MEMORANDUM

To: Public Service Commission

From: Forecasting Task Force
Cheryl Murray, Task Force Chairperson

Date: December 15, 2005

Re: Report of the Forecasting Task Force
Docket No. 04-999-05

Attached is the final Report of the Forecasting Task Force. The Task Force was established by the Commission's Order approving the Stipulation in Docket No 04-035-42. The Task Force was assigned to discuss methods for forecasting revenues, expenses, rate base, and customer loads and to discuss escalation factors and indices.

The Task Force, consisting of five parties, met six times from April 11, 2005 to August 4, 2005. Task Force participants agreed that the emphasis would be on information sharing with an effort to help parties better understand forecasting methodologies and principles, alternative forecasting methods, types of information of interest to parties in performing their analyses, and what information utilities felt could reasonably be provided. Participants generally agreed that differing and changing circumstances may justify using different methodologies for forecasting, therefore, there was no attempt to mandate rules for forecasting of different types of data over different situations.

Utah Forecasting Task Force
Report to the
Utah Public Service Commission

December 15, 2005

Submitted by
Forecasting Task Force Members

Executive Summary

On February 14, 2005, the Parties in PacifiCorp general rate case (Docket No. 04-035-42) submitted a Stipulation regarding Revenue Requirement, Rate Spread and Rate Design which settled all issues in that case. In that Stipulation, the Parties agreed to the formation of a task force to discuss methods for forecasting revenues, expenses, rate base, and customer loads and to discuss escalation factors and indices. The Stipulation also indicated that the Parties recommended that the Committee chair this task force and that a report of the task force be filed with the Commission by November 30, 2005. The Revenue Requirement, Rate Spread and Rate Design Stipulation was approved and incorporated in the Utah Public Service Commission's February 25, 2005 Report and Order. At the request of the Task Force participants, the due date for the report was extended to December 15, 2005.

The Forecasting Task Force involved five interested parties who met numerous times over approximately a five-month period to discuss the assigned issues and other issues proposed by Task Force participants. During the Task Force meetings, presentations were made by various Task Force participants covering forecasting techniques for revenues, customer loads, expenses and rate base items, the Questar Gas and PacifiCorp budgeting process, and burdens and information that may be relevant to determining the accuracy and reliability of forecasted data.

The presentations and discussions provided a forum to educate Task Force participants on forecasting methodologies and principles. It also provided an opportunity to discuss the use of forecasted data in PacifiCorp's most recent general rate case proceeding and questions and concerns parties had related to that forecasted data. However, based on the goals of the Task Force, the discussion of the issues centered on parties gaining a better understanding of the issues related to forecasting data rather than attempting to mandate proscriptive rules for forecasting of different types of data over different types of situations. The parties do not deem this result as a failure of the Task Force process, rather it is part of the nature of forecasting that differing forecasting methods and options will be preferable in different circumstances. The parties are of the opinion that the Forecasting Task Force meetings were time well-spent in helping parties gain a better understanding of the issues and positions and concerns of the parties.

Task Force Assignment

The Revenue Requirement, Rate Spread and Rate Design Stipulation detailed the Task Force assignment as follows:

> 17. Forecasting. The Parties stipulate and agree to the formation of a task force to discuss methods for forecasting revenues, expenses, rate base, and customer loads and to discuss escalation factors and indices. This task force will be comprised of representatives from the Division, Committee and PacifiCorp. Other interested parties may also participate in the task force. The Parties recommend that the chair of this task force be a representative from the Committee. The initial meeting of the task force will be no later than April 15, 2005. PacifiCorp will file with the Parties no later than March 25, 2005 an initial list of issues to be addressed by the task force. The task force should be directed to submit a report to the Commission explaining the information obtained and analyzed, consensus positions, and issues still in dispute no later than November 30, 2005.

PacifiCorp provided its initial list of issues as per the terms of the Stipulation with input from Questar Gas. The Committee provided its recommended objectives for the Task Force at the April 11 meeting. On June 16, the Division provided a document titled DPU Goals, Principles and Expectations. These documents are provided for information purposes only as Attachments A, B, and C, respectively.

Meetings

The Task Force met six times. Early meetings were joint meetings with the Discovery and Filing Requirements Task Forces; however, the later meetings were only the Forecasting Task Force participants. Meetings focused on a pre-assigned subset of the issues with individual participants making presentations and leading the discussion on the various issues and proposals. The Forecasting Task Force held meetings on the following dates:

March 25, 2005
April 11, 2005
May 5, 2005
June 22, 2005
July 8, 2005
August 4, 2005

Participants

The following organizations participated, either in person or by phone, in the Forecasting Task Force.

1. Committee of Consumer Services (CCS)
2. Division of Public Utilities (DPU)
3. PacifiCorp
4. Questar Gas Company (Questar Gas)
5. Utah Association of Energy Users (UAE)
6. Utah Public Service Commission Staff (PSC)

Objectives

Based on the language of the Stipulation, the participants in the Forecasting Task Force agreed upon the following list of objectives to be discussed in preparation for a report to the Utah Commission on November 30, 2005.

1. To obtain a better understanding among the parties with regard to the use of forecasts in rate case filings using a future test year, so that the review process, including the discovery and audit phases, can proceed more smoothly.
2. To obtain a better understanding of alternative forecasting methods.
3. To ensure the utilities have a better understanding of the types of factors and information the parties would like to evaluate in connection with the utilities' forecasts, as well as what the parties would view as a reasonable level of support for those forecasts.
4. Provide guidance to the utilities regarding the types of evidence and level of evidence the parties feel would go towards meeting the utilities' obligations to demonstrate that its proposed forecasting methods selected for each rate case component and the forecasts themselves are reasonable, supported and best reflective of circumstances to be in effect during the rate year.
5. Provide guidance to the utilities regarding what additional information they should provide to support parties' evaluation of the utilities' forecasts and development of alternative forecasts if they so choose.
6. Work with the Filing Requirements Sub Group and the Discovery Task Force to incorporate these findings into the filing and discovery processes in order to provide needed information in those processes as efficiently and effectively as possible.

Conclusions

The objectives of the Task Force can be grouped into two large categories, which the parties spent most of their time reviewing in the context of Task Force meetings. The two broad areas of inquiry were forecasting methods (Objectives 1 and 2) and supporting information (Objectives 3-6).

1. Forecasting Methods

The Task Force participants discussed several different types of forecasting methods, including the use of escalation factors, budgets, linear regression and other econometric models. To gain a better understanding of escalation factors and budgets, Questar Gas and PacifiCorp made presentations to the parties regarding their short and long-term budgeting processes and their use of indices in creating forecasts. The participants also discussed how the use of the first fully forecasted test year in many years in Utah in Docket No. 04-035-42 raised concerns for some parties because of its unfamiliarity in this state. However, experts for some participants with experience in other states that use forecast test years discussed how the concerns with forecasting were not insurmountable obstacles to the use of a forecast test year, although the use of such a test year requires additional auditing work and an understanding of forecasting methodologies and their applications. The issue as to whether an historical, fully forecasted or mixed/middle test year would be the most appropriate test year in any given context or rate case is beyond the scope of the task force and no consensus was reached.

While the participants initially discussed whether to recommend that specific forecasting methodologies be used for specific types of costs in cases where future test years are used, the participants ultimately reached a general agreement that changing circumstances and different factual contexts could justify the use of different methodologies under different circumstances even for the same types of expenses, revenues or loads. Accordingly, the participants agreed to a process for presenting and reviewing forecasts rather than dictating that specific forecasting methods be used. The participants agreed to the following principles with respect to forecasting methodologies and process:

- In making their initial filings, if a future test year is used, utilities choose the forecasting methodologies and applications of the methodologies in light of the conditions they expect and the actions they expect to take.
- The utilities have the obligation to support the methodologies and applications they choose. Support for a forecast includes providing information and data to support the forecast and its application, as well as the source inputs, models and calculations. The utility should also be prepared to provide the information and data necessary for other parties to test (where feasible) the reasonableness of the method or its application.
- The utilities may use different methodologies and applications from time to time to reflect changes in their environments, changes in their budgeting processes, different factual contexts or demonstrable improvements in forecasting

techniques. The utilities bear the burden of demonstrating that a change in methodology and/or application is warranted.

- Any party may challenge a utility forecast on the basis that the forecast is technically incorrect, unreasonable or for other appropriate factual or legal challenges. The participants in the Task Force discussed the following types of possible challenges: lack of support from historical data or recognized independent experts; lack of clearly stated and supported explanations for departures from historical results and expectations; or the use of statistical forecasting methods that fail to adequately model historical data. This list is not all-inclusive of potential challenges.

2. Information in Support of Forecasts

The participants also spent time discussing the methodologies and supporting information for different elements of the general rate case. In general, parties would be seeking information that demonstrated that the utility's forecast included in the test year, if a future test year is used, followed the chosen methodology, correctly applied the methodology and otherwise complied with any internal processes otherwise governing spending in that category of costs. In addition, to gauge the reasonableness of the utility's forecasts over time, parties would be seeking historical information on actual amounts for prior periods and comparisons of actual amounts to budgeted and forecasted amounts. Finally, parties would provide descriptions of the forecasting methodologies employed and the reasons for choosing the methodology, workpapers and calculations supporting the application of the methodology and inputted data. With respect to particular rate case elements, the participants discussed the supporting information for forecasts in the following categories:

a. Rate Base

The participants discussed several issues with respect to rate base additions. First, the utilities emphasized the need to distinguish between capital expenditures and rate base additions. PacifiCorp expressed concern that undue emphasis was placed on progress towards budgeted capital expenditures that may not affect the projected plant in service in the test year. The Division agreed that capital expenditures should only include items that will be added to rate base during the forecasted test year.

The participants also discussed the types of information that would be requested by other parties in order to evaluate the reasonableness of the utility's forecasts. The Division emphasized the need to have data sufficient to support the forecast and where applicable, to permit the Division to replicate the methodologies and their application in arriving at the forecasted levels. The Committee also provided a list of the types of information they would wish to see with respect to rate base forecasts (attached hereto as Attachment D). In discussions, the Committee acknowledged that the list of information was by way of example only and may be over or under-inclusive depending on the type of forecasting methodology employed by the utility. In addition, some of this discussion was later subsumed in the work of the Discovery and Filing Requirements Task Forces.

With respect to cyclicality/seasonality, the utilities pointed out that, depending on a number of factors, capital expenditures that become plant in service may not be expended equally throughout a calendar year. The utilities explained that this unevenness must be considered when comparing monthly actual spending to monthly forecast amounts that were derived by dividing the annual total by 12. Other parties acknowledged that seasonality and/or cyclicality may affect spending, but expressed the view that the utility should explain any such historical trends that demonstrated such cyclicality in its filing and/or in response to discovery.

With respect to cancelled projects, PacifiCorp noted that a project may be cancelled because another project became a higher priority or another project required additional, prudent, but unplanned for spending. The Company explained that such reprioritizations must be considered when comparing actual capital spending to forecast expenditures at a detailed project level. In general, participants agreed that reprioritization was a possibility within management's discretion but parties may monitor such changed projects more closely and monitor the overall actual expenditure levels.

While parties discussed their concerns surrounding analysis and documentation of these two issues (cyclicality and cancelled projects), resolution of how capital expenditures should ultimately be treated in any given rate case is beyond the scope of the Task Force and no consensus was reached.

b. Expenses – OMAG

The participants to the Task Force acknowledged that there were many different reasonable methods to forecast expenses and therefore, there was no "one size fits all" that would work in this area. For example, parties recognized that the use of generic inflation indices, such as the DRI index may not be appropriate for insurance costs or pensions which do not generally vary on that basis. In general, although different types of forecasting methodologies were discussed, it was determined that it would not be appropriate or feasible to pre-determine a forecasting methodology. It will be the responsibility of the utility to demonstrate the reasonableness of their chosen method and to demonstrate that their chosen method best reflects the circumstances that it anticipates to experience in the test year.

The parties also acknowledged that the internal budgeting and forecasting processes within the utilities are not stagnant, but rather, are dynamic in nature and are likely to change and evolve over time.

With respect to inflation indices and escalators, as noted above, Questar Gas and PacifiCorp each made presentations regarding their use of indices in creating and validating forecasts. While participants did not wish to prejudge the types of indices that would be reasonable in all cases for all costs, participants did indicate that it would be helpful to compare a particular utility's historical trends to the indices to determine their suitability for projecting costs for that utility. Again, parties discussed whether updating

to indices and escalation factors should be permitted during the case (see generic discussion of updates under revenues/customer loads below).

One particular area discussed at length during the Task Force meetings was forecasting of labor costs. In particular, the participants discussed the utilities' methodologies for forecasting labor costs. PacifiCorp noted that in some areas of the business, it forecasted the level of work that was included in the forecast test year, and then based on historical trends and known and projected information regarding availability, would use a reasonable mix of FTEs and contract labor to accomplish the projected work in the test year. PacifiCorp acknowledged that it was reasonable for the utility to explain the reasonableness of its assumptions in this regard, however, wanted to emphasize the interrelationship between the labor and contract levels and the work (e.g., plant in service, maintenance levels, etc.).

c. Revenues/Customer Loads

The significant issues discussed under forecasting of revenues and customer loads were information supporting the forecast that should be made available and whether updates to loads for Utah and other states should be permitted during the course of the proceeding. As noted above, the participants generally agreed that it was the utility's initial determination of the proper forecast methodology to be used for revenues and customer loads and that any changes to the methodology should be made known to regulators and other interested parties. The utilities also agreed that if parties requested changes to the calculations or assumptions, the utilities would assist in running the changes through the calculation models through the discovery process. The Division expressed a view that updating of the revenue projections should be permitted as a matter of course and should include, when done, updates to other states' loads and allocations. The Committee raised concerns regarding the timeliness of such updates and whether the timing of proposed updates to the revenue forecasts would allow for adequate discovery, review and audit of the proposed updates. The Division believes that there should be a cut off at some point to the provision and use of updated information either by the utilities or by the parties. This matter was not resolved.

With respect to the types of information that other parties might wish to review to evaluate the reasonableness of the utilities' forecasts, please see Attachment D for the Committee's list, previously discussed.

FORECASTING TASK FORCE
PacifiCorp's Initial List of Issues
March 25, 2005

General Issues

- Review lessons learned from Docket No. 04-035.42
- Burden of proof - what is the standard for a forecast?
- What provisions should be made for forecast updates? Do updates are allowed, can the Company add costs?

Revenues/Customer Loads

- How do you forecast customer responses to time of use rates and other rate design initiatives?
- What load forecast should be used in a rate case?
- Should loads be updated during the course of the case? Is there some cutoff point?
- If Utah loads are updated, are other states updated as well?
- If loads are updated, must allocation factors also be revised?
- How should Other Revenues be forecasted?

Expenses/Escalation Factors and Indices

- What escalation factors/indices should be used to inflate non-labor O&M?
- Should indices be applied an the account level or at the functional level?
- Should escalation factors/indices be updated during the course of the case? If so, when? Is there a cutoff point?
- What expenses should be excluded from general inflation and adjusted individually, e.g., pensions, health care costs, other employee benefits, etc.?
- What is appropriate documentation for forecast pension expense, health care costs, and other expenses that do not track general inflation?
- How do you forecast labor, i.e., is it important to distinguish between Company labor and contract labor? Should they be interchangeable?
- What is appropriate documentation for salary increases for non-union labor?

Rate Base

- Need to distinguish between capital expenditures and rate base additions.
- How to address cancelled projects and reprioritizing of forecast test year capital additions:
    1. Cancelled projects do not signal an automatic reduction in test year rate base.
    2. Individual projects can change within a test year without changing the total forecast of rate base additions.
- How to address the fact that capital expenditures are not spread evenly over a 12-month test year, i.e., low spending levels in the early months do not necessarily mean that the overall test year forecast will not be achieved.

- What level of detail is required to support forecast capital additions? What evidence can the Company provide to demonstrate its commitment to capital spending?
- What kind of evidence of management approval for capital spending is required beyond management approval of the test year construction budget?
- Is it appropriate to give weight to past spending patterns in determining the credibility of the test year forecast?
- Inclusion of SB26 approved items.

April 2005

The Committee of Consumer Services recommends the following objectives for the Forecasting Task Force:

1) To obtain a better understanding among the parties with regards to the use of forecasts in rate case filings using a future test year, so that the review process, including the discovery and audit phases, can proceed more smoothly.

2) To ensure the utilities have a better understanding of the types of factors and information the parties would like to evaluate in connection with the utilities' forecasts, as well as what the parties would view as a reasonable level of support for those forecasts.

3) To obtain a better understanding of the utilities' forecasting methods, as well as alternative forecasting methods.

Forecasting Task Force
DPU Goals, Principles, and Expectations
June 16, 2005

Goals:

The Division, Committee and any other interested parties will have a general understanding of the forecasting methodologies, data bases, assumptions, and justifications that utility companies, and in particular PacifiCorp and Questar Gas, (Companies) use or expect to use in a rate case with a forecasted test period. These methodologies, etc., will be delineated at least by major items found on the income statements and balance sheets of the Companies.

Principles:

1. Forecasting is an inexact process. The only certainty is that a forecast will be different than the actual result, although one may aspire to be "close" in some sense.

2. The Companies will choose the forecasting methodologies and application of the methodologies in light of the conditions they expect and the actions they expect to take.

3. The Companies may change methodologies and applications from time to time to reflect changes in their environments, or demonstrable improvements in forecasting techniques.

4. Any party may challenge a Company forecast to show that the forecast is unreasonable (not just that they can come up with a different forecast). "Unreasonable" may include a lack of support from historical data or recognized independent experts; or in the alternative, a lack of clearly stated and supported explanations for departures from historical results and expectations. "Unreasonable" could also include the use of statistical forecasting methods that fail to adequately model historical data.

5. The Company has the obligation to justify its forecasting methodologies. This includes, but is not limited to, providing enough information or data to replicate (where feasible) the Company's forecast.

Expectations:

1. For major items set forth on the Companies' income statement and balance sheets, the Companies will provide Division, Committee and other interested parities with

A. a complete description of the statistical model or other process the Company went through to make the forecast.

B. an enumeration of, and justification for, any assumptions that went into the model. The Company will also describe any high/low analyses. If significant alternative scenarios, assumptions or models were analyzed before arriving at the final forecast, these will be described with an explanation as to why they were ultimately rejected. The Company does not have to provide information on the assumptions inherent in any generally familiar statistical method, e.g. regression analyses.

C. a description of the total historical data base available for a given item. If a subset of the data base was used in the forecast, the Companies will explain why only a subset was used.

D. the raw data used in the model in usable form so that the Division, Committee or other interested parties can readily replicate the forecast and do their own sensitivity and scenario analyses should they desire to do so.

2. The Companies will be able to reasonably support changes in forecasting methodology from prior forecasts they intend to make; and will timely notify the Division, Committee and other interested parties of these changes, with an explanation and any supporting data backing the change.

3. The Division includes by reference the American Institute of Certified Public Accountants (AICPA) forecasting guidelines published in "Guide for Prospective Financial Information," especially note paragraphs 6.09 through 6.46.

4. By the end of this Task Force, the Division and Committee staffs, and other interested parties will have been provided with information both general and specific to satisfy the goals of this Task Force.

CCS EXAMPLES OF INFORMATION PARTIES WOULD WANT TO REVIEW IN EVALUATING FORECASTS USED BY A UTILITY IN A GENERAL RATE CASE USING A FUTURE TEST YEAR

General – Overall

The following information would be beneficial to parties evaluating forecasts in all areas in which other than historical levels are used:

- Detailed description of how the projected/forecasted amounts were determined, basis of the forecast/projection, and why a particular forecasting/projection methodology was utilized by the utility.
- Detailed calculations and workpapers showing how the projected/forecasted amounts were determined, with explanations provided with the workpapers and calculations when not clear by the workpapers themselves.
- Back-up and supporting documentation relied on by the utility in determining the projected/forecasted amounts.
- Inputs used by the utility in any models used in forecasting and projections, including source documents.
- Descriptions of changes in forecasting methodology from prior periods along with description of why change was made.
- Comparison of historical budgeted (1 year out) and forecasted (over 1 year out) amounts to actual amounts for period of prior years.
- Trend of actual amounts for a number of years (i.e., 5 years) as compared to forecasted amount included in rate case filing.
- Where forecasting models are used, electronic copy of model with formulas intact, to degree possible.
- Detailed budget variance reports with narrative explanations of variances.

Rate Base – Plant in Service

- Description of process by which capital additions are projected.
- If historical trending is used, discussion of why historical level of additions and retirements are projected to continue.
- If other than historical trending is used, detailed description of how projected additions and retirements were determined. If done by business unit, description of how projections are determined by business unit.
- Instructions provided to the business units (or groups making capital projections if not business units) regarding projections of capital additions and retirements.

- Detailed capital budget by business unit (or most detailed level within the utility's budget process).
- For projected additions over a certain threshold, detailed description of the project and purpose, copy of cost benefit analysis for the project, project work orders. (Parties may have differing views on what the threshold should be - percent of rate base could be used in setting the level for purposes of a master data request).
- Description of approval process and thresholds for capital additions.
- Comparison of historical budgeted (1 year out) and forecasted (over 1 year out) additions and retirements to actual amounts for period of prior years.
- Amount of actual additions and retirements for a number of years (i.e., 5 years) as compared to forecasted additions and retirements included in rate case filing by functional category or by FERC account.
- In areas (functional categories) in which projected additions or retirements differ substantially from historical levels of additions/retirements, description of factors driving the variances.
- Capital variance reports, with narrative explanations, in the most detailed format available for period of historical test year and interim period through the most recent dates available.

Expenses – OMAG

The type of information/documentation parties will want to review in this area will vary significantly depending upon the basis used by the utility in determining the future test year amounts -- historical level, trended historical level, historical level with inflation/escalation factors applied, or budgeted/forecasted amounts. Examples of the type of information that parties may want to evaluate include, but are not limited to:

- Source documents for inflation/escalation factors used by the utility.
- Description of why particular inflation/escalation factors were selected by the utility along with description of why the utility believes the factors it chose to use are appropriate and reflective of the utility's costs.
- Detailed description of the utility's budgeting/forecasting process.
- Copy of instructions given to budgeting units for guidance in preparing budgets/forecasts.
- Description of utility's approval process for budgeting/forecasting.
- Copies of budgets, in the most detailed level available, by budget unit, including back-up documentation and support for amounts included in the budgets.

- Budget variance reports, with narrative descriptions, in the most detailed format available for the historical test year and the interim period through the most recent date available.
- Comparison of historical budgeted (1 year out) and forecasted (over 1 year out) expense amounts by FERC account (or most detailed level available if not by FERC account) to actual amounts for period of prior years.
- Table or schedule providing the actual expenses by account for a number of years (i.e., 5 years) as compared to forecasted amounts included in rate case filing.
- In accounts in which projected expenses differ substantially from historical levels, detailed description of factors driving the variances along with justifications.
- For any expenses or categories of expenses that are individually forecasted by the utility, detailed calculations and assumptions used in determining the forecasted amounts, along with description of why a particular method was used and supporting documentation.
- Description and copies of any cost savings initiatives/plans and early retirement or company downsizing plans the utility is undergoing or considering.
- Detailed description of any changes in projected work force (additions or subtractions) from the historical test year to the amount included in the projected test year in the utility's filing, along with justification for changes and steps utility is undergoing to implement those changes.
- Budgeted number of full time equivalent employees, by month and by business unit, to actual number of employees for a number of past years.
- Projected number of full time equivalent employees, by month and by business unit, for the period from the end of the historical test year through the end of the projected future test year included in the filing.
- Comparison of actual full time equivalent employees from period of end of historical test year through most recent date available to projected amount through same date as used in preparing the filing.

<u>Revenues/Customer loads</u>

- Copy of electronic model(s) used by utility in determining forecasted customer growth, load growth, changes in usage per customer (if applicable) and forecasted revenues.
- Source data used by utility as inputs into its forecasting model (hard copy & electronic).
- Detailed description of assumptions used in determining future load and revenues, by customer class/group.

- Detailed description of any changes in forecasting/projection process from prior case.
- Detailed description and justification of any changes in assumptions from those used in most recent resource planning process as compared to amounts used in general rate case filing.
- Description of process used by utility in determining weather normalized usage used in trending and forecasting if different from method used in prior case.
- Comparison of historical projected customers, usage per customer, total sales and revenues to actual amounts by customer class.
- Comparison of annual customer growth, by class, for a number of years (i.e., 5 years) as compared to forecasted customer growth for the interim period and forecasted test year included in rate case filing.
- Comparison of weather normalized average usage per customer, and annual percentage change in weather normalized average usage per customer, by class, for a number of years (i.e., 5 years) as compared to forecasted customer growth for the interim period and forecasted test year included in rate case filing.
- In rate classes in which projected changes in customer levels and/or usage per customer differ substantially from historical levels, description of factors driving the variances.
- Discussion of any projected additions or removal of large commercial and industrial customers from the historical test year to the projected test year, along with projected usage and revenue impacts.