

Exhibit No. KGS-37
Docket UE-152253
Witness: Kurt G. Strunk

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFIC POWER & LIGHT
COMPANY,

Respondent.

DOCKET UE-152253

PACIFIC POWER & LIGHT COMPANY

EXHIBIT OF KURT G. STRUNK

Summary of Adjustment Mechanisms for Proxy Group Utilities

April 2016

Pacific Power & Light Company
Use of Adjustment Clauses by Mr. Parcell's Proxy Group Companies
As Extracted from Regulatory Research Associates Special Report
"Adjustment Clauses: A State-by-State Overview"
Published on October 2, 2015

Ultimate Parent Ticker	State	Company	Type Service	Type of Adjustment Clause										RTO-Transmission Expense	Other	
				Electric Fuel/Conserv.			Decoupling			Renewables Expense	Environmental Compliance	New Capital				RTO-Transmission Expense
				Purch. Power	Program Expense	Full	Partial	Capacity	Infrastructure							
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)			
DTE	Michigan	DTE Electric	Elec.	✓	✓	--	--	✓	--	--	--	--	✓	--		
	Michigan	DTE Gas	Gas	✓	✓	--	✓	--	--	--	--	✓	--	--		
ES	Connecticut	Connecticut Lt. & Pwr.	Elec.	--	✓	✓	--	--	--	--	--	--	✓	--		
	Connecticut	Yankee Gas Service	Gas	✓	✓	--	--	--	--	--	✓	--	--	--		
	Massachusetts	NSTAR Electric	Elec.	--	✓	--	--	--	--	--	--	--	✓	✓		
	Massachusetts	NSTAR Gas	Gas	✓	✓	--	--	--	✓	--	--	--	--	✓		
	Massachusetts	Western Mass. Electric	Elec.	--	✓	✓	--	--	✓	--	✓	--	✓	✓		
	New Hampshire	Public Service Co. of New Hampshire	Elec.	✓	--	--	--	--	--	--	--	✓	✓	--		
LNT	Iowa	Interstate Power & Light	Elec.	✓	✓	--	--	✓	✓	--	--	--	✓	✓		
	Iowa	Interstate Power & Light	Gas	✓	✓	--	--	--	--	--	--	--	--	✓		
	Wisconsin	Wisconsin Power & Light	Elec.	✓	--	--	--	--	--	--	--	--	--	✓		
	Wisconsin	Wisconsin Power & Light	Gas	✓	--	--	--	--	--	--	--	--	--	✓		
OGE	Arkansas	Oklahoma Gas & Electric	Elec.	✓	✓	--	✓	✓	--	✓	✓	✓	✓	✓		
	Oklahoma	Oklahoma Gas & Electric	Elec.	✓	✓	--	✓	--	✓	✓	✓	✓	✓	✓		
PNW	Arizona	Arizona Public Service	Elec.	✓	✓	--	✓	✓	✓	✓	✓	✓	✓	✓		
WEC	Illinois	North Shore Gas	Gas	✓	✓	✓	--	--	✓	✓	--	--	--	✓		
	Illinois	Peoples Gas Light & Coke	Gas	✓	✓	✓	--	--	✓	✓	--	✓	--	✓		
	Michigan	Michigan Gas Utilities	Gas	✓	✓	--	--	--	--	--	--	--	--	--		
	Michigan	Wisconsin Electric Power	Elec.	✓	✓	--	--	✓	--	--	--	--	--	--		
	Minnesota	Minnesota Energy Resources	Gas	✓	✓	✓	--	--	--	--	--	--	--	--		
	Wisconsin	Wisconsin Electric Power	Elec.	✓	--	--	--	--	--	--	--	--	--	✓		
	Wisconsin	Wisconsin Electric Power	Gas	✓	--	--	--	--	--	--	--	--	--	✓		
	Wisconsin	Wisconsin Gas	Gas	✓	--	--	--	--	--	--	--	--	--	✓		
	Wisconsin	Wisconsin Public Service	Elec.	✓	--	--	--	--	--	--	--	--	--	✓		
	Wisconsin	Wisconsin Public Service	Gas	✓	--	--	--	--	--	--	--	--	--	✓		
WR	Kansas	Kansas Gas & Electric	Elec.	✓	✓	--	✓	✓	✓	✓	--	--	✓	✓		
	Kansas	Westar Energy	Elec.	✓	✓	--	✓	✓	✓	✓	--	--	✓	✓		

Notes:
Data are from SNL Financial Regulatory Research Associates Topical Special Report, "Adjustment Clauses: A State-by-State Overview," October 2, 2015.