party?

A. Yes. The Office proposed a potential remedy in Docket No. 09-035-23 in Rocky Mountain Power's last general rate case.

Q. Could you summarize the Office's proposed remedy in the 2009 rate case?

A. Yes. The Office sought to estimate the number of customers sharing service drops. It used the housing data from the 2000 census information for the specific Utah counties that RMP serves along with Company-provided data on the number of customers in its service territory by county to estimate this number. This analysis concluded that the total number of service drops to residential customers is about 20 percent less than the number the Company used to develop an allocation factor.

Q. Does the Division agree with the Office's proposed remedy?

A. Not entirely. The Division believes that the Office's approach is a step in the right direction. However, this approach suffers in that it assumes each multi-family building is using only one service drop. This assumption is not necessarily true. Some anecdotal evidence (personal observations) indicates that there are some apartment complexes that have more than one service drop. In other words, the Office's methodology likely overstates any necessary adjustment. In addition, the Office did not show the impact of its proposed adjustment on the different classes.

Q. Please describe the Office's proposed adjustment to the number of residential service drops.

A. Yes. The Office's proposal equates the number of residential service drops to 80% of the average number of residential customers. This number is then multiplied by the average

newly installed service drops cost which did not change. This reduced the residential service cost in this case, based on the Company's original filing, from $326,091,469 to $260,873,175. The difference, $9,038,653 (about 1.3% of residential revenue) is spread among customers in Schedules 6, 8, 12TS, 12OL, and 23, with Schedules 6 and 23 picking up the majority of the costs, $3,303,560 (approximately 0.6% of Schedule 6's revenue) and $5,452,437 (about 4.5% of Schedule 23's revenue), respectively (DPU Exhibit 17.1D-COS).

Q. Why did the service cost for the small commercial customers (Schedule 23) go up?

A. Because of the number service drops for this class was not adjusted down. However, even if you assume that the number of service drops for this class is equal to 80% of its average number of customers, as did the Office for Schedule 1, its service cost will still increase by $4,623,358 (DPU Exhibit 17.1D-COS). This shows that the determination of the correct number of service drops, especially for the residential class, is important in developing the correct allocation factor (F70).

Q: Did you perform any other analysis of the Office's recommendation?

A: Yes. In DPU Exhibit 17.1D-COS, I show the results of a sensitivity analysis for the percentage adjustments to the number of service drops. The Office proposed in Docket No. 09-035-23 to use 80%; in this exhibit I lowered the percent to 90, assuming the Office's method overstates the needed adjustment. As can be seen, the decrease in

Schedule 1's revenue requirement changes from $9,038,653 to only $4,135,683. Again, this demonstrates the importance of correctly identifying the number of service drops.

Q. Has the Division come up with the proper estimate of the number of residential service drops?

A. No. The Division believes that specific Company data on the number of shared service drops and the number of customers sharing each type of service drop are necessary to address and resolve this problem and, thus, to fully address the Commission's directive. Consequently, on September 29, 2010, the Division and the Office met with the Company to discuss the availability of this data and, if it were not available, what would be the best way to estimate it. The Company indicated, as it did in its response to the OCS data request 7.3 in the 09-035-23 general rate case, that its records do not contain this type of specific service drop data. The Division also researched what other electric utilities are doing but could not find any utility that estimates such information.

Q. What is the Division's recommendation regarding this issue?

A. The Division's analysis indicates that this is a significant issue: upwards of $9 million may be misallocated to the residential class. Therefore, although the Division has some concerns with the Office's methodology, the Division recommends that for this rate case, the Commission adopt the Office's proposal from the prior rate case and as outlined herein. Given the Division's concerns with this approach, the Division also recommends that the Commission direct the Company, on a going forward basis, to collect data on the

number of shared service drops and the number of customers sharing each type of service drop and provide such information in the next general rate case.

III. MINIMUM BILL

Q. PacifiCorp's current tariff contains a $3.67 minimum bill, which is imposed on customers whose usage in a given month is less than 39 kWhs.[1] The Company is now recommending that the minimum bill be eliminated all together. What is the Division's recommendation on this?

A. The bill for a residential customer is the maximum of the minimum bill and a bill calculated by summing the customer charge and the product of the energy rate and the usage. There exists a usage threshold below which the customer is charged the minimum bill. If the customer's usage level is equal to the threshold, then both the customer and the Company are indifferent about which bill is used. The usage threshold level can be calculated as follows:

$$Minimum\ Bill = Customer\ Ch\arg e + (First\ Block\ Energy\ Rate\ x\ kWh\ Consumed)$$

$$kWh\ Consumed = \frac{Minimum\ Bill - Customer\ Ch\arg e}{First\ Block\ Rate}$$

This indicates that for a minimum bill to be valid, it must be set at a level equal to or higher than the customer charge. This results in a usage threshold level equal to or greater than zero. If the minimum bill is set at a level less than the customer charge, then the kWh threshold will be negative. That is, customers who are putting more power into the grid than they are taking out from the grid will be the ones who will have to pay the minimum bill.

Q. What Company costs is the minimum charge designed to cover?

[1] ($3.67-$0.98)/$0.06936/kWh = 38.78 kWh, where $0.06936 is the current initial-block energy charge per kWh.

A. The kind of costs a minimum charge would cover depends on its level. If it is set at a level equal to the customer charge, then it will cover the same costs that the Commission ruled customer charge should cover. However, if it is set at a level higher than the customer charge, it will cover the customer charge plus some of the volumetric charge (the extent of which depends on how much higher it is set above the customer charge).

Q. What did the Commission rule the customer charge should cover?

A. In its Rate Design and Spread Issues Report and Order in Case Docket No. 84-035-01, dated on July 1, 1985, the Commission stated the following:

> *5. The Commission has previously made the finding (Mountain Fuel Supply Company Case No. 82-057-15) that a customer charge results in the payment by each customer of those costs that he imposed upon the system, which are independent of actual energy consumption during a given month. A customer of UP&L, who uses no electricity in a given month, must nonetheless have his meter read, be issued a billing statement and have his meter maintained in good operating conditions. Those activities represent costs to UP&L. We find that a customer charge, as opposed to a minimum billing, allows such costs to be recovered reasonably and properly.*

One needs to recognize that the list in the above Commission statement is not comprehensive and the Commission did not intend to make it comprehensive. Rather, the Commission's intent was to include all individual-customer-related costs into the customer charge. For example, the above Commission statement does not include the meter, service drop, and their respective depreciations which all rightfully are costs that the customer imposes on the system regardless of his/her energy consumption.

Q. What is the residential minimum bill the Company is proposing in this rate case?

A. For residential customers, the Company is proposing to eliminate the minimum bill.

Q. What is your recommendation regarding the minimum bill?

A. Since the minimum charge that corresponds to no energy consumption would collect the costs that the customer charge is designed to collect, the Division does see the need for a minimum bill. Therefore, the Division recommends the elimination of the minimum bill.

IV. SCHEDULES 1 AND 3 HOUSEKEEPING BILLING CHANGE

Q. Could you summarize the Company's proposed Schedule 1 and Schedule 3 housekeeping billing change?

A. Yes. The Company is proposing to replace the language in paragraph 2 of the Application section of Schedules 1 and 3 with a language that better reflects the current billing practice. The current language that the Company is proposing to replace is

> When conditions are such that service is supplied through one meter to more than one dwelling or apartment unit, the charge for such service will be computed by multiplying the minimum charges by the maximum number of dwelling or apartment units that may be served.

The language that the Company is proposing is

> When conditions are such that service is supplied through one meter to more than one dwelling or apartment unit, the charge for such service will be computed by multiplying **the number of kWh in each applicable usage block, the Customer Charge and** the minimum charge by the maximum number of dwelling or apartment units that may be served. (Emphasis added)

The Company indicated that the proposed language "…will reflect current billing practices for multiple dwelling units."

Q. What is the current billing practice for multiple dwelling units?

A. The Division understands that currently the bill is calculated by the sum of the product of the customer charge and the number of units and the energy charge. The energy charge is determined by multiplying the number of kWh in each block by the number of units and the block rate.

Q. How does the current tariff language deviate from this billing practice?

A. The current language only increases the minimum charge to reflect the total number of units served. It fails to adjust the cut-off points of the usage blocks for the number of units served. For example, if there are four apartment units sharing the same meter, during the summer months, the current language would suggest that the first 400 kWh would be charge the first block rate, the next 600 kWh consumed would be charged the second block rate. The rest of the kWh used would be charged using the third block rate. Because a disproportionately number of kWh will be charged the higher rates, especially the third block rate, this would result in an unfairly large or overstated bill. Had the language adjusted for the usage block cut-off points, the first 1,600 kWh (400 kWh x 4) would be charged the first block rate, the next 2,400 kWh (600 kWh x 4) would be charged the second block rate, and the rest of the kWh consumed would be charged the third block rate, which would better reflect the intent of the inverted block rates. That is, this change in the language, which reflects the Company's current billing practice, would preserve price signals and incent conservation on the part of users.

In addition, the current language does not indicate a change or adjustment to the customer charge for the number of units behind the meter. However, the Company's current

billing practice multiplies the customer charge by the maximum number of units behind the meter.

Q. Is the proposed language consistent with the above described current billing practice?

A. Yes. The Company's proposed language adjusts for the maximum number of units the customer charge, minimum charge, and the kWh in each block.

Q. What is your position regarding the proposed language change?

A. While it is reasonable to adjust the minimum bill and kWh blocks for the number of units behind the meter, adjusting the customer charge in this manner is not. In essence, the Company's proposal to adjust the customer charge in this fashion suggests that the cost of serving a multi-family unit with one meter is directly proportional to the number of units behind the meter. For example, if there are four units behind the meter, then it costs four times as much to serve that one meter as it does a single-family dwelling. The Company has presented no evidence in this case or elsewhere to support its proposed adjustment to the customer charge. Therefore, the Division recommends rejection of this portion of the Company's proposed language dealing with the adjustment to the customer charge for multi-family dwellings that are served through one meter.

Q: Does the Division's proposed rate spread and rate design incorporate this recommendation?

A: No, the Division did not take into account the impact of this recommendation. Nor does the Division have an alternative to the Company's proposed adjustment to the customer charge for multi-family units. If the Commission rejects the proposed adjustment to the customer charge for multi-family dwellings, the Division recommends that the Commission order the Company to account for the difference in its compliance filing following this case. Given that the current billing practice collects (or credits) these revenues from the residential class, this will increase slightly the increase to the residential class.

V. RATE DESIGN

Q. What are the Division's Rate Design objectives?

A. Based on the state code, the Division's rate design objectives are for the rates to be stable, simple, understandable and acceptable to the public, economically efficient, to promote fair apportionment of costs among individual customers within each customer class with no undue discrimination, and to protect against wasteful use of utility services (UCA § 54-4a-6)

Q. What are the Division's guiding principles to achieve these objectives?

A. To balance these objectives, Lowell Alt, a former Division employee, developed guiding principles consistent with the Division's statutory obligation. These guiding principles,

with some modifications necessitated by the changes in operating conditions, are as follows[2]:

1) *Simple* – Simple rates are likely to be accepted by customers. Tariff descriptions should be clear, unambiguous and understandable by the public.
2) *Correct price signal* – if rates are correctly based on costs, customers can make the right decision about energy use including energy conservation decisions. A complicated rate that is not understood cannot be a good price signal. Some customer classes are better able to understand complicated rates than others.
3) *Multi-part rates* – three part rates with customer, energy, and demand components will more fairly apportion the costs among individual customers than one or two part rates. However, a demand component for the residential class is normally not recommended since the added cost of demand meters usually outweighs the benefit of better cost apportionment.
4) *Gradualism* – to promote rate stability and to minimize impacts on individual customers, rate changes should be done gradually.
5) *Marginal and embedded costs* – regulated rates must recover the embedded revenue requirement of a rate schedule. Marginal and average unit embedded costs should be reviewed and taken into account when setting prices.
6) *Customer charges* – costs that generally increase with the number of customers, but are not caused by each customer should be excluded from the customer charge and

[2] Docket No. 97-035-01, Direct Testimony of Lowell E. Alt, Jr. pages 24-25.

instead be included within the commodity portion of rates. This customer charge position was stated by the PSC in its Order in Mountain Fuel Case No. 82-057-15.

Q: In direct testimony, the Division's rate spread and design excluded the adjustments for MSP and Apex. Has the Division redone its spread to include these adjustments?

A: Yes. In direct testimony, the Division's spread did not include the MSP adjustment for moving from Revised Protocol to Rolled-In or the adjustment for the Company's Apex decision. As identified in my direct testimony, the Division's rate spread was based on a revenue requirement increase of approximately $131 million (See DPU Exhibit 17.0DC-COS). The Division's final spread is done in two steps. In the first step, the MSP adjustment is deducted from the revenue increase of $131 million, which yields a revenue requirement increase of approximately $116 million. Using the same methodology described in DPU witness Ms. Lee Smith's direct testimony, this yields the revenue spread shown in Table 14 of DPU witness Ms. Smith's supplemental direct testimony.

In the second step, the Apex adjustment of approximately $8.6 million is spread to the various classes on the basis of the current revenue as described by DPU witness Ms. Smith in her supplemental direct testimony. The final spread and revenue requirement increase (approximately $108 million) is depicted in Table 15 of DPU witness Ms. Smith in her supplemental direct testimony.

Ms. Smith recommends allocating the Apex adjustment based on current revenues. The Division recognizes that the Apex adjustment could be allocated to the various classes in a number of ways besides current revenue. For example, since the Apex adjustment

includes capacity and energy costs, this adjustment could be allocated using the F10 factor which combines demand and energy. It could also be allocated using equal percent spread to the various classes. The Division is open to the use of any reasonable allocation factor or methodology to spread the Apex adjustment among the various classes.

Q: How does this final spread affect the Division's recommendations regarding rate design?

A: While the final spread decreases the increase to the various classes, the Division's final rate design recommendations follow the same pattern as in direct testimony. The Division's proposed revenue requirement increase of approximately $108 million yields a jurisdictional average increase of 6.53%.

Q: Would you explain the Division's final rate design proposals?

A: Yes. For the various classes, the Division is proposing a rate design that collects the Division's proposed revenue requirement for each class and encourages energy efficiency and conservation while minimizing the Company's risk of not being able to collect its fixed costs.

Q. What are the Division's recommendations in relation to Schedule 1 Rate Design?

A. The Division proposes that the customer charge be raised from its current level of $3.75 to $6.81, the minimum charge be eliminated, and that the summer first, second, and third block rates and the winter single block rate be increased by 9.4% from their respective current levels. This proposed rate design will still encourage energy efficiency while

reducing the Company's vulnerability to the risk of under-collecting its distribution fixed costs. DPU Exhibit 17.2DC-COS summarizes the Division's proposed residential rate design.

Q. Is your proposed customer charge based on Commission ordered methodology?

A. Partially. The Division calculated a customer charge of $3.91 based on the Commission ordered methodology. However, this does not account for all the retail costs. If the Commission accepts all of the retail costs to be included into the formula, then the appropriate customer charge would be $6.81. The direct testimony of the Division's consultant, Ms. Lee Smith in this case contains a more detailed discussion of the residential customer charge and its calculation (Tables 4 and 5).

Q. What is the bill impact of your proposed residential rate design?

A. The bill impact of the Division's proposed rate design is reported in DPU Exhibit 17.3DC-COS. This exhibit shows that the bill impact for the Division's proposed summer rates is minimal for low energy users but greater for high energy users. Customers with a usage level up to 1,000 kWh will see, bill increases ranging from $3.48, for those who use 100 kWh, to $7.80 for those who use 1,000 kWh. Customers with usage levels between 1,000 kWh to 2,000 kWh will see a substantial increase in their summer monthly bills ranging from $8.44 for those with a usage level of 1,100 kWh to $14.16 per month for those using 2,000 kWh. Usage levels higher than 2,000 kWh will see a much higher bill increase.

The Exhibit also shows that the proposed rate design has similar bill impacts during the winter, from $3.49 to $7.37 for usage levels up to 1,000 kWh and $7.80 to $11.67 for usage levels between 1,100 and 2,000. Customers with usage levels higher than 2,000 kWh will experience an even higher bill impact. Hence, the proposed rate design, while having minimal bill impact for low usage, will promote energy efficiency during summer when we are more concerned about the increasing peak. It will also reduce the Company's risk in relation to collecting enough revenue to cover its distribution fixed costs.

Q. What was the Division's general approach to the remaining rate classes?

A. The Division is in general agreement with the Company's proposals for the remaining rate classes. However, because the Company's rate design is based on its proposed revenue increase of approximately $232 million and the Division's proposal is based on its proposed revenue increase of approximately $108 million, the Division is proposing to decrease by approximately one half the customer charge increases that the Company proposed for the major non-residential classes. However, we are not contesting the basic structures of these other classes in this case.

Q. What rate design would you propose for Schedule 6 customers?

A. The Division's proposal is summarized in DPU Exhibit 17.2DC-COS. In short, the Division proposes that the customer charge be increased from $45 to $49 and that both the demand and energy charges be increased by about 6.76% both during the summer and winter months.

Because of the heterogeneity of the customers in this class, it is difficult to design rates that would encourage energy efficiency and conservation. Increasing the demand or energy charge more proportionately than the other would disproportionately hurt the low or high load factor customers. However, a uniform percent increase in both the demand and energy charges would promote energy efficiency and conservation.

Q. What is the bill impact of your proposal?

A. DPU Exhibit 17.4DC-COS shows that the percent bill increase is approximately the same for those customers with low load factor and those with high load factor since the energy and demand charges are increased equally.

Q. What rate design would you propose for Schedule 8?

A. The Division's proposal is summarized in DPU Exhibit 17.2DC-COS. For this Schedule, the Division proposes that the customer charge be increased from its current level of $55 to $59. The Division also proposes that to collect the remainder of the revenue increase, the energy and demand charges be increased by approximately 12.09% each. Because the current basic rate designs are seen as just and reasonable by the Commission, the Division proposes no changes to these rate design structures.

Q. What are the bill impacts of your proposal for Schedule 8?

A. DPU Exhibits 17.5DC-COS shows the bill impacts of the Division's proposed rate design for Schedule 8. This exhibit shows that the percent bill impact is relatively the same for all customers regardless of the demand and usage levels. The specific percent bill impact

is approximately between 6.6% to 6.7% during the summer and 6.6% to 6.9% during winter.

Q. What rate design would you propose for Schedule 9?

A. The Division's proposal is summarized in DPU Exhibit 17.2DC-COS. The Division proposes no change in the basic rate structure for this class except scaling the rates to collect the Division's proposed revenue increase for this class. The Commission considers the current rate structure as just and reasonable. Therefore, the Division proposes the customer charge be increased from its current level of $200 to $220 and that the demand and energy charges be increased by 14.75% each.

Q. What are the bill impacts of your proposal for Schedule 9?

A. DPU Exhibit 17.6DC-COS shows the bill impacts of the Division's proposed rate design for Schedule 9. This exhibit shows that the percent bill impact is relative the same for all customers regardless of the demand and usage levels. The specific percent bill impact is approximately 8.5% to 8.7% for summer and 8.6% to 8.8% during winter.

Q. What rate design would you propose for Schedule 10?

A. The Division's proposal is summarized in DPU Exhibit 17.2DC-COS. For this Schedule, the Division proposes no change in the rate design except adjusting the current rates to collect the Division's proposed revenue increase. This will amount to increasing both the demand and energy charges by about 4.45%. The Division also proposes that annual customer service charge-primary and secondary and monthly customer service charge be

increased from their respective current levels of $98, $30 and $12, to $106, $33 and $13, respectively.

Q. What are the bill impacts of your proposal for Schedule 10?

A. DPU Exhibit 17.7DC-COS shows the bill impacts of the Division's proposed rate design for Schedule 10. This exhibit shows that the percent bill impact is the same for all customers regardless of the demand and usage levels.

Q. What rate design would you propose for Schedule 23?

A. The Division's proposal is summarized in DPU Exhibits 17.2DC-COS. For this Schedule, the Division proposes that the customer charge be increased from its current level of $8 to $9. The Division also proposes that to collect the remainder of the revenue increase, the energy and demand charges be scaled up 6.87%. Because the current basic rate designs are seen as just and reasonable by the Commission, the Division proposes no changes to these rate design structures.

Q. What are the bill impacts of your proposal for Schedule 23?

DPU Exhibit 17.8DC-COS shows the bill impact of the Division's proposed rate design for Schedule 23. This exhibit shows that within the low load sizes, the percentage bill impact decreases with the energy consumption level. It is worth noting that this does not mean that the dollar increases in the bill gets smaller as energy consumption increases. Rather, dollar increases in the bill get larger as energy consumption increases. For higher load sizes, the bill impact remains relatively the same with an increase in consumption levels.

Q. The Company proposed to close Schedule 25 and to move those customers to Schedule 23 or Schedule 25. Do you agree with this proposal?

A. Yes. This proposal is in accordance with the Non-residential Rate Design Stipulation in Docket No. 09-035-23 which required customers from Schedule 25 be moved to a more appropriate general service schedule.

Q. Does that conclude you direct testimony?

A. Yes.