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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 Service Regulations, Consisting of a General Rate Increase of Approximately $161.2 Million Per Year, and for Approval of a New Large Load Surcharge	Docket No. 07-035-93 **BRIEF BY THE DIVISION OF PUBLIC UTILITIES**

The Division of Public Utilities (Division or DPU) hereby submits its brief in the above entitled matter.

INTRODUCTION

At the end of the revenue requirement hearings the Division adjustments and Rate of Return recommendations result in a rate increase of $44.3 million. This, however, does not reflect adjustments the company has accepted from other parties. This Brief will address both Rate of Return issues addressed in the May hearing and the Division's Revenue Requirement adjustments discussed at the June hearing. In addition, this Brief will address certain test years and filing requirements issues. It should also be pointed out that in this brief the Division will not address several adjustments proposed by other parties. This should not be taken to imply that the Division is opposing those adjustments.

RATE OF RETURN ISSUES

The Commission is charged with determining just and reasonable rates for Rocky Mountain Power.[1] Important components of rates include the cost of equity and the overall weighted cost of capital. The Utah Supreme Court has recognized the Commission's "broad discretion in setting the rate of return on equity."[2] RMP's 10.75 percent point cost of equity[3] and requested cost of debt of 6.30 percent[4] are too high.[5] The Division recommends a point estimate of a 10.10 percent authorized cost of equity and an overall weighted cost of capital of 8.20 percent for PacifiCorp and Rocky Mountain Power's (RMP) operations in Utah. The Division agrees that RMP's capital structure and cost of preferred stock are reasonable.[6]

The Commission has applied court decisions when determining the justness and reasonableness of rates. The Commission is guided by the leading cases of <u>FPC v. Hope Natural Gas Company</u>[7] and <u>Bluefield Water Works v. PSC</u>.[8] Reflecting upon those two cases, the Commission stated:

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[1] See Utah Code Ann. § 54-3-1.
[2] See Mountain Fuel Supply Co. v. Public Service Commission, 861 P.2d 414 (Utah 1993) citing Kearns-Tribune Corp., 682 P.2d at 860.
[3] Hadaway Direct Testimony, lines 36-43.
[4] Williams Supplemental Direct Testimony, lines 27-33.
[5] Peterson, Direct Testimony DPU Exh. 2, lines 132-136.
[6] Peterson, Direct Testimony, DPU Exh. 2, lines 130 – 132.
[7] 320 US 591 (1944).
[8] 262 US 659 (1923).

> From them, we learn that our rate-of-return decision should give investors the opportunity to earn a return on an investment in the Company comparable to the return the investor might earn in other investments of similar risk, and it should be a return sufficient to attract capital on reasonable terms and to maintain a financially viable utility. This points to the importance of an analysis of risk, and to the selection of comparable companies for that purpose. Investors' required return, the opportunity cost of capital, is thus the utility's cost of capital.[9]

When commenting upon ratemaking, the Utah Supreme Court stated "Two polar constitutional principles fix the parameters of rate regulation for natural monopolies: the protection of utility investors from confiscatory rates and, of equal importance, the protection of ratepayers from exploitative rates."[10] Further, the Utah Supreme Court stated, "The Commission must examine the effects of the proposed expenses upon ratepayers and shareholders."[11] A return should be sufficient to allow the utility to raise necessary money to provide public service but rates should not be exploitative.[12]

In the 2002 Questar Gas case Order, the Commission commented upon the process used to determine rate of return issues. The Commission stated,

> As in past deliberations, record evidence is used to define a range of reasonable equity return estimates. At the low end, the range is defined not simply by ratepayer interest in low-cost utility service but by possible confiscation of shareholder property. At the high end, the range is likewise not simply defined by shareholder interest in high returns on investment, but by ratepayer interest in avoiding excessive rates; that is, rates based on no more than is required to

[9] Questar Gas Company, Docket No. 02-057-02, page 19 (2002) (2002 Order).
[10] Stewart v. Utah Public Service Commission, 885 P.2d 759, 767 (Utah 1994), citing Federal Power Commission v. Hope Natural Gas Company, 320 US 591 (1944).
[11] US West Communications Inc. v. Public Service Commission of Utah, 901 P.2d 270, 276 (Utah 1995).
[12] See Stewart at 771.

> meet the capital attraction, comparable risk, and utility financial viability standards. The allowed return, in short, must be reasonable, and be fair to shareholders and to ratepayers. Within this range, all returns are by definition reasonable.[13]

In evaluating the record evidence, the Commission emphasized that it is important for it to "ascertain that each witnesses' judgments are finely and carefully made" utilizing financial model data and other information because a "rate of return analysis is a subjective exercise" which requires the Commission to "assess witnesses' judgments carefully."[14] In the 2002 Questar Gas Order, the Commission also commented upon business risk and the various financial models and proxy companies utilized and proposed by the parties.

RETURN ON EQUITY

Determining return on equity involves evaluating often conflicting, contentious information utilizing sophisticated models and financial market data. It is often said that ratemaking is an art, and this seems particularly true when determining return on equity – which is, just as the Commission recognized in the 2002 Questar Gas Order -- subjective. This case is no exception to the general rules stated above. Witnesses presented lengthy, detailed, specific testimony, utilized different inputs, and came up with various conclusions.

In selecting comparable or proxy companies, DPU Witness Mr. Charles Peterson carefully scrutinized company characteristics, resulting in the inclusion of seven of Dr. Hadaway's 15 proxy companies, and an addition of five

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[13] 2002 Order at 20.
[14] Id. at 19-20.

companies to create a meaningful proxy group.[15] Mr. Peterson compared and contrasted his process with Dr. Hadaway's at the hearing.[16]

Mr. Peterson concluded that a point estimate of 10.10 percent cost of equity was applicable to PacifiCorp. In reaching this conclusion, Mr. Peterson presented a robust variety of models and offered specific information concerning the inputs and reasons for those inputs. Mr. Peterson used the formula set forth in the Questar 2002 Order,[17] the CAPM model,[18] single stage and two stage discounted cash flow models incorporating two types of risk premium models and various growth rates, as well a model Mr. Peterson had used previously to give the Commission yet another check on reasonableness.[19] After addressing all his calculations, Mr. Peterson concluded that the high-low range, excluding 82-year estimates, was 8.63 to 10.47 percent.[20] Mr. Peterson's point estimate of 10.10 percent was close to the 10.20 percent expressed by Dr. Hadaway's constant growth DCF model analyst growth rates, if PPL and its outlier of 16.8 percent are deleted.[21]

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[15] See Peterson Direct Testimony, DPU Exh. 2.3.

[16] See Transcript at pp. 102-104.

[17] Applying the Commission's formula set forth in the 2002 Questar Gas rate case, Mr. Peterson calculated a value of 10.08 percent for a single stage forecast, and a value of 10.32 percent for a single stage forecast, adjusted average. Contrastingly, Dr. Hadaway neither read the Commission's 2002 order nor performed the calculation utilizing the formula set forth therein, and was unsure if he discussed this case with counsel.

[18] Mr. Peterson recognized the Commission's "justified skepticism about the CAPM model," but urged the Commission to look at this model, along with other models, because the use of multiple models should increase confidence in and refine the estimates. Peterson Direct Testimony, DPU Exh. 2, lines 72-83.

[19] See, generally, Peterson Direct Testimony, DPU Exh. 2, and DPU Exh. 2.5.

[20] See Peterson Direct Testimony, DPU Exhibit 2.5.

[21] See Dr. Hadaway's Exh. SCH 7-R, as discussed at Transcript, p. 46, lines 10-25 and p. 47 lines 1-2.

Mr. Peterson demonstrated that his “cost of equity estimate sits well within the estimates arrived at using standard financial models and forecasts derived from market participants” and rebutted Dr. Hadaway’s criticisms by showing “that a 10.10 percent cost of equity is well within the range of the authorizations granted other utility companies” and “not outside any range or expectations of Wall Street.”[22] A cost of equity of 10.10 percent should allow the Company to continue to raise capital, including capital for Rocky Mountain Power because – as Mr. Peterson noted -- “the equity rates [he’s] advocating are derived from market data, and are higher than the Company’s earning recent history [sic][23] “also, when responding to cross examination by the Company concerning his testimony about Questar Gas’ recent debt issuance in the Questar Gas rate case, Mr. Peterson recognized that more things than just debt ratings affect interest rates on debt; here Mr. Peterson noted that the second part of Questar Gas’ debt issuance was affected by its small size and that “PacifiCorp should not be faced with that circumstance with their debt offering that’s coming up.”[24]

Applying the case law discussed at the beginning of this section to the facts presented here, and the other facts in the record, supports a point estimate of 10.10 percent for PacifiCorp’s cost of equity in this case. This result is just, reasonable, and in the public interest.

COST OF DEBT

Mr. Peterson provided a substantiated analysis demonstrating that PacifiCorp’s proposed cost of new long-term debt must be adjusted downward.

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[22] Peterson Direct Testimony, DPU Exh. 2, lines 909-921.
[23] Peterson Direct Testimony, DPU Exh. 2, lines 377-383.
[24] Transcript, p. 106, lines 9-25 and p. 107, lines 1-12.

Specifically, Mr. Peterson determined that a 21 basis point downward adjustment was warranted, taking the overall cost of debt from 6.30 percent to 6.28 percent.[25] Mr. Williams' attempts and Dr. Hadaway's attempts to discredit Mr. Peterson's analysis were unpersuasive, and lacking in support.[26] Mr. Peterson carefully analyzed the arguments proposed by PacifiCorp in its rebuttal testimony, and found them to be unsupported because of contradictory statements and unique fact circumstances.[27] After evaluating the arguments and support, or lack therefore, provided by PacifiCorp, Mr. Peterson determined that "the interest rate [when PacifiCorp issues its contemplated debt] could very well be 6.28 percent (the rate I used in my Direct Testimony) or lower."[28] Even if the positions of Dr. Hadaway and Mr. Williams could be reconciled, and more data were provided, the impact would only affect the recommend cost of capital by 1 basis point.[29] Mr. Peterson, after a thorough analysis and even after providing for reconciliation and additional evidence from PacifiCorp, stands by his original testimony that a downward adjustment is warranted.[30] At the hearing, Mr. Williams attempted to distinguish his testimony from Dr. Hadaway's, and offered that the testimonies differed with respect to borrowers and periods of time.[31] However, this distinction rings hollow in light of the facts. Of note, the Company

[25] Peterson Direct Testimony, DPU Exh 2.0, p. 10, lines 202-236.
[26] See Williams Rebuttal Testimony, lines 23-45 and Hadaway Rebuttal Testimony at lines 83-85.
[27] Peterson Surrebuttal Testimony, DPU Exh. 2.0 SR, lines 257-296.
[28] Id. at lines 293-296.
[29] Peterson Direct Testimony, DPU Exh. 2.0, at lines 297-305.
[30] Id. at lines 297-305.
[31] Transcript, p 27, lines 17-25 and p. 28, lines 1-4.

has not hedged the future interest rate for its projected $700 million bond issuance in November.[32]

Mr. William's arguments are unpersuasive, and the Company's cost of debt should be adjusted downward.

The evidence supports the Division's point estimate of 10.10 percent cost of equity. This result is consistent with applicable case law. The Company's overall cost of debt must be also adjusted downward to 6.28%. These results are in the public interest, and will result in just and reasonable rates.

REVENUE REQUIREMENT ISSUES

CASH WORKING CAPITAL

The Company is requesting a cash working capital allowance of $31,688,954. This rate base amount is calculated based on the use of a 2003 lead lag study. Cash working capital is not a hard asset like a piece of plant. Therefore, the DPU recommended that a high standard of proof exist before the PSC would allow this asset into rate base. This avoids the incentive for a utility to turn its cash management center into a profit center.[33] This high standard of proof was not met in this case and can only be met with the use of a current lead lag study.

It is commonly understood and often recited by all parties that the utility has the burden of proof in a rate case. That standard has been affirmed by the Utah Supreme Court. In Utah Department of Business Regulation, Division of Public Utilities v. Public Service Commission, the Utah Supreme Court stated:

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[32]Transcript, p. 28, lines 20-25 and p. 29, lines 1-3.
[33] DPU Exh. 5.0, p. 11.

> In the regulation of public utilities by governmental authority, a fundamental principal is: the burden rests heavily upon the utility to prove it is entitled to rate relief not upon the commission, the commission staff, or any interested party or protestant; to prove the contrary. A utility has the burden of proof to demonstrate its proposed increase in rates and charges is just and reasonable. The company must support its application by way of substantial evidence, and the mere filing of schedules and testimony in support of a rate increase is insufficient to sustain the burden. Rate making is not an adversary proceeding in which the applicant needs only to present a prima facie case to be entitled to relief. A state regulatory commission, whose powers have been invoked to fix a reasonable rate, is entitled to know and before it can act advisedly must be informed of all relevant facts. Otherwise, the hands of the regulatory body could be tied in such fashion it could not effectively determine whether a proposed rate was justified.[34]

In this case the Commission can now determine if the statements of the Supreme Court and the recognized burden of the utility have any meaning. Both DPU Witness Mr. Mark Garrett and CCS Witness Ms. Donna DeRonne testified that because of the age of the study it could not be relied upon to determine the proper leads and lags necessary to set a cash working capital allowance.[35] In addition the company only submitted a summary of the lead lag study. The underlying data could not be reviewed by any party. Without being able to "trace the original source documents, invoices, canceled checks, payment vouchers, wire transfers, contracts, accounts payable journals, accounts receivable registers, etc. an auditor can not test the validity or reliability of the calculations or conclusions reached in the study."[36]

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[34] 614 P.2d 1242, 1245-46(Utah 1980) (citations omitted).
[35] DPU Exh. 5.0S, p. 3, DPU Exh. 5.0, p. 5, and CCS Exh.2D pp. 14-15.
[36] DPU Exh. 5.0S, p. 4. See also Ms. DeRonne's testimony, CCS 2D p. 14, in answer to a question of whether she reviewed the lead lag study, she indicted that she did not because of the age of the study.

Without a current lead lag study Mr. Garrett indicated that some Commissions set cash working capital at zero.[37] The Company chooses the timing of its rate cases. It should not be able to avoid its burden of proof by failing to present all necessary elements to its rate case. The Company indicated that it is currently performing a new lead lag study. It could have chosen to finish that study for this case but chose not to. It should not be rewarded for its choice by a cash working capital allowance that has not been based on competent evidence. It has failed to meet its burden to show the amount of cash working capital needed, and the Commission should set that level at zero until a new study is submitted in the next rate case and a review by all parties can take place of the underlying data to determine the appropriate amount of cash working capitol to include in rate base.

OFFICE CONSOLIDATION

One relatively minor adjustment deserves some discussion. On the joint matrix, line 40 is RMP's response to DPU Witness Mr. Matthew Croft's adjustment on certain office consolidation expenses that were inconsistent with historical costs. The Division proposed to remove the costs that were out of line with historical levels and to allow recovery of the average expense level that has existed since the company started keeping track of these costs (which has only been a couple of years). The additional adjustment of the Division is found on line 104. At the hearing the Company acknowledged that these costs are not

[37] DPU Exh. 5.0, pp. 6-10. Mr. Garret indicated that Texas actually presumes that a CWC allowance is negative and the utility must prove its CWC allowance with a reliable study. In Iowa Mr. Garrett indicated that their rules requires a recent lead lag study that "represents conditions during that test year."

significant but proposed to amortize the anomalous expense over three years. The DPU opposes this amortization. Non-recurring expenses should just be removed from the test year unless they are significant. These costs will not occur in 2008 and therefore there is no need to include them in rates.

ADJUSTMENTS BASED ON THE USE OF A FUTURE TEST YEAR

The Commission should consider productivity, capitalization ratio, and the cost of employee medical expenses in light of the use of a future test year. This is the first litigated case since the passage of the statute that prohibits the use of a purely historical test year. Now the utility can forecast its costs out 20 months from the date of filing. Understanding that the utility has significant control over the forecast that is presented in a rate case, this case provides the Commission an opportunity to insert its views into how in the future those forecasts will be presented. In each of these three adjustments the Commission can interject its views on how future forecasted test years will be presented.

PRODUCTIVITY

Regardless of whether the test year is forecasted out 18 months as in this case (June 2007 to December 2008) or forecasted out the longest period allowed by the statute labor costs for the Company cannot be set without considering the effect of productivity. Productivity is a reality that affects how labor costs are incurred for RMP, the electric utility industry, and business in general in the United States. Failure to consider productivity will not allow a reasonable labor cost to be set for the Company.

Mr. Garrett proposed that a modest 1 percent productivity improvement factor be applied to the company labor costs. The Bureau of Labor Statistics reports that productivity for the overall business sector grew by 1.9 percent in 2007, 1 percent in 2006 and 2 percent in 2005. For the electric utility industry, the last reported productivity gains were 6.2 percent for 2005, 2.2 percent for 2004 and 2.1 percent for 2003.[38] In a report for the Edison Electric Institute it was reported that productivity for electric utilities has been equal to or exceeded the general economy for the last 20 years.[39] The Company acknowledged that it did not include a specific productivity adjustment in forecasting labor costs.[40] Instead, the Company provided a listing of its efforts to improve productivity. The Company indicated that its labor costs include the effect of the CIC [change in control] severance and the automated meter-reading program. The CIC severance took place in the past and therefore, does not reflect future productivity gains.[41] The AMR program does reflect improved productivity and its effects alone, when spread over the 18 month forecast amounts, to a .5 percent improvement.[42] The important issue for the Division is not whether the Commission takes into account the AMR program but instead to establish as a requirement that when the company is forecasting labor costs it must include

[38] DPU Exh. 5.0, p. 15.
[39] DPU Exh. 5.0, p. 16.
[40] Transcript, p. 228.
[41] DPU Exh. 5.0S, p. 11.
[42] DPU Exh. 5.0S, p. 11.

productivity in that analysis.[43] The Division believes that with the use of a future test year productivity needs to be included to estimate future labor costs.

CAPITALIZATION RATIO

The capitalization ratio takes the company labor costs after all Commission adjustments and splits that cost between current expense and capital projects. Establishing a capitalization ratio is not a question of recovery of labor costs but is instead a question of where they will be recovered and when. The ratio in RMP's original filing is 26 percent. That ratio was established at the end of 2006. At the end of 2007 the company reported that the ratio had increased to 28 percent. The exact percentage of this ratio will vary from year to year depending on capital projects. Although Mr. McDougal had not done a specific study, he expected that the ratio would go up with increased capital projects.[44] It was Mr. Garrett's testimony that the most current ratio should be applied to labor costs particularly when the expectation is that the ratio will go up. 2008 is the test year and we will not know what the ratio is for that year until 2009. The DPU adjustment is simple: Apply the 2007 ratio to 2008 and not the 2006 ratio.

FORECASTED MEDICAL COST INCREASES

The Company has forecasted medical costs to increase 14.6 percent from June 2007 or 9.8 percent annually. It was based, at least in part, on its consultant, Hewitt Associates. The DPU, based on a Towers Perrin report,

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[43] The New York Public Service Commission appears to include a standard 1% productivity adjustment in utility rate cases. See Case No. 07-E-0523 Consolidated Edison Company of New York, Order dated March 25, 2008, p. 60.

[44] Transcript at p. 68.

estimated that health care costs would increase 7.6 percent for the 18 month period or 5.03 percent for 2008. That report is in the record and can be reviewed by the PSC. One of the main differences between the Company's estimate and Mr. Garrett's is that the DPU relied on an outside estimate of health care costs increases for high performing companies in the US. That is what the Company should strive to be and using such an estimate to forecast a future test year will provide an incentive to the Company to achieve that level of high performance.

Finally, Mr. Helmet Schultz for the CCS also makes an adjustment to 2008 health care costs. He claims that the Company's 2007 actual health care costs were significantly below the forecasted 2007 estimate.[45] Therefore, both the evidence presented by the Division and Mr. Schultz for the CCS demonstrate that the Company's health care cost forecasted increases are overstated for 2008. We do not know what will happen in 2008. The Commission should not just accept the Company's representations of what it expects to happen particularly when external evidence shows that the national expectation for 2008 is a lower cost increase.

POLICY ISSUES

Although the Division at the test year hearing indicated that it believed that it would not be a problem to conduct an audit with a change in test year, it did become a problem. Had a consultant not already been under contract, the Division would have been hard-pressed to complete the work required within the required timeframe. With the assistance of an outside consultant, audits could be conducted for both Questar Gas and RMP even though it took almost three

[45] CCS Exh. 6, p. 21.

months to make the test year decision and receive the new filings from each company. As with the Questar Gas stipulation, a number of the policy recommendations revolve around the test year issue. We make similar recommendations in this case.

First, it is high time that the filing requirements that have been used by agreement in the last few rate cases be made a requirement of the Commission. A similar provision to paragraph 14 of the Questar Gas Stipulation should be ordered by the Commission for RMP.

Second, the Company should be required to file detailed variance reports. These reports would compare actual results of operation with the forecast used in the general rate case. These reports should be filed as part of the company's semi-annual results of operation. In addition, Tab 11, as contained in the Utah Jurisdiction Results of Operations, June 2007, should be required to be continued.

Although the Division is recommending no cash working capital allowance in this case (because of the age of the study), the DPU recommends that the Commission in this case order a new contemporaneous lead lag study to be filed with any future rate case if the Company is to recover cash working capital. The end date used in the study should be no more then three years old from the date of filing the general rate case.

This case and the current Questar Gas case were the first contested rate cases where the Commission had an opportunity to decide test year. In the Orders in both this case and Questar Gas case, the Division requests that the

Commission provide guidance to the parties on the selection of a test year. Under the old statute there was almost a presumption in favor of a historical test year. If, as in these cases, the test year became the year after the rate case filing, the Division requests that the Commission provide the parties with guidance to make the process of selecting a test year run more smoothly. This would also help to prevent the three-month delay in initiating audits that occurred in this case from recurring in future cases.

Absent the test year decisions running more smoothly, the DPU believes that the Commission will have to consider its legal authority to determine when the 240 day rate case suspension period begins in cases where the test year used by the utility in its initial filing is not the test year selected by the Commission.

CONCLUSION

For the foregoing reasons, the Division respectfully urges the Commission to adopt the positions set forth herein. The Division requests that the Commission award the Company a 10.10 percent cost of equity and a 6.28 cost of long-term debt, accept the Division's adjustments, and implement the policy recommendations supported by the Division.

RESPECTFULLY SUBMITTED, this ________ day of June, 2008.

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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing **BRIEF BY THE DIVISION OF PUBLIC UTILITIES (DPU)** was sent by electronic mail, to the following on June ____, 2008:

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