Overview:

An incentive return approach can be developed that actually gives the utility a reward for exceeding Commission DSM goals on a performance basis. These incentives are symmetrical and provide both rewards for exceptional performance and penalties for inferior performance.

The benefit/cost (B/C) ratio approach would scale rewards and penalties based upon costeffectiveness, rather than the total volume (or dollar) of savings. The higher the ratio, indicating the greater the benefit relative to every dollar spent, the greater the opportunity for the utility to earn an incentive. Lower ratios would result in penalties.

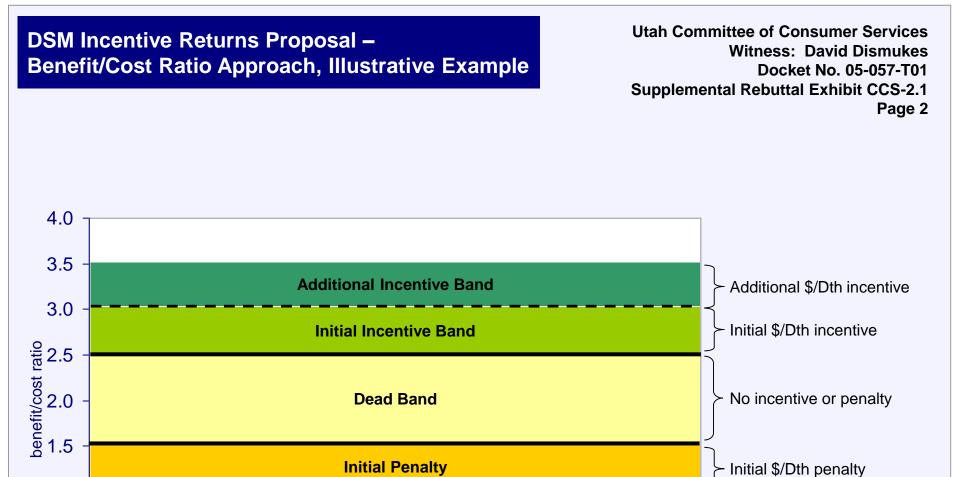
Data and Approach:

The data used in this approach would be taken from information supporting the portfolio of programs the Company proposes over the 3 year pilot period. Estimates of costs and savings would be used to develop the baseline B/C ratio for incentive purposes. Comparisons to other states' best practices could also be utilized in establishing the baseline B/C ratio.

This proposal envisions a dead-band around the baseline B/C ratio. Actual performance that falls within the baseline would not be subject to any penalties or rewards.

Performance that exceeds the dead-band would result in a fixed dollar per decatherm (\$/Dth) reward to the Company. The reward levels would be established from the benefits estimated in the Company's proposed 3 year portfolio of DSM programs.

Additional bounds could be established that give higher rewards as higher levels of DSM delivery effectiveness are attained.



Additional \$/Dth penalty

Note: For illustrative purposes only, actual amounts would have to be determined by the parties after DSM programs are submitted by the Company.

Additional Penalty Band

1.0

0.5

0.0

Overview:

An incentive return approach can be developed that actually gives the utility a reward for exceeding Commission DSM goals in absolute value. These incentives are symmetrical and provide both rewards for exceptional performance and penalties for inferior performance.

This proposed approach would scale rewards and penalties based upon total volume of savings. The higher the total achieved savings the greater the opportunity for the utility to earn an incentive. Lower achieved savings levels would result in penalties.

Data and Approach:

The data used in this approach would be taken from information supporting the portfolio of programs the Company proposes over the 3 year pilot period. Estimates of savings would be used to develop the baseline savings levels for incentive purposes. Comparisons to other states' best practices could also be utilized in establishing the baseline level.

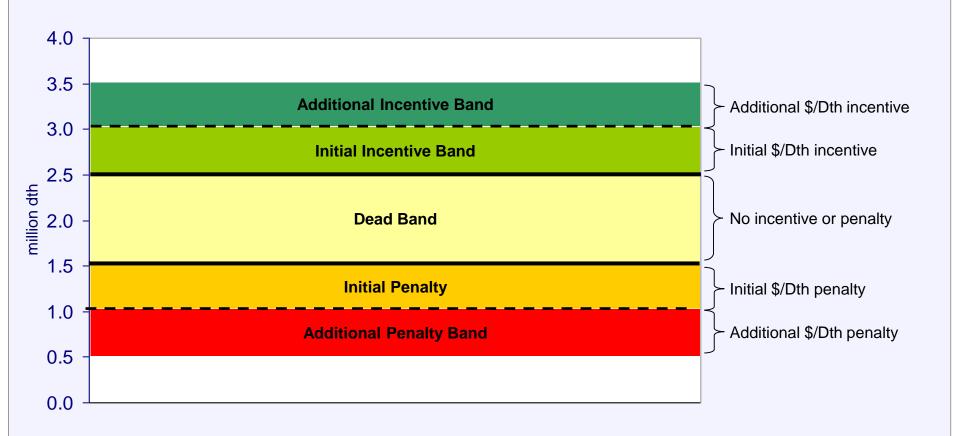
This proposal envisions a dead-band around the baseline savings level. Actual performance that falls within the baseline would not be subject to any penalties or rewards.

Performance that exceeds the dead-band would result in a fixed dollar per decatherm (\$/Dth) reward to the Company. The reward levels would be established from the benefits estimated in the Company's proposed 3 year portfolio of DSM programs.

Additional bounds could be established that gives higher rewards as higher levels of DSM savings are attained.

DSM Incentive Returns Proposal – Total Savings Approach, Illustrative Example

Utah Committee of Consumer Services Witness: David Dismukes Docket No. 05-057-T01 Supplemental Rebuttal Exhibit CCS-2.2 Page 2



Note: For illustrative purposes only, actual amounts would have to be determined by the parties after DSM programs are submitted by the Company.

Overview:

A statistical re-coupling approach is a modification of a full revenue decoupling approach like the CET. The only difference is that the "true-up" amounts are adjusted to "back-out" the impacts associated with exogenous impacts like changes in the economy, prices and other factors.

Making these adjustments results in maintaining the traditional risk relationship between a utility and its ratepayers.

Thus, increased sales due to an expanding economy, or decreases in natural gas prices would be credited to the utility. Like traditional methods, the approach is also symmetrical meaning that decreases in economic activity, or increases in natural gas commodity prices, would result in decreases in the true-up amount.

Data and Approach:

A statistical re-coupling approach would use estimates of the income and price elasticity of demand to adjust the proposed average revenue balances. Income and price elasticities are estimated on a regular basis, through the load forecasting process, that is part of the Company's Integrated Resource Plan ("IRP"). This proposal would adopt the Company's current elasticity estimates and forecasted decrease in use per customer.

The income elasticity of demand is 0.05 and the price elasticity of demand is -0.06 on a use per customer basis.

Average use per customer would also be adjusted for the 2.7 Dth/customer reduction anticipated to occur from customer-initiated efficiency.

Statistical Re-coupling Approach

Utah Committee of Consumer Services Witness: David Dismukes Docket No. 05-057-T01 Supplemental Rebuttal Exhibit CCS-2.3 Page 2

Example:

Allowed Amounts	
Revenues	\$ 150,000,000
Usage	68,400,000
Customers	600,000
Revenue per customer	\$ 250.00
Use per customer	114.00
Actual Amounts	
Actual Amounts Revenues	\$ 145,500,000
	\$ 145,500,000 66,348,000
Revenues	. , ,
Revenues Usage	66,348,000 600,000
Revenues Usage Customers	66,348,000 600,000

Unadjusted True-Up	
Shortfall, Total Revenue	\$ (4,500,000)
Shortfall, Revenue per Customer	\$ (7.50)
Adjustments (Use per Customer)	
Price Elasticity Adjustment	-0.547
Income Elasticity Adjustment	0.143
Trend Adjustment	-2.700
Adjusted Use Per Customer	107.48
Adjustments (Revenues)	
Price Elasticity Adjustment	\$ (720,000)
Income Elasticity Adjustment	\$ 187,500
Trend Adjustment	\$ (3,552,632)
Total Adjustment	\$ (4,085,132)
Total Adjustment per Customer	\$ (6.81)
Net Decoupling Adjustment (Total)	\$ (414,868)
Net Decoupling Adjustment (per Customer)	\$ (0.69)

Note: This example assumes an annual price increase of 8 percent and an increase in personal income of 2.5 percent.

Impact of Sales on Utility Earnings

Utah Committee of Consumer Services Witness: David Dismukes Docket No. 05-057-T01 Supplemental Rebuttal Exhibit CCS-2.4

- (1) E * = R * -FC VC
- (2) $\Delta R(\Delta Q \times P) \Delta VC = \Delta E$
- (3) $(R/E) \times ([\Delta R \Delta VC]/R) = \Delta E/E = \Delta ROE/ROE *$

Where:

E = earnings to common equity shareholders;

R = revenues;

FC = fixed costs (exclusive of equity returns)

VC = variable costs

 ΔQ = the change in the quantity of sales relative to the test-year level,

P = the delivered price of gas;

ROE = rate of return on equity;

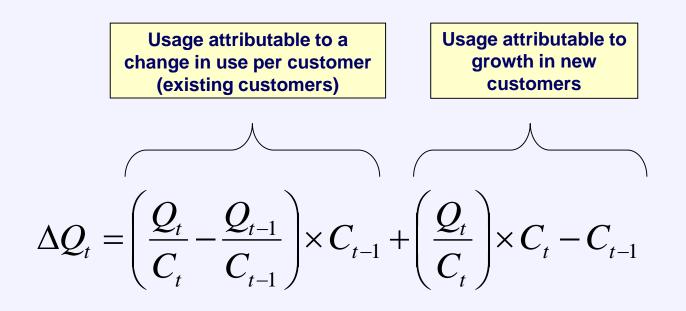
* = targeted or authorized levels for the specified parameters

Equation (1) assumes that common equity shareholders hold residual claims to a utility's earnings.

Equation (2) says that changes in the earnings to common equity shareholders equal the difference between changes in revenue and variable costs (i.e., the change in net revenues).

Equation (3) relates the proportional changes in earnings and the rate of return on equity to the change in net revenues and the ratio of revenues to earnings to common equity shareholders.

Changes in total usage can be decomposed between:



Where: C = customers C_{t-1} = prior period customers C_t = current period customers Q_t/C_t = current period use per customer Q_{t-1}/C_{t-1} = prior period use per customer

			Temperature	Change i	n Use	
	Average Number of Customers GS1	GS1 Usage per Customer (Dth/Cust)	Adjusted GS1 Usage (Dth)	Average Use Existing Customers (Dth)	Number of New Customers (Dth)	Net Change (Dth)
2001	693,316	118.97	82,483,943			
2002	711,636	115.84	82,436,911	(2,169,247)	2,122,214	(47,033)
2003	730,777	118.90	86,888,508	2,175,756	2,275,842	4,451,598
2004	753,953	114.10	86,027,940	(3,505,008)	2,644,440	(860,568)
2005	785,746	112.88	88,692,051	(924,563)	3,588,674	2,664,111
				Net I	Period Change	6,208,108
				٦	Fotal Decrease	(907,601)
					Total Increase	7,115,709
				Net I	Period Change	6,208,108
				Average I	Period Change	1,552,027

	Average	GS1	Temperature Adjusted	R	t	
	Number of Customers GS1	Usage per Customer (Dth/Cust)	GS1 Usage (Dth)	Use per Customer	Customers (\$)	Total
2001	693,316	118.97	82,483,943			
2002	711,636	115.84	82,436,911	\$ (2,789,498)	\$ 4,881,786	\$ 2,092,288
2003	730,777	118.90	86,888,508	\$ 12,357,411	\$ 5,432,940	\$ 17,790,351
2004	753,953	114.10	86,027,940	\$ (2,071,375)	\$ 6,512,534	\$ 4,441,159
2005	785,746	112.88	88,692,051	\$ (4,664,219)	\$ 8,737,257	\$ 4,073,039

				Change i	n Use	
	Average Number of Customers	Usage per Customer (Dth/Cust)	Total Usage (Dth)	Average Use Existing Customers (Dth)	Number of New Customers (Dth)	Net Change (Dth)
2001	693,316	118.97	82,483,943			
2002	711,636	115.84	82,436,911	(2,169,247)	2,122,214	(47,033)
2003	730,777	118.90	86,888,508	2,175,756	2,275,842	4,451,598
2004	753,953	114.10	86,027,940	(3,505,008)	2,644,440	(860,568)
2005	786,017	112.88	88,722,641	(924,563)	3,619,264	2,694,700
Forecast:						
2006	811,017	110.18	89,354,801	(2,122,246)	2,754,406	632,160
2007	836,017	107.48	89,851,961	(2,189,746)	2,686,906	497,160
2008	858,017	104.78	89,899,792	(2,257,246)	2,305,077	47,831
2009	880,017	102.08	89,828,823	(2,316,646)	2,245,677	(70,969)
2010	902,017	99.38	89,639,055	(2,376,046)	2,186,277	(189,769)

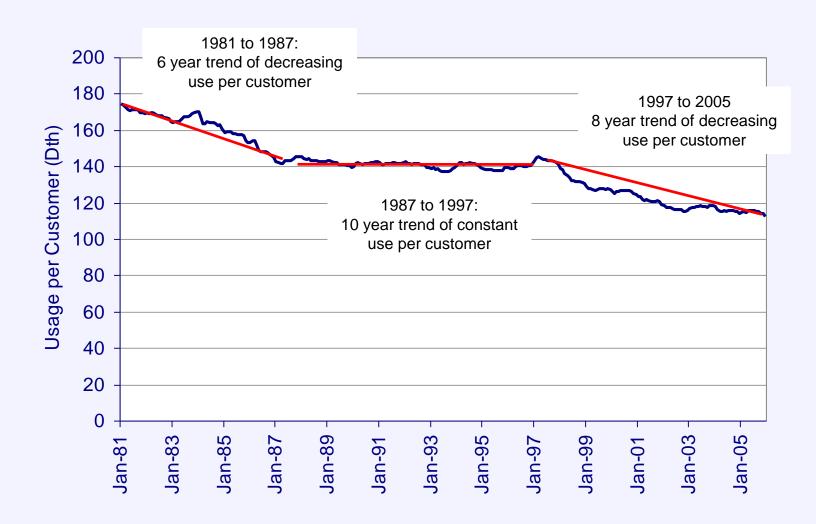
	2001	2002	2003	2004	2005
<u>Return on Equity</u> Allowed ROE	11.00%	11.00%	11.20%	11.20%	11.20%
ROE Impact of Change in Use per Customer ROE Impact Change in Customers	0.00% 0.00%	-0.59% 1.03%	2.55% 1.10%	-0.41% 1.18%	-0.89% 1.53%
ROE Impact Change in Expenses Rate Base and Capital Elements	-0.54%	-2.38%	-3.76%	-1.92%	-1.17%
Actual Achieved ROE	10.46%	9.06%	11.09%	10.05%	10.68%

				Utah Jurisdiction DNG Related						
Description		2001	2002		2003			2004		2005
Utility Operating DNG Revenue										
System Distribution Non-Gas Revenue	\$	200,696,764	\$	204,279,049	\$	218,434,068	\$	224,782,962	\$	228,246,882
General Related Other Revenue		11,123,598		11,443,447		5,130,380		5,177,571		6,535,759
	\$	211,820,362	\$	215,722,496	\$	223,564,448	\$	229,960,533	\$	234,782,641
Revenue Impact Declining Usage		-		(2,789,498)		12,357,411		(2,071,375)		(4,664,219
Utility Operating Expenses										
<u>Gas Purchase Expenses</u>										
Utah Gathering & CO2	\$	12,006,619	\$	12,622,788	\$	8,298,154	\$	8,977,154	\$	8,460,107
Total Gathering & CO2	\$	12,006,619	\$	12,622,788	\$	8,298,154	\$	8,977,154	\$	8,460,107
Operation and Maintenance Expenses										
Production	\$	(1,214,912)	\$	(745,152)	\$	(1,010,739)	\$	(1,203,294)	\$	(1,352,503
Distribution		30,365,590		37,720,970		39,644,134		36,869,734		40,254,743
Customer Accounts		14,255,577		15,232,585		26,204,678		23,751,948		22,384,076
Customer Service & Information		2,013,500		1,860,122		2,445,531		2,443,979		2,288,424
Administrative & General (1)		48,294,087		38,236,699		26,170,801		35,666,695		33,126,824
Total O&M Expense	\$	93,713,842	\$	92,305,224	\$	93,454,405	\$	97,529,062	\$	96,701,563
Other Operating Expenses										
Depreciation, Depletion, Amortization	\$	34,548,652	\$	38,409,553	\$	38,687,066	\$	41,599,371	\$	44,205,272
Taxes Other Than Income Taxes		8,895,086		8,983,426		9,409,773		9,417,462		10,667,038
Income Taxes		17,089,113		14,913,704		24,565,519		19,229,657		19,623,189
South Georgia Amortization		1,407,363		1,431,437		1,435,745		-		-
Section 29 Tax Credits		(2,650,483)		-		224		-		-
Total Other Operating Expenses	\$	59,289,732	\$	63,738,121	\$	74,098,327	\$	70,246,491	\$	74,495,499
Total Utility Operating Expenses	\$	165,010,193	\$	168,666,133	\$	175,850,886	\$	176,752,707	\$	179,657,169
NET OPERATING INCOME	\$	46,810,169	\$	44,266,864	\$	60,070,973	\$	51,136,452	\$	50,461,253
TOTAL RATE BASE	\$	505,674,144	\$	539,520,097	\$	549,428,512	\$	600,068,706	\$	595,177,075
Adjusted Return on Rate Base		9.26%		8.20%		10.93%		8.52%		8.48%
Adjusted Return on Equity		10.46%		8.47%		13.64%		9.64%		9.79%
Actual Return on Rate Base		9.26%		8.52%		9.55%		8.73%		8.96%
Actual Return on Equity		10.46%		9.06%		11.09%		10.05%		10.68%
Incremental Impact Return on Rate Base		0.00%		-0.32%		1.38%		-0.21%		-0.48%
Incremental Impact Return on Equity		0.00%		-0.59%		2.55%		-0.41%		-0.89%

	Utah Jurisdiction DNG Related								
Description	2001			2002		2003		2004	2005
Utility Operating DNG Revenue									
System Distribution Non-Gas Revenue	\$	200,696,764	\$	204,279,049	\$	218,434,068	\$	224,782,962	\$ 228,246,882
General Related Other Revenue		11,123,598		11,443,447		5,130,380		5,177,571	6,535,759
	\$	211,820,362	\$	215,722,496	\$	223,564,448	\$	229,960,533	\$ 234,782,641
Revenue Impact Customer Growth		-		4,881,786		5,432,940		6,512,534	8,737,257
Utility Operating Expenses									
Gas Purchase Expenses									
Utah Gathering & CO2	\$	12,006,619	\$	12,622,788	\$	8,298,154	\$	8,977,154	\$ 8,460,107
Total Gathering & CO2	\$	12,006,619	\$	12,622,788	\$	8,298,154	\$	8,977,154	\$ 8,460,107
Operation and Maintenance Expenses									
Production	\$	(1,214,912)	\$	(745,152)	\$	(1,010,739)	\$	(1,203,294)	\$ (1,352,503
Distribution		30,365,590		37,720,970		39,644,134		36,869,734	40,254,743
Customer Accounts		14,255,577		15,232,585		26,204,678		23,751,948	22,384,076
Customer Service & Information		2,013,500		1,860,122		2,445,531		2,443,979	2,288,424
Administrative & General		48,294,087		38,318,782		26,125,792		35,726,783	33,232,695
Total O&M Expense	\$	93,713,842	\$	92,387,307	\$	93,409,396	\$	97,589,149	\$ 96,807,434
Other Operating Expenses									
Depreciation, Depletion, Amortization	\$	34,548,652	\$	38,409,553	\$	38,687,066	\$	41,599,371	\$ 44,205,272
Taxes Other Than Income Taxes		8,895,086		8,983,426		9,409,773		9,417,462	10,667,038
Income Taxes		17,089,113		17,801,001		21,947,629		22,473,287	24,682,658
South Georgia Amortization		1,407,363		1,431,437		1,435,745		-	-
Section 29 Tax Credits		(2,650,483)		-		224		-	-
Total Other Operating Expenses	\$	59,289,732	\$	66,625,417	\$	71,480,438	\$	73,490,120	\$ 79,554,969
Total Utility Operating Expenses	\$	165,010,193	\$	171,635,513	\$	173,187,987	\$	180,056,424	\$ 184,822,510
NET OPERATING INCOME	\$	46,810,169	\$	48,968,770	\$	55,809,401	\$	56,416,644	\$ 58,697,388
TOTAL RATE BASE	\$	505,674,144	\$	539,520,097	\$	549,428,512	\$	600,068,706	\$ 595,177,075
Adjusted Return on Rate Base		9.26%		9.08%		10.16%		9.40%	 9.86%
Adjusted Return on Equity		10.46%		10.09%		12.19%		11.22%	12.21%
Actual Return on Rate Base		9.26%		8.52%		9.55%		8.73%	8.96%
Actual Return on Equity		10.46%		9.06%		11.09%		10.05%	10.68%
Incremental Impact Return on Rate Base		0.00%		0.55%		0.61%		0.67%	0.90%
Incremental Impact Return on Equity		0.00%		1.03%		1.10%		1.18%	1.53%
Allowed Return on Equity		11.00%		11.00%		11.20%		11.20%	11.20%

				Utah 、					
Description		2001		2002		2003	2004		2005
Rate Base	\$ 505	5,674,144	\$ 5	39,520,097	\$ 5	549,428,512	\$ 600,068,706	\$:	595,177,075
Change in Rate Base			\$	33,845,953	\$	9,908,416	\$ 50,640,194	\$	(4,891,631)
Average Customers		694,363		712,651		731,752	754,960		786,740
Change in Customers				18,288		19,101	23,208		31,780
Incremental Rate Base Cost Per Customer			\$	1,851	\$	519	\$ 2,182	\$	(154)
Average Rate Base Cost per Customer	\$	728	\$	757	\$	751	\$ 795	\$	757
Net Utility Plant in Service	\$ 580),037,119	\$6	20,793,377	\$6	650,036,512	\$ 705,080,214	\$	719,756,346
Change in Net Utility Plant in Service				40,756,258		29,243,135	55,043,702		14,676,132
Average Customers		694,363		712,651		731,752	754,960		786,740
Change in Customers				18,288		19,101	23,208		31,780
Incremental Net Utility Plant Cost Per Custo	omer		\$	2,229	\$	1,531	\$ 2,372	\$	462
Average Net Utility Plant Cost per Customer	\$	835	\$	871	\$	888	\$ 934	\$	915

		Impact on S After		Incr	eme	ental Net Impac	:t
	GS1 Revenue Reduction	DSM Sales Reduction f 1 Percent	Customer Growth	Income Impact	S	tockholders Equity	Impact on ROE
Base Year	\$ 2.43				\$	325,986,094	
2006-2007	\$ (2,159,364)	\$ (1,337,646)	\$ 4,255,974	\$ 2,918,328	\$	352,276,008	0.83%
2007-2008	\$ (4,318,727)	\$ (2,675,292)	\$ 4,255,974	\$ 1,580,682	\$	377,275,360	0.42%
2008-2009	\$ (6,478,091)	\$ (4,012,938)	\$ 3,745,257	\$ (267,680)	\$	397,609,541	-0.07%
Total	\$ (12,956,182)	\$ (8,025,876)	\$ 12,257,206	\$ 4,231,331			1.18%



	Average Number of Customers GS1	GS1 Usage per Customer (Dth/Cust)	GS1 Usage (Dth)		GS1 Revenue Per Customer
	693,316 711,636 730,777 753,953 785,746 Sample Mean ard Deviation	118.970 115.841 118.899 114.103 112.876 116.138 2.7620	82,483,943 82,436,911 86,888,508 86,027,940 88,692,051	\$ \$ \$ \$ \$	270.50 266.47 283.84 281.00 274.82 275.32 7.19
5-y <i>l</i> i	test (2005 vs. year average) f "t-test" value i no statistically s		76, then there is rence.	;	-0.0707

Utah GS-1 Temperature-Adjusted Use Per Customer with Major Period Trends

