

BEFORE THE
STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

In the Matter of
Central Hudson Gas & Electric Corporation
Cases 08-E-0887 & 08-G-0888
November 2008

Prepared Testimony of:

Vijay Puran
Utility Engineer 3
Office of Electric, Gas and
Water

State of New York
Department of Public Service
Three Empire State Plaza
Albany, New York 12223-1350

1 Q. Please state your name, business address and
2 current position.

3 A. My name is Vijay Puran. My business address is
4 Three Empire State Plaza, Albany, New York
5 12223-1350. I am a Utility Engineer 3 in the
6 Office of Electric, Gas and Water.

7 Q. Please summarize your educational background and
8 experience.

9 A. I graduated from the University of Guyana in
10 October 1987 with a Bachelor of Engineering
11 Degree in Electrical Engineering. In February
12 1993, I graduated from the City College of New
13 York with a Master of Engineering Degree in
14 Electrical Engineering. I received a Master of
15 Public Administration Degree from the Nelson A.
16 Rockefeller College, University at Albany, in
17 December 2001.

18 I accepted employment with the Department of
19 Public Service in November 1994. My duties
20 include the technical analysis of utility rate
21 filings, focusing mainly on cost allocation and
22 rate design.

23 Q. Have you appeared as a witness before this

1 Commission?

2 A. Yes, I have testified in Cases 02-E-0198, 02-E-
3 0551 and 03-E-0765.

4 Q. What is the purpose of your testimony in this
5 proceeding?

6 A. The purpose of my testimony is to present
7 recommendations addressing:

- 8 ➤ Electric revenue allocation,
- 9 ➤ Electric rate design,
- 10 ➤ The Company's proposed Electric Bill Credit
- 11 ➤ Price-out of Staff's sales adjustments
- 12 ➤ Factor of adjustment, and
- 13 ➤ Reactive demand charges.

14 Q. Are you sponsoring any exhibits?

15 A. Yes, I am sponsoring Exhibit__(VVP-1) through
16 Exhibit__(VVP-7).

17 Electric Revenue Allocation

18 Q. Have you reviewed Central Hudson Gas and
19 Electric Corporation's (Central Hudson or the
20 Company) proposed interclass electric revenue
21 allocation?

22 A. Yes. Central Hudson's Electric Forecasting
23 Panel (EFP) employed a multi-step process to

1 allocate the Company's proposed revenue increase
2 among the various service classifications as
3 shown in the EFP's Exhibit__(EFP-6), Schedule A.
4 The first step used the results of Company
5 witness Arvidson's Pro-Forma Rate Year Embedded
6 Cost of Service Study to calculate the revenue
7 adjustments necessary to bring each service
8 class' rate of return to within a plus or minus
9 15 percent tolerance band of the system average
10 rate of return. This interclass revenue
11 adjustment was revenue neutral on a system
12 basis.

13 The second step allocated the proposed revenue
14 increase to each service class in proportion to
15 the total delivery revenue calculated at current
16 rates. The EFP then added the proposed revenue
17 increase allocated to each service class to the
18 respective revenue adjustments determined in the
19 first step to get the unconstrained revenue
20 increase for each service class. The EFP then
21 constrained the resulting increase to each
22 service class such that no class received an
23 increase less than 0.75 times the system average

1 increase or greater than 1.25 times the system
2 average increase. The application of the
3 constraints resulted in a revenue shortfall from
4 the proposed revenue increase. The shortfall
5 was recovered from each service class in
6 proportion to each class' constrained revenue
7 increase. Finally, the EFP added the shortfall
8 to be recovered from each service class to each
9 class' respective constrained revenue increase
10 to get the final proposed revenue increase for
11 each service class.

12 Q. Do you support the revenue allocation
13 methodology proposed by the EFP?

14 A. Yes. I support the application of a tolerance
15 band to bring the rates of return of the various
16 service classes to within a certain percentage
17 of the system average rate of return. This
18 action should result in a more equitable
19 contribution from each service class to the
20 Company's overall revenue requirement.

21 I also support the EFP's proposal to constrain
22 the revenue increase to each service class in
23 order to mitigate impacts to those classes that

1 would have otherwise experienced significant
2 increases and to allocate a less than system
3 average increase to those service classes with
4 rates of return exceeding the upper tolerance
5 level of the system average rate of return. A
6 similar methodology was approved by the
7 Commission in the Company's last electric rate
8 proceeding, Case 05-E-0934.

9 Q. Did the EFP make any adjustments to the final
10 base revenue increase allocated to each service
11 class?

12 A. Yes. After the final proposed total revenue
13 increase for each service class was determined,
14 the EFP then adjusted each service class'
15 proposed revenue increase to reflect the
16 increased revenue estimated to be collected
17 through the proposed Merchant Function Charges
18 (MFC) shown in the EFP's Exhibit__(EFP-7),
19 Schedule A. To do this, the EFP reduced rate-
20 year sales by the forecasted dual-billed and
21 retail access sales then priced-out the
22 resulting sales at the current and proposed MFC
23 Administration and MFC Supply rates,

1 respectively. The EFP then determined the
2 increased revenue estimated to be collected
3 through the proposed MFC for each service class
4 and subtracted the respective amounts from the
5 total revenue increase previously allocated to
6 each service class to calculate the incremental
7 revenue to be recovered through base delivery
8 rates.

9 Q. Do you agree with all of the EFP's calculations
10 of the adjustments above?

11 A. Not entirely. The EFP's calculations of the
12 increased revenue estimated to be collected
13 through the MFC and the resulting incremental
14 revenue to be recovered through base delivery
15 rates would result in lost revenue associated
16 with dual-billed and retail access sales to be
17 collected in base delivery rates. This is
18 inconsistent with the EFP's testimony on page
19 37, lines 7 through 13, where the EFP proposed
20 that:

21 [T]he net lost revenue provisions of
22 the Joint Proposal (section VI.H.)
23 approved by the Commission in Case 05-

1 E-0934 continue to be applied, with
2 the delivery portion of forecast net
3 lost revenue recovered through the
4 Transition Adjustment and the supply
5 portion of forecast net lost revenue
6 recovered through the MFC Supply
7 Charge.

8 As proposed, this situation would result in
9 double recovery of lost revenue associated with
10 dual-billed and retail access sales; once
11 through base delivery rates and again through
12 the Transition Adjustment and MFC Supply Charge.
13 The EFP acknowledged in its response to Staff
14 interrogatory DPS-548, see Exhibit___(VVP-1),
15 that by reducing forecasted total deliveries for
16 forecasted dual-billed deliveries and forecasted
17 retail access deliveries, the Company
18 inadvertently included MFC lost revenue in the
19 portion of the revenue increase allocated to
20 base delivery rates. I will address Staff's
21 recommended method for recovering the lost
22 revenue associated with dual-billed and retail
23 access sales in my testimony below.

1 Q. Please describe your interclass electric revenue
2 allocation.

3 A. My interclass revenue allocation to the service
4 classes is shown in Exhibit___(VVP-2). The
5 revenue allocation reflects Staff's recommended
6 \$17.6 million (\$17.17 million without revenue
7 taxes) electric revenue increase. I used the
8 same general methodology as the EFP to allocate
9 Staff's recommended revenue increase to the
10 service classes. Like the Company, I used a
11 plus or minus 15 percent tolerance band to bring
12 the individual service classes' rates of return
13 to within that range of the system average rate
14 of return. I then constrained the revenue
15 increase to the service classes such that no
16 class received an increase less than 0.5 times
17 the system average increase. To calculate the
18 upper constraint level, I determined the
19 constraint level necessary for the revenue
20 shortfall to be as close to zero as possible,
21 while still achieving acceptable revenue
22 impacts. I found that upper constraint level to
23 be 2.2 times the system average increase,

1 meaning that no class should received an
2 increase more than 2.2 times the system average
3 increase. The impacts of my proposed revenue
4 allocation will be discussed later in my
5 testimony.

6 Q. Please explain your revenue allocation shown on
7 Exhibit__(VVP-2).

8 A. The first 7 columns of Exhibit__(VVP-2) are the
9 same as the EFP's Exhibit__(EFP-6), Schedule A
10 because I made no adjustments to Company witness
11 Arvidson's Pro-Forma Rate Year Embedded Cost of
12 Service Study and I used the same tolerance band
13 as the EFP. In column 8, I adjusted the
14 Company's current total base rate revenue (rate-
15 year billing determinants priced-out at current
16 base delivery and MFC rates) for S.C. Nos. 1
17 (Residential), 2 (General Service) and
18 3 (Primary Service) to reflect the revenue
19 adjustments in Exhibit__(VVP-5), page 2 of 2,
20 based on Staff Sales Forecasting Panel's sales
21 adjustment. In column 9, I allocated Staff's
22 recommended base revenue increase, less revenue
23 taxes, to the service classes in proportion to

1 the current total base rate revenue shown in
2 column 8. Column 10 shows the unconstrained
3 revenue increase for each service class after
4 combination with the revenue adjustments
5 resulting from application of the tolerance
6 band. Column 11 shows the unconstrained revenue
7 increase as a percentage of current total base
8 rate revenue.

9 In column 12, I constrained the revenue increase
10 to the applicable service classes as discussed
11 above. Column 13, shows the unadjusted
12 percentage increase for the classes that were
13 within the constraint range. Column 16 shows
14 the revenue increases for each service class
15 after application of the constraints. Column 17
16 shows that application of the constraints
17 resulted in no revenue shortfall, as discussed
18 before. Finally, Column 18 shows the final
19 total base revenue increases allocated to each
20 service class.

21 Q. Please discuss the results of your revenue
22 allocation.

23 A. Initially the rates of return for only S.C.

1 Nos. 1 and 2 - Primary were within the 15
2 percent tolerance band. The rates of return for
3 S.C. Nos. 2 - Secondary, 3, 6 - Residential
4 Time-of Use, 8 - Street Lighting and 9 - Traffic
5 Signals were above the upper tolerance band
6 level of 5.37 percent and were therefore lowered
7 to this level. On the other hand, the rates of
8 return for S.C. Nos. 2 - Non-Demand, 5 - Area
9 Lighting, 13 - Substation and 13 - Transmission
10 were below the lower tolerance band level of
11 3.97 percent and were therefore raised to this
12 level.

13 Application of the tolerance band compounded
14 with Staff's revenue increase resulted in
15 unconstrained delivery impacts ranging from
16 -22.2 percent to 67.8 percent. After
17 application of the constraints, the delivery
18 impacts ranged from 4 percent to 17.7 percent.

19 Q. Please discuss the impacts to the service
20 classes that would experience a 17.7 percent
21 delivery increase.

22 A. The service classes or sub-classes that will
23 experience a 17.7 percent delivery increase are

1 S.C. Nos. 2 - Non-Demand, 5 - Area Lighting,
2 13 - Substation and 13 - Transmission. These
3 service classes or sub-classes rates of return
4 were below the lower tolerance band level of
5 3.97 percent, as mentioned before. The revenue
6 increases for these classes have been moderated
7 significantly by application of the constraints.
8 For example, S.C. No. 13 - Transmission would
9 have experienced an unconstrained base delivery
10 revenue increase of approximately \$3 million or
11 67.8 percent, however, with the application of
12 the constraints it will experience a delivery
13 increase of approximately \$0.8 million or
14 17.7 percent. The revenue increases to these
15 service classes or sub-classes are necessary to
16 bring their rates of return closer to the lower
17 level of the tolerance band.
18 For S.C. Nos. 13 - Substation and 13 -
19 Transmission customers, the delivery rate
20 increase will be further mitigated because most
21 of these customers currently have accrued PPA
22 benefits that will be used to offset the
23 increased delivery rates, see Exhibit___(VVP-7).

1 Q. Did you make any adjustments to the final base
2 revenue increases allocated to each service
3 class?

4 A. Yes. In conjunction with the testimony of Staff
5 witness Twergo, it was decided that the forecast
6 lost revenue associated with dual-billed and
7 retail access sales should be recovered in base
8 delivery rates. As a result, I reduced the
9 total revenue increase recommended for each
10 service class' to reflect the increased revenue
11 estimated to be collected through the Company's
12 proposed Merchant Function Charges assuming no
13 dual-billed and retail access sales (i.e., no
14 lost revenue), as shown in Exhibit__(VVP-3),
15 page 1 of 3. I then reduced Staff's forecast
16 rate-year sales by the forecast dual-billed and
17 retail access sales in the same proportion as
18 the Company, see Exhibit__(VVP-3), pp. 2 and 3,
19 and priced-out the resulting sales at the
20 Company's proposed MFC Administration and MFC
21 Supply rates, respectively, in order to
22 calculate the lost revenue associated with dual-
23 billed and retail access sales for each service

1 class. I then added the forecast lost revenue
2 to be recovered from each service class to the
3 respective total revenue increase allocated each
4 service class in the first step above, to
5 calculate the incremental revenue to be
6 recovered through base delivery rates as shown
7 in column 7 of Exhibit___(VVP-3), page 1 of 3.

8 Q. Would collecting lost revenue associated with
9 dual-billed and retail access sales through base
10 delivery rates result in double recovery through
11 the Company's lost revenue mechanism?

12 A. No. Staff witness Twergo is proposing to
13 eliminate the Company's lost revenue mechanism
14 in his testimony. He also discusses how
15 forecast and actual lost revenue will be
16 reconciled.

17 Electric Rate Design

18 Q. Please describe the EFP's proposed rate design
19 in general terms.

20 A. For S.C. Nos. 5 - Area Lighting, 8 - Street
21 Lighting and 9 - Traffic Signal, the EFP
22 proposes to apply the class average increase to
23 each element within each class. For the

1 remaining service classes (non-lighting), the
2 ERP proposes to increase the customer charges to
3 move them closer to the embedded customer costs
4 produced by the Company's embedded cost of
5 service study and to collect the remaining base
6 rate revenue requirement from the other
7 applicable rate elements (per kWh, per kW and
8 per RkVA charges).

9 Q. Do you support the EFP's rate design proposal
10 for the non-lighting service classes?

11 A. No. While the EFP's proposal to increase the
12 customer charges closer to the embedded costs is
13 cost justified, I recommend smaller increases to
14 all customer charges in an effort to move
15 gradually to the embedded costs and to mitigate
16 bill impacts to the smaller customer classes.
17 Exhibit___(VVP-4) summarizes the current,
18 Company's proposed and Staff recommended
19 customer charges for the non-lighting service
20 classes.

21 Q. Please describe your rate design proposal for
22 S.C. No. 1 - Residential Service.

23 A. I recommend that the S.C. No. 1 customer charge

1 be increased by \$2.00 per month to \$18.00 per
2 month. The remaining revenue requirement for
3 S.C. No. 1 should be recovered through the per
4 kWh delivery rate.

5 Q. Please describe your rate design proposals for
6 S.C. No. 2 (General Service).

7 A. I recommend that the S.C. No. 2 - Non-Demand
8 customer charge be increased by \$5.00 per month
9 to \$25.00 per month. The remaining revenue
10 requirement for S.C. No. 2 - Non-Demand should
11 be recovered through the per kWh delivery rate.
12 For S.C. No. 2 - Secondary Demand, I recommend
13 that the customer charge be increased by \$5.00
14 per month to \$35.00 per month. The demand
15 charge should be increased by \$0.22 per kW to
16 \$7.75 per kW to maintain the demand revenue
17 level at approximately 75 percent of the total
18 Secondary Demand revenue. The remaining base
19 rate revenue requirement should be recovered
20 through the per kWh delivery rate.

21 Similarly, for S.C. No. 2 - Primary, I
22 recommend that the customer charge be increased
23 by \$20.00 per month to \$130.00 per month. The

1 demand charge should be increased by \$0.32 per
2 kW to \$5.55 per kW to maintain the demand
3 revenue level at approximately 85 percent of the
4 total Primary Demand revenue. The remaining
5 revenue requirement should be recovered through
6 the per kWh delivery rate.

7 Q. Please describe your rate design proposal for
8 S.C. No. 3 - Primary Service.

9 A. I recommend that the S.C. No. 3 - Primary
10 Service customer charge be increased by \$100 per
11 month to \$500 per month. I also recommend that
12 the customer charge be further increased by \$20
13 per month consistent with the Company's proposal
14 to recover costs associated with the monthly
15 meter subscription fee for its Energy Manager
16 advanced metering software. Moreover, I
17 recommend that the reactive demand charge should
18 be increased by \$0.39 per RkVA to \$0.83 per
19 RkVA, consistent with the discussion provided
20 later in my testimony. Finally, the remaining
21 base rate revenue requirement should be
22 recovered through the per kW delivery rate.

23 Q. Please describe your rate design proposal for

1 S.C. No. 6 - Residential Time-of-Use Service.

2 A. I recommend that the S.C. No. 6 customer charge
3 be increased by \$3.00 per month to \$22.00 per
4 month. The remaining base rate revenue
5 requirement for S.C. No. 6 should be recovered
6 through the per kWh delivery rate consistent
7 with the method used by the Company.

8 Q. Please describe your rate design proposal for
9 S.C. No. 13 (Substation and Transmission
10 Service).

11 A. I recommend that the customer charges for S.C.
12 No. 13 - Substation and S.C. No. 13 -
13 Transmission be increased by \$200 per month to
14 \$700 per month. I also recommend that the
15 customer charges be further increased by \$20 per
16 month consistent with the Company's proposal to
17 recover costs associated with the monthly meter
18 subscription fee for its Energy Manager advanced
19 metering software. Moreover, I recommend that
20 the reactive demand charge should be increased
21 by \$0.39 per RkVA to \$0.83 per RkVA, consistent
22 with the discussion provided later in my
23 testimony. Finally, the remaining base rate

1 revenue requirement should be recovered through
2 the per kW delivery rate.

3 Q. Please describe your rate design proposals for
4 S.C. No. 5 - Area Lighting, S.C. No. 8 - Street
5 Lighting and S.C. No 9 - Traffic Signal.

6 A. For S.C. Nos. 5, 8 and 9, I recommend that the
7 respective class average increase be applied to
8 each element (fixture, lamps, poles, signal
9 faces, etc.) offered in the class, similar to
10 the Company's proposal.

11 Company's Proposed Electric Bill Credit

12 Q. Please describe the Company's proposed Electric
13 Bill Credit.

14 A. The Company proposes to use an Electric Bill
15 Credit to mitigate the effects of its rate
16 increase during the rate year. Consequently, it
17 further proposes to fund the Electric Bill
18 Credit with the actual net regulatory liability
19 remaining after all offsets as of June 30, 2009.
20 At the time of the rate case filing, the Company
21 estimated the net credit to be approximately
22 \$21.2 million. The Company proposes that the
23 Electric Bill Credit be applied as a per

1 customer-month credit for the twelve months
2 ending June 30, 2010 on a service class or sub-
3 class specific basis.

4 Q. Do you support the Company's proposed Electric
5 Bill Credit?

6 A. No. Using all the net regulatory liability
7 remaining as of June 30, 2009, to mitigate the
8 impacts of the rate increase would result in
9 automatic bill increases after the rate year in
10 the amounts of the bill credits, all else being
11 equal. For example, if the Company uses
12 \$21.2 million for bill credits during the rate
13 year, then after the rate year, customers will
14 experience a rate increase equivalent to
15 \$21.2 million, even if the Company does not file
16 another rate case. If the Company does file a
17 rate case to become effective at the end of the
18 proposed rate year, the customers will
19 experience a rate increase equivalent to the
20 amount the Company is seeking compounded by the
21 \$21.2 million bill credit. This could lead to
22 unacceptably high bill impacts after the end of
23 the proposed rate year.

1 Q. Under what circumstance would you recommend
2 using bill credits?

3 A. If the rate increase ultimately approved by the
4 Commission is significantly greater than Staff's
5 recommended increase, the Commission could use a
6 portion of the net regulatory liability to
7 offset some of the rate increase through bill
8 credits. I recommend that the amount used,
9 however, should be minimized to avoid
10 potentially unacceptable bill impacts to
11 customers after the rate year.

12 Price-out of Staff's Sales Adjustments

13 Q. Please describe your price-out of Staff's
14 recommended sales adjustments.

15 A. I used the Staff Forecasting Panel's summary of
16 electric rate year sales by Revenue Account
17 Group to calculate the adjustments to the
18 Company's sales as shown in Exhibit___(VVP-5),
19 page 1 of 2. I then allocated the sales
20 adjustments to the service classes using the
21 Company's sales allocators. Next, I priced-out
22 each service class sales adjustment at the
23 current base delivery kWh rate and MFC rates. I

1 also calculated the revenue taxes based on the
2 revenue tax factors shown in the EFP's
3 Exhibit___(EFP-6), Schedule B. The results of
4 my price-out are presented in Exhibit___(VVP-5),
5 page 2 of 2, which shows that base revenue
6 decreased by \$233,266 resulting in a concomitant
7 revenue tax decrease of \$7,941, for a total
8 decrease of \$241,207. This revenue adjustment
9 was provided to the Accounting Panel to be
10 incorporated into Staff's overall revenue
11 adjustment.

12 Factor of Adjustment

13 Q. What is the factor of adjustment used for?

14 A. The factor of adjustment is used to adjust
15 certain costs for lost and unaccounted for
16 kilowatthours.

17 Q. Please describe the EFP's proposal to change the
18 Company's factor of adjustment.

19 A. The EFP proposes to change the factor of
20 adjustment from 1.042 to 1.045 based on a three-
21 year average of lost and unaccounted energy on
22 the Company's electric system. This method was
23 approved by the Commission in the Company's last

1 electric rate proceeding, Case 05-E-0934.

2 Q. Do you agree with the change proposed by the
3 EFP?

4 A. No. I find that the factor of adjustment should
5 be changed from 1.042 to 1.043 based on a three-
6 year average of lost and unaccounted energy on
7 the Company's electric system. The EFP agreed
8 with this change in its response to Staff
9 interrogatory DPS-557, see Exhibit___(VVP-6).

10 Q. Are you making any other recommendations
11 regarding the Company's factor of adjustment?

12 A. Yes. Central Hudson is the only major electric
13 utility in New York State that applies the same
14 factor of adjustment to customers served at all
15 voltage levels in its service territory.
16 Applying the same factor of adjustment to all
17 customers has the effect of socializing the
18 losses over all voltage levels. This obviously
19 unfairly penalizes high voltage customers
20 because losses are smaller at higher voltage
21 levels. To ensure cost-based rates, all
22 customer classes should be responsible for their
23 share of the losses incurred on the Company's

1 system in the process of serving them.
2 Therefore, I recommend that the Company conduct
3 a loss allocation study to calculate the factors
4 of adjustment at the secondary, primary,
5 substation and transmission voltage levels. The
6 Company should file the results of this study as
7 part of its filing in the next rate case so that
8 voltage-level specific factors of adjustment can
9 be recommended for approval.

10 Reactive Demand Charge

- 11 Q. Please describe the Company's proposed changes
12 related to reactive demand.
- 13 A. The Company proposes to increase the reactive
14 demand charge from \$0.44 per RkVA to \$0.83 per
15 RkVA for S.C. No. 3 and S.C. No. 13 customers.
16 The Company also proposes to use one-quarter
17 (instead of the current one-half) of the highest
18 15-minute integrated kilowatt demand established
19 during the month for the determination of
20 reactive demand calculation. The Company states
21 that it believes that these changes are
22 necessary to properly assign costs of excessive
23 current flow due to poor power factor to those

1 customers who continue to draw excess current
2 rather than install their own capacitors.

3 Q. What are your recommendations regarding the
4 Company's proposed changes related to reactive
5 demand?

6 A. I reviewed the Company's calculations of the
7 proposed reactive demand charge and find the
8 calculations to be reasonable. Consequently, I
9 recommend that the reactive demand charge be
10 increased to \$0.83 per RkVA for S.C. No. 3 and
11 S.C. No. 13 customers. However, I recommend
12 that one-third, instead of the Company's
13 proposed one-quarter, of the highest 15-minute
14 integrated kilowatt demand established during
15 the month be used for the determination of
16 reactive demand calculation, as discussed later.
17 This means that customers whose power factor is
18 below 95 percent will have to pay the reactive
19 demand charge.

20 Q. Please continue.

21 A. Currently, the reactive demand charge is
22 applicable to customers whose power factor is
23 below 89 percent. Under the Company's proposal,

1 the reactive demand charge would be applicable
2 to customers whose power factor is below
3 97 percent. This would result in the most
4 stringent operating requirement in New York
5 State.

6 Currently, National Grid and New York State
7 Electric & Gas Corporation reactive demand
8 charges are applicable to customers whose power
9 factor is below 95 percent. Consequently, as
10 mentioned before, I recommend that Central
11 Hudson's reactive demand charge be applicable to
12 customers whose power factor is below
13 95 percent, unless changed by the Commission in
14 Case 07-M-0548. In that case, by Order
15 Establishing Energy Efficiency Portfolio
16 Standard and Approving Programs (issued June 23,
17 2008), the Commission ordered each utility to
18 provide an analysis of reactive power provisions
19 and charges contained in utilities' tariffs in
20 their six-month report to be filed in December
21 2008.

22 Q. Does this conclude your direct testimony?

23 A. Yes, it does.