

Exh. AEB-13
Docket UE-230172
Witness: Ann E. Bulkley

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFICORP dba
PACIFIC POWER & LIGHT COMPANY

Respondent.

Docket UE-230172

PACIFICORP

EXHIBIT OF ANN E. BULKLEY

Regulatory Risk Analysis

March 2023 (REFILED April 19, 2023)

COMPARISON OF FACILITY AND FUND GROUP COMPANIES

Proxy Group Company	Operating Subsidiary	Jurisdiction	Service	Electric (eligible commodity) purchase	Test Year	Revenue Decoupling	Form-based rate	Non-Volumetric Rate Design		Traditional Generation	Renewable/Non-Traditional Generation	Capital Cost Recovery	Environmental Compliance	Capital Cost Recovery
								Variable Rate Design	Shared Risk Design					
Xcel Energy Inc.	Allegheny Energy Inc.	West Virginia	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
	Allegheny Power Co.	West Virginia	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
Alinta Energy Corporation	Alinta Energy	Western Australia	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
	Alinta Energy	Western Australia	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
Ameren Corporation	Ameren Energy	Missouri	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
	Ameren Energy	Missouri	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
American Electric Power Company, Inc.	AEP	Ohio	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
	AEP	Ohio	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
Avista Corporation	Avista Energy	Iowa	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
	Avista Energy	Iowa	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
CANS Energy	CANS Energy	Ontario	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
	CANS Energy	Ontario	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
Duke Energy Corporation	Duke Energy	North Carolina	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
	Duke Energy	North Carolina	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
Energy Corporation	Energy Corp	Illinois	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
	Energy Corp	Illinois	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
Energy, Inc.	Energy, Inc.	Illinois	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
	Energy, Inc.	Illinois	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
EPCOR Inc.	EPCOR Inc.	Alberta	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
	EPCOR Inc.	Alberta	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
NextEra Energy, Inc.	NextEra Energy	Florida	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
	NextEra Energy	Florida	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
NorthWestern Corporation	NorthWestern	Washington	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
	NorthWestern	Washington	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
OGE Energy Corporation	OGE Energy	Oklahoma	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
	OGE Energy	Oklahoma	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
One Tail Corporation	One Tail	California	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
	One Tail	California	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
Portland General Electric Company	Portland General	Oregon	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
	Portland General	Oregon	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
Southern Company	Southern	Georgia	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
	Southern	Georgia	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
Xcel Energy Inc.	Xcel Energy	Minnesota	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
	Xcel Energy	Minnesota	Electric	Yes	2022	Yes	No	No	No	No	No	No	No	No
Prty Group Average														

Notes: (1) Source: S&P Global Market Intelligence, Regulatory Focus: Adjustment Churns, dated July 18, 2022. Operating subsidiaries not covered in this report were excluded from the analysis. (2) Source: Regulatory Research Associates, effective as of September 30, 2022. (3) Source: S&P Global Market Intelligence, Regulatory Focus: Adjustment Churns, dated July 18, 2022. (4) Source: S&P Global Market Intelligence, Regulatory Focus: Adjustment Churns, dated July 18, 2022. (5) Source: S&P Global Market Intelligence, Regulatory Focus: Adjustment Churns, dated July 18, 2022. (6) Source: S&P Global Market Intelligence, Regulatory Focus: Adjustment Churns, dated July 18, 2022. (7) Source: S&P Global Market Intelligence, Regulatory Focus: Adjustment Churns, dated July 18, 2022. (8) Source: S&P Global Market Intelligence, Regulatory Focus: Adjustment Churns, dated July 18, 2022. (9) Source: S&P Global Market Intelligence, Regulatory Focus: Adjustment Churns, dated July 18, 2022. (10) Source: S&P Global Market Intelligence, Regulatory Focus: Adjustment Churns, dated July 18, 2022. (11) Source: S&P Global Market Intelligence, Regulatory Focus: Adjustment Churns, dated July 18, 2022. (12) Data provided by PacificCorp.