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BEFORE THE ARIZONA CORPORATION

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COMMISSIONERS 2 MIKE GLEASON, Chairman 3 WILLIAM A. MUNDELL JEFF HATCH-MILLER KRISTIN K. MAYES 4

GARY PIERCE

2001 JUN 28 P 3:57

AZ CORP COMUSSION DOCKET CONTROL

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IN THE MATTER OF THE APPLICATION OF UNS ELECTRIC, INC. FOR APPROVAL OF THE ESTABLISHMENT OF JUST AND REASONABLE RATES AND CHARGES DESIGNED TO REALIZE A REASONABLE

DOCKET NO. E-04204A-06-0783

RATE OF RETURN ON THE FAIR VALUE OF THE PROPERTIES OF UNS ELECTRIC. 9 INC.

STAFF'S NOTICE OF FILING DIRECT **TESTIMONY**

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Staff of the Arizona Corporation Commission ("Staff") hereby files the Direct Testimony of Ralph C. Smith (Redacted Version)(Consultant - Larkin & Associates, Inc.); David C. Parcell (Consultant - Technical Associates, Inc.); Alexander Ibhade Igwe (Utilities Division); Steve Taylor (Utilities Division); Julie McNeely-Kirwan (Utilities Division); and Bing E. Young (Utilities Division) in the above-referenced matter. An Unredacted version of Ralph C. Smith's Direct Testimony has also been provided under seal to the Commissioners, their Assistants, the assigned

Administrative Law Judge and the parties that have signed the Protective Agreement in this case.

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RESPECTFULLY SUBMITTED this 28th day of June 2007.

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Arizona Corporation Commission DOCKETED

JUN 2 8 2007

DOCKETED BY

Maureen A. Scott, Senior Staff Counse Kevin O. Torrey, Attorney

Legal Division

Arizona Corporation Commission 1200 West Washington Street Phoenix, Arizona 85007

(602) 542-3402

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Original and thirteen (13) copies of the foregoing were filed this 28th day of June 2007 with:

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Docket Control 26 Arizona Corporation Commission 1200 West Washington Street 27 Phoenix, Arizona 85007

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DIRECT

TESTIMONY

OF

RALPH C. SMITH
DAVID C. PARCELL
ALEXANDER IBHADE IGWE
STEVE TAYLOR
JULIE MCNEELY-KIRWAN
BING E. YOUNG

DOCKET NO. E-04204A-06-0783

IN THE MATTER OF THE APPLICATION OF
UNS ELECTRIC, INC. FOR THE ESTABLISHMENT
OF JUST AND REASONABLE RATES AND
CHARGES DESIGNED TO REALIZE A
REASONABLE RATE OF RETURN ON THE FAIR
VALUE OF THE PROPERTIES OF UNS ELECTRIC,
INC. DEVOTED TO ITS OPERATIONS
THROUGHOUT THE STATE OF ARIZONA AND
REQUEST FOR APPROVAL OF RELATED
FINANCING

JUNE 28, 2007

Edison Electric Institute Dues UNS Electric, Inc.

Docket No. E-04204A-06-0783

Schedule C-12 Page 1 of 2

Test Year Ended June 30, 2006

Company		Adjustment Amount Adjustment	(D)	\$ (2,000) \$ 8,000 \$	\$ - \$ 24,071 \$ (2,675) b	\$ 2,802 \$ - \$ 2,802 \$ (2,802) \$ -	\$ 36,873 \$ (2,000) \$ 34,873 \$	JARG per G/L \$ (21,396) \$ - \$ (21,396) \$ - \$	\$ 15,477 \$ (2,000) \$ 13,477 \$ (8,470) \$
		Description	-	Regular Dues	2005 UARG	2006 UARG	Total Test Year EEI Dues	Journal Entry to Correct 2005 L	Adjusted Test Year EEI I
	Line	Ņ.		-	7	3	4	5	9

Notes and Source Col. A: Amounts taken from the Company's response to STF 3.72

Staff adjustment for Regular Dues based on a disallowance percentage of 49.93% (see page 2) સં

49.93% 2,000) 10,000 Adjustment Staff Staff adjustment to Regular Dues Remaining Staff adjustment to Regular Dues Regular Dues Regular Dues disallowance percentage Less: Company adjustment

b: Allocation of TEP's portion of 2005 UARG in the amount of \$24,071 booked in error. Corrected by Journal Entry 910.

(21,396)24,071 Correcting JE910 UNS Electric allocation of 2005 UARG TEP allocation of 2005 UARG

Col D. Per letter from Edison Electric Institute included in Company's workpapers for its EEI adjustment, 100% of environmental related separately funded activities are classified as "non-deductible" expenses

FERC 930

Edison Electric Institute Schedule of Expenses by NARUC Category For Core Dues Activities For the Year Ended December 31, 2005

Docket No. E-04204A-06-0783 Schedule C-12 Page 2 of 2

NARUC Operating Expense Category	% of <u>Dues</u>	Recommended <u>Disallowance</u>
Legislative Advocacy	20.38%	20.38%
Legislative Policy Research	6.02%	
Regulatory Advocacy	16.49%	16.49%
Regulatory Policy Research	13.99%	
Advertising	1.67%	1.67%
Marketing	3.68%	3.68%
Utility Operations and Engineering	11.31%	
Finance, Legal, Planning and Customer Service	18.75%	
Public Relations	7.71%	7.71%
Total Expenses	100.00%	49.93%

Comments:

- The above percentages represent expenses associated with EEI's core dues activities, based on the operating expense categories established by NARUC. Core expenses are those expenses paid for by shareholder-owned electric utilities' dues.
- * The legislative advocacy percent will differ slightly for IRS reporting requirements. For 2005, the lobbying % for IRS reporting is 19.4%.
- Administrative expenses are included in the percentages listed above. Approximately 11% of EEI's core dues expenses are administrative.