Docket 19-057-02 Dominion Energy Utah General Rate Case Questions for August 14th Technical Conference

- DEU Exhibit 3.11 and the response to MDR B.04, Attachment 1, provides some details regarding the forecasted labor and labor overhead (i.e., employee benefits) amounts included in test year expenses in the filing. However, based on a review of this information, it is not clear exactly how the forecasted 2020 test year amounts were derived for the various components of labor and labor overhead costs that are incorporated in the Company's filing. Can you please explain how each of the 2020 forecasted labor costs incorporated in the filing were determined, by component (i.e., salaries and wages, overtime, incentives, pension, medical, 401K plan, etc.). As part of the discussion, also please explain how the forecasted labor and labor overhead costs to be charged from affiliates was determined and what level of support the Company has for the affiliate labor and labor overhead costs.
- 2. With reference to DEU Exhibit 3.11, can you elaborate on how the 2020 forecasted amount for "Voluntary Retirement Program" of (\$7,154,145) was determined? Additionally, please explain if this adjustment includes the impacts of the program on both salaries and wages and employee benefits costs.
- 3. For consistency between the parties and/or to make future comparisons of parties positions smoother, to the extent possible, if parties recommend a modification to one of the Company's existing adjustments in the revenue requirement model, is it preferable to modify the Company's adjustment tab in the model, or to add a new adjustment that works off of the adjusted results? Or is the approach dependent on the type of adjustment? As a hypothetical example, if parties recommended a revision to the Company's adjustment to Sporting Events or pipeline integrity, is it better to: 1) modify the tabs with those adjustments and highlight or explain where the change was entered; or 2) make a separate adjustment in the "Optional Adjustment" tabs on the model that works off of the Company's adjusted position?