BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION)) D)
Complainant,)
V.)
CASCADE NATURAL GAS CORPORATION))
Respondent.))

DOCKET UG-200568

EXH. BGM-8

Updated Revenue Requirement Calculations

То

CROSS-ANSWERING TESTIMONY OF

BRADLEY G. MULLINS ON BEHALF OF

THE ALLIANCE OF WESTERN ENERGY CONSUMERS

January 8, 2021

Exhibit BGM-2 Docket UG-200568 Page 1 of 8

Natural Gas Revenue Requirement Summary (\$000)

Natural C	as Revenue	Requirement Summary (\$000)								
			Staff DR 127 at	Staff DR 127 at AWEC RoR			AWEC Proposed			
Line	Adj. No.	Description	Net Oper. Income	Rate Base	Rev. Req. Def. / (Suf.)	Net Oper. Income	Rate Base	Rev. Req. Def. / (Suf.)		
1		Per Book Results (Y/E Dec. 2018)	20,804	374,226	6,295	\$20,804	374,226	6,295		
<u>Restatin</u>	g Adjustmen	<u>ts:</u>								
2	R-1	Annualize CRM Adjustment	(2,192)	-	2,904	(2,192)	-	2,904		
3	R-2	Promotional Advertising Adjustment	22	-	(29)	22	-	(29)		
4	R-3	Restate Revenue Adjustment	11,264	-	(14,923)	11,264	-	(14,923)		
5	R3 (A11)	TCJA Revenues	-	-	-	-	-	-		
6	R-4	Restate End of Period (EOP) Adj.	(812)	21,636	3,034	(530)	-	702		
7	R-5	Restate Wages	(69)	-	91	(69)	-	91		
8	R-5 (A8)	Affiliate Wages and Salaries	-	-	-	376	-	(498)		
9	R-5 (A9)	Cascade Wage Escalation	-	-	-	790	-	(1,047)		
10	R-6	Executive Incentives	972	-	(1,288)	972	-	(1,288)		
11	R-6 (A7)	Affiliate Bonues	-	-	-	948	-	(1,255)		
12	A10	Director Fees	-	-	-	138	-	(183)		
		Restated Results	29,989	395,863	(3,916)	32,524	374,226	(9,232)		
Pro For	ma Adjustme	ents:								
13	P-1	Interest Coordination Adjustment	(92)	-	122	(444)	-	589		
14	P-2	Pro Forma Wage Adjustment	(1,596)	-	2,115	(1,596)	-	2,115		
15	P-3 (CA)	Pro Forma Plant Additions	(1,884)	64,723	8,351	(1,884)	64,723	8,351		
16	P-3 (A1)	UG-190210 Pro Forma Additions	-	-	-	1,169	(26,761)	(3,970)		
17	P-3 (A2)	Pro Forma Additions Not in Service	-	-	-	188	(5,426)	(740)		
18	P-3 (A3)	Blanket Capital Accounts	-	-	-	843	(25,738)	(3,445)		
19	P-3 (A4)	2020 Customer Growth	-	-	-	(967)	-	1,281		
20	P-3 (A3)	Retirements	-	-	-	389	246	(493)		
21	P-3 (A6)	Removal Cost	-	-	-	121	76	(153)		
22	P-4	MAOP Deferral Amortization	(731)	-	969	(731)	-	969		
23		Pro Forma Results	25,686	460,585	7,641	29,612	381,347	(4,729)		
				Calculated:	12,004			(4,729)		
				ROE Impact	(4,363)					

Exhibit BGM-2 Docket UG-200568 Page 2 of 8

Natural Gas Revenue Requirement Summary (\$000)

			Impact of AWE	C Adjustments			
Line	Adj. No.	Description	Pre-Tax Net Oper. Income	Net Oper. Income	Rate Base	Rev. Req. Def. / (Suf.)	AWEC Position
1		Per Book Results (Y/E Dec. 2018)					
<u>Restatin</u>	g Adjustmen	<u>ts:</u>					
2	R-1	Annualize CRM Adjustment	-	-	-	-	Neutral
3	R-2	Promotional Advertising Adjustment	-	-	-	-	Neutral
4	R-3	Restate Revenue Adjustment	-	-	-	-	Neutral
5	R3 (A11)	TCJA Revenues	-	-	-	-	Neutral
6	R-4	Restate End of Period (EOP) Adj.	358	283	(21,636)	(2,332)	Oppose
7	R-5	Restate Wages	-	-	-	-	Oppose
8	R-5 (A8)	Affiliate Wages and Salaries	476	376	-	(498)	Proposed
9	R-5 (A9)	Cascade Wage Escalation	1,000	790	-	(1,047)	Proposed
10	R-6	Executive Incentives	-	-	-	-	Oppose
11	R-6 (A7)	Affiliate Bonues	1,199	948	-	(1,255)	Proposed
12	A10	Director Fees	175	138	-	(183)	Proposed
		Restated Results	3,209	2,535	(21,636)	(5,316)	
Pro For	ma Adjustme	ents:					
13	P-1	Interest Coordination Adjustment	(446)	(352)	-	467	Neutral
14	P-2	Pro Forma Wage Adjustment	-	-	-	-	Neutral
15	P-3 (CA)	Pro Forma Plant Additions	-	-	-	-	Neutral
16	P-3 (A1)	UG-190210 Pro Forma Additions	1,480	1,169	(26,761)	(3,970)	Oppose
17	P-3 (A2)	Pro Forma Additions Not in Service	238	188	(5,426)	(740)	Proposed
18	P-3 (A3)	Blanket Capital Accounts	1,067	843	(25,738)	(3,445)	Proposed
19	P-3 (A4)	2020 Customer Growth	(1,224)	(967)	-	1,281	Proposed
20	P-3 (A3)	Retirements	492	389	246	(493)	Proposed
21	P-3 (A6)	Removal Cost	153	121	76	(153)	Proposed
22	P-4	MAOP Deferral Amortization	-	-	-	-	Neutral
23		Pro Forma Results	4,969	3,926	(79,238)	(12,370)	

Exhibit BGM-2 Docket UG-200568 Page 3 of 8

Natural Gas Revenue Requirement Summary (\$000)

Line Adj. No. Description Net Oper. Income Rate Base Rev. Req. Def. / Income Net Oper. Income 1 Per Book Results (Y/E Dec. 2018) 20,804 374,226 6,295 \$20,804 374,226 2 R-1 Annualize CRM Adjustment (2,192) - 2,904 (2,192) - 3 R-2 Promotional Advertising Adjustment 11,264 - (14,923) 11,264 4 R-5 Restate Evenue Adjustment 11,264 - (14,923) 11,264 5 R-4 Restate End of Period (EOP) Adj. (1,620) 21,636 4,104 (812) 21,636 6 R-5 Restate Wages 972 - (1,288) 972 - 7 R-6 Executive Incentives 972 - 12 92,989 395,863 Pro Forma Adjustments: - - - - - - 9 P-2 Pro Forma Wage Adjustment (1,596) - 2,115 (1,596)	Rev. Req.
Restating Adjustments: 2 R-1 Annualize CRM Adjustment (2,192) - 2,904 (2,192) - 3 R-2 Promotional Advertising Adjustment 22 - (29) 22 - 4 R-3 Restate Revenue Adjustment 11,264 - (14,923) 11,264 - 5 R-4 Restate End of Period (EOP) Adj. (1,620) 21,636 4,104 (812) 21,636 6 R-5 Restate Wages (69) - 91 (69) - 7 R-6 Executive Incentives 972 - (1,288) 972 - Restated Results 29,182 395,863 (2,846) 29,989 395,863 Pro Forma Adjustment: 8 P-1 Interest Coordination Adjustment (92) - 122 (92) - 9 P-2 Pro Forma Vage Adjustment (1,596) - 2,115 (1,596) - 10 P-3 Pro Forma Plant Additions (2,791) 64,781 9,558 (1,884) 64,723 <th>Def. / (Suf.)</th>	Def. / (Suf.)
2 R-1 Annualize CRM Adjustment (2,192) - 2,904 (2,192) - 3 R-2 Promotional Advertising Adjustment 22 - (29) 22 - 4 R-3 Restate Revenue Adjustment 11,264 - (14,923) 11,264 - 5 R-4 Restate End of Period (EOP) Adj. (1,620) 21,636 4,104 (812) 21,636 6 R-5 Restate Wages (69) - 91 (69) - 7 R-6 Executive Incentives 972 - (1,288) 972 - Restated Results 29,182 395,863 (2,846) 29,989 395,863 Pro Forma Adjustments: 8 P-1 Interest Coordination Adjustment (92) - 122 (92) - 9 P-2 Pro Forma Wage Adjustment (1,596) - 2,115 (1,596) - 10 P-3 Pro Forma Plant Additions (2,791) 64,781 9,558 (1,884) 64,723 11 <td>6,295</td>	6,295
2 R-1 Annualize CRM Adjustment (2,192) - 2,904 (2,192) - 3 R-2 Promotional Advertising Adjustment 22 - (29) 22 - 4 R-3 Restate Revenue Adjustment 11,264 - (14,923) 11,264 - 5 R-4 Restate End of Period (EOP) Adj. (1,620) 21,636 4,104 (812) 21,636 6 R-5 Restate Wages (69) - 91 (69) - 7 R-6 Executive Incentives 972 - (1,288) 972 - Restated Results 29,182 395,863 (2,846) 29,989 395,863 Pro Forma Adjustments: 8 P-1 Interest Coordination Adjustment (92) - 122 (92) - 9 P-2 Pro Forma Wage Adjustment (1,596) - 2,115 (1,596) - 10 P-3 Pro Forma Plant Additions (2,791) 64,781 9,558 (1,884) 64,723 11 <td></td>	
3 R-2 Promotional Advertising Adjustment 22 - (29) 22 - 4 R-3 Restate Revenue Adjustment 11,264 - (14,923) 11,264 - 5 R-4 Restate End of Period (EOP) Adj. (1,620) 21,636 4,104 (812) 21,636 6 R-5 Restate Wages (69) - 91 (69) - 7 R-6 Executive Incentives 972 - (1,288) 972 - Restated Results Pro Forma Adjustments: 8 P-1 Interest Coordination Adjustment (92) - 122 (92) - 9 P-2 Pro Forma Vage Adjustment (1,596) - 2,115 (1,596) - 10 P-3 Pro Forma Plant Additions (2,791) 64,781 9,558 (1,884) 64,723 11 P-4 MAOP Deferral Amortization (731) - 969 (731) -	2,904
4 R-3 Restate Revenue Adjustment 11,264 - (14,923) 11,264 - 5 R-4 Restate End of Period (EOP) Adj. (1,620) 21,636 4,104 (812) 21,636 6 R-5 Restate Wages (69) - 91 (69) - 7 R-6 Executive Incentives 972 - (1,288) 972 - Restate Results 29,182 395,863 (2,846) 29,989 395,863 Pro Forma Adjustments: -	(29)
6 R-5 Restate Wages - 91 (69) - 7 R-6 Executive Incentives 972 - (1,288) 972 - Restated Results 29,182 395,863 (2,846) 29,989 395,863 Pro Forma Adjustments: 8 P-1 Interest Coordination Adjustment (92) - 122 (92) - 9 P-2 Pro Forma Wage Adjustment (1,596) - 2,115 (1,596) - 10 P-3 Pro Forma Plant Additions (2,791) 64,781 9,558 (1,884) 64,723 11 P-4 MAOP Deferral Amortization (731) - 969 (731) -	(14,923)
7 R-6 Executive Incentives 972 - (1,288) 972 - Restated Results 29,182 395,863 (2,846) 29,989 395,863 Pro Forma Adjustments: 8 P-1 Interest Coordination Adjustment (92) - 122 (92) - 9 P-2 Pro Forma Wage Adjustment (1,596) - 2,115 (1,596) - 10 P-3 Pro Forma Plant Additions (2,791) 64,781 9,558 (1,884) 64,723 11 P-4 MAOP Deferral Amortization (731) - 969 (731) -	3,034
Restated Results 29,182 395,863 (2,846) 29,989 395,863 Pro Forma Adjustments: 8 P-1 Interest Coordination Adjustment (92) - 122 (92) - 9 P-2 Pro Forma Wage Adjustment (1,596) - 2,115 (1,596) - 10 P-3 Pro Forma Plant Additions (2,791) 64,781 9,558 (1,884) 64,723 11 P-4 MAOP Deferral Amortization (731) - 969 (731) -	91
Pro Forma Adjustments: (92) - 122 (92) - 9 P-2 Pro Forma Wage Adjustment (1,596) - 2,115 (1,596) - 10 P-3 Pro Forma Plant Additions (2,791) 64,781 9,558 (1,884) 64,723 11 P-4 MAOP Deferral Amortization (731) - 969 (731) -	(1,288)
8 P-1 Interest Coordination Adjustment (92) - 122 (92) - 9 P-2 Pro Forma Wage Adjustment (1,596) - 2,115 (1,596) - 10 P-3 Pro Forma Plant Additions (2,791) 64,781 9,558 (1,884) 64,723 11 P-4 MAOP Deferral Amortization (731) - 969 (731) -	(3,916)
9 P-2 Pro Forma Wage Adjustment (1,596) - 2,115 (1,596) - 10 P-3 Pro Forma Plant Additions (2,791) 64,781 9,558 (1,884) 64,723 11 P-4 MAOP Deferral Amortization (731) - 969 (731) -	
10 P-3 Pro Forma Plant Additions (2,791) 64,781 9,558 (1,884) 64,723 11 P-4 MAOP Deferral Amortization (731) - 969 (731) -	122
11 P-4 MAOP Deferral Amortization (731) - 969 (731) -	2,115
	8,351
12 Pro Forma Results 23,971 460,643 9,918 25,686 460,585	969
	7,641
Calculated: 14,281	12,004
Cost of Capital Impacts	
9.40% ROE 7.091% (2,765)	(2,764)
4.54% Debt 6.990% (616)	(616)
Capital Structure 6.83% (983)	(983)
ROE Impact (4,363.462)	(4,363)

Natural Gas Revenue Requirement Summary (\$000)

Natural C	Jas Revenu	e Requirement Summary (\$000)				
			Impact of Staff	Data Request 12	27	
			Pre-Tax			Rev. Req.
	Adj.		Net Oper.	Net Oper.		Def. /
Line	No.	Description	Income	Income	Rate Base	(Suf.)
1		Per Book Results (Y/E Dec. 2018)				
<u>Restatin</u>	g Adjustme	<u>nts:</u>				
2	R-1	Annualize CRM Adjustment	-	-	-	-
3	R-2	Promotional Advertising Adjustment	-	-	-	-
4	R-3	Restate Revenue Adjustment	-	-	-	-
5	R-4	Restate End of Period (EOP) Adj.	1,022	808	-	(1,070)
6	R-5	Restate Wages	-	-	-	-
7	R-6	Executive Incentives	-	-	-	-
		Restated Results	1,022	808	-	(1,070)
Pro For	ma Adjustn	ients:				
8	P-1	Interest Coordination Adjustment	(0)	(0)	-	0
9	P-2	Pro Forma Wage Adjustment	(0)	(0)	-	0
10	P-3	Pro Forma Plant Additions	1,149	907	(58)	(1,208)
11	P-4	MAOP Deferral Amortization	-	-	-	-
12		Pro Forma Results	2,170	1,715	(58)	(2,277)

С

Cascade Results of Operations Summary Sheet Twelve Months Ended December 31, 2019								
	Twelve Months	Ended December	31, 2019					
	12/31/2019	Summary	Test Year	Requested	Adjusted			
	Results Per	of	Adjusted	Revenue	Results			
	Company	Adjustments	Total	Increase	After Proposed			
	Filing				Revenues			
SUMMARY SHEET	(1)	(2)	(3)	(4)	(5)			
Operating Revenues								
1 Natural Gas Sales	221,481,600	12,018,592	233,500,192	(4,728,930)	228,771,262			
2 Gas Transportation Revenue	24,094,628	-	24,094,628		24,094,628			
3 Other Operating Revenues	1,748,762	-	1,748,762		1,748,762			
4 REVENUES	247,324,989	12,018,592	259,343,581	(4,728,930)	254,614,651			
Operating Expenses								
5 Nat. Gas/Production Costs	125,165,839		125,165,839		125,165,839			
6 Revenue Taxes	20,632,283	486,993	21,119,276	(191,616)	20,927,660			
7 Production	320,028	3,256	323,284	(191,010)	323,284			
8 Distribution	20,414,280	1,371,727	21,786,006		21,786,006			
9 Customer Accounts	5,854,251	115,098	5,969,349	(19,010)	5,950,339			
10 Customer Service	7,311,469	13,994	7,325,464	(19,010)	7,325,464			
11 Sales	5,409	(1,924)	3,485		3,485			
12 Administrative and General	18,950,113	(2,574,334)	16,375,779		16,375,779			
13 Depreciation & Amortization	24,915,118	765,668	25,680,785		25,680,785			
14 Regulatory Debits	, ,	-	-		-			
15 Taxes Other Than Income	4,176,015	127,089	4,303,103		4,303,103			
16 State & Federal Income Taxes	(1,224,200)	2,903,763	1,679,563	(948,844)	730,719			
17 Total Operating Expenses	226,520,605	3,211,330	229,731,934	(1,159,470)	228,572,464			
18 Net Operating Revenues	20,804,385	8,807,262	29,611,647	(3,569,460)	26,042,187			
Rate Base	025.055.001	7 110 500	0.40.000 401		040 006 401			
19 Total Plant in Service	835,867,891	7,118,539	842,986,431		842,986,431			
20 Total Accumulated Depreciation	(389,781,048)	(47,653)	(389,828,701)		(389,828,701)			
21 Customer Adv. For Construction	(3,800,413)	-	(3,800,413)		(3,800,413)			
22 Deferred Accumulated Income Taxes23 Working Capital Allowance	(75,625,050)	49,723	(75,575,327)		(75,575,327)			
23 Working Capital Allowance 24 TOTAL RATE BASE	7,565,011 374,226,392	7,120,609	7,565,011 381,347,000		7,565,011 381,347,000			
	0	7,120,009		-				
25 Rate of Return	0		0		0			

AWEC Proposed

AWEC Proposed Revenue Requirement Calculation 12 Months ended December 31, 2019

1 Adjusted Rate Base	\$381,347,000
2 Rate of Return	6.83%
3 Required Return (ln 1 x ln 2)	\$26,042,187
4 Adjusted Net Income	\$29,611,647
5 Required Net Income Increase (ln 3 - ln 4)	-\$3,569,460
6 Conversion Factor	0.75481
7 Revenue Increase Required (ln 5 / ln 6)	-\$4,728,930
8 Test Year Adjusted Revenue	\$259,343,581
9 Overall Revenue Increase	-1.823%

AWEC Proposed Proposed Adjustments to Test Year Results Twelve Months Ended December 31, 2019

_				Oppose	Oppose	Oppose	Oppose	Propose			Oppose		
		Annualize	Promotional	Restate	Restate	Restate	Executive	Director	Interest	Pro Forma	Pro Forma	MAOP	Total
		CRM	Advertising	Revenue	End of Period	Wages	Incentives	Fees	Coordination	Wage	Plant	Deferral	Adjustments
		Adjustment	Adjustment	Adjustment	(EOP) Adj.				Adjustment	Adjustment	Additions	Amortization	
		R-1	R-2	R-3	R-4	R-5	R-6	A10	P-1	P-2	P-3	P-4	
1	Operating Revenues												
2	Natural Gas Sales	(2,904,184)		14,922,776	-						-		12,018,592
3	Gas Transportation Revenue										0		0
4	Other Operating Revenues												0
5	REVENUE	(\$2,904,184)	\$0	\$14,922,776	\$0	\$0	\$0	\$0	\$0	\$0	\$0		\$12,018,592
	Operating Expenses												
6	Nat. Gas/Production Costs												\$0
7	Revenue Taxes	(117,678)		604,671	0						0		\$486,993
8	Production					0				3,256			\$3,256
- 9	Distribution					77,165				368,812		925,750	\$1,371,727
10	Customer Accounts	(11,674.48)		\$59,988	\$0	3,359				63,425	0		\$115,098
11	Customer Service									13,994			\$13,994
12	Sales		(1,977)							53			(\$1,924)
13	Administrative and General		(25,714)			39	(2,430,195)	(175,185)		56,722			(\$2,574,334)
14	Depreciation & Amortization				670,361						95,307		\$765,668
15	Regulatory Debits												\$0
16	Taxes Other Than Income					6,163				38,480	82,446		\$127,089
17	State & Federal Income Taxes	(582,715)	5,815	2,994,205	(140,776)	(18,213)	510,341	36,789	444,448	(114,396)	(37,328)	(194,407)	\$2,903,763
18	Total Operating Expenses	(712,067)	(21,876)	3,658,863	529,585	68,514	(1,919,854)	(138,396)	444,448	430,347	140,425	731,342	\$3,211,330
19	Net Operating Revenues	(\$2,192,117)	\$21,876	\$11,263,913	(\$529,585)	(\$68,514)	\$1,919,854	\$138,396	(\$444,448)	(\$430,347)	(\$140,425)	(\$731,342)	\$8,807,262
20	Rate Base												
21	Total Plant in Service				0						7,118,539		\$7,118,539
22	Total Accumulated Depreciation				0						(47,653)		(\$47,653)
23	Customer Adv. For Construction				0								\$0
24	Deferred Accumulated Income Taxes				0						49,723		\$49,723
25	Working Capital Allowance				0								\$0
26	TOTAL RATE BASE	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$7,120,609		\$7,120,609
27	Revenue Requirement Effect	\$2,904,184	(\$28,983)	(\$14,922,776)	\$701,611	\$90,769	(\$2,543,482)	(\$183,351)	\$588,818	\$570,136	\$830,259	\$968,905	(\$11,023,909)

AWEC Proposed
Results of Operations Summary Sheet
Twelve Months Ended December 31, 2019
Twelve Month's Ended December 51, 2019

REVENUE SENSITIVE COSTS	5
Revenues	1.00000
Operating Revenue Deductions	
Uncollectible Accounts	0.00402
State B&O Tax	0.03852
UTC Fees	0.00200
Interest expense	
State Taxable Income	0.95546
State Income Tax	0.00000
Federal Taxable Income	0.95546
Federal Income Tax @ 21%	0.20065
Total Income Taxes	0.20065
Total Revenue Sensitive Costs	0.24519
RESULTS OF OPERATIONS SUMMARY SHEET	
Net-to-Gross Factor	0.75481
Combo-State & Federal Income Tax	
State	0.00000
Federal	0.21000
State and Federal Effective Tax Rate	0.21