conforming certain calculations to be consistent with those of Public Counsel and Staff, my updated analysis also presents the recommendation using the Company’s adjustment numbering. Table 1‑CA, below, details the updated calculations, representing a $24.8 million reduction to the Company’s current revenues. A description of each of the changes that I have made to these revenue requirement calculations follows my response to Staff’s proposed attrition adjustment.

TABLE 1-CA

Cross-Answering Revenue Requirement Recommendation

($000)



implemented the known and measurable standard for ratemaking. Thus, I disagree that the reliance on trends satisfies the known and measurable standard.

1. Revenue Requirement

Q. PLEASE PROVIDE A SUMMARY OF THE CHANGES TO YOUR REVENUE REQUIREMENT RECOMMENDATION IN YOUR CROSS-ANSWERING TESTIMONY.

A. As detailed in Table 1-CA above, I have made several updates to my revenue requirement calculations in response to the positions of other parties in this proceeding. I have also made a few minor updates and corrections to calculations that were presented in my initial testimony. Collectively, I have reduced my revenue requirement recommendation from a $17.4 million to a $24.8 million reduction to the Company’s current revenues. Detailed revenue requirement calculations can be found in Exh. No.\_\_\_(BGM-6), which supersedes Exh. No.\_\_\_(BGM-3) included in my Response Testimony.

Q. HAVE YOU RESPONDED TO ALL OF THE ADJUSTMENTS PRESENTED BY OTHER PARTIES?

A. No. To the extent that my Cross-Answering Testimony does not respond to a particular issue raised by another party, that should not be construed as my rejection or acceptance of that party’s recommendation.

Q. HAVE YOU UPDATED THE STARTING POINT FOR YOUR RECOMMENDATION?

A. Yes. I have updated my recommendation to be based on the Company’s revised response to Staff Data Request (“DR”) 131 Attachment B, which was issued on June 18, 2015.