

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND)	
TRANSPORTATION COMMISSION,)	
)	
Complainant,)	
)	
v.)	Docket Nos. UE-111048/UG-111049
)	(Consolidated)
PUGET SOUND ENERGY, INC.,)	
)	
Respondent.)	
_____)	

EXHIBIT NO. ____ (MCD-6)

ICNU STUDY OF ACTIVE DECOUPLING PROGRAMS

January 17, 2012

Utility (Jurisdiction)	ROE Reduction?	Comments	Citation
United Illumination (Connecticut)	Yes 100bp	Decoupling was one of six cumulative factors considered in this ROE reduction.	<u>Re United Illumination</u> , CDPUC Docket No. 08-07-04, Order on Reconsideration at 267-268 (June 3, 2009)
Idaho Power (Idaho)	Unknown	Decoupling adopted outside of rate case. Commission delayed determination of proper ROE adjustment until the next rate case filing.	<u>See Re Investigation of Financial Disincentives</u> , IPUC Case No. IPC-E-04-15, Order No. 30267 at 15 (March 12, 2007)
PEPCO (District of Columbia)	Yes 50bp	Initial 10.15 ROE adjusted down 50 points to reflect BSA.	<u>Re PEPCO</u> , D.C.PUC, Case No. 1076, Order No. 15864 at 18 (June 23, 2010)
HECO (Hawaii) Subsidiaries Hawaii Electric and Maui Electric	Yes Unspecified	Commission set ROE at low end of range in rate case (10%) to reflect full decoupling. Declined to specify ROE if it had not approved decoupling.	<u>Re Hawaii Electric Co.</u> , HPUC Docket No. 2008-0083, Final Order at 35 (Dec. 29, 2010)
BGE (Maryland)	Yes 50bp	Full Decoupling	<u>Re Baltimore Gas & Elec.</u> , MPSC Case No. 9230, Order No. 83907 at 106 (March 9, 2011)
Pepco (Maryland)	Yes 50bp	Full Decoupling	<u>Re Pepco</u> , MPSC Case No. 9217, Order No. 83516 at 93 (Aug. 6, 2010)
WMECO (Mass.)	Yes unspecified	The Commission established a greatly reduced ROE (9.6%) that reflected the required reduction due to decoupling but refused to disclose what ROE would have been without decoupling, preferring to make a judgment based on the totality of the Company's circumstances.	<u>Re Western Massachusetts Energy and Comm. Co.</u> , DPU 10-70 at 407-08 (Jan. 31, 2011)
Consumers Energy Co. (Michigan)	No	Pilot program; will be reviewed for viability. Numerous non-decoupling revenue trackers discontinued at the time, raising business risk.	<u>Re Consumers Energy Co.</u> , MPSC Case No. U-16191 at 47-48 (Nov. 4, 2010)

Detroit Edison (Michigan)	No	Declined to lower ROE because decoupling is a pilot program. Will consider adjusting ROE if pilot is continued.	<u>Re Detroit Edison Co., MPSC Case No. 15768 at 33 (Jan. 11, 2010)</u>
Sierra Pacific (Nevada)	No	Commission disregarded staff's comparisons to gas ROE reductions as irrelevant to electric decoupling and stated it would not reduce ROE <i>at that time</i> . (Nevada has reduced both gas utilities' ROE 25 pts for decoupling).	<u>Re Sierra Pacific, NPSC Docket No. 10-6001 at 39 (Dec. 23, 2010)</u>
Central Hudson Gas and Electric (New York)	Yes 10bp	Full Decoupling	<u>Re Central Hudson Gas and Electric, NYPS Case No. 08-E-0887, Order Adopting Recommended Decision at 65 (June 22, 2009)</u>
Con Edison (New York)	Yes 10bp	Per class, Weather adjusted.	<u>Re Con Edison, NYPS Case No. 07-E-0523</u>
PGE (Oregon)	Yes 10bp		<u>Re PGE, OPUC Docket No. UE-197, Order No. 09-020 (Or. Jan. 22, 2009)</u>
CVPS	Yes 50bp	CVPS' decoupling program is not full decoupling, but is in the context of a larger AFOR that accomplishes similar goals.	<u>See Re Central Vermont Public Service, VPSB Docket No. 7191, Order Approving Modification to Methodology (Vt. Jan. 8, 2009)</u>
Green Mountain Power (Vermont)	Yes 50bp	GMP's decoupling program is not full decoupling, but is in the context of a larger AFOR that accomplishes similar goals.	<u>Re Green Mountain Power, VPSB Docket No. 7175, Order at 5-6 (Dec. 22, 2006)</u>
WPSC (Wisconsin)	No	Decoupling implemented through adoption of stipulation. No data observed regarding whether ROE considerations were part of settlement	<u>Re Wisconsin Public Service Corporation, PSCW Docket No. 6690-UR-119, Final Order (Dec. 30, 2008)</u>