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**ATTACHED EXHIBITS**

Exhibit No. JRS-10—Proposed Allocation of Revenue Requirement Increases

Exhibit No. JRS-11—Proposed Prices and Billing Determinants effective July 1, 2016

Exhibit No. JRS-12—Proposed Prices and Billing Determinants effective July 1, 2017

Exhibit No. JRS-13—Monthly Billing Comparisons effective July 1, 2016

Exhibit No. JRS-14—Monthly Billing Comparisons effective July 1, 2017

Exhibit No. JRS-15—Decoupling Mechanism Deferral

Exhibit No. JRS-16—Proposed Schedule 93 Tariff

Exhibit No. JRS-17—Rate Impacts from Boise’s Rate Design Proposal

Exhibit No. JRS-18—Staff Response to Company Data Request 2

**Q. Are you the same Joelle R. Steward who submitted direct testimony in this case on behalf of Pacific Power & Light Company (Pacific Power or Company), a division of PacifiCorp?**

A. Yes.

# PURPOSE AND SUMMARY

**Q. What is the purpose of your rebuttal testimony?**

A. The purpose of my rebuttal testimony is to present the proposed rate spread, rate design, and decoupling mechanism reflecting the Company’s revised revenue requirement. I also respond to the direct testimonies of Mr. Jason L. Ball and Ms. Tiffany M. Van Meter on behalf of Staff of the Washington Utilities and Transportation Commission (Commission), Mr. Shawn M. Collins on behalf of the Energy Project, Mr. Bradley G. Mullins on behalf of Boise White Paper, LLC (Boise), and Mr. Ralph Cavanagh on behalf of NW Energy Coalition (NWEC) regarding issues related to the decoupling mechanism, low-income programs, rate spread, and rate design.

**Q. Please summarize your testimony.**

A. The Company continues to recommend a rate spread that allocates the revenue requirement change to rate schedule classes on an equal percentage basis for both years of the rate plan.

 For rate design, the Company continues to recommend the rate design methodology filed in my direct testimony, which generally applies an equal percentage increase to all billing elements, with the exception of rates applicable to Schedule 48T – Dedicated Facilities. The Company does not oppose application of Boise’s proposed rate design for Schedule 48T – Dedicated Facilities, but recommends that the Commission reject Boise’s proposal that its rate spread and rate design be applied to *all* Schedule 48T customers.

 For the proposed decoupling mechanism, consistent with Staff’s recommendation, the Company agrees to increase its annual conservation targets, participate in the Commission’s investigation on reliability metrics, and provide review and reporting consistent with what was approved for Avista Utilities (Avista) and Puget Sound Energy (PSE). The Company also agrees to continue to offer customer guarantees for service quality through the term of the decoupling mechanism and to modify its proposed decoupling mechanism to include a threshold at which the deferral would trigger a rate adjustment, but proposes a trigger of plus or minus 0.5 percent, rather than the 2.5 percent proposed by Staff. Regarding Staff’s recommendation that the Company commit at least $50,000 in incremental funding for low income conservation, the expenditures for low income conservation do not yet exceed the program’s annual budget cap of $1 million; for that reason the Company believes that the additional funding proposed by Staff is unnecessary at this time. Additionally, the Company has committed to a stakeholder collaborative to discuss future modifications to the Company’s Low Income Bill Assistance (LIBA) program before the conclusion of the current five-year program plan, as proposed by The Energy Project.

 Lastly, the Company agrees to participate in a cost of service and rate design collaborative as proposed by Staff. If consensus is reached among all parties, changes may be implemented in the second year of the rate plan, otherwise the Company proposes that resolution of these issues be addressed before or in the Company’s next general rate case.

# REVISED RATE SPREAD AND RATE DESIGN EXHIBITS

**Q. Have you prepared exhibits showing the Company’s proposed rate spread and rate design based on the Company’s revised revenue requirement in this rebuttal filing?**

A. Yes. Exhibit No. JRS-10 shows the proposed rate spread for the revised revenue requirement increases. Exhibit No. JRS-11 contains the proposed prices and billing determinants used in calculating the proposed prices effective July 1, 2016. Exhibit No. JRS-12 contains the proposed prices and billing determinants used in calculating the proposed prices effective July 1, 2017. Exhibit No. JRS-13 contains monthly billing comparisons for the revised proposed prices effective July 1, 2016, at different usage levels for each rate schedule. Exhibit No. JRS-14 contains monthly billing comparisons for the revised proposed prices effective July 1, 2017, at different usage levels for each rate schedule. Exhibit No. JRS-15 contains the decoupling example updated for the rates that go into effect July 1, 2016, on page one and rates that go into effect July 1, 2017, on page two.

# DECOUPLING

**Response to Staff Witness Mr. Ball**

**Q. Please summarize Staff’s testimony regarding the Company’s decoupling proposal.**

A. Generally, Staff supports the Company’s proposal but recommends several conditions for its approval and two small modifications to how the proposed decoupling mechanism’s deferral would be implemented in rates. Specifically, Staff proposes the following conditions for approval of the Company’s decoupling proposal: (1) an increase in the Company’s annual conservation targets; (2) $50,000 in shareholder funding for low-income conservation programs; (3) the Company’s participation in Staff’s investigation on reliability metrics in Docket U-151958; (4) continuation of the Company’s customer guarantee program on a permanent basis; and (5) a detailed report of decoupling mechanism following the completion of its third year.[[1]](#footnote-1) Staff also recommends a trigger mechanism, requiring that the total decoupling deferral for any class of customers must reach a threshold that is equivalent of plus or minus 2.5 percent of allowed decoupled revenue before any rate adjustments occur.[[2]](#footnote-2) Along with this proposed trigger, he recommends increasing the Company’s proposed rate cap of three percent to five percent.[[3]](#footnote-3) I address each of these items below.

**Q. What is your understanding of Staff’s proposed increase to the Company’s conservation target?**

A. Staff recommends that the Company’s annual conservation target be increased by 2.5 percent for the Company’s current 2016-2017 biennium,[[4]](#footnote-4) and five percent thereafter through the period when decoupling is in effect.

**Q. Does the Company accept this condition?**

A. Yes.

**Q. Do you agree with Staff that the additional conservation should be “subject to the same penalty as current conservation described by the EIA”?[[5]](#footnote-5)**

A. The administrative penalties described in the Energy Independence Act (EIA) were established to penalize utilities for not acquiring all cost-effective conservation, as defined through the biennial target-setting process. While the Company does not believe the additional decoupling conservation should be directly tied to the EIA, it is willing to voluntarily submit to financial penalties for failing to meet this higher level of conservation achievement.

**Q. Do you agree with Staff’s recommendation to increase funding for conservation programs targeting low-income customers?**

A.No, the Company does not believe it is necessary at this time. The Company has a low-income weatherization program in place through Schedule 114 and funded through the Schedule 191 System Benefits Charge Adjustment. This is a long-term program that installs energy conservation measures at no cost to income-eligible households residing in single-family, manufactured, and multi-family homes. Participants can either rent or own their home.

 The Company partners with three non-profit weatherizing agencies to implement the programs offered through Schedule 114: Blue Mountain Action Council in Walla Walla; Northwest Community Action Center in Toppenish; and the Opportunity Industrialization Center of Washington located in Yakima. These agencies leverage Schedule 191 funds with state Match Maker program funds to cover 50 percent of the cost of installing efficiency measures included in Schedule 114 and determined to be cost-effective through an U.S. Department of Energy approved audit. When Match Maker monies are depleted, the Company reimburses 100 percent of the measure costs. Total available funding under Schedule 191 for all program components is $1 million per calendar year.

 The $1 million annual cap has never been reached. In 2015, the Company’s partnering agencies completed weatherization of 98 low-income homes, and program costs totaled $858,122.

 The maximum cap is set at a level that will allow the program to grow without the need to be adjusted for a number of years. Because there is still funding available for the agencies to increase their services and the program is achieving a reasonable level of success in meeting the conservation needs of the Company’s low-income customers, it is unnecessary to expand the program at this time. For these reasons, The Company does not support Staff’s condition to increase low-income conservation funding.

**Q. Staff compares the Company’s low-income weatherization funding with that provided by Avista to argue that the Company’s funding is insufficient.[[6]](#footnote-6)  How do you respond?**

A. It can be difficult to compare the expenditures on energy efficiency activities of one utility to another. Staff reviewed the percentage of demand-side management expenditures on low-income activities compared to overall expenditures on residential programs. Another way to compare funding is by determining expenditures per customer. Pacific Power has 105,259 residential customers and with low-income weatherization program expenditures of $858,122 in 2015, the investment per residential customer was approximately $8.15. Evaluating funding on the basis of low-income weatherization program funding per customer may reflect more comparable funding levels among the utilities.

**Q. Does the Company agree to participate in Docket U-151958 regarding reliability metrics?**

A. Yes. The Company plans to participate in this proceeding.

**Q. Does the Company agree to make its customer guarantee program permanent as Staff recommends?**

A. Instead of making the customer guarantee program permanent, the Company agrees to extend the current program through the decoupling mechanism’s currently proposed five-year term. The Company is firmly committed to excellent customer service. While the formal obligation to offer the customer guarantee program concluded in 2011, the Company has not proposed to cancel or otherwise diminish the program since that time. The adoption of a decoupling mechanism would not change the Company’s emphasis on customer service. The Company has no plans to cancel its customer guarantee program, and since it is in tariff Rule 25, discontinuing or altering the program would require approval by the Commission. The Company’s concern with agreeing to extend the program on a permanent basis is that it could preclude the ability for the Company or other stakeholders to re-evaluate and propose modifications in the future to align with changing customer expectations. Accordingly, the Company commits to continue the current customer guarantee program through the proposed five-year program term for the decoupling mechanism. In this way, if any concerns arise in regards to changes in customer service in conjunction with the implementation of the decoupling mechanism, they can be addressed at that time.

**Q. Does the Company agree with Staff’s recommendations for a review of the decoupling mechanism after its first three years of operation?**

A. Yes. As I indicated in my direct testimony, the Company plans to evaluate the mechanism consistent with the Commission’s requirement for Avista’s and PSE’s decoupling mechanisms.

**Q. Can you please summarize the Company’s proposed process for filing rate adjustments outlined in your direct testimony?**

A. Yes. As described in my original testimony and in proposed Schedule 93, the Company proposes to file a rate adjustment (surcharge or surcredit) on Schedule 93 by December 1 of each year.[[7]](#footnote-7) The Company proposes that the Schedule 93 rates depend on the results of an earnings test, as described in the direct testimony of Ms. Shelley E. McCoy, and a three percent annual increase limitation similar to those currently adopted for Avista’s and PSE’s decoupling mechanisms.[[8]](#footnote-8) No cap was proposed for credits back to customers under the mechanism.[[9]](#footnote-9)

**Q. Does Staff recommend any changes to the implementation of the Company’s proposed decoupling mechanism?**

A. Yes. Staff recommends that the annual increase limitation be increased to five percent, and that a “trigger” be imposed when a specific dollar threshold for each rate schedule is reached.[[10]](#footnote-10)  Staff proposes to set the dollar threshold such that rate adjustments to Schedule 93 to recover deferral balances are triggered only if the amount in the deferral account exceeds approximately plus or minus 2.5 percent of allowed revenue at the end of the deferral period.[[11]](#footnote-11)

**Q. Do you agree with Staff’s proposed changes?**

A. In principle, I agree that a trigger such as the one described by Staff can be a helpful design feature to improve rate stability and avoid small Schedule 93 rate adjustments that may be confusing for customers. However, I am concerned that the proposed threshold level of 2.5 percent is too high, and may make it more challenging for the decoupling mechanism to achieve its goal of providing the Company with better fixed cost recovery. Neither Avista nor PSE have such triggers, and Staff’s proposed threshold is nearly as large as the three percent cap adopted for both Avista and PSE and proposed by the Company. While Mr. Ball’s proposal to increase the cap to five percent on annual rate increases along with his proposed 2.5 percent trigger may result in fewer annual adjustments, they may result in adjustments that are larger in magnitude. The Company recommends that a more reasonable 0.5 percent trigger be adopted in the proposed decoupling mechanism and that the Company’s originally proposed annual increase limit for filing Schedule 93 rate adjustments remain at three percent. The Company’s proposed trigger will ensure a more continual collection of the balancing account and avoid the risk of rate shock. Please refer to Exhibit No. JRS-15 for the Company’s proposed Schedule 93 tariff, which has been revised from the tariff presented in the Company’s direct filing to include a description of the proposed 0.5 percent trigger.

**Response to NWEC Witness Mr. Cavanagh**

**Q. Please summarize NWEC’s testimony concerning decoupling.**

A. NWEC strongly endorses the Company’s decoupling proposal, but similar to Staff, recommends that the Company’s annual conservations targets be increased by five percent and that LIBA rate credits be increased proportionately with any annual decoupling-related increases in residential bills.[[12]](#footnote-12)

**Q. Do you agree with NWEC’s recommendation to increase the Company’s annual conservation targets by five percent?**

A. Yes. As I stated in my response to Staff’s testimony, the Company agrees to increase the annual conservation target by five percent with the noted clarification that the target be increased by 2.5 percent in the current conservation biennium, and five percent thereafter through the period when decoupling is in effect.

**Q. Do you agree with NWEC’s proposal to increase the LIBA rate credits proportional to any residential bill increases resulting from the decoupling mechanism?**

A. No. It would not be appropriate to tie the level of LIBA rate credits to changes in adjustment schedules such as the Company’s proposed Schedule 93, because such rate adjustments are not a part of base revenues and are subject to changes both up and down to recover or refund associated balances. The Company has already proposed to increase the LIBA rate credits at two times the average residential customer increase for base rate changes in this filing. The Schedule 93 adjustments are for surcharge or surcredit to customers of the deferral under the decoupling mechanism. LIBA rate credits are not modified with price changes related to other adjustment schedules that are not a part of base revenue such as the Schedule 191, System Benefits Charge, or the Schedule 95, Renewable Energy Revenue Adjustment. Changing LIBA rate credits for temporary rate adjustments may result in confusion if LIBA credits go up and down on a more frequent basis. Finally, the Company has already agreed to include an assessment of the impact on low income customers in the evaluation of the decoupling program.

# LOW-INCOME PROGRAM

**Response to The Energy Project Witness Mr. Collins**

**Q. Please provide an overview of the Low Income Bill Assistance (LIBA) program.**

A. The LIBA program provides a bill discount to income eligible households during the winter heating months of November through April. Customers are certified as eligible by the Company’s three partnering local agencies (Blue Mountain Action Council in Walla Walla, Northwest Community Action Center in Toppenish; and the Opportunity Industrialization Center of Washington located in Yakima). The annual enrollment cap (i.e., the number of customers who will be certified to participate) for the program continues to be 4,720, but the number of participants has grown. Before the LIBA five-year plan (Five-Year Plan) was established in the settlement stipulation in Docket UE-111190, all participants were enrolled in the LIBA program for a one-year period. The number of households enrolled for a two-year period has gradually risen to 25 percent in the current program year.

 Each of the Company’s three partnering agencies enrolls a specified portion of the annual enrollment cap. The funding of the fee per certification by the local agencies has increased each year from 2012-2016. Two of the three agencies have not enrolled their maximum number of customers every program year. Because the agencies have not yet met the maximum cap and enrollments have gradually grown, the funding level remains sufficient at this time. Increasing the participation numbers may strain the resources of the agencies that determine household income eligibility. This will be one of the program components discussed in upcoming collaborative meetings.

**Q. Please clarify the Energy Project’s statements regarding the Five-Year Plan as it relates to the 2015 benchmark of 25 percent of clients certified for two years.**

A. The Energy Project stated in testimony his understanding of the Five-Year Plan that it would have a goal of “25 percent of all eligible customers being certified by the year 2015.”[[13]](#footnote-13) To clarify, the Five-Year Plan states:

Certify a share of the client population to be eligible for a two-year period. Beginning in 2012, ten percent of clients will be certified as eligible for a two-year period, and in each of the following three program years, an additional five percent of clients will be certified for two years up to 25 percent in 2015. Up to 40 percent of the customers participating in 2016 will be in some phase of two-year participation.[[14]](#footnote-14)

Thus, the intent of the 2015 benchmark of 25 percent was a target for the number of customers certified as eligible for a two-year period, not for the total number of all eligible customers being certified.

**Q. Does the Company agree with the Energy Project’s suggestions regarding the process of developing future modifications to the LIBA program?**

A. Yes. The Company will convene a stakeholder group to discuss additional LIBA program changes to be effective beginning with the 2017-2018 winter season, as described in NWEC’s testimony. The Company agrees that a stakeholder group addressing the low-income weatherization program will be beneficial. The collaborative for low-income weatherization should, however, be conducted separately from the LIBA collaborative since the local agencies generally have different staff members who are experts on energy assistance and bill discount issues and others who are responsible for energy efficiency services.

**Q. NWEC recommends that a professional facilitator be hired for the stakeholder collaborative.[[15]](#footnote-15) How do you respond?**

A. The group has had positive results without a facilitator. Collaborative participants are respectful of each other and offer good ideas and discussion. The extra cost to the program for a facilitator’s services is not warranted. Should any unresolved disagreements arise during the collaborative process, the Commission’s dispute resolution processes outlined in Dockets A-950243 and A-940351 are available to the parties in the collaborative.

**Q. Mr. Collins discusses the need to establish funding and a timeline for a new study to determine the number of low-income households within the Company’s service territory; as well as the impact that a third-block rate design would have on low income customers.[[16]](#footnote-16) Please comment.**

A. I agree that this type of information is important for both the low-income collaborative as well as Staff’s proposed cost of service and rate design collaborative. I do not, however, think that a new and potentially costly study is necessary. Estimates of the number of low-income households in the Company’s service territory can be prepared from publicly available government sources. Also, information regarding the potential impacts to low-income customers of a third‑energy-block rate design can be developed from the Company’s billing data for Schedule 17, as well as its residential consumption surveys. The Company agrees to discuss this in the collaborative efforts.

**Q. Is the Energy Project’s claim that the Company is proposing a higher rate increase to the residential class than the average class increase correct?[[17]](#footnote-17)**

A. No. The Company’s proposed residential class increase is the same as its proposed increase for all other customers.

# RATE SPREAD and RATE DESIGN

**Rebuttal of Boise Witness Mr. Mullins**

**Q. Please describe Boise’s “rate design” recommendations and how this differs from the Company’s proposed rate design as explained in your direct testimony.**

A. For all schedule 48T customers—including rates for primary, secondary, and dedicated facilities customers over 30 MW—Mr. Mullins recommends applying a 25 percent increase to the basic charges and then spreading the remaining allocated increase as an increase to demand charges.[[18]](#footnote-18)

In my direct testimony, I proposed to apply the class average increase to the billing elements in Schedule 48T, with the exception of rates for Schedule 48T-Dedicated Facilities (Dedicated Facilities), for which I proposed a higher increase to the demand charge and a smaller increase to the other billing elements.[[19]](#footnote-19) Since I proposed to exclude Schedule 48T customers from the decoupling mechanism, I looked to the cost of service study to ensure that rate design was aligned with cost recovery. Since the demand and customer charges for Dedicated Facilities were less than the demand- and customer-related costs, I proposed the modification in rate design for Dedicated Facilities.

**Q. Does the Company agree with Boise’s proposal to combine Schedule 48T and Schedule 48T – Dedicated Facilities into a single class for purposes of designing rates?**

A. No. Applying the same rate design to all customer types on Schedule 48T ignores differences in cost characteristics for the different types of customers and is inconsistent with past treatment. Schedule 48T currently has separate rates for service at secondary voltage, primary voltage, and for one customer over 30 MW who is served by dedicated facilities.

**Q. What is the impact of Boise’s proposed rate design on Schedule 48T customers compared to the Company’s?**

A. Table 1 below compares the increase in each of the Schedule 48T customer types between Boise’s proposal and the Company’s proposed rate spread and design. As this table shows, Boise’s proposal results in a significantly lower increase to the Dedicated Facilities customer than to the other customers on Schedule 48T.

**TABLE 1**



At the individual customer level, under Mr. Mullins’ proposed increase and rate design, the average customer impact for the other Schedule 48T customers in the first year is 1.8 percent, with the highest customer increase at 5.0 percent. The distribution of rate impacts by customer is shown in Exhibit No. JRS-17.

**Q. Please explain the history of Schedule 48T – Dedicated Facilities.**

A. In Docket UE-080220, the Commission approved an all-party settlement stipulation in which the Company agreed to consult with the Industrial Customers of Northwest Utilities (ICNU) and other interested parties to review Schedule 48T cost of service and rate design issues.[[20]](#footnote-20) As a result of those discussions, which included a review of Schedule 48T cost of service data, it was agreed that the service characteristics of the Company’s largest Schedule 48T customer significantly differed from other Schedule 48T customers and therefore justified separate consideration in the cost of service and pricing models. These differences include the customer’s demand, which is approximately 10 times larger than the next largest Schedule 48T customer; the customer’s energy usage, which comprises over 50 percent of total energy sales on Schedule 48T; and that this large customer is served from a Company-owned distribution substation that is dedicated to serving only that customer. As presented in the cost of service study in Docket UE-090205, the Company’s 2009 general rate case (2009 Rate Case), the cost ofservingthis primary voltage customer from dedicated facilities differs significantly from other Schedule 48T customers. The Company therefore proposed that the unique service characteristics of such large customers be charged separately under proposed Schedule 48T.

 The Company entered into an all-party settlement stipulation in the 2009 Rate Case, which was approved by Commission Order 09 on December 16, 2009. This settlement included the Company proposed rate spread and rate design based on the outcome of discussions with ICNU. Since that time, Schedule 48T – Dedicated Facilities has been treated as a separate class in cost of service and rate design from other Schedule 48T customers in order to account for the different characteristics.

**Q. What is the relationship of cost of service for Dedicated Facilities compared to other Schedule 48T customers?**

A. While the Company did not prepare a new cost of service study for this case, as discussed in my direct testimony, Table 1 on page 5 of my direct testimony shows the parity percentage including the ordered increase for Schedule 48T – Dedicated Facilities is 96 percent of cost of service. In contrast, the other Schedule 48T customers are at 102 percent of parity. This means that Schedule 48T – Dedicated Facilities rates are slightly below the cost of service while the rates for the other Schedule 48T customers are slightly above cost of service.

Additionally, Table 2 on page 12 of my direct testimony shows demand and customer charges for Dedicated Facilities are under-collecting the related costs compared to other Schedule 48T customers.

**Q. Is Mr. Mullins’ proposed rate design/rate spread reasonable?**

A. No. Since both Dedicated Facilities and other Schedule 48T customers are within a reasonable range of parity, Boise’s proposal to allocate a below average increase to the rates for Dedicated Facilities through rate design compared to other customer rates on Schedule 48T is not justified. Allowing one class of customers to receive an increase that is more than five times the average increase would fail to respect factors the Commission has identified as necessary considerations when making changes in rate spread: fairness, gradualism, and rate stability.

**Q. Does the Company oppose applying Boise’s proposed rate design logic for Schedule 48T – Dedicated Facilities?**

A. No. After applying an equal percentage increase to rates for Dedicated Facilities, the Company does not oppose increasing the basic charge for Dedicated Facilities by 25 percent and spreading the remainder of its increase to demand charges. This is not inconsistent with what I proposed in my direct testimony where I recommended greater increases to fixed charges for Dedicated Facilities. What I disagree with is shifting costs to other Schedule 48T customers as Boise proposes. In light of this discrepancy in impacts to other customers, the Company recommends that the Commission adopt the Company’s proposed rate design for other Schedule 48T customers, which is based on applying the class average increase to all billing charges. This provides more reasonable and consistent impacts across the other customers.

**Response to Staff Witness Ms. Van Meter**

**Q. Staff questions the reasonableness of using an equal percentage rate spread. Does the Company still believe the proposed equal percentage rate spread is reasonable?**

A. Yes. Table 2 below shows that the Company’s proposed rate spread is comparable to the ordered rate spreads in the last five general rate cases.

**TABLE 2**



While Staff argues in her direct testimony that it is not appropriate “to apply across-the-board rate increases to the different rate classes,”[[21]](#footnote-21) the Company’s experience of Commission-approved allocations, as shown in Table 2, show that equal percentage increases have been accepted or ordered by the Commission on a relatively consistent basis.

**Q. Does the Company believe that a cost of service study is necessary for this filing?**

A. No. With the cost of service study litigated in the 2014 Rate Case plus the ordered rate spread bringing all classes within a reasonable range of parity (10 percent) of cost of service as shown on Table 1 of my direct testimony, the Company believes a new cost of service study is unnecessary for this limited-issue filing.

# COLLABORATIVE

**Q. Does the Company agree to participate in a cost of service and rate design collaborative?**

A. Yes. The Company agrees to participate in a cost of service and rate design collaborative. If consensus is reached, the Company can agree to implement second‑year changes subject to the Commission’s approval of those changes. If consensus is not reached within a reasonable timeline before the second-year rate changes, the Company proposes to address cost of service and rate design issues in the next general rate case filing.

**Q. Does this conclude your rebuttal testimony?**

A. Yes.

1. Ball, Exh. No. JLB-1T 45:10-28. [↑](#footnote-ref-1)
2. *Id.,* 45:19-22. [↑](#footnote-ref-2)
3. *Id.* [↑](#footnote-ref-3)
4. *See* Steward Exh. No. JRS-18, which is the Staff Response to Company Data Request 2. [↑](#footnote-ref-4)
5. Ball, Exh. No. JLB-1T 46:6. [↑](#footnote-ref-5)
6. *Id.,* 48:20-21. [↑](#footnote-ref-6)
7. Steward, Exh. No. JRS-1T 18:4-5. [↑](#footnote-ref-7)
8. *Id.,* 18:7-8. [↑](#footnote-ref-8)
9. *Id.,* 18:9-10. [↑](#footnote-ref-9)
10. Ball, Exh. No. JLB-1T 49:5-8, 52:3-6. [↑](#footnote-ref-10)
11. *Id.,* 49:8-9. [↑](#footnote-ref-11)
12. Cavanagh, Exh. No. RC-1T 5:2-5, 10:2-5. [↑](#footnote-ref-12)
13. Collins, Exh. No. SMC-1T 5:11-12. [↑](#footnote-ref-13)
14. *See Wash. Utils. & Transp. Comm’n v. PacifiCorp d/b/a Pacific Power & Light Co*., Docket UE-111190, Order 07, Settlement Stipulation at ¶¶ 25 (March 30, 2012). [↑](#footnote-ref-14)
15. Collins. Exh. No. SMC-1T 8:21-22. [↑](#footnote-ref-15)
16. *Id.* 9:1-7. [↑](#footnote-ref-16)
17. *Id.* 9:19-21. [↑](#footnote-ref-17)
18. Mullins, Exh. No. BGM-1CT 43:4-6. [↑](#footnote-ref-18)
19. Steward, Exh. No. JRS-1T 7:14-23. [↑](#footnote-ref-19)
20. *See* *Wash. Utils. & Transp. Comm’n v. PacifiCorp d/b/a Pacific Power & Light Co.,* Docket UE-080220, Order 05, Settlement Stipulation, ¶¶ 13-14 (October, 8, 2008). [↑](#footnote-ref-20)
21. Van Meter, Exh. No. TMV-1T 6:26-27. [↑](#footnote-ref-21)