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.

Docket No. 13-035-184

Direct Testimony and Exhibits of

Michael P. Gorman

On behalf of

The Federal Executive Agencies

April 17, 2014



Brubaker & Associates, Inc.

Project 9908

11	Q	ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?	
12	Α	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	Α	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	Α	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 7.747.41% 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 wil	
31		preserve the Company's financial integrity and credit standing.	

operates. PacifiCorp's competitive position reflects the 171 stable regulatory framework of the low-risk regulated 172 utility. We consider the utility's geographical, market, and 173 regulatory diversity over its six-state service territory a 174 strength because these factors provide extensive market 175 diversity. About 70% of retail revenue is derived from 176 residential and commercial customers, providing cash 177 flow diversity and at least a base level of usage. 178 PacifiCorp serves a total of 1.7 million retail customers, in 179 Utah, Wyoming, and Idaho through its Rocky Mountain 180 Power operating unit; and in Oregon, Washington, and 181 California through its Pacific Power unit, which provides a 182 high level of cash flow diversity.4 183

184 RMP's Proposed Capital Structure

185 Q WHAT IS RMP'S PROPOSED CAPITAL STRUCTURE?

186 A RMP's proposed capital structure is shown in Table 1 below.

TABLE 1

RMP's Proposed Capital Structure (June 30, 2015)

Description	Weight
Long-Term Debt	48.38%
Preferred Stock	0.02%
Common Equity	<u>51.60%</u>
Total Regulatory Capital Structure	100.00%

Source: Direct Testimony of Bruce Williams, page 2.

187 I will not raise issues with RMP's capital structure in this case.

⁴Standard & Poor's RatingsDirect Summary: "PacifiCorp," March 31, 2014 at 2-4.