



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS AIR FORCE LEGAL OPERATIONS AGENCY

May 9, 2014

USAF Utility Law Field Support Center
139 Barnes Drive
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Gary Widerburg, Commission Secretary
Utah Public Service Commission
Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111

Re: Docket No. 13-035-184

Attention: Gary Widerburg, Commission Secretary,

Re: Errata Testimony of Michael P. Gorman representing the Federal Executive Agencies

Enclosed please find an original and 12 copies of Michael P. Gorman's replacement errata testimony for pages 2, 12 and exhibit MPG-17 (page 1) previously filed on 28 April 2014 in Docket 13-035-184. Mr. Michael P. Gorman, is a consultant at Brubaker and Associates, and represents the FEA. I have also sent a copy of this document electronically to psc@utah.gov.

Thank you for your assistance with this matter. If you have questions regarding these documents, please contact me at 850-283-6663 or by email at Thomas.Jernigan@US.AF.MIL.

Sincerely

A handwritten signature in black ink, appearing to read "Thomas A. Jernigan".

THOMAS A. JERNIGAN, Capt, USAF
Counsel For Federal Executive Agencies

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of May, 2014, a true copy of the foregoing document was sent via email to the following:

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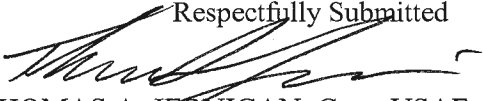
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Respectfully Submitted



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11 **Q ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?**

12 A I am appearing on behalf of the Federal Executive Agencies ("FEA"). The
13 FEA represents numerous federal customers within the area serviced by
14 Rocky Mountain Power ("RMP" or "Company"). These entities include, but are
15 not limited to, military installations, post offices and federal buildings. Mainly,
16 Hill Air Force Base represents a significant customer to the Company.

17 **Q WHAT IS THE SUBJECT OF YOUR TESTIMONY?**

18 A My testimony will address the Company's overall rate of return including return
19 on equity, embedded debt cost and capital structure.

20

SUMMARY

21 **Q PLEASE SUMMARIZE YOUR RATE OF RETURN RECOMMENDATIONS.**

22 A I recommend the Public Service Commission of Utah (the "Commission" or
23 "PSCU") award RMP a return on common equity of 9.40%.

24 My recommended return on equity of 9.40% would result in an overall
25 cost of capital of ~~7.747~~ 4.1% as developed on my Exhibit FEA___(MPG-1).

26 My recommended return on equity and the Company's proposed capital
27 structure will provide RMP with an opportunity to realize cash flow financial
28 coverages and balance sheet strength that conservatively support RMP's
29 current investment grade bond rating. Consequently, my recommended return
30 on equity represents fair compensation for RMP's investment risk, and it will
31 preserve the Company's financial integrity and credit standing.

228 S&P's corporate credit rating for RMP of "A-." The proxy group's corporate
229 credit rating from Moody's of "A3" is identical to RMP's corporate credit rating
230 from Moody's of "A3."

231 The proxy group has an average common equity ratio of 46.6%
232 (including short-term debt) from SNL Financial ("SNL") and 49.0% (excluding
233 short-term debt) from *The Value Line Investment Survey* ("Value Line") in
234 2013. The proxy group's common equity ratio is lower and more reasonable
235 than RMP's 51.6% common equity ratio. RMP's inflated common equity ratio
236 indicates that the proxy group has less financial risk than RMP.

237 I also compared RMP's business risk to the business risk of the proxy
238 group based on S&P's ranking methodology. RMP has an S&P business risk
239 profile of "Excellent," which is identical to the S&P business risk profile of the
240 proxy group.⁵ The S&P business risk profile score indicates that RMP's
241 business risk is comparable to that of the proxy group.

242 I believe that my proxy group reasonably approximates the investment
243 risk of RMP, and can be used to estimate a fair return on equity for RMP.

⁵S&P ranks the business risk of a utility company as part of its corporate credit rating review. S&P considers total investment risk in assigning bond ratings to issuers, including utility companies. In analyzing total investment risk, S&P considers both the business risk and the financial risk of a corporate entity, including a utility company. S&P's business risk profile score is based on a six-notch credit rating starting with "Vulnerable" (highest risk) to "Excellent" (lowest risk). The business risk of most utility companies falls within the lowest risk category, "Excellent," or the category one notch lower (more risk), "Strong." *Standard & Poor's RatingsDirect*: "Criteria Methodology: Business Risk/Financial Risk Matrix Expanded," May 27, 2009.

Rocky Mountain Power

Standard & Poor's Credit Metrics

Thousands of Dollars

<u>Line</u>	<u>Description</u>	<u>Retail</u>	<u>S&P Benchmark^{1/2}</u>		<u>Reference</u>
		<u>Cost of Service</u>	<u>Significant</u>	<u>Aggressive</u>	
		<u>Amount</u>	<u>(2)</u>	<u>(3)</u>	<u>(4)</u>
		<u>(1)</u>			
1	Rate Base (UT)	\$ 6,029,328,450			Exhibit RMP__(SRM-3), Page 1.5
2	Weighted Common Return	4.85%			Page 2, Line 3, Col. 3.
3	Pre-Tax Rate of Return	10.39%			Page 2, Line 4, Col. 4.
4	Income to Common	\$ 292,446,547			Line 1 x Line 2.
5	EBIT	\$ 626,356,660			Line 1 x Line 3.
6	Depreciation & Amortization	\$ 285,276,629			Exhibit RMP__(SRM-3), Page 1.5
7	Imputed Amortization	\$ 11,285,298			Page 4, Line 13, Col 1.
8	Deferred Income Taxes & ITC	\$ 59,383,452			Exhibit RMP__(SRM-3), Page 1.5
9	Funds from Operations (FFO)	\$ 648,391,927			Sum of Line 4 and Lines 6 through 8.
10	Imputed Interest Expense	\$ 8,044,866			Page 4, Line 14, Col 1.
11	EBITDA	\$ 930,963,454			Sum of Lines 5 through 7 and Line 10.
12	Total Debt Ratio	49.3%	45% - 50%	50% - 60%	Page 3, Line 4 4, Col. 2 4.
13	Debt to EBITDA	3.2x	3.0x - 4.0x	4.0x - 5.0x	(Line 1 x Line 12) / Line 11.
14	FFO to Total Debt	22%	20% - 30%	12% - 20%	Line 9 / (Line 1 x Line 12).

Sources:

¹ Standard & Poor's: "Criteria Methodology: Business Risk/Financial Risk Matrix Expanded," May 27, 2009.

² S&P RatingsDirect: "U.S. Regulated Utilities, Strongest To Weakest," July 30, 2013.

Note:

Based on the July 2013 S&P report, PacifiCorp has an "Excellent" business profile and a "Significant" financial profile.