Docket	:	A.12-02-014
Exhibit Number	:	DRA-1
Commissioner	:	Florio
ALJ	:	Long
Witness	:	Burns

DIVISION OF RATEPAYER ADVOCATES
CALIFORNIA PUBLIC UTILITIES COMMISSION

Report on the Results of Operations for California Pacific Electric Company General Rate Case

Test Year 2013

Executive Summary, ECAC, BRRAM and Post-Test Year Ratemaking

San Francisco, California
July 27, 2012

TABLE OF CONTENTS

CALIFORNIA PACIFIC ELECTRIC COMPANY
EXECUTIVE SUMMARY, ECAC, BRRAM
AND POST-TEST YEAR RATEMAKING

I. INTRODUCTION / OVERVIEW

The Division of Ratepayer Advocates (DRA) submits its exhibits in response to California Pacific Electric Company's (CalPeco) Test Year (TY) 2013 General Rate Case (GRC) Application (A.) 12-02-014, filed on February 17, 2012, for authority to increase rates. This exhibit presents DRA's (1) executive summary regarding CalPeco's TY 2013 proposals and various policy matters, (2) audit examination summary, and DRA's testimony regarding CalPeco's Energy Cost Adjustment Clause (ECAC), Base Revenue Requirement Adjustment Mechanism (BRRAM) and Post-Test Year Ratemaking.

A. For Test Year 2013, CalPeco Seeks a $16.3 Million Increase in Base Rates, Which is a 62% Base Rate Increase

CalPeco requests a net overall rate increase of $7.5 million annually, or 10.02%, effective January 1, 2013. CalPeco's Application combines base rates and purchased energy costs: base rates (including vegetation management) would increase by $16.3 million annually, with an offsetting reduction of $8.7 million annually in Energy Cost Adjustment Clause (ECAC) rates. CalPeco forecast base rate revenues of $26.1 million for TY 2013 and additional requested revenues of $16.3 million, resulting in a Base Revenue Requirement of $42.4 million, a 62% increase.

Table 1-1 summarizes CalPeco's requested TY 2013 base rate increases.

Table 1-1
CalPeco's Proposed Test Year 2013 Base Rate Increases
(In Millions of Dollars)

CalPeco's Base Revenue Requirement at Present Rates (a)	CalPeco's Base Revenue Requirement at Proposed Rates (b)	$ Increase Over Authorized Base Revenue Requirement (c=b-c)	% Increase Over Authorized Base Revenue Requirement (d=c/a)
$26.1	$42.4	$16.3	62%

B. DRA Recommends a $9.7 Million Base Rate Increase (37%)

DRA recommends that the Commission authorize a $9.7 million increase in base rate revenues compared to CalPeco's TY 2013 request of $16.3 million, a difference of $6.6 million. Table 1-2 summarizes DRA recommended TY 2013 base rate increases compared to base rate revenues at present rates. For a detailed showing of DRA's base rate revenue recommendations, see Exhibit DRA-2, Results of Operations, Cost Allocation, Unbundling and Taxes. CalPeco was granted a 1.15% 2012 Attrition increase by D.12-04-026.

Table 1-2
DRA Recommended TY 2013 Base Rate Increases for CalPeco's Operations
(In Millions of Dollars)

DRA's Recommended Base Revenue Requirement at Present Rates (a)	DRA's Recommended Base Revenue Requirement at Proposed Rates (b)	$ Increase Over Authorized Base Revenue Requirement (c=b-c)	% Increase Over Authorized Base Revenue Requirement (d=c/a)
$25.9	$35.6	$9.7	37%

As seen below in Table 1-3, including CalPeco's reduced purchased energy costs moderates the level of base rate revenue increase. Absent the GRC filing, this reduction would have been implemented through a separate proceeding.

Table 1-3
DRA Recommended TY 2013 Total Operating Revenues Versus CalPeco Requested (in Millions of Dollars)

DRA's Recommended Total Operating Revenues at Proposed Rates (a)	CalPeco's Requested Total Operating Revenues at Proposed Rates (b)	$ Increase Over Total Operating Revenues (c=b-c)	% Increase Over Total Operating Revenues (d=c/a)
$75.5	$82.3	$6.8	9%

For Attrition Years 2014 and 2015, CalPeco proposes additional rate increases close to forecast inflation rates; DRA proposes lower increases based on inflation minus a 0.5% productivity factor.

II. DRA's Analysis

DRA is responding to CalPeco's TY 2013 GRC application, A.12-02-014, with the issuance of 10 exhibits. (A summary of the major differences between DRA's recommendations and CalPeco's TY 2013 requests in provided below in Section III. A brief summary of the 10 exhibits is provided below in Section IV.) DRA's team consisted of 10 persons plus legal counsel responsible for the project coordination, administrative support, financial review, ratemaking and policy analysis needed to process CalPeco's GRC application. DRA issued 43 sets of data requests to CalPeco, and conducted numerous teleconferences with CalPeco's staff. Each exhibit includes a "Qualifications of Witness" section which provides details on DRA's multi-disciplinary team whose members have backgrounds in engineering, accounting, economics, finance, law and policy.

III. Summary of Major Differences Between DRA's Recommendations and CalPeco's TY 2013 Requests

This section highlights areas in which DRA's TY recommendations differ from CalPeco's GRC requests:

- **Distribution Operations and Maintenance (O&M) Expenses (DRA-4)** – DRA recommends TY 2013 distribution O&M expenses of $6.064 million, a reduction of $0.941 million from CalPeco's request. DRA opposes the addition of 14 new employees and proposes lower wage increases.
- **Vegetation Management Expenses (DRA-4)** – DRA recommends TY 2013 vegetation management expenses of $1.712 million, a reduction of $1.557 million from CalPeco's request. DRA also recommends a one-way vegetation management balancing account for those expenses.
- **Customer Accounts, Customer Service and Information Expenses (DRA-5)** – DRA recommends TY 2013 customer accounts, energy efficiency and customer service and information expenses of $1.996 million, a slight reduction of $ 70,400 from CalPeco's request.
- **Administrative and General (A&G) Expenses (DRA-6)** – DRA recommends TY 2013 A&G expenses of $5.123 million, a reduction of

$2.228 million from CalPeco's request. DRA opposes CalPeco's requests for executive and related incentives, allocation of certain parent company costs and miscellaneous general expenses.

- **Cost of Capital (DRA-8)** – DRA recommends a rate of return of 7.50% for TY 2013, as opposed to CalPeco's request of 8.24%, which amounts to almost $1 million. DRA proposes a return on equity of 9.25%, as compared to CalPeco's request of 10.50%. DRA opposes CalPeco's request to increase its equity ratio from 50.71% to 54.99%. DRA proposes a debt/equity ratio of 49.29%/50.71%, compared to CalPeco's request of 45.01%/54.99%.
- **Cost Allocation and Rate Design (DRA-10)** – DRA recommends the Commission adopt DRA's System Average Percent Cost allocation and reject 1) CalPeco's Marginal Cost Study and 2) attendant Equal Percentage Marginal Cost allocation. DRA is indifferent to CalPeco's proposal to create a new unique tariff for its Vegetation Management Program.
- **Post-Test Year Ratemaking (DRA-1)** – DRA recommends continuation of CalPeco's current Post-Test Year Adjustment Mechanism (PTAM) based on CPI minus a 0.5% productivity factor for both labor and non-labor components, and opposes CalPeco's request for a $1.2 million threshold amount for triggering the Major Plant Additions component.

IV. Organization of DRA's Exhibits

This section shows how DRA's exhibits are organized and briefly summarizes the contents of each of DRA's exhibits with regard to base rate revenue requirement, operating expenses, capital expenditures and rate base. Each exhibit contains a statement of qualifications for the witness.

Exhibit DRA-1, Executive Summary, ECAC, BRRAM and Post-Test Year Ratemaking: This exhibit provides a brief overview of CalPeco's request, presents the overall organization of DRA's exhibits, summarizes the differences between DRA's and CalPeco's TY 2013 GRC estimates, and addresses the Energy Cost

Adjustment Clause (ECAC) CalPeco's Base Revenue Requirement Adjustment Mechanism (BRRAM) proposal and Post-Test Year Ratemaking.

Exhibit DRA-2, Results of Operations, Cost Allocation, Unbundling and Taxes: The exhibit presents DRA's analyses and recommendations regarding CalPeco's Results of Operations (RO) Model, Jurisdictional Cost Allocation Factors, Unbundling and Revenue Requirements for CalPeco's and DRA's Summary of Earnings for CalPeco's California Jurisdiction for TY 2013.

Exhibit DRA-3, Sales, Customers, Revenues and Depreciation: This exhibit presents DRA's analyses and recommendations regarding CalPeco's Electric Sales, Customers, Revenues and Depreciation for TY 2013.

Exhibit DRA-4, Distribution O&M/Vegetation Management: This exhibit presents DRA's analyses and recommendations regarding CalPeco's Distribution Operation and Maintenance (O&M) and Vegetation Management expenses for TY 2013.

Exhibit DRA-5, Customer Accounts, Customer Service and Information Expenses: This exhibit presents DRA's analyses and recommendations regarding CalPeco's Customer Accounts, Energy Efficiency and Customer Service and Information expenses for TY 2013.

Exhibit DRA-6, Administrative &General Expenses: This exhibit presents DRA's analyses and recommendations regarding CalPeco's Administrative and General (A&G) expenses for TY 2013.

Exhibit DRA-7, Plant and Rate Base: This exhibit presents DRA's analyses and recommendations regarding CalPeco's Plant and Rate Base estimates for TY 2013. Rate Base (which includes Additions and Reductions to Rate Base) is the net investment in facilities, equipment and other properties which is used to determine CalPeco's return.

Exhibit DRA-8, Cost of Capital: This exhibit presents DRA's analyses and recommendations regarding CalPeco's rate of return (ROR) for TY 2013. The ROR or weighted cost of capital is defined as the cost of common equity, preferred equity and long-term debt weighted by the shares of common equity, preferred equity and long-term debt in the capital structure.

Exhibit DRA-9, Results of Examination: This exhibit presents DRA's audit of CalPeco's financial records for the utility's TY 2013 GRC application. DRA recommends CalPeco use a lower Allowance for Funds Used During Construction (AFUDC) rate.

Exhibit DRA-10, Cost Allocation and Rate Design: This exhibit presents DRA's analyses and recommendations regarding CalPeco's revenue allocation, rate design and Marginal Cost Study, which develops marginal customer, energy and demand costs for each existing rate class.

V. Energy Cost Adjustment Clause (ECAC)

CalPeco recovers its approximately $44.6 million fuel and purchased power costs through an Energy Cost Adjustment Clause (ECAC) mechanism.[1] The vast majority of CalPeco's energy costs are from its 5 year Power Purchase Agreement with Sierra Pacific (Sierra PPA), with a small amount from fuel inventory costs associated with CalPeco's Kings Beach diesel generators.[2] CalPeco proposes to (1) modify its tariff language to reflect the transition from Sierra Pacific's operations to CalPeco's, and to (2) move its application for revisions to the ECAC Billing Factors from April 1st to July 1st for non-GRC filing years.[3] (For GRC filing years, CalPeco would file its ECAC revisions concurrent with its GRC filing.) CalPeco also proposes to reduce its overall ECAC Billing Factor revenues by $8.7 million (17.9%) to reflect a reduction in forecast 2013 fuel and purchased power costs and a forecast over-collection in its Energy Cost Adjustment Account, as of December 31, 2012.[4] CalPeco proposes to amortize the current ECAC over-collection over three years, resulting in an ECAC Balancing Rate Revenue Requirement of $(4.294) million.[5]

[1] CalPeco Exh. 2, Ch.2.

[2] CalPeco Exh. 2, Ch. 2 at 2-3 and Exh. 2, Ch. 2, Table 2.1, ln. 3.

[3] CalPeco Exh. 2, Ch. 2 at 2-4 to 2-5.

[4] CalPeco Exh. 2, Ch. 2 at 2-5.

[5] CalPeco Exh. 2, Ch. 2 at 2-5 to 2-6.

CalPeco's testimony shows an ECAC Adjusted Balance over-collection estimate of $(12.883) million.[6]

DRA does not oppose CalPeco's proposal to modify its tariff language to reflect the transition from Sierra Pacific's operations to CalPeco's operations along with its proposal to move its application for revisions to the ECAC Billing Factors to July 1st for non-GRC filing years and concurrently with CalPeco's GRC filings in GRC years. Moving the filing dates might result in reduced regulatory costs.

DRA does not oppose CalPeco's proposal to reduce its ECAC Billing Factor revenues to reflect a reduction in forecast 2013 fuel and purchased power costs and a projected over-collection in its Energy Cost Adjustment Account. DRA does not oppose amortizing the current ECAC over-collection over three years, since it will smooth out the ECAC rate decrease over the GRC period.

VI. Base Revenue Requirement Adjustment Mechanism (BRRAM)

CalPeco proposes to reinstate a revenue decoupling balancing account mechanism, the Base Revenue Requirement Adjustment Mechanism (BRRAM), "which will remove the financial incentives under CalPeco's current ratemaking to increase sales and thus will promote the Commission's energy efficiency objectives….the BRRAM will ensure that there is no over- or under-collection of the CalPeco adopted revenue requirements based on the differences between the sales forecast used to set rates and the actual sales levels."[7]

DRA does not oppose CalPeco's BRRAM proposal. PG&E, Southern California Edison, SDG&E and Bear Valley Electric Service currently have BRRAM-like mechanisms in place. The adoption of a BRRAM will reduce litigation of the sales forecast, which may have some minor regulatory cost benefit. DRA notes that adoption of a BRRAM for CalPeco would reduce the company's sales forecasting risk, which would have an impact on CalPeco's overall risk.

[6] CalPeco Exh. 2, Ch. 2, Table 2.1, ln. 20.

[7] CalPeco Exh. 5, Ch. 2 at p. 2-1.

VII. Post-Test Year Ratemaking

This section presents DRA's analyses and recommendations regarding CalPeco's Post-Test Year Ratemaking testimony. DRA conducted its analysis by reviewing CalPeco's testimony, issuing data requests and reviewing CalPeco's responses.

Background

Prior to 1982, the base revenue requirement was adjusted during GRC proceedings and there were no rate adjustments between rate cases. Utilities received additional revenue between rate cases from customer growth. GRC rate adjustments for Attrition were implemented in the early 1980's in response to unprecedented higher inflation and lower rates of customer growth and sales in the late 1970's. However, during the mid-1980's, inflation declined to more modest historical levels. Between rate cases, utilities were not automatically entitled to Attrition rate increases. Although the Commission has authorized Attrition-type increases for some utilities in the past, there have been times when the Commission has also denied such increases.[8] Absent an Attrition-type mechanism, some utilities have had revenue balancing account protection from sales fluctuation, e.g., CalPeco's resurrected BRRAM proposal. Further, highly volatile utility fuel-related costs, where the utility has limited control, were removed from base rates and are recovered through separate Energy Cost mechanisms with balancing accounts. Regarding Attrition mechanisms, the Commission has stated the following:

> The attrition mechanism is not an entitlement. Nor is it a method of insulating the company from the economic pressures which all businesses experience…Neither the Constitution nor case law has ever required automatic rate increases between general rate case applications. (CPUC D.93-12-043, 52 CPUC 2d 471, 492).

Utility rates are set by the Commission for a particular Test Year, in this case 2013, through a GRC proceeding after an extensive review and analysis. Attrition

[8] In CPUC D.02-02-043, the Commission authorized PG&E a 2001 Attrition increase of approximately $151 million while in D.03-03-034, the Commission denied PG&E's Attrition request for 2002.

year increases are not scrutinized by the Commission to the same degree, typically resulting from an Advice Letter review.

IHS Global Insight's current CPI forecast is 1.7% for 2012, 1.3% for 2013, 2.3% for 2014 and 2.0% for 2015.[9] Commission Decision D.12-04-026 approved a 2012 PTAM Attrition Factor of 1.15% for CalPeco (CPI forecast of 1.65% minus 0.5%).[10]

CalPeco Post-Test Year Adjustment Mechanism Request

CalPeco proposes modifications to its current Post-Test Year Adjustment Mechanism (PTAM), which was approved for Sierra Pacific in the Test Year 2009 GRC settlement, D.09-10-041, and subsequently applied to CalPeco in D.10-10-017. CalPeco's current PTAM includes the following:

> 8.2.1 The attrition rate factor will be based on the September Global Insight U.S. Economic Outlook forecast for CPI, minus 0.5% productivity factor (but will not be less than zero); and
> 8.2.2 For the Major Plant Additions component, Sierra will provide advance notice to DRA and the A-3CC of any plan to make a major plant addition. (D.09-10-041, Attachment A, Settlement Agreement, p. 8.)

CalPeco's current PTAM also includes a Major Plant Additions Component for capital additions greater than $20 million, based on Sierra Pacific's total company.[11]

CalPeco's TY 2013 GRC testimony includes the following requests:

a. Adjust revenues by CPI for all non-labor related revenue requirements,
b. Adjust revenues for the labor component including wages, salary, payroll taxes and employee benefits by the wage escalation amount negotiated for in the three-year contract with the International Brotherhood of Electrical workers (IBEW),
c. Remove the 0.5% productivity adjustment for the labor component,

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[9] IHS Global Insight, U.S. Economic Outlook, July 2012, p. 8.

[10] CPUC D.12-04-026 at p. 4.

[11] D.09-10-041, Attachment A, Settlement Agreement, p. 8, sec. 8.1.

d. Reduce the threshold amount for triggering the Major Plant Additions component from $20 million to 1% of CalPeco's rate base, or $1.2 million.

CalPeco Vol. 3, Exh. 5, Ch. 1, pgs. 1-3 to 1-4.

In response to a DRA data request, CalPeco clarified that the company does not propose to remove the current 0.5% productivity factor reduction for non-labor related revenue requirements.[12]

Regarding its proposal to reduce the threshold amount for triggering the Major Plant Additions component, CalPeco's testimony states "total annual plant additions are $6 million to $10 million per year. Most, individual plant additions projects range between $25,000 and $500,000."[13] Essentially, CalPeco's individual plant additions projects are typically very small, since it is primarily a distribution-only company. Indeed, CalPeco filed a separate application at the Commission for the proposed $46.3 million 625 and 650 Line transmission Upgrade Project (A.10-08-024). The settlement adopted in D.09-10-041 states that "[f]or the Major Plant Additions component, Sierra will provide advance notice to DRA and the A-3CC of any plan to make a major plant addition."[14] In this case, CalPeco has stated "CalPeco was not planning to provide advance notice to the DRA and A-3 CC. However, if DRA and the A-3CC requests advance notice and justified the request, we would consider the request."[15]

Regarding CalPeco's proposal to remove the 0.5% productivity factor adjustment from its labor costs, it stated that "[t]he removal of the 0.5% productivity factor for labor costs was to more closely align the labor increases negotiated in its

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[12] CalPeco response to DRA data request DRA-29, Q.4: "No. As described on pp1-4 lines 5-6, the removal of the attrition factor would only be applicable to the labor component."

[13] CalPeco Exh. 5, p 1-5, lns. 11-13. CalPeco supported the statements in its testimony in response to DRA data request DRA-29, Q.2.

[14] D.09-10-041, Settlement Agreement at 8.

[15] CalPeco response to DRA data request DRA-29, Q.3.

most recent Collective Bargaining Agreement to the PTAM mechanism."[16] According to CalPeco, the company negotiated a labor escalation percentage of 1.5% for 2013 and 2014.[17]

DRA Recommendations

DRA recommends that the Commission continue with CalPeco's current PTAM mechanism based on CPI minus a 0.5% productivity factor for both labor and non-labor components. Given the current low inflation regime, there is no reason to deviate from CPI minus a productivity factor. The Commission recently approved a 2012 PTAM Attrition Factor of 1.15% for CalPeco, essentially a CPI forecast of 1.65% minus 0.5%.[18] With the transition of ownership from Sierra Pacific to CalPeco in 2011, along with CalPeco's proposal to add new employees, which should produce productivity gains, CalPeco should have the incentive to achieve a 0.5% productivity factor in its Attrition years.

DRA opposes CalPeco's proposal to escalate its labor component based on its agreement with the IBEW – CalPeco should not be permitted to assume that any labor escalation rate negotiated with the union would be used in Attrition years. As discussed in prior Commission decisions, an attrition mechanism is not an entitlement, nor is it a method of insulating the company from the economic pressures which all businesses experience. As discussed in Exhibit DRA-4, CalPeco previously agreed to an average salary increase of 11.85% from Base Year 2011 to Test Year 2013, with 14 of 72 (19%) employees receiving an increase of more than 25%. CalPeco did not propose to remove the 0.5% productivity factor from non-labor related revenue requirements.

Regarding CalPeco's proposal to reduce the threshold amount for triggering the Major Plant Additions component from $20 million to 1% of CalPeco's rate base, or $1.2 million; DRA opposes CalPeco's reduced threshold proposal. DRA's recommendation is based on CalPeco's rate base amount of approximately $121

[16] CalPeco response to DRA data request DRA-29, Q.5.

[17] CalPeco response to DRA data request DRA-29, Q.6.

[18] CPUC D.12-04-026 at p. 4.

million and the fact that CalPeco is not adding large amounts to rate base on an annual basis – they are essentially a distribution-only company. Setting the threshold too low at $1.2 million, as proposed by CalPeco, could permit CalPeco to have significant plant-related Attrition year rate increases that would defeat the purpose of the Attrition mechanism. CalPeco should retain the risk of cost recovery for its capital additions during Attrition years. If the Commission does desire to reduce the threshold trigger, a more reasonable amount would be a $5 million threshold. Nothing would prevent CalPeco from filing an application for a major plant addition, e.g., CalPeco's proposed $46.3 million 625 and 650 Line transmission Upgrade Project (A.10-08-024).

VIII. Tax Relief, Unemployment Insurance Reauthorization, and Job Creation Act of 2010 Memorandum Account

Commission Resolution L-411A was issued on June 23, 2011. Ordering Paragraph Number 6 of the Resolution states that, "In each Covered Utility's next General Rate Case (GRC), or at such other time as ordered in that GRC decision, the Commission shall address the disposition of amounts (a) recorded in the memorandum account and (b) forecast for the remainder of the Memo Account Period, and may reflect any revenue requirement decrease in prospective rates."

CalPeco has not complied with the Commission Resolution L-411A and requested that it be exempted. Ordering Paragraph 2 of Resolution L-411A only exempted those utilities addressing the New Tax Law in a 2011 or 2012 Test Year GRC. CalPeco has filed a TY 2013 GRC and is not exempted from the requirements and provisions of Resolution L-411A.

The current GRC filing does not address the memorandum accounts described in Resolution L-411A. The current memorandum accounts should continue through the period that a Commission decision adopts the new GRC base revenue in this proceeding. The adopted revenue requirement for 2013 will ultimately include the impacts of bonus depreciation in the adopted GRC revenue requirement starting in 2013. As provided by Resolution L-411A, DRA recommends that the Commission GRC decision in this proceeding order CalPeco to address the disposition of amounts described in Ordering Paragraph 6 of Commission Resolution L-411A within the same filing (e.g. application) addressing recovery of recorded costs in its Vegetation Management Memorandum Account (VMMA) adopted in Resolution E-4464.

IX. Qualifications of Witness

Q.1 Please state your name and business address.

A.1 My name is Truman L. Burns. My business address is 505 Van Ness Avenue, San Francisco, California, 94102.

Q.2 By whom are you employed and in what capacity?

A.2 I am employed by the California Public Utilities Commission as Program and Project Supervisor in the Division of Ratepayer Advocates Energy Cost of Service and Natural Gas Branch.

Q.3 Briefly describe your educational background and work experience.

A.3 I received a Bachelor of Arts Degree in Political Science and English and a Masters of Arts Degree in Political Science, State Politics and Policy Specialization, from the University of California, Davis. I received a Juris Doctor Degree from the University of San Francisco, and am a member of the California Bar. I joined the CPUC's Special Economics Projects Branch in 1986. During my employment with the CPUC, I have performed various tasks, and have spent most of my time on electric utility regulation. I have testified before the Commission related to PG&E's Diablo Canyon nuclear power plant (steam generator replacement cost effectiveness, nuclear decommissioning trust funds, target capacity factor, long-term operating costs, utility retained generation capital and operating costs) Humboldt Bay Unit No. 3 nuclear power plant (decommissioning trust funds and decommissioning costs) and Southern California Edison's San Onofre Units 2 & 3 (utility retained generation capital and operating costs) and Unit 1 nuclear power plant (environmental costs and rate base recovery). I have also testified before the Atomic Safety and Licensing Board of the U.S. Nuclear Regulatory Commission regarding PG&E's financial qualifications requirements for an independent spent fuel storage installation (ISFSI), and was appointed to the National Association of Regulatory Utility Commissioners Staff Subcommittee on Nuclear Issues-Waste Disposal in 2004. I am DRA Co-Project Coordinator for the TY 2012 Sempra (SoCalGas and SDG&E) General Rate Case.

Q.4 What is the purpose of your testimony?

A.4 I am responsible for Exhibit DRA-1, Executive Summary. I am also DRA's Project Coordinator for CalPeco's general rate case.

Q.5 Does that complete your prepared testimony?

A.5 Yes, it does.

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