
BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION
OF ROCKY MOUNTAIN POWER FOR
APPROVAL OF THE 2026 INTER-
JURISDICTIONAL COST ALLOCATION
PROTOCOL

Docket No. 25-035-47

DIRECT TESTIMONY

OF

JUSTIN BIEBER

On Behalf of the

Utah Association of Energy Users

February 5, 2026

TABLE OF CONTENTS

I. INTRODUCTION	1
II. OVERVIEW & CONCLUSIONS	3
III. Proposed 2026 Inter-Jurisdictional Cost Allocation Protocol	4

UAE Exhibit 1.0
UAE Exhibit 1.1

Direct Testimony of Justin Bieber
RMP Responses to Data Requests

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
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DIRECT TESTIMONY OF JUSTIN BIEBER

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Justin Bieber. My business address is 111 E Broadway, Suite 1200, Salt Lake City, Utah, 84111.

Q. By whom are you employed and in what capacity?

A. I am a Principal for Energy Strategies, LLC. Energy Strategies is a private consulting firm specializing in economic and policy analysis applicable to energy production, transportation, and consumption.

Q. On whose behalf are you testifying in this proceeding?

A. My testimony is being sponsored by the Utah Association of Energy Users (“UAE”).

Q. Please describe your professional experience and qualifications.

A. My academic background is in business and engineering. I earned a Bachelor of Science in Mechanical Engineering from Duke University in 2006 and a Master of Business Administration from the University of Southern California in 2012. I am also a registered Professional Civil Engineer in the state of California. I joined Energy Strategies in 2017, where I provide regulatory and technical support on a variety of energy issues, including regulatory services, transmission and renewable development, and financial and economic analyses. While at Energy Strategies, I have filed and supported the development of testimony before various state utility regulatory commissions.

23 Prior to joining Energy Strategies, I held three positions at Pacific Gas and
24 Electric Company (“PG&E”) as Manager of Transmission Project Development,
25 ISO Relations and Federal Energy Regulatory Commission (“FERC”) Policy
26 Principal, and Supervisor of Electric Generator Interconnections. During my career
27 at PG&E, I supported multiple facets of utility operations, and led efforts in policy,
28 regulatory, and strategic initiatives, including supporting the development of
29 testimony before and submitting comments to the FERC, California Independent
30 System Operator, and the California Public Utilities Commission.

31 **Q. Have you testified previously before this Commission?**

32 A. Yes. I testified in the following proceedings before this Commission:

- 33 • Dominion Energy Utah’s (“DEU”) request for approval to construct an LNG
34 Facility, Docket No. 19-057-13;
- 35 • Rocky Mountain Power’s (“RMP”) 2020 general rate case, Docket No. 20-035-
36 04;
- 37 • RMP’s application for alternative cost recovery for major plant additions, Docket
38 No. 21-035-42;
- 39 • RMP’s application for a certificate of public convenience and necessity for the
40 Gateway South Transmission Project, Docket No. 21-035-54;
- 41 • RMP’s 2024 general rate case, Docket No. 24-035-04; and
- 42 • Enbridge Gas Utah’s 2025 general rate case, Docket No. 25-057-06.

43 **Q. Have you filed testimony previously before any other state utility regulatory**
44 **commissions?**

45 A. Yes. I have testified in more than 80 regulatory proceedings on the subjects of
46 utility rates and regulatory policy before state utility regulators in Colorado,
47 Indiana, Kansas, Kentucky, Michigan, Montana, Nevada, New Mexico, North
48 Carolina, Ohio, Oklahoma, Oregon, Pennsylvania, Texas, Virginia, Washington,
49 West Virginia, and Wisconsin.

50

51

II. OVERVIEW & CONCLUSIONS

52 **Q. What is the purpose of your direct testimony in this proceeding?**

53 A. My testimony responds to the application by Rocky Mountain Power (“RMP”)
54 seeking approval of the 2026 inter-jurisdictional cost allocation protocol (“2026
55 Protocol”) to allocate costs to retail customers in Utah.

56 **Q. What are your primary conclusions and recommendations?**

57 A. I recommend that the Commission reject RMP’s proposed 2026 Protocol and
58 instead extend the existing 2020 Protocol for the state of Utah until a methodology
59 can be developed that more comprehensively addresses the impacts of diverging
60 state policies in a manner that is balanced, durable, and consistent with cost-
61 causation principles. The 2020 Protocol has functioned effectively for the past six
62 years, providing a stable, negotiated, and Commission-approved framework for
63 allocating costs among states. The Commission should not allow RMP to
64 implement a multi-phased approach to inter-jurisdictional cost allocations that

65 shifts the burden of Washington’s policy choices on Utah customers in the near-
66 term, resulting in an estimated \$23.5 million annual increase to Utah’s revenue
67 requirement, without a firm or actionable plan to address other relevant and
68 interdependent inter-jurisdictional cost allocation issues.

69

70 **III. PROPOSED 2026 INTER-JURISDICTIONAL COST ALLOCATION PROTOCOL**

71 **Q. Please summarize Rocky Mountain Power’s proposed 2026 Inter-
72 Jurisdictional Cost Allocation Protocol.**

73 A. According to RMP’s Application, the 2026 Protocol is intended to supersede the
74 2020 Protocol for Utah, Idaho, Wyoming, California, and Oregon, and align with
75 changes proposed in the Washington 2026 Protocol to ensure that all resources are
76 100% allocated. The 2026 Protocol is the first phase of a proposed multi-phase
77 process to transition the Company’s inter-jurisdictional cost-allocation
78 methodology to accommodate diverging resource portfolios and changes to
79 operations needed to address individual state energy policies.¹

80 **Q. What is the 2020 Protocol?**

81 A. RMP witness Rick Link explains that the 2020 Protocol is the inter-jurisdictional
82 cost-allocation agreement between the Company and stakeholders in Utah,
83 Washington, Idaho, Oregon, and Wyoming, including regulatory staff and
84 consumer advocates, and includes a Washington-specific allocation methodology
85 known as WIJAM. The 2020 Protocol was the product of lengthy negotiations

¹ Application, pp. 2-3.

86 between the relevant parties, who agreed to support commission adoption and use
87 of the 2020 Protocol in Company rate proceedings filed after December 31, 2019,
88 through the Interim Period ending December 31, 2023. The protocol was approved
89 by the commissions in Utah, Washington, Idaho, Oregon, and Wyoming in 2020,
90 and by the California Public Utilities Commission in the Company's 2022 general
91 rate case.²

92 The 2020 Protocol was subsequently extended by utility commissions in
93 Utah, Oregon, Idaho, and Wyoming to be used through December 31, 2025.
94 Washington did not extend the WIJAM because it was effective until it was
95 replaced. Similarly, California's use of the 2020 Protocol was effective until it was
96 replaced.³

97 **Q. Please explain why RMP now seeks approval of a new 2026 Inter-**
98 **Jurisdictional Cost Allocation Protocol in Utah.**

99 A. RMP witness Rick Link explains that the Company is proposing the 2026 Protocol
100 to replace the expiring 2020 Protocol, realign resources in light of state
101 disallowances of carbon costs, comply with state law, and set the stage for future
102 cost-allocation changes that support diverging state policies.⁴

² Direct Testimony of Rick T. Link p. 6.

³ *Id.* p. 7.

⁴ *Id.* p. 2.

103 **Q. How does RMP propose to allocate generation resources under the 2026**
104 **Protocol?**

105 A. RMP witness Shelley McCoy explains that under the proposed 2026 Protocol,
106 generation resources will continue to be dynamically allocated for Utah, Idaho,
107 Wyoming, California, and Oregon (“the Five States”), excluding the fixed portion
108 allocated to Washington as identified in the Washington 2026 Protocol, with one
109 exception being the Chehalis generation facility. The 2026 Protocol includes an
110 immediate reassignment of the costs associated with Chehalis from being allocated
111 to all states to being situs-assigned to Washington only.⁵

112 **Q. What are the key differences between the 2020 Protocol and proposed 2026**
113 **Protocol?**

114 A. Ms. McCoy explains that the 2026 Protocol modifies the allocation of generation
115 costs and benefits relative to the 2020 Protocol in several respects. Most notably,
116 the Chehalis generating facility is situs-assigned to Washington. In addition, RMP
117 is proposing to update the allocation factors applied to other resource categories as
118 follows:

- 119 • **Non-emitting resources (excluding Rolling Hills):** Costs and benefits are
120 proposed to be dynamically allocated to the Five States for the non-Washington
121 portion using the SG5A allocation factor.

⁵ Direct Testimony of Shelley E. McCoy, pp. 3-4.

- 122 • **Natural gas resources (excluding Chehalis and Jim Bridger Units 1 and 2):**
123 Costs and benefits are proposed to be dynamically allocated to the Five States
124 using the SG5B allocation factor.
- 125 • **Rolling Hills Wind:** Costs and benefits are dynamically allocated to Utah,
126 Idaho, Wyoming, and California using the SG5C allocation factor,⁶ excluding
127 the 34.87% fixed share allocated to Washington.⁷
- 128 • **Chehalis:** All costs and benefits are proposed to be situs-assigned to
129 Washington.
- 130 • **Jim Bridger Units 1 and 2:** Costs and benefits are proposed to be allocated
131 using the SG5A allocation factor.
- 132 • **Coal resources:** Costs and benefits of existing coal-fired resources are
133 proposed to be dynamically allocated to the Five States using the SG5B
134 allocation factor.⁸

135 **Q. How do the allocation factors listed above differ from each other?**

136 Mr. Link explains that the proposed SG5 allocation factors would reflect
137 differences in the resource types included in the Five-State Portfolio. SG5A would
138 apply to non-emitting resources, Jim Bridger Units 1 and 2, and certain legacy
139 contracts, and allocate costs dynamically among the Five States after excluding the
140 fixed 7.90% share assigned to Washington. SG5B would apply to other thermal
141 resources, excluding Chehalis, and allocates costs dynamically among the Five

⁶ *Id.* p. 4.

⁷ Direct Testimony of Rick T. Link, p. 18.

⁸ Direct Testimony of Shelley E. McCoy, pp. 4-5.

142 States. And SG5C would apply solely to the Rolling Hills Wind facility and allocate
143 costs dynamically among Utah, California, Idaho, and Wyoming, excluding
144 Washington's 34.87% fixed share, and allocating no costs to Oregon.⁹

145 **Q. How does the Company propose to determine the fixed share of resources to**
146 **be allocated to Washington?**

147 A. Mr. Link explains that two resources, Chehalis and Rolling Hills, would be
148 realigned such that Chehalis would be situs-assigned to Washington and
149 Washington would receive the portion of Rolling Hills Wind that would otherwise
150 be assigned to Oregon but for the Public Utility Commission of Oregon's decision
151 to disallow the costs of that resource. All other existing non-emitting and natural
152 gas resources assigned to Washington would be allocated using fixed allocation
153 factors based on a four-year historical average of relevant load data.¹⁰

154 **Q. How does the 2026 Protocol address cost allocations for new large load**
155 **customers?**

156 A. According to Mr. Link, the costs caused by new large load customers, with an
157 individual customer demand of over 50 MW, will be situs assigned when serving
158 the new large load requires the Company to make investments or incur costs for
159 assets placed in service after January 1, 2026. For these customers, RMP will work
160 within the regulatory framework of the state, such as a special contract or tariff, to
161 assign costs to the new large load customer.¹¹

⁹ Direct Testimony of Rick T. Link, pp. 18-19.

¹⁰ *Id.* p. 3.

¹¹ *Id.* pp. 4 & 31.

162 **Q. What is the estimated cost impact of the proposed 2026 Protocol for Utah**
163 **customers?**

164 A. RMP witness Shelley McCoy estimates that Utah’s revenue requirement would
165 increase by approximately \$23.5 million annually under the proposed 2026
166 Protocol compared to the 2020 Protocol. Table JB-1 below summarizes the
167 estimated revenue requirement increase across the Five States.¹²

168 **Table JB-1**
169 **RMP Proposed 2026 Protocol**
170 **Estimated Revenue Requirement Increase for the Five States¹³**

CA (\$M)	OR (\$M)	UT (\$M)	ID (\$M)	WY (\$M)	Total (\$M)
3.1	14.3	23.5	2.5	5.9	49.3

171

172 **Q. What reasons does Rocky Mountain Power provide for proposing the 2026**
173 **Protocol as a phased approach?**

174 A. RMP witness Michael Wilding explains that the 2026 Protocol is the first step in a
175 process to transition cost allocation and changes in operations to accommodate
176 diverging resource portfolios required to comply with different state energy
177 policies. Most immediately, Washington’s Clean Energy Transformation Act
178 requires that the cost of coal generation be excluded from Washington retail rates
179 after December 31, 2025. Additionally, in light of state disallowances of carbon
180 costs under Washington’s Climate Commitment Act, Mr. Wilding asserts that it is

¹² RMP Attachment 2, SEM Workprs 8-5-2025.

¹³ *Id.*

181 necessary to situs assign all the costs and benefits of the Chehalis natural gas plant
182 to Washington. Mr. Wilding also notes that state energy policies across its service
183 territory are increasingly diverging, complicating continued reliance on a single,
184 fully integrated cost-allocation framework.¹⁴

185 Mr. Link explains that the Company's use of a phased approach is intended
186 to allow RMP to address near-term issues while developing a significantly broader
187 Phase 2 that will address more complex operational and planning issues, for which
188 additional time is needed to develop a comprehensive proposal. Mr. Link claims
189 that approval of the 2026 Protocol is necessary as a principled allocation
190 methodology to replace the expiring 2020 Protocol while Phase 2 is developed.¹⁵

191 **Q. What inter-jurisdictional cost allocation issues does RMP propose to address**
192 **in Phase 2?**

193 A. According to Mr. Link, Phase 2 would address additional unresolved cost-
194 allocation issues, including the establishment of fixed allocations among the Five
195 States, implementation of a market-based settlement of Net Power Costs, allocation
196 of costs for resources required to meet state laws with binding compliance
197 milestones beginning in 2030, and transmission cost allocation.¹⁶

198 **Q. When does RMP propose for Phase 2 to become effective?**

199 A. According to RMP witness Cindy Crane, the Company intends to make a Phase 2
200 filing so that rates can be effective beginning January 1, 2030, in order to comply

¹⁴ Redacted Direct Testimony of Michael G. Wilding pp. 2-3.

¹⁵ Direct Testimony of Rick T. Link p. 16.

¹⁶ Direct Testimony of Rick T. Link p. 16.

201 with applicable resource requirements, including Oregon SB 1547’s restriction on
202 coal-fueled thermal resources.¹⁷

203 **Q. Has the Washington Utilities and Transportation Commission approved the**
204 **Washington 2026 Protocol?**

205 A. Yes, the Washington Utilities and Transportation Commission (“UTC”) approved
206 the Washington 2026 Protocol on December 22, 2025, in Docket No. UE-250224.¹⁸
207 In its order approving the Washington 2026 Protocol, the Washington UTC noted
208 that adoption of the Washington 2026 Protocol results in approximately \$68 million
209 in *savings* for Washington ratepayers compared with a continuation of the previous
210 WIJAM allocation method.¹⁹ Notably, the results of the WIJAM differ relative to
211 what Washington’s cost allocation would be under the 2020 Protocol.

212 **Q. What is your assessment of RMP’s proposed 2026 Protocol?**

213 A. I have concerns with the proposed 2026 Protocol because it represents a piecemeal
214 approach to the Company’s inter-jurisdictional cost allocation that seeks to resolve
215 Washington-specific policy issues immediately at the expense of retail customers
216 in Utah and the other Five States. Further, RMP’s phased approach does not provide
217 any guarantees or assurances that the inequitable outcome from the first phase of

¹⁷ Direct Testimony of Cindy A. Crane p. 12.

¹⁸ *Final Order Rejecting Tariff Sheets; Granting Petition In Part, Subject To Conditions; Authorizing And Requiring Compliance Filing*, Docket UE-250224, Order 08 (December 22, 2025), p. 1. The Washington UTC Order 08 can be found at <https://www.utc.wa.gov/casedocket/2025/250224/orders>.

¹⁹ *See id.*, p. 26, ¶ 85 (“The record before us shows that between continuation of the WIJAM or adoption of the 2026 Protocol, there is a substantial difference in cost, with a continuation of the WIJAM resulting in a rate increase of \$80 million as compared to a \$12 million increase under the 2026 Protocol.”).

218 this phased approach will be addressed in a timely or equitable manner in a future
219 phase.

220 Washington's exit from coal, coupled with the proposal to allocate 100% of
221 the Chehalis generating facility to Washington, would shift Washington-driven
222 costs to Utah without providing commensurate benefits, resulting in an immediate
223 increase in Utah's revenue requirement. The primary drivers necessitating
224 immediate changes to the allocation methodology are laws and policies enacted in
225 the state of Washington. However, under the proposed 2026 Protocol, Washington
226 would receive the most favorable immediate cost allocation outcomes, while Utah
227 customers would experience a material and ongoing increase in allocated costs.
228 This outcome is inconsistent with fundamental cost-causation principles, because
229 the costs being reallocated are *caused* by Washington's policy choices, not by
230 actions or decisions made by Utah customers, regulators, or legislators.

231 Further, the Company's proposal relies heavily on the expectation of a
232 future Phase 2 to address broader inter-jurisdictional cost-allocation issues, yet
233 provides no binding framework, defined scope, or enforceable timeline to ensure
234 that such a phase will occur, or that it will mitigate the adverse impacts imposed on
235 Utah in Phase 1. The planned effective date for Phase 2, no later than 2030, means
236 that Utah customers would likely bear increased costs for multiple years based on
237 an interim allocation structure that the Company itself acknowledges is incomplete
238 and driven by its immediate need to address Washington-specific policy issues.

239 **Q. What is your recommendation to the Commission on this issue?**

240 A. I recommend that the Commission reject RMP's proposed 2026 Protocol and
241 instead extend the existing 2020 Protocol for the state of Utah until a methodology
242 can be developed that more comprehensively addresses the impacts of diverging
243 state policies in a manner that is balanced, durable, and consistent with cost-
244 causation principles. The 2020 Protocol has functioned effectively for the past six
245 years, providing a stable, negotiated, and Commission-approved framework for
246 allocating costs among states. The Commission should not allow RMP to shift the
247 burden of Washington's policy choices to Utah customers in the near-term without
248 a firm or actionable plan to address other relevant and interdependent inter-
249 jurisdictional cost allocation issues.

250 **Q. What concerns do you have about the lack of a firm or actionable plan to**
251 **address future known issues?**

252 A. I am concerned with the piecemeal approach proposed by the Company to address
253 Washington state-specific policies in Phase 1 while leaving known Oregon state-
254 specific policy issues for Phase 2 will limit potential cost allocation approaches to
255 comprehensively address all issues in a way that would reasonably balance the
256 interests of Utah ratepayers. As noted above, Utah ratepayers are being asked to
257 bear the cost of Washington's policies in this proposed Phase 1. I am also concerned
258 that Utah will similarly be asked to bear the cost of Oregon's policies in a proposed
259 Phase 2. The piecemeal approach proposed by the Company will limit the tools
260 available to address these issues in a comprehensive manner.

261 **Q. Do you have concerns about fixing the allocation of resources to Washington**
262 **in this proposed Phase 1?**

263 A. Yes, I have two primary concerns. First, the Company's proposal to allocate a fixed
264 percentage of certain generation resources to Washington based on a four-year
265 average of load data may over-allocate resources to Washington based on the
266 relative load growth in Washington as compared to the other five states. For
267 example, the proposed 2026 Protocol uses a four-year average of load data from
268 2020-2023 resulting in a fixed 7.90% fixed allocation factor for Washington.
269 However, based on the 2024 load data used to calculate the 2024 SG factor under
270 the 2020 Protocol, Washington was allocated 7.47% of non-emitting resources.²⁰ I
271 am concerned that the method the Company used to allocate resources to
272 Washington may not accurately reflect Washington customers' use of those
273 resources.

274 Second, whatever method is used to calculate fixed resource allocations, those
275 fixed allocations will in time cease to reflect an accurate or relevant measure of the
276 state's use of the system. When fixed allocations are assigned to resources that can
277 serve customers in all states (e.g., non-emitting resources), some states may end up
278 advantaged or disadvantaged as the actual load patterns diverge from the fixed
279 allocation assumptions. If resources are to be allocated to state jurisdictions based
280 on fixed allocation factors, it is essential to pair them with a reasonable and
281 transparent mechanism for capacity sharing among jurisdictions. If one state's

²⁰ See RMP response to UTLCG data request 3.41, included in UAE Exhibit 1.1.

282 resource portfolio is insufficient to meet its resource adequacy requirements and
283 that state relies on capacity from another state, there must be a mechanism to
284 allocate the costs of that shared or “borrowed” capacity accordingly. The proposed
285 2026 Protocol does not include such a mechanism, which increases the risk of
286 misallocation of costs among states.

287 **Q. Do you have any additional concerns related to the timing and completeness**
288 **of the information underlying the proposed 2026 Protocol?**

289 A. Yes. I have concerns due to the fact that the Company has not yet completed its
290 decommissioning study updates that were explicitly contemplated under the 2020
291 Protocol and are important to inform potential changes to the inter-jurisdictional
292 cost allocation methodology.

293 Under the 2020 Protocol, the Company committed to update its
294 decommissioning studies for several major coal-fueled resources, including Craig,
295 Hunter, Huntington, and Wyodak, no later than June 30, 2024, and to incorporate
296 those updated studies into a Company-sponsored depreciation study. The 2020
297 Protocol further states that the Company would retain and make those updated
298 decommissioning studies available for use in future regulatory proceedings.²¹
299 These studies were intended to inform future cost allocation decisions, including
300 the allocation of decommissioning and retirement-related costs among states.

301 However, those updated decommissioning studies have not been completed.

302 In response to discovery in this proceeding, the Company identified Docket No. 18-

²¹ *Application of Rocky Mountain Power for Approval of the 2020 Inter-Jurisdictional Cost Allocation Protocol*, Docket No. 19-035-42, 2020 Protocol Exhibit RMP__ (JRS-1) (December 3, 2019), pp. 26-27.

303 035-36 as the docket in which the updated depreciation and decommissioning
304 analysis would be filed.²² However, the most recent filing in that docket, a notice
305 dated October 2, 2025, indicates that the depreciation study originally planned for
306 2025 has been delayed and will now be filed in 2026, pending completion of a third-
307 party decommissioning study.²³

308 As a result, stakeholders do not have access to updated estimates of
309 decommissioning costs, which may have increased materially since 2020 due to
310 inflationary pressures and evolving retirement assumptions. Decommissioning
311 costs represent a significant component of long-term resource costs and are directly
312 relevant to inter-jurisdictional cost allocation. It would be premature to approve a
313 new inter-jurisdictional cost allocation protocol without current decommissioning
314 cost information available to inform a comprehensive and durable inter-
315 jurisdictional cost allocation methodology.

316 **Q. You explain above that the 2026 Protocol would situs assign costs to states with**
317 **new large loads greater than 50 MW. Do you have any comments regarding**
318 **this element of the Company's proposal?**

319 A. Notwithstanding my recommendation that the Commission deny RMP's proposed
320 2026 Protocol, the proposed situs assignment of costs associated with new large
321 load customers, and the corresponding allocation of those costs to those customers,
322 should be performed in a manner that reasonably reflects cost causation. While it is

²² See RMP response to UCE data request 2.2, included in UAE Exhibit 1.1.

²³ *Application of Rocky Mountain Power for Authority to Change its Depreciation Rates Effective January 1, 2021*, Docket No. 18-035-36, Notice of Depreciation Study (October 2, 2025), p. 1.

323 appropriate to put guardrails in place to ensure that existing retail customers do not
324 subsidize new large loads, it is also important to ensure that large new load
325 customers are not required to unreasonably subsidize existing customers in a way
326 that could discourage economically beneficial new business development.

327 **Q. Have stakeholders discussed other potential cost allocation mechanisms that**
328 **could serve as an alternative to the 2026 Protocol?**

329 A. Yes. Since the filing of this docket, stakeholders have held numerous discussions
330 regarding a proposal that would address the allocation of generation and
331 transmission resources in a more holistic and integrated manner than the
332 Company's approach, which only addresses a limited number of issues while
333 deferring other critically important issues to a future phase.

334 This alternative proposal builds on some concepts that had been discussed as
335 part of the Multi-State Protocol discussions that stakeholders had engaged in for
336 many years before the Company terminated that process in 2024. The alternative
337 framework merits further consideration. Accordingly, in addition to my
338 recommendation that the Commission deny the Company's request to adopt the
339 proposed 2026 Protocol, I recommend that the Commission establish a working
340 group to further explore this alternative cost allocation methodology.

341 **Q. Does this conclude your direct testimony?**

342 A. Yes, it does.