

BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFIC POWER & LIGHT COMPANY,

Respondent.

DOCKET UE-152253

REVISED DIRECT TESTIMONY OF DONNA M. RAMAS (DMR-1T)

ON BEHALF OF PUBLIC COUNSEL

(RED-LINED)

APRIL 1, 2016

REVISED TESTIMONY OF DONNA M. RAMAS (DMR-1T)
DOCKET UE-152253

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REVISED TESTIMONY OF DONNA RAMAS (DMR-1T)
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EXHIBIT LIST

- Exhibit No. DMR-2 Summary of Adjustments.
- Exhibit No. DMR-3 Revenue Requirement and Adjustment Schedules.
- Exhibit No. DMR-4 Year 2 Rate Plan Adjustments.
- Exhibit No. DMR-5 Qualifications of Donna Ramas.
- Exhibit No. DMR-6 Response to Boise Data Request No. 9 with Redacted Attachment Boise 009-1, Excerpted Attachment Boise 009-3 “Results” tab, Redacted Attachment Boise 009-4, and Attachment Boise 009-7.
- Exhibit No. DMR-7 Response to Boise Data Request No. 13 with Excerpted Attachment Boise 0013-1 “Results” tab.
- Exhibit No. DMR-8 Response to Public Counsel Data Request No. 13 with Attachment.
- Exhibit No. DMR-9 Response to Public Counsel Data Request No. 58.
- Exhibit No. DMR-10 Response to Public Counsel Data Request No. 59.
- Exhibit No. DMR-11 Response to Public Counsel Data Request No. 63.
- Exhibit No. DMR-12 Response to Public Counsel Data Request No. 60.
- Exhibit No. DMR-13 Response to Public Counsel Data Request No. 61.
- Exhibit No. DMR-14 Response to Public Counsel Data Request No. 12.
- Exhibit No. DMR-15 1st Supplemental Response to Sierra Club Data Request No. 1.2(f).
- Exhibit No. DMR-16 1st Supplemental Response to Public Counsel Data Request No. 20 with Redacted 1st Supplemental Attachment.
- Exhibit No. DMR-17 1st Supplemental Response to Boise Data Request No. 62 with Redacted 1st Supplemental Attachment.

REVISED TESTIMONY OF DONNA RAMAS (DMR-1T)
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EXHIBIT LIST - CONTINUED

Exhibit No. DMR-18 Response to Public Counsel Data Request No. 64 with Attachment.

Exhibit No. DMR-19 Response to Public Counsel Data Request No. 38 with Attachment.

Exhibit No. DMR-20 1st Supplemental Response to Public Counsel Data Request No. 36 with 1st Supplemental Attachment PC 36-1.

Exhibit No. DMR-21 Response to Public Counsel Data Request No. 52 with Attachments PC 52-2 and PC 52-3.

Exhibit No. DMR-22 1st Supplemental Response to Public Counsel Data Request No. 37 with 1st Supplemental Attachment PC 37-1.

Exhibit No. DMR-23 Response to Public Counsel Data Request No. 53 with Attachments PC 53-2 and 53-3.

Exhibit No. DMR-24 Response to Public Counsel Data Request No. 49 with Attachment PC 49-2.

Exhibit No. DMR-25 Response to Public Counsel Data Request No. 40.

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I. INTRODUCTION

Q: Please state your name, occupation and business address.

A: My name is Donna M. Ramas. I am a Certified Public Accountant licensed in the State of Michigan and Principal at Ramas Regulatory Consulting, LLC, with offices at 4654 Driftwood Drive, Commerce Township, Michigan 48382.

Q: On whose behalf are you testifying?

A: I was retained by the Public Counsel Unit of the Washington Attorney General’s Office (Public Counsel) to review Pacific Power & Light Company’s (Pacific Power or Company) request for an increase in rates and a two-year rate plan. Accordingly, I am appearing on behalf of Public Counsel.

Q: What is the purpose of your testimony?

A: I present Public Counsel’s overall revenue requirement recommendation based on adjustments presented in this testimony. I also discuss the single issue that is driving the vast majority of the Company’s requested increase in this case, which is the Company’s request to significantly accelerate the recovery of certain coal plant capital costs from Washington ratepayers. I recommend that the Company’s requested acceleration of depreciation be rejected at this time. I also show that, absent the requested acceleration, Pacific Power should lower the rates currently being charged to Washington ratepayers, not increase them. Additionally, I address the Company’s request for a two-year rate plan and recommend that the requested second year step increase be rejected for the reasons discussed later in this testimony.

Q: Have you prepared a summary of your qualifications and experience?

1 A: Yes. I have attached Exhibit No. DMR-5, which is a summary of my regulatory
2 experience and qualifications.

3 **Q: Have you previously filed testimony before the Washington Utilities and**
4 **Transportation Commission (“UTC”)?**

5 A: Yes. I filed testimony before the UTC in Dockets UE-090205 and UE-140762
6 (*Consolidated*), both of which involved Pacific Power & Light Company, and
7 Dockets UE-150204 and UG-150205 (*Consolidated*) involving Avista
8 Corporation.

9 **Q: Have you prepared any exhibits in support of your testimony?**

10 A: Yes. I have prepared Exhibit No. DMR-2, which is a summary of my
11 recommended adjustments to Pacific Power’s first year rate increase and the
12 resulting revenue requirement, and Exhibit No. DMR-3, which presents the Public
13 Counsel’s recommended revenue requirement and the calculationschedules
14 supporting the adjustments sponsored in this testimony.

15 I also prepared Exhibit No. DMR-4 which presents recommended
16 adjustments to the Company’s proposed Year Two incremental step increase,
17 should the Commission choose to adopt a two-year rate plan as proposed by
18 Pacific Power in this case. As explained later in this testimony, I recommend that
19 the Company’s proposed second-year increase be rejected by the Commission.

20 **Q: Are you providing any additional exhibits in this proceeding?**

21 A: Yes. I am also attaching various data responses referenced in this testimony and
22 in Exhibit Nos. DMR-2 through DMR-4. These are being provided as Exhibit
23 Nos. DMR-6 through DMR-25. These exhibits are also identified in the Exhibits
24 List at the beginning of this testimony.

1 **Q: Please discuss how Exhibit No. DMR-3 is organized.**

2 A: Exhibit No. DMR-3 consists of pages 1 through 32~~Schedules 1 through 13~~. Page
3 1~~Schedule 1~~ presents the overall revenue requirement resulting from the
4 adjustments recommended in this testimony. ~~Schedule 2 presents the Result of~~
5 ~~Operations for the Pacific Power's Washington Operations, showing the per~~
6 ~~Company amounts, Public Counsel's recommended adjustments, and the resulting~~
7 ~~Public Counsel adjusted amounts.~~ Pages 2 through 7 provide~~Schedule 3 is a~~
8 summary that begins with the Per Company unadjusted per book amounts on a
9 Washington jurisdictional basis, schedule that lists provide all of the adjustments
10 ~~recommended in this testimony~~ on a Washington jurisdictional basis, as well as
11 provide the resulting Public Counsel recommended adjusted amounts on a
12 Washington jurisdictional basis. Adjustments recommended by Public Counsel
13 that were not adjusted by the Company are presented as Adjustments PC-1
14 through PC-5 on page 8 through 18. Each of the Company's proposed
15 adjustments that Public Counsel revised are presented on pages 19 through 32.
16 Each of the Company adjustments presented on pages 19 through 32 identifies the
17 Company proposed amounts and the Public Counsel adjusted amounts. The
18 Company proposed adjustments that Public Counsel takes no position on at this
19 time are not included as separate pages in Exhibit No. DMR-3, but are included in
20 the summary of adjustments on pages 2 through 7 at the Company proposed
21 amounts.~~Schedules 4 through 13 present the calculations for the adjustments~~
22 ~~recommended in this testimony.~~

23 **Q: Page 1~~Schedules 1 and 2~~ of Exhibit No. DMR-3 ~~include~~includes three**
24 **separate columns containing "Per Company" amounts. Can you please**

1 **explain why there are three different “Per Company” presentations on these**
2 **schedules?**

3 A: Yes. The Protecting Americans From Tax Hikes Act of 2015, hereinafter referred
4 to as the “PATH Act,” was signed into law by President Obama on
5 December 18, 2015. Included in the PATH Act was the extension of bonus
6 depreciation with the 50 percent bonus depreciation provisions being effective
7 retroactively to the beginning of 2015 through 2017, and additional bonus
8 depreciation provisions phasing-down through 2019, as well as other tax
9 provisions. Since the PATH Act was signed into law subsequent to the filing of
10 the Company’s application, the impacts of the PATH Act were not incorporated
11 in the Company’s filing. Clearly the known and measurable impacts of this new
12 law that became effective less than a month after the Company submitted its filing
13 and impacts the test year should be incorporated in this case.

14 Additionally, the Company’s filing is based on an End of Period (“EOP”)
15 rate base approach instead of the Average of Monthly Averages (“AMA”)
16 approach recently adopted by the Commission for this Company in its most recent
17 rate case. Later in this testimony, I recommend that the Commission use the
18 AMA approach for determining the appropriate rate base for setting rates for
19 Pacific Power.

20 For the ease of the Commission in reviewing my testimony and exhibits in
21 this proceeding, and in being able to compare impacts of the EOP and AMA
22 approaches on the individual components of the revenue requirement equation, I
23 have included the three “Per Company” columns on my Revenue Requirement
24 [presentation on Exhibit No. DMR-3, page 1 of 32, ~~schedule \(Schedule 1\) and~~](#)

1 | ~~Results of Operations schedule (Schedule 2).~~ The first “Per Company” column
2 | presents the amounts contained in the Company’s original November 25, 2015,
3 | filing which uses an EOP rate base approach. The second column presents the
4 | revised EOP rate base approach amounts with the impacts of the PATH Act
5 | incorporated. Finally, the third column presents the AMA approach with impacts
6 | of the PATH Act incorporated. Both the second and third columns were based on
7 | information provided by the Company in response to discovery in this case.¹

8 | **Q: What impacts do the PATH Act and the AMA rate base approach have on**
9 | **the revenue requirements presented in the Company’s original filing?**

10 | A: As shown on ~~both Exhibit No. DMR-2 and~~ Exhibit No. DMR-3, page 1 of
11 | 32Schedule 4, the revenue requirement calculated in the Company’s original
12 | filing of \$10,746,470 declined by \$251,092 to \$10,495,378 when the impacts of
13 | the PATH Act are reflected. As also shown on the above referenced exhibits, the
14 | revenue requirement that would result if the PATH Act impacts are reflected and
15 | the AMA approach to rate base is used is \$9,116,220, which is \$1,379,158 lower
16 | than the revenue requirement under the EOP approach with the PATH Act
17 | impacts reflected. Additionally, as shown on Exhibit No. DMR-4, page 1 at lines
18 | 1 through 4, the Year Two step increase calculated in the Company’s original
19 | filing of \$10,550,094 declines by \$705,581 to \$9,844,513 when the impacts of the
20 | PATH Act are reflected.²

¹ The Impacts of the PATH Act on the Company’s filing was provided in response to Boise Data Request No. 9, provided as Exhibit No. DMR-6. The impacts of reflecting both the AMA rate base approach and the impacts of the PATH Act was provided by the Company in response to Boise Data Request No. 13, provided as Exhibit No. DMR-7.

² The impacts of the PATH Act on the Company’s requested Year Two step increase were provided in response to Boise Data Request No. 9, provided as Exhibit No. DMR-6.

1 **II. SUMMARY OF TESTIMONY**

2 **Q: Based on Public Counsel’s analysis of Pacific Power’s filing, what is Public**
3 **Counsel’s recommended change to the current level of Washington revenue**
4 **requirements for Pacific Power?**

5 A: While the Company’s initial filing presented revenue requirement calculations
6 resulting in a calculated \$10,746,470 increase in rates, and the impacts of the
7 PATH Act reduce that amount to \$10,495,378, Pacific Power limited its requested
8 increase in base rates to \$10 million, or 2.99 percent, as a result of its decision to
9 file its case as an Expedited Rate Filing (“ERF”).³ Based on the adjustments
10 proposed in this testimony, the \$10 million requested increase should instead be a
11 reduction in current rates of ~~\$3,389,490~~~~\$3,396,464~~~~\$4,512,983~~. The resulting
12 revenue reduction of ~~\$3,389,490~~~~\$3,396,464~~~~\$4,512,983~~ is presented on Exhibit
13 No. DMR-2 and on Exhibit No. DMR-3, page 1 of 32 Schedule 1.⁴ As shown on
14 each of these exhibits, Public Counsel’s recommended revenue requirement is
15 based on the AMA rate base approach with the impacts of the PATH Act
16 incorporated.

17 It should be noted that ~~each of the individual~~ adjustments PC-1 through
18 PC-5 recommended in this testimony remain the same if the EOP or the AMA
19 approach is used. Since Exhibit No. DMR-3 begins with the per books amounts
20 (Washington Jurisdictional basis) and incorporates each of the Company’s
21 adjustments, the Company adjustments that are impacted by the PATH Act and

³ The Prehearing Conference Order, Order 03 of this proceeding, at paragraph 14, states, in part, “The Commission does not recognize this filing as an ERF, but to the extent practicable, we have and will continue to expedite the procedural schedule.”

⁴ There is a \$2 rounding difference between the two exhibits.

1 by use of the AMA approach instead of the Company's proposed EOP approach
2 are modified in Exhibit No. DMR-3.

3 **Q: Did you undertake a comprehensive analysis and review of Pacific Power's**
4 **claimed revenue deficiency for its Washington jurisdictional electric**
5 **operations?**

6 A: No. My primary focus was on items with larger impacts on customers.
7 Additionally, I did not review or analyze the cost allocation methodology and
8 resulting allocation factors used by Pacific Power and did not review and analyze
9 whether or not the amount of Net Power Costs currently incorporated in current
10 base rates should be revised. In its filing, the Company has not proposed any
11 changes to the net power costs incorporated in current base rates. While I did
12 review many areas of Pacific Power's filing, I did not conduct a complete or
13 comprehensive review of all issue areas. Public Counsel may subsequently elect
14 to support some of the adjustments of other parties in this proceeding. As a result,
15 the revenue requirements presented above should not be considered a final
16 revenue requirement recommendation on behalf of Public Counsel.

17 **Q: How is the rest of your testimony organized?**

18 A: I first address why the AMA rate base approach should be used in determining the
19 appropriate revenue requirements in this case as opposed to the EOP approach
20 proposed by Pacific Power. I then address the single driver causing the
21 Company's filing to result in an increase in base rates, that being Pacific Power's
22 request to substantially accelerate the recovery of certain coal plant capital
23 expenditures from Washington ratepayers. Next, I present various adjustments to
24 the revenue requirements requested by the Company in this case. In the final

1 section of my testimony, I address the Company's request for a Year Two step
2 increase and recommend that the two-year rate plan approach be rejected by the
3 Commission at this time. As part of that final section, I also present several
4 adjustments to the Company's proposed Year Two step increase should the
5 Commission elect to adopt a two-year rate plan as proposed by the Company.

6 **III. APPROPRIATE RATE BASE APPROACH - EOP OR AMA**

7 **Q: In the Commission's decision in the Company's most recent rate case, Docket**
8 **UE-140762, did the Commission adopt the EOP approach or the AMA**
9 **approach in determining test year rate base?**

10 A: In Pacific Power's last rate case, the Company requested that rate base be
11 determined on the EOP rate base approach. In Order 08 in Docket UE-140762,
12 issued on March 25, 2015, the Commission explicitly rejected the use of EOP rate
13 base and determined that rate base should be based on its preferred AMA
14 approach.

15 **Q: Why has the AMA approach to rate base been generally preferred over the**
16 **EOP approach?**

17 A: The AMA approach results in rate base (or investment used to serve customers)
18 being better matched to the test year revenues and expenses. Use of AMA
19 approach avoids the distortion between each of these components of the revenue
20 requirement equation.

21 **Q: In Order 08, in the most recent Pacific Power rate case, did the Commission**
22 **address the circumstances in which it has found the use of EOP rate base**
23 **approach to be appropriate?**

1 A: Yes. In addressing the issue at paragraph 145 (page 63 – 64) of the Order, the
2 Commission quoted from several prior orders in which it discussed the limited
3 circumstances in which it has found the EOP rate base approach to be an
4 appropriate regulatory tool:

5 The Commission has traditionally required that utility rates be
6 established relying on the measurement of rate base using the
7 AMA approach. The Commission, however, has occasionally
8 recognized that the alternative approach of utilizing end-of-test
9 period rate base may be appropriate in a variety of circumstances.
10 In a 1981 case, *WUTC v. Washington Natural Gas*, the
11 Commission drew on its early experience evaluating the relative
12 merits of the two approaches and drew the following conclusions:

13
14 (1) Average rate base is the most favored,

15
16 (2) Year-end rate base is an appropriate regulatory tool under one
17 or more of the following conditions:

18
19 (a) Abnormal growth in plant

20 (b) Inflation and/or attrition

21 (c) As a means to mitigate regulatory lag

22 (d) Failure of utility to earn its authorized rate of return
23 over an historical period.⁵

24 Order 08 went on to find that these circumstances were not present for PacifiCorp.

25 The Commission stated as follows:

26 In this case, we have some evidence of capital additions during
27 relevant periods but it does not demonstrate abnormal growth in
28 plant. Inflation remains very low in the current economic
29 environment in the United States. The Company did not present
30 persuasive evidence that it is suffering attrition in earnings. In
31 particular, the Company did not present an attrition study.
32 Moreover, the fact that the Company failed in the past to earn its
33 authorized return cannot justify use of EOP absent a showing that,
34 due to factors beyond the Company's control, the Commission can

⁵ *Petition of Puget Sound Energy and NWECA for Decoupling Authority*, Dockets UE-12167 and UG-121705 (*Consolidated*) and *WUTC v. Puget Sound Energy*, Dockets UE-130037 and UG-130138 (*Consolidated*), Order 07 ¶ 45 (June 25, 2013) (citing *WUTC v. Wash. Nat. Gas Co.*, 44 P.U.R. 4th 435, 438 (Sept. 24, 1981)).

1 expect this condition to continue into the future. There is no such
2 evidence in the record of this case.⁶

3 **Q: In this case, has the Company met the criteria for using EOP rate base**
4 **identified by the Commission in the Company's last rate case?**

5 A: No, it has not. The Company has not demonstrated unusual or abnormal growth
6 in plant. The Company has not indicated that we are in a period of high inflation;
7 in fact, the United States continues to be in a low inflation period. The Company
8 once again has not presented an attrition study. The Company has not
9 demonstrated that it is suffering attrition in earnings. In short, the Company has
10 failed to present evidence demonstrating that it meets the limited conditions under
11 which the Commission has adopted the EOP rate base approach.

12 **Q: Has net rate base grown significantly for the Company since the last rate**
13 **case?**

14 A: No, it has not. The Company's unadjusted Washington jurisdictional rate base in
15 the prior rate case for the test year ended December 31, 2013, was \$788,256,372
16 on an AMA basis.⁷ In the current rate case, the Company's original filing shows
17 an unadjusted Washington jurisdictional rate base for the test year ended
18 June 30, 2015, of \$781,321,066⁸ on an AMA basis, lower than the unadjusted rate
19 base in the prior case. In the last rate case, the Company made adjustments to
20 reflect EOP plant balances and included certain projected major pro forma plant
21 additions through March 31, 2015. In the original filing in that case the Company

⁶ *WUTC v. Pacific Power & Light Co.*, Docket UE-140762 (*Consolidated*), Order 08, ¶ 146 (March 25, 2015).

⁷ Docket UE-140762, Natasha C. Siores, Exhibit No. NCS-3 at 2.2.

⁸ Shelley E. McCoy, Exhibit No. SEM-3 at 2.2.

1 requested an adjusted rate base of \$849,625,443.⁹ In the original filing in this
2 case, the Company made adjustments to reflect EOP plant balances and included
3 an adjustment for certain pro forma major plant additions, resulting in an
4 originally requested rate base of \$838,124,164,¹⁰ which is also lower than the rate
5 base requested by the Company in its last rate case.

6 **Q: In the last Pacific Power rate case, did you recommend that the EOP or the**
7 **AMA approach be used in determining the appropriate revenue requirement**
8 **for the Company?**

9 A: In my direct testimony in the last Pacific Power rate case, Docket UE-140762
10 (*Consolidated*), I expressed my understanding that in certain recent cases, Public
11 Counsel had recommended the use of EOP rate base as a preferred tool to attrition
12 adjustments to address regulatory lag asserted by utilities and had indicated that it
13 might help reduce the frequency of rate case proceedings. Thus, I indicated that,
14 consistent with Public Counsel's position, I was not challenging Pacific Power's
15 use of EOP rate base.

16 Although Public Counsel and Staff did not challenge the use of EOP rate
17 base in the last rate case, as discussed, the Commission explicitly rejected the use
18 of the EOP approach. Given the Commission's recent finding on this issue, the
19 Company's failure to demonstrate in this case that it has met the limited criteria
20 identified by the Commission in Order 08, I recommend that rate base be
21 determined based on the AMA approach in this case. Use of the AMA approach
22 assures a better matching of the capital investments used to provide service to

⁹ Docket No. UE-140762, Siores, Exhibit No. NCS-3 at 2.2.

¹⁰ McCoy, Exhibit No. SEM-3 at 2.2.

1 customers to the associated revenues and operating expenses in the revenue
2 requirement equation.

3 **IV. ACCELERATED RECOVERY OF CERTAIN COAL PLANT**

4 **CAPITAL COSTS**

5 **Q: Would you please summarize the Company's request with regards to**
6 **accelerating the recovery from Washington ratepayers of certain coal plant**
7 **capital costs?**

8 A: In this case, the Company is proposing to significantly shorten the depreciation
9 period over which it recovers from Washington ratepayers the capital costs of the
10 four coal generation units at the Jim Bridger facility and Unit 4 of the Colstrip
11 coal generation plant. It is proposing to shorten the capital recovery period of the
12 Jim Bridger generating plant units from 2037 to 2025, reducing the recovery
13 period by 12 years. It is proposing to shorten the capital recovery period of
14 Colstrip Unit 4 generating plant from 2046 to 2032, reducing the recovery period
15 by 14 years. In other words, recovery of the plant costs will be significantly
16 accelerated from the current Commission approved depreciable lives of the plant
17 assets under the Company's proposal.

18 **Q: What impact does the accelerated recovery of the Jim Bridger and Colstrip**
19 **coal generating unit assets have on the revenue requirements in this case?**

20 A: The entirety of the Year One rate increase proposed by Pacific Power is driven by
21 the requested accelerated recovery of these coal generating units from
22 Washington ratepayers. Exhibit No. SEM-2 attached to the direct testimony of
23 Company witness Shelley E. McCoy shows that the Company's adjustment to
24 accelerate depreciation on the Jim Bridger and Colstrip plants increases the

1 revenue requirements by \$9,907,232.¹¹ Additionally, the Company’s application
2 of the proposed accelerated depreciation rates on the pro forma major plant
3 addition associated with the Jim Bridger Unit 3 Overhaul Project, including the
4 installation of the Selective Catalytic Reduction (“SCR”) system, as compared to
5 the existing approved depreciation rates increases the revenue requirements by
6 approximately \$1.2 million. Thus, the application of the accelerated depreciation
7 rates on the test year end Jim Bridger and Colstrip Unit 4 plant assets, and the pro
8 forma major plant additions requested in this case, increases the revenue
9 requirements by approximately \$11.1 million (\$9.9 million + \$1.2 million).

10 Removing only one component from this request, the acceleration of the
11 coal plant asset recovery period from Washington ratepayers, would result in a
12 reduction in current rates for the first year of the Company’s proposed two-year
13 plan. This is true even with the pro forma major plant additions for the Jim
14 Bridger Unit 3 overhaul and SCR system included in rates. In other words, the
15 impacts of the requested acceleration of the recovery of Jim Bridger and Colstrip
16 plants from Washington ratepayers exceeds the entirety of the requested Year One
17 rate increase in this case. There would be no Pacific Power rate case at this time
18 absent the request for accelerated recovery of coal plant costs from Washington
19 ratepayers!

20 **Q: What reasons or support has the Company offered for its proposed**
21 **accelerated recovery of the coal plant costs from Washington ratepayers?**

22 **A:** The Company offered minimal explanation in its original filing in support of its
23 substantial acceleration of the recovery of the Jim Bridger and Colstrip Unit 4

¹¹ McCoy, Exhibit No. SEM-2, at 1:28.

1 coal generation plant capital costs from Washington ratepayers. In his direct
2 testimony, Company witness R. Bryce Dalley states as follows:

3 To provide additional flexibility for compliance with major state
4 and federal environmental initiatives, the Company also proposes
5 to reinstate Washington's previous, shorter depreciation lives for
6 coal plants, similar to Oregon's, the other major state within the
7 west control area. Early implementation of this proposal smooths
8 the associated rate impacts and provides maximum planning
9 benefits.¹²

10 Mr. Dalley also addresses the issue as follows in his direct testimony:

11 ...[T]he Company's proposal aligns current depreciation periods
12 between Washington and Oregon, the two states that account for
13 most of the load in the west control area, for the coal-fired
14 resources that serve Washington. The proposed depreciation
15 schedules reflect the shorter depreciation lives Washington used
16 before the Company's 2007 depreciation study. These schedules
17 end in 2025 for all four units at the Jim Bridger generating plant
18 and in 2032 for Unit 4 of the Colstrip generating plant (Colstrip
19 Unit 4). This change will provide greater resource planning
20 flexibility for the Company and its customers as Washington
21 implements state and federal environmental policies described
22 below.¹³

23
24 In summary, the reasons identified by the Company for the significant
25 acceleration of recovery of the Jim Bridger and Colstrip Unit 4 coal generating
26 plant costs from Washington ratepayers are: 1) to go back to depreciation lives
27 used prior to the 2007 depreciation study; 2) to match the depreciation period
28 used in Oregon; and 3) to "...provide greater resource planning flexibility to the
29 Company...".

30 **Q: The Company indicates that its proposal reflects shorter depreciation lives**
31 **used in Washington before its 2007 depreciation study. Why were the**
32 **depreciation lives extended in the 2007 depreciation study?**

¹² Direct Testimony of R. Bryce Dalley, Exhibit No. RBD-1T at 3:1 – 6.

¹³ *Id.* at 4:20 – 5:5.

1 A: The depreciation lives were extended based on the anticipated dates the plants
2 would cease to produce electricity and provide service to customers. The lives for
3 depreciation purposes were extended to align them with the anticipated life of the
4 associated plants. In the case addressing the 2007 depreciation study, Docket
5 UE-071794, Company witness Mark C. Mansfield described the term “estimated
6 plant depreciable life” for the steam generating plants as follows:

7 For the purpose of determining depreciation, the estimated plant
8 depreciable life of a steam plant is the period of time that begins
9 when the plant is initially placed in service and begins to generate
10 electricity and ends when the plant is finally removed from service
11 and ceases to generate electricity. In other words it is the period of
12 time during which the electric customers benefit from the
13 generation output of the plant.¹⁴

14 Mr. Mansfield’s testimony in that case explained that the estimated steam
15 generation plant depreciable life analysis was prepared by PacifiCorp Energy’s
16 engineering staff.

17 **Q: What is depreciation and what is the purpose of depreciation?**

18 A: In general terms, depreciation is a method of recognizing the costs of an asset
19 over the useful life of the asset. In Pacific Power’s most recent depreciation case
20 before the WUTC, Docket UE-130052, the direct testimony of Company witness
21 Henry E. Lay contained the following description of depreciation and explanation
22 of the importance of depreciation to an electric utility:

23 **Q. Please explain the concept of depreciation.**

24 A. There are many definitions of depreciation. The following
25 definition was put forth by the American Institute of
26 Certified Public Accountants in its Accounting Research
27 Bulletin #43:

28 Depreciation accounting is a system of

¹⁴ Docket UE-071795, Direct Testimony of Mark C. Mansfield, Exhibit No. MCM-1T at 2:11-15.

1 accounting which aims to distribute the cost
2 or other basic value of tangible capital
3 assets, less salvage (if any), over the
4 estimated useful life of the unit (which may
5 be a group of assets) in a systematic and
6 rational manner. It is a process of
7 allocation, not of valuation.

8 The actual payment for an electric utility plant asset
9 occurs in the period in which it is acquired through
10 purchase or construction. Depreciation accounting spreads
11 this cost over the useful life of the property. The
12 fundamental reason for recording depreciation is to provide
13 for accurate measurement of a utility's results of
14 operations. Capital investments in the buildings, plant, and
15 equipment necessary to provide electric service are
16 essentially a prepaid expense, and annual depreciation is
17 the part of that expense applicable to each successive
18 accounting period over the service life of the property.
19 Annual depreciation is an important and essential factor in
20 informing investors and others of a company's periodic
21 income. If it is omitted or distorted, a company's periodic
22 income statement is distorted and would not meet required
23 accounting and reporting standards.

24 **Q. Why is depreciation especially important to an electric**
25 **utility?**

26 A. An electric utility is very capital intensive; that is, it
27 requires a tremendous investment in generation,
28 transmission, and distribution equipment with long lives in
29 order to provide electric service to customers. Thus, the
30 annual depreciation of this equipment is a major item of
31 expense to the utility. Regulated electric prices are
32 expected to allow the utility to fully recover its operating
33 costs, earn a fair return on its investment and equitably
34 distribute the cost of the assets to the customers using these
35 facilities. If depreciation rates are established at an
36 unreasonably low or high level for ratemaking purposes,
37 the utility will not recover its operating costs in the
38 appropriate period, which will shift either costs or benefits
39 from current customers to future customers.¹⁵

¹⁵ Docket UE-130052, Direct Testimony of Henry E. Lay, Exhibit No. HEL-1T at 4:10 – 5:5 (emphasis added).

1 In the same docket, Company witness K. Ian Andrews provided the following
2 response in his direct testimony when discussing why it is necessary to estimate
3 the economic life of a generating asset when developing depreciation rates:

4 One major component of PacifiCorp's cost of service is the
5 recovery of capital investment. This recovery is accomplished
6 through depreciation expense over the life of each resource. From
7 the standpoint of setting depreciation rates, it is necessary to have a
8 reasonable estimate of the economic life of a resource at the time it
9 is placed into service in order to reasonably calculate the
10 depreciation expense. The estimated plant economic life of a
11 generating asset is the period of time that begins when the asset is
12 placed in service and starts generating electricity and ends when
13 the asset is removed from service. In other words, it is the period
14 of time during which customers benefit from the asset.¹⁶

15 **Q: What depreciable lives are currently being used in the Company's other**
16 **regulatory jurisdictions for the Jim Bridger and Colstrip coal generation**
17 **facilities?**

18 A: The depreciation lives for the Jim Bridger Units are through 2037 in Washington,
19 California, Utah, Wyoming and Idaho.¹⁷ The depreciation lives for the Colstrip
20 Units is currently through 2046 in Washington, California, Utah, Wyoming, and
21 Idaho.¹⁸ Only Oregon is currently using the shorter depreciation period for
22 ratemaking purposes for the Jim Bridger Units (2025) and the Colstrip Units
23 (2032), based on an order entered in August 2008.¹⁹ In that order, the Public
24 Utility Commission of Oregon required the Company to return to life end-dates

¹⁶ Docket UE-130052, Direct Testimony of K. Ian Andrew, Exhibit No. KIA-1T at 3:10-3:18 (emphasis added).

¹⁷ See Response to Public Counsel Data Request No. 13 provided as Exhibit DMR-8.

¹⁸ Ibid.

¹⁹ *PacifiCorp Petition to File Preliminary Depreciation Study*, Docket UM 1329, Order No. 08-427 (P.U.C. of Oregon, August 20, 2008).

1 for 11 coal-fired plants for depreciation purposes based on its prior depreciation
2 case.²⁰

3 **Q: You previously indicated that the Company is proposing to shorten the**
4 **depreciation period for the Jim Bridger generation facilities to 2025 and for**
5 **the Colstrip Unit 4 generation facility to 2037. Does the Company currently**
6 **plan to retire or remove the Jim Bridger and Colstrip coal generation**
7 **facilities from service in 2025 and 2037, respectively?**

8 A: No, it does not. In response to Public Counsel Data Request No. 58, the
9 Company indicated that its "...current best estimate for planning purposes' of the
10 date each of the Jim Bridger units will be retired from service is 2037, which
11 aligns with the currently approved depreciable lives for those resources in the
12 majority of PacifiCorp's states."²¹ Similarly, the response to Public Counsel Data
13 Request No. 59 indicated that "...the Company's current best estimate for
14 planning purposes of the date that the Colstrip units will be retired from service is
15 2046, which aligns with the currently approved depreciable lives for those
16 resources in the majority of PacifiCorp's states."²²

17 The Company is currently working on its 2015 Integrated Resource Plan
18 ("IRP") Update, which the Company will file in March 2016. In the 2015 IRP
19 Update, the assumed end of life date for the Jim Bridger Units remains as 2037
20 and the assumed end of life date for Colstrip Unit 4 remains 2046.²³ Thus, for
21 Integrated Resource Planning purposes, the Company has not shortened the plant

²⁰ *PacifiCorp Application for an Order Authorizing a Change in Depreciation Rates*, Docket UM 1064, Order No. 03-457 (P.U.C. of Oregon, July 24, 2003).

²¹ Ramas, Exhibit No. DMR-9.

²² Ramas, Exhibit No. DMR-10.

²³ See Response to Public Counsel Data Request No. 63, provided as Exhibit No. DMR-11.

1 lives to the depreciation lives it is requesting in this case. I have seen no
2 information presented by the Company that would indicate that it has plans to
3 remove the Jim Bridger coal generating facilities from service in 2025 or Colstrip
4 Unit 4 from service in 2037.

5 **Q: Under the Company’s proposal, will it be using the depreciation rates**
6 **applicable to the Jim Bridger and Colstrip units that are currently**
7 **authorized by the Oregon Public Service Commission?**

8 A: No. The Company is proposing to significantly increase the depreciation rates
9 currently authorized in Washington applicable to the Jim Bridger and Colstrip
10 facilities so that the capital costs would be fully recovered by the earlier recovery
11 dates or “depreciation lives” authorized in Oregon. However, since Oregon has
12 been using the shorter recovery life in determining the depreciation rates for a
13 longer period of time, the depreciation rates in Oregon associated with the Jim
14 Bridger and Colstrip facilities are considerably lower than the depreciation rates
15 proposed by Pacific Power in this case.

16 **Q: If the Company is granted the shorter depreciation lives for the Jim Bridger**
17 **and Colstrip units, will the Company stop supplying coal generated**
18 **electricity to Washington ratepayers from the Jim Bridger plants in 2025 and**
19 **from Colstrip Unit 4 in 2032?**

20 A: No. The Company is simply proposing to recover the costs of the plants over a
21 period shorter than the plants’ anticipated service lives, yet still keep the plants in
22 service and use them to generate coal based energy through the longer lives. In
23 response to Public Counsel Data Request No. 60, the Company states, in part, as
24 follows: “Changing depreciable lives, however, would not restrict the Company

1 from using generation from these resources to serve Washington customers after
2 the end of the facilities' depreciable lives, nor would it prevent the Commission
3 from revisiting the depreciable lives in a future proceeding.”²⁴ Similarly, the
4 response to Public Counsel Data Request No. 61 states, in part, that “...adjusting
5 depreciable lives for coal-fueled generation facilities included in Washington
6 rates would not restrict Pacific Power from operating those generation units to
7 serve Washington customers or customers in other states after the end of those
8 depreciable lives.”²⁵

9 In response to Public Counsel Data Request No. 12, the Company states
10 that: “Accelerating depreciation on coal-fueled generation facilities in
11 Washington allows Washington customers to preemptively pay down the costs of
12 these plants, to mitigate the risk of simultaneously incurring costs associated with
13 remaining book values and replacement resource costs if state and federal
14 environmental policies and mandates, including carbon emission regulations,
15 force premature shut-down(s) of these facilities.”²⁶ Thus, the Company is
16 apparently offering Washington ratepayers the “opportunity” to pay the Company
17 in advance for coal plant costs just in case the facilities have to be shut down early
18 without yet knowing if early shut-down will in fact occur.

19 **Q: Do you agree that the Company should be permitted in this case to begin to**
20 **accelerate the recovery of these coal plant costs from Washington**
21 **ratepayers?**

²⁴ Ramas, Exhibit No. DMR-12.

²⁵ Ramas, Exhibit No. DMR-13.

²⁶ Ramas, Exhibit No. DMR-14.

1 A: No, I do not. Absent plans to actually remove the plants from service earlier,
2 there is no justification for accelerating the recovery of the plant costs from
3 ratepayers at this time. The very purpose of including depreciation expense in
4 rates is to allow the Company to recover the capital costs of the associated assets
5 over the period the assets are used to provide service to customers, i.e., the life of
6 the plant. By allowing the recovery through depreciation over the life of the
7 plant, the customers that receive energy from the plant are paying for the capital
8 cost of the plant that is being used to serve them. If the Company is permitted to
9 accelerate recovery of the plant costs over a period of time that is shorter than the
10 anticipated period in which the plant will be providing service to customers,
11 current ratepayers will be paying for capital costs that will be used to serve future
12 customers. This would result in intergenerational inequity. Under the Company's
13 proposal, the Washington jurisdictional capital costs of the Jim Bridger coal
14 generation units would be fully recovered from Washington ratepayers by 2025,
15 yet those generation units are currently anticipated to continue to providing
16 service to customers through 2037. Thus, Washington ratepayers receiving
17 service in the period 2026 through 2037 will not be paying towards the capital
18 costs for the Jim Bridger units that provide service to them; these costs would
19 have been prepaid by other Washington customers between 2016 through 2025.

20 **Q: Is the Pacific Power proposal to accelerate recovery based on a new**
21 **depreciation study?**

22 A: No, a new depreciation study was not filed as part of this case. It is my
23 understanding that the Company conducts full depreciation studies on
24 approximately five year intervals. It is important to periodically re-evaluate the

1 appropriate depreciation rates through full depreciation studies to ensure that the
2 depreciation rates are still on-track to recover the capital costs over the life of the
3 underlying assets. If the Company determines that the coal generation facilities
4 will be removed from service earlier than the dates currently incorporated in the
5 most recent depreciation study, it can address the changed life of the facilities in
6 its next depreciation study.

7 **Q: How do you respond to Mr. Dalley's concern that state and federal**
8 **environmental regulations could result in premature shut-down of the coal**
9 **plants?**

10 A: If information arises that result in it becoming known that any of the coal
11 generation facilities will be removed from service and no longer used to serve
12 customers at a date that is earlier than the depreciation lives incorporated in the
13 most recent depreciation study, and those shorter depreciation lives would have a
14 substantial impact on depreciation expense incorporated in base rates, the
15 Company could conduct a new depreciation study and present that study to the
16 Commission for its consideration. However, it is my opinion that it is not
17 appropriate to substantially change the depreciation rates being applied to the Jim
18 Bridger and Colstrip plants at this time, particularly when the Company does not
19 currently have plans to shorten the actual plant lives from the depreciation lives
20 that were used in determining the depreciation rates currently in place in
21 Washington. As discussed, the Company acknowledges there are no plans to
22 remove the plants from service by the accelerated dates, the plants would continue
23 to provide service to Washington customers, and most other Pacific Power states
24 would not be accelerating their depreciation rates.

1 **Q: Above, you discuss potential *intergenerational* inequities for Washington**
2 **ratepayers that result from the Company’s proposal to accelerate the**
3 **recovery of the coal generation plant costs. Could there also be**
4 ***interjurisdictional* inequity issues that result from the request to accelerate**
5 **recovery of the coal generation plant costs from Washington ratepayers?**

6 A: There could be in certain potential future situations or scenarios. For example,
7 assume that the Company’s request in this case is granted and the Jim Bridger
8 units continue to operate after the proposed depreciation life in this case (i.e., after
9 2025), but the energy generated from those facilities ceases to be utilized in
10 providing electric service to customers in the State of Washington after 2025. In
11 other words, after 2025 the electricity generated from the Jim Bridger plants is
12 only sold to jurisdictions outside of Washington. In this scenario the Washington
13 ratepayers, between 2016 and 2025, would be subsidizing customers in other
14 jurisdictions that continue to receive power from the Jim Bridger units after 2025.
15 This is because the recovery of the coal facility costs in Washington would no
16 longer be aligned with the anticipated service life of the coal facilities.

17 **Q: What adjustments are needed to remove the proposed accelerated recovery**
18 **of the Jim Bridger and Colstrip capital costs in this case?**

19 A: Two separate adjustments are needed to remove the proposed accelerated
20 recovery of the Jim Bridger and Colstrip coal facility capital costs. The first
21 adjustment, presented in Exhibit No. DMR-3, page 23 of 32~~Schedule 4~~, simply
22 removes~~reverses~~ the Company’s proposed adjustment that accelerated the
23 recovery, which was provided in Company Exhibit No. SEM-3 at page 6.4
24 (Company Adjustment 6.4). In other words, Company Adjustment 6.4 –

1 Accelerated Depreciation on Jim Bridger and Colstrip Plants – should be reflected
2 as \$0. As shown on this schedule, depreciation expense should be reduced by
3 \$10,276,745 and rate base should be increased by \$3,188,308 to reverse the
4 impacts on accumulated depreciation and accumulated deferred income taxes.—As
5 shown on Exhibit No. DMR-2, line 277, rejection the reversal of this Company
6 adjustment reduces the revenue requirements in this case by \$9,907,231.²⁷

7 **Q: What is the second adjustment that is needed?**

8 A: In its filing, the Company made a pro forma major plant addition adjustment in
9 which it added certain major plant addition projects associated with the Jim
10 Bridger Unit 3 overhaul and Select Catalytic Reduction (SCR) system that were
11 placed into service in November 2015, which is five months after the end of the
12 test year. The filing included \$127.5 million on a total Company basis and \$28.6
13 million on a Washington jurisdictional basis for these post test year Jim Bridger
14 Unit 3 plant additions. In the pro forma major plant addition adjustment, the
15 Company included the associated depreciation expense based on its proposed
16 accelerated depreciation rates. The Company used a depreciation rate of 7.155
17 percent based on the proposed accelerated recovery period in its adjustment, while
18 the current Commission approved depreciation rate for the applicable account is
19 2.86 percent. Thus, an adjustment is needed to remove the accelerated recovery
20 of the post test year Jim Bridger Unit 3 plant additions.

21 As discussed later in this testimony, I am recommending an adjustment to
22 the Company's major pro forma plant addition adjustment (Company Adjustment

²⁷ Company Exhibit No. SEM-2, page 1 of 3, line 28 shows the same revenue requirement impact from the accelerated depreciation on Jim Bridger and Colstrip of \$9,907,232.

1 8.4) to reflect the actual costs for the projects.²⁸ As shown on Exhibit No. DMR-
2 3, at page 29 of 32 Schedule 7, removing the acceleration of the depreciation on
3 the as-adjusted major plant additions results in a \$1,129,62145 reduction to
4 depreciation expense and a \$764,871903 reduction to accumulated depreciation.
5 ~~As shown on Exhibit No. DMR-2, line 10, the impact on revenue requirements is~~
6 ~~a reduction of \$1,093,997.~~ This adjustment still allows the inclusion of the major
7 post test year plant additions associated with the Jim Bridger Unit 3 overhaul and
8 SCR system in rates based on the actual plant costs with depreciation expense
9 determined based on the depreciation rates currently authorized by this
10 Commission.

11 **Q: Do you have any other comments with regards to the post test year addition**
12 **of the Jim Bridger Unit 3 SCR system?**

13 A: Yes. In conducting the economic evaluation of whether to proceed with the
14 addition of the SCR System at the Jim Bridger Unit 3 and Unit 4 coal generation
15 facilities, or to either early retire units or convert the units to natural gas
16 generation, the Company assumed the Jim Bridger Unit 3 and Unit 4 retirement
17 dates after installation of the SCR would be December 31, 2037. This is the same
18 retirement date that is incorporated in the current Commission authorized
19 depreciation rates. If the units had been assumed to be retired early in the SCR
20 implementation scenario, such as the 2025 depreciation life date it is proposing in
21 this case, the results of the analysis would have differed substantially. In its 1st
22 Supplemental Response to Sierra Club Data Request No. 1.2(f), provided as

²⁸ As discussed later in the testimony, the actual costs of the Jim Bridger Unit 3 overhaul and SCR system capital projects was \$117.2 million as compared to the \$127.5 million included in the Company's filing for these projects.

1 Exhibit No. DMR-15, the Company indicated that it "...has not performed
2 analysis evaluating the installation of selective catalytic reduction at Jim Bridger
3 Unit 3 and Jim Bridger Unit 4 with the assumption that Jim Bridger would cease
4 operation on or before January 1, 2026."²⁹ The Company has not demonstrated
5 that the SCR implementation would be the ideal approach with regards to the Jim
6 Bridger Units if the plants are removed from service during or before 2025. If the
7 Company does not currently intend to remove the plants from service in 2025,
8 then there is no justification for accelerating the depreciation of the plants to an
9 assumed 2025 life at this time, particularly at a time when the Company is
10 seeking to recover the substantial Jim Bridger Unit 3 and Unit 4 SCR system plant
11 costs from Washington customers in rates.

12 **Q: If the Commission determines that some form of early or accelerated**
13 **recovery of coal generation facility costs should begin, do you have any**
14 **recommendations to offer?**

15 A: Yes. First, I must reiterate that I recommend that the Company's request to
16 accelerate recovery in this case be rejected at this time. If the Company's current
17 plans regarding the dates the coal units used to serve Washington ratepayers will
18 be retired from service changes, then the Company can seek to modify the
19 depreciation lives in the future when the change is known.

20 However, if the Commission determines that pre-collecting some of the
21 coal generation facility costs from Washington ratepayers is desirable at this time
22 to allow for more flexibility for the Commission in addressing the coal generation

²⁹ Ramas, Exhibit No. DMR-15.

1 facilities in the future, then I recommend that a separate regulatory liability be
2 established.

3 **Q: Please explain how the regulatory liability would work.**

4 A: Under this recommendation, the current Commission approved depreciation rates
5 that are based on a full depreciation study and incorporates the current anticipated
6 lives of the Jim Bridger and Colstrip facilities would remain in place until such
7 time as the next depreciation study is conducted by the Company for the
8 Commission's consideration. Rather than modifying the currently approved
9 depreciation rates, a separate coal facility early retirement fund expense could be
10 established in rates by the Commission with the purpose of the expense being to
11 fund a regulatory liability. The Company would increase the regulatory liability
12 account by the amount of coal facility early retirement fund expense collected
13 from customers in base rates and the entries to increase the liability account
14 would occur on a regular basis as the amounts are collected from customers. The
15 regulatory liability collected from customers, which would be reflected as an
16 offset to rate base in future cases, would be used in the future to apply towards
17 prudently incurred, unrecovered coal plant costs should circumstances change and
18 it be determined that one or more coal facilities serving Pacific Power's
19 Washington customers will be removed from service before the currently
20 anticipated plant retirement date(s).

21 **Q: How would this provide the Commission flexibility regarding coal facility**
22 **costs?**

23 A: This would give the Commission even greater flexibility than that proposed by the
24 Company as the funds collected from customers and set aside in the new

1 regulatory liability account could be directed towards specific prudently incurred
2 unrecovered coal facility costs at the Commission's discretion. Say, for example,
3 it is determined that one or two of the four Jim Bridger units should be retired
4 before the current projected retirement dates, but not all of the Jim Bridger units.
5 The Commission could direct that the funds collected in advance from
6 Washington ratepayers and set aside in the regulatory liability account be used
7 towards the unrecovered costs of the asset(s) that are removed from service early.

8 Additionally, if it becomes more clear in the future that the units will not
9 be retired early and continue to be used to provide service to customers
10 throughout their currently anticipated life, the Commission could direct that the
11 amounts collected from Washington ratepayers and held in the regulatory liability
12 account be returned to Washington ratepayers.

13 If the Commission decides to require accelerated cost recovery in this
14 case, this would be preferable to the approach proposed by the Company. It
15 would allow the depreciation rates incorporated in Washington rates to be
16 consistent with the currently anticipated plant lives and aligned with the majority
17 of the jurisdictions that receive service from the Jim Bridger and Colstrip plants.
18 It would also allow more flexibility as the funds collected from Washington
19 ratepayers could be directed towards the early retirement of specific coal
20 generation units in the future.

21 **Q: If the Commission agrees that this alternative approach of establishing a**
22 **regulatory liability should be implemented, would the amount to be collected**
23 **from customers for the new regulatory liability have to be based on the**
24 **amount of accelerated recovery the Company is seeking in this case?**

1 A: Absolutely not. Again, the accelerated recovery period the Company is
2 requesting in this case is not based on the currently anticipated service lives of the
3 coal units, nor is the accelerated depreciation expense based on the depreciation
4 rates that were authorized by the Oregon Public Utility Commission. Thus, if the
5 Commission does determine that funds should begin to be collected from
6 Washington ratepayers to establish a regulatory liability as I describe, it should
7 not be based on the amount on the depreciation rates the Company has calculated
8 and requested in this case. As previously indicated, \$9.1 million of the requested
9 increase in this case is caused by the application of the accelerated depreciation
10 rates on the test year end Jim Bridger and Colstrip Unit 4 plant balances and \$1.1
11 million is caused by the application of the accelerated rates on the Jim Bridger
12 Unit 3 pro forma major plant additions. This is a significant amount the Company
13 proposes to recover from customers that is not based on any known or currently
14 planned early plant retirement dates, nor is it based on any projections of potential
15 unrecovered balances at the time of plant retirement.

16 I would suggest that if the Commission determines that a regulatory
17 liability should be established to set aside funds for the potential early retirement
18 of coal generation facilities serving Pacific Power customers in Washington, that
19 it do so through a separate proceeding. The Commission could open the
20 proceeding or ask PacifiCorp to file a request to establish a regulatory liability
21 and hold a separate adjudicative proceeding. The proceeding would determine
22 both the appropriate amount of target funding for the regulatory liability account
23 and the appropriate period over which to recover the targeted amount from
24 Washington customers. This would allow for a more thorough vetting of the

1 determination of the appropriate amount of funds to be collected in advance from
2 customers for the potential future early retirement of the coal generation facilities.

3 **Q: Please restate your primary recommendation with regard to depreciation.**

4 A: It is still my recommendation that accelerated recovery not begin at this time and
5 instead be addressed when it becomes known that one or more of the coal
6 generation facilities will actually be removed from service before the currently
7 anticipated plant retirement dates. At that time depreciation rates can be updated
8 based on a new depreciation study.

9 **V. RECOMMENDED ADJUSTMENTS**

10 **Q: Are you recommending any revisions to the various test year and pro forma**
11 **adjustments proposed by Pacific Power?**

12 A: Yes. As previously discussed above, I recommend that the Company's proposed
13 acceleration of the recovery of the Jim Bridger and Colstrip coal plant costs be
14 rejected at this time. Each of the adjustments needed to reflect this recommended
15 rejection of the accelerated recovery have been discussed above. I am
16 recommending several additional adjustments to the Company's filing in this
17 testimony. I will address each of my recommended adjustments below.

18 Additionally, as addressed previously in this testimony, I recommend that
19 the impacts of the PATH Act be reflected in this case and that the AMA approach
20 be used for rate base instead of the Company's proposed EOP approach. The
21 PATH Act impacts the following Company adjustments: Adjustment 7.1 –
22 Interest True Up; Adjustment 7.4 – PowerTax ADIT Balance; Adjustment 7.7 –
23 Remove Deferred State Tax Expense & Balance; and Adjustment 8.4 – Pro Forma
24 Major Plant Additions. The use of the AMA approach instead of the Company's

1 proposed EOP approach impacts the following Company adjustments:
2 Adjustment 6.1 – End-of-Period Plant Reserves; Adjustment 6.2 – Annualization
3 of Base Period Depreciation/Amortization Expense; Adjustment 6.3 – Hydro
4 Decommissioning; Adjustment 7.1 – Interest True Up; Adjustment 7.4 –
5 PowerTax ADIT Balance; Adjustment 7.7 – Remove Deferred State Tax
6 Expenses & Balance; Adjustment 8.1 – Jim Bridger Mine Rate Base; Adjustment
7 8.11 – End-of-Period Plant Balances; and 8.13 – Idaho Asset Exchange. Since I
8 am beginning with the Company per books balances in my presentation, I have
9 included the impacts of the PATH Act and the AMA rate base approach on each
10 of these Company adjustments in Exhibit No. DMR-3.

11 **A. Update Pro Forma Major Plant Additions to Actual.**

12 **Q: In its Year One revenue requirement calculations, the Company included a**
13 **major pro forma plant addition adjustment. Can you briefly discuss what**
14 **capital additions were included in the pro forma major plant addition**
15 **adjustment?**

16 **A:** Yes. The Company's pro forma major plant addition adjustment added the Jim
17 Bridger Unit 3 overhaul and SCR system, which were placed into service in
18 November 2015, to rate base and also included the impacts of the additions on
19 accumulated depreciation, accumulated deferred income taxes and depreciation
20 expense. The total amount added to test year plant in service for the combination
21 of the Jim Bridger Unit 3 overhaul costs and SCR system was \$127,544,646 on a
22 total Company basis and \$28,617,198 on a Washington jurisdictional basis.

23 **Q: Are you recommending any revisions to the Company's Year One pro forma**
24 **major plant addition adjustment?**

1 A: Yes. In response to Public Counsel Data Request No. 20, the Company provided
2 the actual amounts placed in service for the Jim Bridger Unit 3 overhaul and SCR
3 system projects.³⁰ Subsequently, in response to Boise Data Request No. 62, the
4 Company provided a revised version of its pro forma major plant addition
5 adjustment that incorporated the impacts of the actual amounts placed into service
6 for the projects as of December 31, 2015.³¹ These responses indicate that the
7 actual amount placed into service for the projects was \$117,233,290 on a total
8 Company basis, which is \$10.3 million less than the amount incorporated in the
9 Company's filing. As shown on Exhibit No. DMR-3, at page 28 of 32 Schedule 5,
10 I recommend that the Company's Adjustment - Pro Forma Major Plant
11 Addition Adjustment be revised to reflect the actual known and measurable
12 project costs instead of the estimated amounts incorporated in the Company's
13 filing. In my recommended revised Adjustment 8.4 – Pro Forma Major Plant
14 Additions on page 28 of 32, I include the impacts of the PATH Act as well as the
15 actual project costs instead of the projected costs included by the Company. As
16 shown on Schedule 5, on a Washington jurisdictional basis, plant in service
17 should be reduced by \$2,313,559, accumulated depreciation should be reduced by
18 \$111,181, Accumulated Deferred Income Taxes should be reduced by \$53,588,
19 and depreciation expense should be reduced by \$165,524.

20 Additionally, as previously discussed in this testimony, I recommend that
21 the proposed accelerated recovery proposed by the Company for the Jim Bridger
22 Unit 3 overhaul and SCR system additions be rejected and the associated

³⁰ 1st Supplemental Response to Public Counsel Data Request No. 20 and Attachment PC-20 (Redacted version) are provided as Exhibit No. DMR-16.

³¹ 1st Supplemental Response to Boise Data Request No. 62 at Attachment Boise 62 (Redacted version) are provided as Exhibit No. DMR-17.

1 depreciation expense instead by based on the current Commission authorized
2 depreciation rates. This results in an additional \$1,129,6~~2145~~ reduction to
3 depreciation expense and a \$764,8~~71903~~ reduction to accumulated depreciation
4 based on the actual Jim Bridger Unit 3 overhaul and SCR system plant additions,
5 as shown on Exhibit No. DMR-3, at page 29 of 32Schedule 7.

6 **Q: Did the Jim Bridger Unit 3 Overhaul and SCR project additions cause any**
7 **existing assets that were included in the test year rate base to be retired from**
8 **service?**

9 A: Yes. The Jim Bridger Unit 3 overhaul projects resulted in certain existing plant
10 assets being retired. While the retirements would have no impacts on net plant in
11 service as the adjustment to plant in service at retirement would be offset by the
12 adjustment to accumulated depreciation, the retirements do impact depreciation
13 expense. Depreciation expense is impacted because the plant assets being retired
14 are removed from the plant in service balances to which the depreciation rates are
15 applied. In response to Public Counsel Data Request No. 64, the Company
16 indicated that the test year included \$69,429 on a Washington jurisdictional basis
17 for the retired assets and agreed that the depreciation expense associated with the
18 retirements related to the installation of the pro forma plant additions should be
19 removed from the test year.³² As shown on Exhibit No. DMR-3, page 18 of
20 32Schedule 6, I have presented Adjustment PC-5, which reduces~~d~~ test year
21 depreciation expense by \$69,429.

22 **Q: Does the Company's request to apply accelerated depreciation rates to the**
23 **Jim Bridger generation plant assets impact this adjustment?**

³² Response to Public Counsel Data Request No. 64 and Attachment PC-64, provided as Exhibit No. DMR-18.

1 A: Yes, if the Commission adopts the Company's proposed accelerated depreciation
2 rates, which I recommend against in this testimony, then my recommended
3 adjustment to depreciation expense would need to be increased from \$69,429 to
4 \$162,036 as shown on line B.3 of Exhibit No. DMR-3, [page 18 of 32 for](#)
5 [Adjustment PC-5](#)~~Schedule 6~~. The necessary adjustment of \$69,429 presented by
6 the Company in its response to Public Counsel Data Request No. 64 is based on
7 the current Commission authorized depreciation rates, not the accelerated
8 recovery rates requested in this case. Since I have already removed the
9 accelerated depreciation of the Jim Bridger coal generation plant assets in another
10 adjustment, I am removing only \$69,429 based on the currently authorized rates
11 in my adjustment. However, the Company's proposed adjusted test year would
12 include the depreciation on these retired assets based on the Company's proposed
13 accelerated recovery rates. Thus, if my adjustment to remove the accelerated
14 depreciation is rejected, then the adjustment to remove the depreciation expense
15 associated with the retired assets needs to be increased to \$162,036.

16 **Q: Are you opining on the prudence of the Jim Bridger Unit 3 Overhaul and**
17 **SCR system plant additions included by Pacific Power as a pro forma**
18 **adjustment in this case?**

19 A: No. It is my understanding that Public Counsel will consider all evidence
20 presented in this proceeding regarding the prudence of the investments and would
21 have the opportunity to address the prudence of the SCR system additions in its
22 brief. My testimony focuses on reflecting the actual project costs in rates and not
23 whether the projects were prudent and should be passed on to Washington
24 ratepayers in this case. As mentioned previously in this testimony, the Company

1 has not provided any analysis demonstrating that the installation of the SCR
2 systems at Jim Bridger Unit 3 and Unit 4 would be cost-effective if the units were
3 retired from service in 2025. While I have not weighed in on the prudence of the
4 installation of the SCR systems at Jim Bridger Units 3 and 4, I do recommend that
5 the Commission take these major projects into consideration in evaluating
6 whether or not the recovery of the associated capital costs should be accelerated
7 to allow for full recovery from Washington ratepayers prior to the end of the
8 projected service life of the projects. The Company's proposed recovery period
9 would result in the Washington jurisdictional portion of SCR system costs being
10 fully recovered from Washington ratepayers by the end of 2025, which is a short
11 9 ½ year recovery period for such major generation projects.

12 **B. Impact of Current Employee Levels.**

13 **Q: In the last Pacific Power rate case, Docket No. UE-140762, the Commission**
14 **adopted a Public Counsel recommended adjustment to reflect the impacts of**
15 **the reductions to the employee complement that occurred during the test**
16 **year and subsequent to the test year. Could you please briefly discuss the**
17 **adjustment?**

18 **A:** Yes. The Commission Order 08 in Docket No. UE-140762 (*Consolidated*)
19 addressed the reduction to employees, in part, as follows:

20 Elaborating on this last point, Public Counsel states that while
21 Pacific Power's adjusted test year labor costs are based on the
22 average number of employees employed by the Company during
23 the test year ending December 31, 2013, the full time equivalent
24 (FTE) employee count for Pacific Power declined significantly
25 during the test year and continued to decline measurably through
26 October 2014, just prior to the evidentiary hearing in this case (*i.e.*,
27 December 16-19, 2014). Providing details, Public Counsel says
28 that:

1
2 During the test year, PacifiCorp's employee count
3 declined by 115.5 employees. Six months later, by
4 June 2014, the employee count had declined by
5 another 27 FTEs, such that the actual employee
6 level was 66.5 FTE lower, or 1.24% below the
7 average count for the test year upon which Pacific
8 Power based its labor costs. Additional data
9 provided to Public Counsel after the filing of Pacific
10 Power rebuttal shows (sic) that FTE counts
11 continued to decline every month after June 2014,
12 until November, just one month before the
13 hearing.³³

14 At page 20 of the same order, the Commission also found that, "The record
15 demonstrates that the reductions in workforce reflect a continuing trend over
16 several years."³⁴ In the decision, the Commission agreed with Public Counsel's
17 recommended adjustment to reflect the impacts of the test year and post test year
18 actual reduction to the employee complement.

19 **Q: Has the employee complement continued to decline since the last rate case?**

20 A: Yes. In fact, the decline has accelerated. The average test year ended
21 December 31, 2013, full time equivalent (FTE) employee count in the last rate
22 case was 5,375 and the FTE employee count as of June 2014 was 5,308
23 employees.³⁵ The adjustment adopted by the Commission in the last rate case was
24 based on the reduction between the average test year employee count and the June
25 2014 employee count. The FTE employee count has continued to steadily decline
26 since the last rate case. As shown on Exhibit No. DMR-3, Schedule 8, page 2 of
27 4, the average test year FTE employee count in this case is 5,247. The FTE

³³ *WUTC v. Pacific Power & Light Co.*, Docket UE-140762(Consolidated) Order 08, ¶ 36, at 17 (March 25, 2015) (footnote omitted).

³⁴ *WUTC v. Pacific Power & Light Co.*, Docket UE-140762 (Consolidated) Order 08, ¶ 42, at 20 (March 25, 2015).

³⁵ *WUTC v. Pacific Power & Light Co.*, Docket UE-140762 (Consolidated) Order 08, ¶ 43, at 21 (March 25, 2015).

1 employee count as of the end of the test year (June 30, 2015) was 5,231.5
2 employees and the FTE employee count as of December 2015 was 5,128
3 employees. Thus, the actual FTE employee count as of the most recent date
4 provided by the Company (December 2015) is 180 FTEs lower than the June
5 2014 level reflected in rates resulting from the last Pacific Power rate case.³⁶

6 **Q: Given the continued decline in the employee complement that occurred**
7 **during the test year and subsequent to date, do you recommend any revisions**
8 **to the labor costs requested by the Company in this case?**

9 A: Yes. Pacific Power's adjusted test year labor costs are based on the employee
10 complement in place during the test year ended June 30, 2015. In calculating the
11 adjusted test year regular, overtime and premium time labor costs, the Company
12 began with the actual amounts recorded in each month of the test year ended
13 June 30, 2015, and applied various wage escalation factors to the actual recorded
14 monthly amounts in order to annualize the salary and wage increases that went
15 into effect during the test year. Thus, the labor costs included in the adjusted test
16 year are based on the number of employees that were employed by the Company
17 during the test year. As shown on Exhibit No. DMR-3, page 9 of 32 (Adjustment
18 PC-1 at PC-1.2)Schedule 8, page 2 of 4, the FTE employee level declined from
19 5,280 at the beginning of the test year (July 2014) to 5,231.5 as of the end of the
20 test year (June 2015), and declined even further to 5,128 as of December 2015.
21 The schedule shows that the actual December 2015 employee complement is 119
22 FTEs or 2.27 percent lower than the average test year employee complement that
23 is incorporated in the Company's adjusted test year labor costs. I recommend that

³⁶ Calculated as 5,308 FTEs as of June 2014 less 5,128 FTEs as of December 2015 (5,308 – 5,128 = 180).

1 this known and measurable reduction in employees that occurred both during and
2 subsequent to the test year be reflected in determining the appropriate labor costs
3 to include in rates.

4 **Q: What adjustment is needed to reflect the impact of the significant known and**
5 **measurable reduction in employees that occurred both during and**
6 **subsequent to the test year in this case?**

7 A: As indicated above, the actual FTE employee complement as of the most recent
8 month for which the information has been provided (December 2015) is 2.27
9 percent lower than the average test year employee complement. The labor and
10 incentive costs, employee benefit costs (i.e., medical, dental, vision, 401K, etc.),
11 and payroll tax costs in the Company's labor cost adjustment would all be
12 impacted by the employee level. Exhibit No. DMR-3, page 10 of 32 (Adjustment
13 PC-1 at PC1.3)Schedule 8, page 3 of 4, identifies the amount of labor costs
14 included in the Company's labor cost adjustment that are impacted by the
15 employee level as \$676,492,294. As shown on Adjustment PC-1 at PC-1.1
16 (Exhibit No. DMR-3, page 9)Schedule 8, page 1 of 4, application of the 2.27
17 percent FTE employee reduction to the labor costs impacted by the employee
18 level results in a \$15,356,375 reduction to labor costs. Thus, I recommend test
19 year labor costs be reduced by \$15,356,375. As shown on Adjustment
20 PC-1Schedule 8, after removing the portion that is capitalized and the portion
21 allocated to non-utility, test year expenses should be reduced by \$10,457,510 on a
22 total Company basis and by \$655,673 on a Washington jurisdictional basis. This
23 adjustment to reflect the actual known and measurable reduction in employee

1 levels is calculated on the same methodology as used in the prior PacifiCorp rate
2 case, which was adopted by the Commission.

3 **C. Pension Expense.**

4 **Q: What amount is included in the test year ended June 2015 for pension costs**
5 **and how was that amount determined?**

6 A: Company Exhibit No. SEM-3, page 4.2.2 identifies the test year pension costs as
7 \$24,712,488. The 1st Supplemental Response to Public Counsel Data Request
8 No. 36, Attachment PC 36-1 shows that the \$24,712,488 is based on six months
9 of pension costs associated with the pension actuarial reports for 2014 and six
10 months of pension costs associated with the pension actuarial reports for 2015
11 plus \$937,209 of pension administration costs.³⁷ Thus, the actual recorded test
12 year pension costs are \$23,775,279 once the administrative cost is removed and is
13 based on the 2014 and 2015 pension actuarial reports.

14 **Q: Have more recent actuarial reports been completed for the Company?**

15 A: Yes. In response to Public Counsel Data Request No. 52, the Company provided
16 the most recent pension actuarial report for the 2016 plan year.³⁸ The actuarial
17 assumptions for use in the 2016 plan year would have been selected by the
18 Company in December 2015 and are now known and measurable. These known
19 and measurable actuarial assumptions, as well as the known and measurable
20 impacts of the actual 2015 plan experience, would be incorporated the 2016
21 actuarial report provided by the Company. The response, at Attachment PC 52-3,
22 shows that the pension expense based on the most recent actuarial report is

³⁷ Ramas, Exhibit No. DMR-20.

³⁸ Response to Public Counsel Data Request No. 52 and Attachments PC 52-2 and PC 52-3 are provided as Exhibit No. DMR-21.

1 | \$21,935,427.³⁹ As shown on Exhibit No. DMR-3, [page 12 of 32 \(Adjustment](#)
2 | [PC-2 at PC-2.1\)Schedule 9, page 1 of 2](#), the most recent known and measurable
3 | pension cost is \$1,839,852 less than the amount included in the test year.

4 | **Q: Do you recommend that this known and measurable reduction to pension**
5 | **costs be reflected in this case?**

6 | A: Yes, I do. As shown on [Adjustment PC-2Schedule 9, page 1 of 2](#), test year
7 | pension costs should be reduced from the \$23,775,279 contained in the
8 | Company's filing to \$21,935,427, which is a reduction of \$1,839,852. After
9 | removing the portion allocated to capital and non-utility, the impact is a reduction
10 | to pension expense of \$1,252,917 on a total Company basis and ~~\$382,518~~[\\$78,556](#)
11 | on a Washington jurisdictional basis.

12 | **Q: Did the Commission adopt a similar adjustment in the Company's last rate**
13 | **case?**

14 | A: Yes. In Pacific Power's most recent rate case, Docket UE-140672 et. al.
15 | (*Consolidated*), I also recommended that the impact of the most recent pension
16 | and OPEB actuarial reports be reflected in rates as a known and measurable post
17 | test year adjustment. The Commission agreed with my recommendation in its
18 | Order 08 in Dockets UE-140762 et al. (*Consolidated*).⁴⁰

19 | **D. OPEB Expense.**

20 | **Q: What amount is included in the test year ended June 2015 for Other**
21 | **Post-Employment Benefits ("OPEB") costs and how was that amount**
22 | **determined?**

³⁹ Excludes \$920,000 of pension administration costs shown on the response, resulting in pension costs excluding administration costs of \$21,935,427.

⁴⁰ *WUTC v. Pacific Power & Light Co.*, Docket UE-140762 (*Consolidated*) Order 08, ¶ 46, at 22 (March 25, 2015).

1 A: Company Exhibit No. SEM-3, page 4.2.2 identifies the test year OPEB costs as
2 (\$4,043,010). The 1st Supplemental Response to Public Counsel Data Request
3 No. 37, Attachment PC 37-1 shows that the (\$4,043,010) is based on six months
4 of OPEB costs associated with the OPEB actuarial reports for 2014 and six
5 months of OPEB costs associated with the OPEB actuarial reports for 2015.⁴¹
6 The portion applicable to the six months ended December 31, 2014, is \$90,552,
7 while the portion applicable to the six months ended June 30, 2015, is
8 (\$4,133,562). Thus, the 2015 OPEB actuarial report included a significant
9 reduction to OPEB costs as compared to the 2014 OPEB actuarial report.

10 **Q: Similar to the pension expense adjustment recommended above, is the most**
11 **recent expense for OPEBs also available?**

12 A: Yes. In response to Public Counsel Data Request No. 53, the Company provided
13 the OPEB costs based on the actuarial report for the 2016 plan year.⁴² This would
14 include the known and measurable actuarial assumptions that were selected in
15 December 2015 as well as the impacts of the actual OPEB plan experience for
16 2015.

17 **Q: Did the OPEB expense also decline?**

18 A: Yes, the OPEB expense declined fairly substantially as compared to the amount
19 recorded by the Company during the test year. As shown on Exhibit No. DMR-3,
20 [page 14 of 32 \(Adjustment PC-3 at PC-3.1\)Schedule 10, page 1 of 2](#), the OPEB
21 costs declined from the (\$4,043,010) recorded during the test year to (\$8,222,739)
22 based on the most recent actuarial report, which is a reduction of \$4,179,729.

⁴¹ Ramas, Exhibit No. DMR-22.

⁴² Response to Public Counsel Data Request No. 53 with Attachments PC 53-2 and PC 53-3, provided as Exhibit No. DMR-23.

1 **Q: Do you recommend that the test year OPEB expense be revised to reflect the**
2 **known and measurable change?**

3 A: Yes. Consistent with the recommendation discussed above regarding pension
4 expense, as well as the Commission’s finding in the last Pacific Power rate case, I
5 also recommend that the OPEB expense be updated to reflect the impacts of the
6 known and measurable actuarial assumptions and actual 2015 plan experience
7 reflected in the most recent actuarial report. As shown on [Adjustment](#)
8 [PC-3 Schedule 10, page 1 of 2](#), OPEB costs should be reduced by \$4,179,729.
9 After removal of the amounts allocated to capital and non-utility, the result is a
10 \$2,846,346 reduction to OPEB expense on a total Company basis and a reduction
11 of ~~\$868,995~~ [\\$178,462](#) on a Washington jurisdictional basis.

12 **E. Normalize Salary Overhead Costs.**

13 **Q: Are you recommending any additional adjustments to the test year labor**
14 **costs?**

15 A: Yes. Included in the test year labor costs is \$1,742,747 for “Other Salary
16 Overheads/Oncosts.”⁴³ This category of costs includes charges from outside
17 vendors that provided services in the labor cost area. The response to Public
18 Counsel Data Request No. 40 shows that the “Other Salary Overheads/Oncosts”
19 have increased from \$510,778 in the test year in the Company’s last rate case to
20 \$1,742,747 in the test year ended June 30, 2015, in this case, which is an increase
21 of \$1,231,969.⁴⁴ The response to Public Counsel Data Request No. 49,
22 Attachment PC 49-2, shows that the Other Salary Overheads/Oncosts recorded by

⁴³ Test year expenses for this category provided in response to Public Counsel Data Request No. 40 and Attachment PC-40, which are provided as Exhibit No. DMR-25.

⁴⁴ Response to Public Counsel Data Request No. 40, provided as Exhibit No. DMR-25.

1 the Company for calendar year 2014 was \$1,437,813 and the expense for calendar
2 year 2015 was \$1,191,391.⁴⁵ Based on the significant increase since the last rate
3 case, as well as the fact that the test year expenses are so much higher than the
4 expenses incurred in both calendar years 2014 and 2015, the test year costs do not
5 appear reflective of a normal annual cost level, which could be the result of
6 timing of the charges being recorded on the Company's books. I recommend that
7 the test year costs be normalized to reflect the two-year average of the costs
8 recorded during 2014 and 2015. As shown on Exhibit No. DMR-3, page 16 of 32
9 (Adjustment PC-4 at PC-4.1)Schedule 11, page 1 of 2, the recommended
10 normalization of the Other Salary Overhead costs results in a \$428,145 reduction
11 to the costs recorded during the test year ended June 30, 2015. After removing
12 the portion allocated to capital and non-utility, the impact is a reduction to Other
13 Salary Overhead expense of \$291,562 on a total Company basis and
14 ~~\$89,014~~\$18,281 on a Washington jurisdictional basis.

15 **F. Interest Synchronization Adjustment.**

16 **Q: What is the purpose of Company Adjustment 7.1 – Interest True-up or**
17 **interest synchronization adjustment shown on your Exhibit No. DMR-3 at**
18 **page 24 of 32 Schedule 12?**

19 **A:** The interest synchronization or interest true-up adjustment allows the adjusted
20 rate base and the weighted cost of debt to coincide with the income tax
21 calculation. Since interest expense is deductible for income tax purposes, any
22 revisions to the rate base or the weighted cost of debt will impact test year income

⁴⁵ Response to Public Counsel Data Request No. 49 and Attachment PC 49-2, provided as Exhibit No. DMR-24.

1 tax expense. The adjusted test year rate base I am recommending differs from the
2 Company proposed rate base. Thus, the resulting interest expense deduction for
3 determining the test year income tax expense will differ from the interest expense
4 deduction used by Pacific Power in its filing.

5 Adjustment 7.1 – Interest True Up, shown on Exhibit No. DMR-3, at page
6 24 of 32, presents the calculation of the interest deduction and resulting impact on
7 test year income tax expense based on: 1) the Company’s as-filed amounts; 2) the
8 Company’s revised amounts based on impacts of the PATH Act; 3) the
9 Company’s revised amounts based on impacts of the PATH Act and AMA rate
10 base; and 4) Public Counsel’s recommended position in this case.~~The~~
11 ~~Jurisdictional Allocation Model used by the Company in determining revenue~~
12 ~~requirements automatically incorporates the impacts of changes in the rate base~~
13 ~~and weighted cost of debt on the interest deduction and resulting income tax~~
14 ~~expense. Since I did not use the Company’s Jurisdictional Allocation Model in~~
15 ~~calculating the adjusted revenue requirement, the additional adjustment reflected~~
16 ~~on Schedule 12 is needed to reflect the impacts.~~

17 **VI. PROPOSED YEAR TWO STEP INCREASE**

18 **Q: Can you please summarize the reasons presented by the Company for**
19 **requesting a second rate increase to be effective May 1, 2017?**

20 **A:** Yes. Company witness R. Bryce Dalley addresses the second rate increase
21 starting at page 15 of his direct testimony. He indicates that the Company is
22 “experiencing a ten-year trend of earnings attrition.”⁴⁶ He goes on to identify four
23 cost drivers in 2016. These include: 1) the Jim Bridger Unit 4 overhaul and SCR

⁴⁶ Dalley, Exhibit No. RBD-1T, at 15:19.

1 system installation anticipated to be complete by December 2016; 2) the
2 expiration of Production Tax Credits available for certain renewable resources
3 beginning in May 2016; 3) the replacement and upgrade of the Supervisory
4 Control and Data Acquisition Energy Management System project in 2016; and 4)
5 placement of the Union Gap Substation Upgrade transmission project into service
6 in 2016. Since the final costs of these 2016 plant additions will not be known
7 before the conclusions of the proceedings in this case, the Company has indicated
8 that it will provide an attestation in late 2016 or early 2017 verifying the final
9 costs of these investments going into service in 2016. As part of its proposal, the
10 Company also committed not to filing another general rate case or Expedited Rate
11 Filing with a rate effective date prior to April 1, 2018.

12 **Q: Above you indicate that Mr. Dalley claims the Company “is experiencing a**
13 **ten year-trend of earnings attrition.” What is the basis of this Company**
14 **assertion?**

15 A: At pages 8 and 9 of his direct testimony, Mr. Dalley states that the Company has
16 under earned its authorized return on equity in Washington by an average of 500
17 basis points since 2006 and that for nine consecutive years through 2014 it did not
18 earn its authorized rate of return in Washington. The failure to achieve its
19 authorized rate of return in Washington is apparently the evidence the Company is
20 relying on, asserting that it has been experiencing earnings attrition. Table 1
21 presented on page 9 of Mr. Dalley’s direct testimony calculates the amount by
22 which the unadjusted per books return on equity in Washington has been below
23 the authorized return on equity, showing an average of actual per books below
24 authorized of 5.49 percent for the nine year period 2006 through 2014. The most

1 recent year presented in the table, 2014, showed the per books return on equity
2 being 2.55 percent less than the authorized return in that year.

3 **Q: Did the Company present a similar analysis in its last Washington rate case?**

4 A: Yes, in the last rate case, Docket UE-140762 et al. (*Consolidated*), Mr. Dalley
5 presented the same table in his testimony with the only apparent difference being
6 that it only included the years 2006 through 2012. That table showed an average
7 by which the unadjusted per books return on equity in Washington has been
8 below the authorized return on equity, showing an average of actual per books
9 below authorized of 6.04 percent for the seven year period 2006 through 2012,
10 which exceeds the nine-year average of 5.49 percent presented in updated table in
11 this case.

12 **Q: Did the Commission agree in the last case that this Company analysis**
13 **demonstrated that it was experiencing earnings attrition?**

14 A: No, it did not. In fact, in Order 08 in that case, the Commission specifically stated
15 as follows regarding earnings attrition:

16 In this case, we have some evidence of capital additions during
17 relevant periods but it does not demonstrate abnormal growth in
18 plant. Inflation remains very low in the current economic
19 environment in the United States. The Company did not present
20 persuasive evidence that it is suffering attrition in earnings. In
21 particular, the Company did not present an attrition study.
22 Moreover, the fact that the Company failed in the past to earn its
23 authorized return cannot justify use of EOP absent a showing that,
24 due to factors beyond the Company's control, the Commission can
25 expect this condition to continue into the future. There is no such
26 evidence in the record of this case.⁴⁷

27
28 The Company analysis in this case is essentially identical to that presented in the
29 2014 docket and is no more persuasive.

⁴⁷ *WUTC v. Pacific Power & Light Co.*, Docket UE-140762(*Consolidated*) Order 08, ¶ 146, at 64 (March 25, 2015).

1 **Q: Do you agree that the Company has shown in this case that it is experiencing**
2 **earnings attrition that would justify the allowance of a Year Two rate**
3 **increase in this case?**

4 A: No, I do not. As indicated previously in this testimony, absent the Company's
5 request to accelerate the recovery of its coal facility capital costs from
6 Washington ratepayers in this case, based on the Company's own numbers there
7 would be no basis to increase in rates for Year One. The impact of the
8 accelerated recovery request exceeds the entire amount of Year One rate increase
9 being sought by the Company. This is true even if the EOP rate base approach.
10 The EOP approach would reflect the test year capital additions in their entirety
11 and the requested pro forma major plant additions associated with the Jim Bridger
12 Unit 3 overhaul and SCR system would also be included in the test year. Clearly,
13 this is not demonstrative of a company experiencing earnings attrition as current
14 base rates result in revenues that are sufficient to cover operating expenses and
15 the requested return on rate base.

16 As also previously indicated in this testimony, on a Washington
17 jurisdictional basis the total rate base presented by the Company for the test year
18 in this case (test year ended June 30, 2015) is lower than the total rate base
19 presented by the Company for the test year in its last rate case (test year ended
20 December 31, 2013) on both an adjusted and an unadjusted basis. Again, this is
21 not demonstrative of a company experiencing earnings attrition due to abnormal
22 growth in plant.

23 Early in this testimony, I also indicated that the Company's employee
24 complement has continued to decline substantially since the last rate case, going

1 from the 2013 test year average at the time of the last rate case of 5,375 FTE
2 employees to an average of 5,247 in the test year in this rate case and 5,128 as of
3 December 31, 2015. In fact, the actual December 31, 2015, FTE employee
4 complement of 5,128 is 247 FTE or 4.6 percent lower than the average 2013 test
5 year FTE employee complement in the prior rate case. This is not consistent with
6 a company experiencing earnings attrition. Rather, the declining employee
7 complement would be more indicative of declining costs.

8 The table below presents a comparison of certain categories of expense on
9 an unadjusted Washington jurisdictional basis presented in the Company's current
10 rate case filing as compared to the last rate case filing.

	Current Case Unadjusted	Prior Case Unadjusted	Change
Distribution Expense	11,025,297	12,193,373	(1,168,076)
Customer Accounting Expense	5,916,884	6,347,128	(430,244)
Customer Service & Info Expense*	761,054	778,218	(17,164)
Administrative & General Expense	9,604,908	13,226,426	(3,621,518)
Total of Above	27,308,143	32,545,145	(5,237,002)

11 *Customer Service & Info Expense Excludes the DSM Expense

12 Similarly, the table below presents a comparison of certain categories of expense
13 on an adjusted Washington jurisdictional basis presented in the Company's
14 current rate case filing as compared to the last rate case filing.

	Current Case Adjusted	Prior Case Adjusted	Change
Distribution Expense	11,115,084	12,252,659	(1,137,575)
Customer Accounting Expense	6,342,566	6,967,383	(624,817)
Customer Service & Info Expense	761,220	790,894	(29,674)
Administrative & General Expense	10,155,481	12,471,080	(2,315,599)
Total of Above	28,374,351	32,482,016	(4,107,665)

1 Clearly the reduction in various categories of expense between the 2013 test year
2 in the last rate case and the test year ended June 30, 2015, in this rate case, on
3 both an adjusted and unadjusted basis, is not reflective of a company experiencing
4 earnings attrition.

5 In short, the Company has failed to demonstrate in this case that it is
6 currently experiencing earnings attrition due to abnormal growth in plant or other
7 expense growth beyond the Company's control. In fact, as demonstrated above,
8 rate base, employee levels, and expenses have been declining since the last rate
9 case, not increasing. Based on the Company's failure to demonstrate that it is
10 experiencing earnings attrition, I do not agree that a Year Two rate increase is
11 appropriate or a reasonable outcome in this case.

12 **Q: If the Commission disagrees with your recommendation and determines that**
13 **a Year Two rate increase should be implemented in this case, are you**
14 **recommending any revisions to the Year Two rate increase calculations**
15 **presented by the Company?**

16 A: Yes. The Company's proposed Year Two rate increase is based on certain limited
17 adjustments that were presented on Company Exhibit No. SEM-4 at Tab 1, page 1
18 of 2, and resulted in total incremental revenue requirements of \$10,550,094. The
19 implementation of the PATH Act previously discussed in this testimony reduces
20 the Year Two incremental revenue requirements by \$705,582 to \$9,844,513. At a
21 minimum, this known and measurable impact should be reflected. The
22 Company's limited adjustments after reflecting the PATH Act impacts along with
23 the associated revenue requirement amounts include: 1) \$5,218,907 for the Jim
24 Bridger Unit 4 Overhaul and SCR Installation; 2) \$293,404 for the SCADA EMS

1 Replacement & Upgrade project; 3) \$523,440 for the Union Gap Transmission
2 Project; 4) \$4,234,464 associated with the expiring Production Tax Credits;
3 5) \$7,933 associated with Deferred State tax expense and balance; and
4 6) (\$433,635) for the impact of the previous adjustments on interest
5 synchronization.

6 Several revisions beyond the reflection of the impacts of the PATH Act
7 need to be made to the above adjustments.

8 **Q: What additional adjustments to you recommend?**

9 A: Consistent with my recommendation that the accelerated depreciation of the coal
10 facility costs be disallowed in this case, I recommend that the Company's
11 application of the proposed accelerated depreciation rates on the Jim Bridger
12 Unit 4 Overhaul and SCR system costs be removed. The \$5,218,907 revenue
13 requirement impact of the Jim Bridger Unit 4 Overhaul and SCR system costs
14 identified above includes the application of the accelerated depreciation rates on
15 the projected plant additions. As shown on Exhibit No. DMR-4, page 1 of 2,
16 reflecting the currently approved depreciation rates instead of the accelerated
17 depreciation rates proposed by the Company results in a \$1,299,936 reduction to
18 the resulting revenue requirements. The calculation of the needed adjustments,
19 which reduces accumulated depreciation by \$1,283,578 and depreciation expense
20 by \$1,384,375 on a Washington allocated basis is provided on Exhibit No.
21 DMR-4, page 2 of 2.

22 Similar to my discussion on the Company's pro forma major plant
23 adjustment for the Jim Bridger Unit 3 SCR system, I am not opining in this
24 testimony on whether or not the Company's decision to install the SCR system on

1 Jim Bridger Unit 4 is appropriate. However, I do recommend that the
2 Commission take the project costs into consideration in its evaluation of whether
3 or not the request to accelerate the recovery of these costs should be approved.

4 Additionally, I recommend that the additional accumulation of
5 depreciation associated with the Company's proposed first year pro forma major
6 plant addition adjustment be reflected in determining the Year Two incremental
7 revenue requirement. As shown on Exhibit No. DMR-4, page 1 of 2, this results
8 in a \$752,220 reduction to accumulated depreciation reducing the Year Two
9 incremental revenue requirement by \$88,548. If the Commission disagrees with
10 my recommended removal of the acceleration of the depreciation on the Jim
11 Bridger Unit 3 Overhaul and SCR system additions, then my recommended
12 \$752,220 reduction to accumulated depreciation would need to be increased to
13 reflect the impacts of the higher level of depreciation expense on those additions.

14 **Q: What Year Two incremental rate increase results from your recommended**
15 **adjustments?**

16 A: First, I need to reiterate that I do not recommend that any Year Two incremental
17 rate increase be approved by this Commission for the reasons discussed
18 previously in this testimony. However, if the Commission disagrees with this
19 primary recommendation, then the result of my recommended specific
20 adjustments are presented on Exhibit No. DMR-4. As shown on this exhibit, the
21 Company's proposed Year Two incremental rate increase should be reduced by a
22 minimum of \$2,101,970, going from the \$10,550,094 presented in the Company's
23 filing to \$8,448,125.

1 **Q: Does this conclude your direct testimony?**

2 A: Yes, it does.