

BEFORE THE  
STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION

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In the Matter of  
  
Consolidated Edison Company Of New York, Inc.

Case 09-E-0428

August 2009

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Prepared Testimony of:

Liliya A. Randt  
Utility Engineer 2  
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, title, employer, and  
2 business address.

3 A. My name is Liliya A. Randt. I am employed by  
4 the New York State Department of Public Service  
5 (Department). My business address is Three  
6 Empire State Plaza, Albany, New York 12223-1350.

7 Q. Ms. Randt, what is your position in the  
8 Department?

9 A. I am employed as a Utility Engineer 2 in the  
10 Rates and Tariffs section of the Office of  
11 Electric, Gas and Water.

12 Q. Ms. Randt, please state your educational  
13 background and professional experience.

14 A. I graduated magna cum laude from the State  
15 University of New York, Institute of Technology  
16 at Utica with a Bachelor of Science degree in  
17 Mechanical Engineering Technology in May 2004.  
18 I also received a Master Degree in Civil  
19 Engineering from Poltava Technical University,  
20 Ukraine in 1997. I began my employment with the  
21 Department in April 2005 and currently hold the  
22 title of Utility Engineer 2. While with the  
23 Department, I have prepared, analyzed, and  
24 reviewed reports and studies involving operating

1 revenues, sales forecasts, operation and  
2 maintenance expenses, embedded costs, revenue  
3 allocation, and rate design. My duties include  
4 engineering analyses of utility rate, pricing,  
5 and tariff proposals.

6 Q. Have you previously testified before the New  
7 York State Public Service Commission?

8 A. Yes, I testified in Consolidated Edison Company  
9 of New York, Inc.'s (Con Edison or the Company)  
10 steam rate cases (Cases 05-S-1376 and 07-S-1315)  
11 regarding the embedded cost of service study  
12 (ECOS), rate design and other revenue  
13 requirement issues. I testified in the Freeport  
14 Electric rate case (Case 06-E-0911) regarding  
15 capital expenditures, depreciation, and rate  
16 design. I testified in Orange and Rockland  
17 Utilities, Inc.'s electric rate cases (Cases 06-  
18 E-1433 and 07-E-0949) regarding the delivery  
19 revenue forecast, ECOS and rate design issues.  
20 I also testified in the two Con Edison electric  
21 rate proceedings, Cases 07-E-0523 and 08-E-0539.

22 Q. What is the scope of your testimony in this  
23 proceeding?

24 A. My testimony will address the following: (1) the

1 Company's Embedded Cost of Service study (ECOS);  
2 (2) revenue allocation; (3) declining block  
3 rates; (4) price out of Staff's sales forecast;  
4 and, (5) the Company's Plant-in-Service forecast  
5 model.

6 Q. In your testimony, will you refer to, or  
7 otherwise rely upon, any information produced  
8 during the discovery phase of this proceeding?

9 A. Yes, I will refer to, and have relied upon,  
10 several responses to Department of Public  
11 Service Staff (Staff) Information Requests (IR).  
12 These responses are included in Exhibit \_\_ (LAR-  
13 1).

14 Q. Are you sponsoring any other exhibits?

15 A. Yes. I am sponsoring Exhibit\_\_ (LAR-2),  
16 Exhibit\_\_ (LAR-3), Exhibit\_\_ (LAR-4) and  
17 Exhibit\_\_ (LAR-5).

18 Q. Would you briefly describe each exhibit?

19 A. Exhibit\_\_ (LAR-2) and Exhibit\_\_ (LAR-3) contain  
20 Staff's revenue allocation for Rate Year 1.  
21 Exhibit\_\_ (LAR-4) contains estimated net plant  
22 additions for three rate years.  
23 Exhibit\_\_ (LAR-5) contains specific forecasted  
24 plant in service by category for the three rate

1           years.

2   Embedded Cost of Service Study

3   Q.   Did you examine the ECOS study submitted by the  
4           Company?

5   A.   Yes.

6   Q.   Please briefly describe the purpose of the ECOS  
7           study.

8   A.   The ECOS study allocates the Company's operating  
9           costs to the full service, New York Power  
10          Authority (NYPA) and Economic Development  
11          Delivery Service (EDDS) service customer classes  
12          based on an analysis of the rate base and  
13          operating expenses associated with each service  
14          class for the calendar year 2007. I will refer  
15          to the study as the 2007 ECOS.

16   Q.   Please continue.

17   A.   There are two major steps in developing an ECOS  
18          study: (1) the functionalization and  
19          classification of costs to operating functions,  
20          such as to production, transmission and  
21          distribution, customer accounting and customer  
22          service; and (2) the allocation of each  
23          classified function to the individual service  
24          classes based on selected characteristics. The

1 final output of the ECOS study is a summary of  
2 the overall system and individual class rates of  
3 return, based on revenues reflecting current  
4 rates effective May 1, 2009. This provides an  
5 indication of the extent to which each class  
6 contributes to the total system rate of return.

7 Q. Please explain the "tolerance band" that the  
8 Company applies to the results of the ECOS  
9 study.

10 A. Individual class revenue responsibilities have  
11 been measured with a +/-10% tolerance band  
12 around the total system average rate of return.  
13 Specific classes would be considered deficient  
14 or surplus if their computed return falls  
15 outside of this tolerance band.

16 Q. Did the Company present any methodological  
17 changes in the 2007 ECOS as compared to prior  
18 ECOS studies?

19 A. Yes. There are two methodological changes to  
20 the 2007 ECOS study. In this study, the Company  
21 classified overhead and underground line  
22 transformers and rectifiers into demand and  
23 customer components based on a methodology  
24 similar to that used for the minimum system

1 calculation of low tension lines. In addition,  
2 in compliance with the Commission's Order in  
3 Case 07-E-0523, the Company assigned street  
4 lighting costs associated with the Stray Voltage  
5 and Mobile Testing programs to all classes  
6 rather than allocating these costs directly to  
7 the Street Lighting classes.

8 Q. Do you have an opinion regarding the proposed  
9 change to the classification of overhead and  
10 underground transformers and rectifiers?

11 A. I agree with the proposed change.

12 Q. Please explain why?

13 A. According to the NARUC Electric Utility Cost  
14 Allocation Manual, total dollars in Account 368  
15 - Line Transformers should be classified into  
16 customer and demand components. The NARUC  
17 manual suggests two different methods to  
18 determine such classifications, the Minimum-Size  
19 method and the Minimum-Intercept method. The  
20 Minimum-Size method assumes that a minimum size  
21 distribution system can be built to serve the  
22 minimum loading requirements of the customer.  
23 This method is already used by the Company to  
24 classify overhead and underground conductors and

1       it would be a natural extension to apply the  
2       Minimum-Size method to line transformers. I  
3       have reviewed the Company's workpapers found in  
4       Exhibit\_(ERP-1), Schedule 1, page 49 for this  
5       classification and found that based on the 2007  
6       data provided, the Company first calculated the  
7       average book cost of installed overhead and  
8       underground line transformers that were sized up  
9       to 25 kVA. The decision to use transformers  
10      sized up to 25 kVA was based upon the fact that  
11      this represented a significant quantity of line  
12      transformers installed and that it generally  
13      represented the smallest sizes of installed line  
14      transformers. The average book cost was then  
15      multiplied by the total number of line  
16      transformers in the account in arriving at the  
17      total dollars that were classified as customer-  
18      related. The Company performed this calculation  
19      separately for overhead and underground line  
20      transformers, and rectifiers. The total dollars  
21      in the account, minus the amount that was  
22      classified as customer-related, is the total  
23      dollars that were classified as demand related.  
24      Taking these two totals, the Company determined



1       the percentage split between customer and  
2       demand, which then was applied in the ECOS  
3       study. The customer-related portion of overhead  
4       line transformer costs was calculated to be  
5       21.82% and the demand-related portion was  
6       78.18%; for underground line transformers, the  
7       split was 4.51% customer and 95.49% demand; for  
8       rectifiers, the split was 26.40% customer and  
9       73.60% demand. Based on my review, the  
10      Company's proposal, as well as its methodology  
11      and calculations of classification of overhead  
12      and underground line transformers and rectifiers  
13      into demand and customer components are  
14      reasonable.

15    Q.   Please state your position regarding re-  
16          assignment of the Street Lighting costs  
17          associated with the Stray Voltage and Mobile  
18          Testing Programs.

19    A.   The majority of the Stray Voltage program costs  
20          are paid for by all customers and not just by  
21          the street lighting service class, since all  
22          customers benefit from this program, therefore  
23          in the ECOS these costs should be allocated to  
24          all classes rather than allocating these costs

1 directly to the Street Lighting classes. The  
2 Company has made this change in compliance with  
3 the Rate Order in Case 07-E-0523 (2008 Rate  
4 Order). I have reviewed the work papers of the  
5 functionalization of Stray Voltage and Mobile  
6 Testing Programs costs and the calculations are  
7 reasonable and in compliance with the 2008 Rate  
8 Order.

9 Q. What was the result of the 2007 ECOS study?

10 A. The rate of return for Con Edison's individual  
11 service classes and EDDS fall within the 10%  
12 tolerance band. The NYPA delivery service class  
13 is \$14,423,801 deficient.

14 Q. What is your position regarding the results of  
15 the 2007 ECOS study?

16 A. I find the results of the ECOS study to be  
17 reasonable.

18 Q. Please explain your view on the NYPA class  
19 deficiency exhibited in the 2007 ECOS study.

20 A. In Case 07-E-0523, the Company presented a 2005  
21 ECOS study which revealed that the NYPA class  
22 was \$30 million deficient. The 2008 Rate Order  
23 addressed only half of the NYPA deficiency, or  
24 \$15 million. In the last Con Edison electric

1 rate case, Case 08-E-0539, the Company presented  
2 the same 2005 ECOS study. The Commission  
3 adopted that study with a 15% tolerance band and  
4 therefore recognized a \$6.7 million NYPA  
5 deficiency.

6 Q. If the Commission recognized the deficiencies in  
7 the 2008 and 2009 Rate Orders, why does the NYPA  
8 class continue to be deficient?

9 A. There are several factors that contribute to the  
10 NYPA class continuing to be deficient in the new  
11 ECOS study. First, the original \$30 million  
12 deficiency evident in the 2005 ECOS was not  
13 fully recognized in the realignment of the NYPA  
14 revenues related to the revenue allocation in  
15 the 2008 Rate Order; therefore NYPA was  
16 allocated a lower rate increase than would have  
17 otherwise been assigned. Similarly, in the 2009  
18 Rate Order, the full NYPA deficiency was again  
19 not recognized, compounding this effect.

20 Another factor contributing to the NYPA  
21 class deficiency is the exclusion of NYPA from  
22 an allocation of miscellaneous revenue related  
23 to Late Payment Charges, Purchase of Receivable  
24 (POR) Discount Revenues and Consolidated Utility

1 Billing System (CUBS) Credit Revenues. As Con  
2 Edison describes in response to Staff IR DPS-397  
3 Exhibit \_\_ (LAR-1), the 2005 ECOS incorrectly  
4 assigned a portion of these miscellaneous  
5 revenues to NYPA. The 2007 ECOS corrects that  
6 error. These factors contribute to the NYPA  
7 class continuing to be deficient in the 2007  
8 ECOS.

9 Q. What do you recommend regarding the ECOS study  
10 in this case?

11 A. I recommend the Commission adopt the Company's  
12 2007 ECOS study and recognize the full NYPA  
13 deficiency. If a multi-year rate plan is  
14 directed by the Commission, the deficiency could  
15 be phased in over the term of the plan.

16 Q. In the 2009 Rate Order, the Company was provided  
17 with funding for the purchase and installation  
18 of interval meters necessary to support a load  
19 diversity study. This study would allow the  
20 Company to gain a better understanding of the  
21 hourly demand characteristics of SC1 and SC7  
22 residential customers living in buildings  
23 containing multiple dwelling units (apartments).  
24 Did the Company submit such as load diversity

1 study in this case?

2 A. No, it did not. The Company in the process of  
3 purchasing and installing 500 interval meters in  
4 2009 to collect data of customer's hourly usage  
5 patterns over time. Due to timing, that study  
6 is not available for use in this case.

7 Q. Since it did not, do you recommend a 15%  
8 tolerance band be applied to the 2007 ECOS in  
9 this case as was Staff's position in the prior  
10 two rate cases?

11 A. No, I do not.

12 Q. Please explain why you do not recommend a 15%  
13 band in this case.

14 A. In Case 08-E-0539, I recommended a 15% tolerance  
15 band to account for concerns related to: 1) the  
16 allocation factors DO8/DO9 for the SC1 and SC7  
17 customer classes that I identified in my  
18 testimony in Case 07-E-0523; 2) the age of the  
19 2005 ECOS study; 3) the fact that significant  
20 capital expenditures were made by the Company  
21 over the last three years since the 2005 ECOS  
22 study was conducted; and, 4) the class demand  
23 study was dated. A 15% tolerance band around  
24 the 2005 ECOS system rate of return addressed

1 the uncertainty related to these issues. In the  
2 2009 Rate Order at page 205, the Commission  
3 determined that the most reasonable way to  
4 reflect the significant increases in plant  
5 investment and expenses and changes in load and  
6 sales since 2005 was to increase the ECOS  
7 tolerance band from +/-10% to +/- 15%. The  
8 Commission declined to consider the issue of  
9 whether the Company gave appropriate weightings  
10 to non-coincident peak and individual customer  
11 maximum demands in arriving at the DO8/DO9  
12 allocation factors for SC1 and SC7 classes and  
13 whether those weightings are consistent with  
14 those employed by the Company in the standby  
15 rate proceedings.

16 Q. Please continue.

17 A. A 15% tolerance band takes into account the  
18 potential outcomes of the load diversity study.  
19 It allows for a greater range of outcomes than a  
20 10% tolerance band. The ECOS study in this case  
21 reflects the most current cost data and is based  
22 on a current demand class study. Therefore,  
23 there is no reason to change the 10% tolerance  
24 band traditionally used by the Commission.

1    Revenue Allocation

2    Q.    Have you reviewed the Company's proposed  
3           transmission and distribution (T&D) revenue  
4           allocation?

5    A.    Yes.    The Company first deducted gross receipts  
6           taxes from the rate year T&D related delivery  
7           revenue increase.    Then rate year T&D related  
8           delivery revenues at the current rate level for  
9           each service class were realigned to reflect the  
10          revenue surpluses and deficiencies.

11   Q.    Please explain how the Company allocated the  
12          proposed T&D revenues increases to the customer  
13          classes.

14   A.    Con Edison allocated the proposed T&D revenue  
15          increase to Con Edison, NYPA and EDDS customers  
16          based on the proportion of each class'  
17          respective re-aligned rate year delivery  
18          revenues to the total rate year delivery  
19          revenues.    The Company then added or subtracted  
20          the class deficiency or surplus to the revenue  
21          increase allocated to each class to arrive at  
22          the total revenue increase for each class.

23   Q.    Do you agree with this approach?

24   A.    Yes.    This approach recognizes the results of

1 the ECOS study and balances the rate increase to  
2 all classes. This approach has been used by the  
3 Company in prior cases and was the approach used  
4 by the Commission in the 2008 and 2009 Rate  
5 Orders.

6 Q. Have you prepared a revenue allocation?

7 A. Yes, I have performed a revenue allocation using  
8 the same general approach as described above,  
9 but using Staff's inputs for the sales forecast  
10 provided by Staff witness Dr. Liu, and the  
11 revenue requirement increase provided by the  
12 Staff Accounting Panel. Staff's revenue  
13 allocation is provided as Exhibit\_\_ (LAR-2) and  
14 Exhibit\_\_ (LAR-3). Exhibit\_\_ (LAR-3) shows the  
15 resulting recommended non-competitive T&D  
16 increases for each service class. Staff's  
17 recommended system average increase to delivery  
18 rates is 11.5%. The SC6 and the NYPA delivery  
19 service classes receive above system average  
20 increases while other classes receive below  
21 system average increases. The resulting  
22 proposed non-competitive T&D percentage  
23 increases are shown in Exhibit\_\_ (LAR-3), Column  
24 11a.



1    Rate Design

2    Q.    Have you reviewed the Company's Billing and  
3           Payment Processing (BPP) charge?

4    A.    Yes.    The current BPP charge is \$0.94.    As a  
5           result of the 2007 ECOS study, the Company  
6           proposed to increase the BPP charge to \$1.05 per  
7           bill to recover the cost for printing and  
8           mailing of \$0.51 per bill and the cost for  
9           payment processing of \$0.54 per bill.

10   Q.    Do you propose any changes to the proposed BPP  
11           charge?

12   A.    Yes, the Company made an error when it  
13           calculated the BPP charge.    In response to DPS-  
14           141, Exhibit \_\_ (LAR-1), the Company agreed to  
15           make a correction to the BPP charge at the  
16           completion of the case.

17   Q.    Do you propose any changes to the rate design?

18   A.    Yes.    I propose that the Commission eliminate  
19           the declining block rate structure currently  
20           employed for the following classes: SC1; SC2;  
21           SC4; SC7; SC8; SC9; and, SC12.    The Company  
22           collects approximately 11% of its T&D revenues  
23           through the existing declining blocks.    In fact,  
24           Con Edison and Orange and Rockland Utilities,

1 Inc. are the only two electric utilities in New  
2 York State that continue to have declining block  
3 rates.

4 Q. Please explain why you are recommending the  
5 elimination of declining block rates?

6 A. The Commission has embarked on an extensive  
7 energy efficiency program in its Energy  
8 Efficiency Portfolio Standard proceeding (EEPS).  
9 The long term goal of the State and Commission  
10 is to reduce electricity usage by 15% statewide  
11 by 2015. As the Commission recognized in its  
12 EEPS Order (Case 07-M-0548, issued June 23,  
13 2008), attaining this goal will ultimately  
14 moderate expected increases in average bills and  
15 the State's energy costs over time. Eliminating  
16 the declining block rate structure will help to  
17 support this policy by removing any incentive  
18 for customers to use more energy and pay less.

19 Q. Should all the classes that currently have  
20 declining block delivery rates be changed?

21 A. Yes. I propose that the Commission make changes  
22 to the SC1, SC2, SC7 and SC8 classes.  
23 Furthermore, the Commission should re-design the  
24 SC4, SC9 and SC12 rate classes.

1 Q. Before I ask you what these changes are, has the  
2 Company provided what the revised rates for each  
3 class would be if the declining blocks were  
4 eliminated?

5 A. Yes, in response to DPS-361 and DPS-449, Exhibit  
6 \_\_ (LAR-1), the Company provided the resulting  
7 rates and charges for the SC1, SC2, SC7, SC8,  
8 and the re-designed SC4, SC9 and SC12 rate  
9 classes, assuming a flat rate block structure  
10 instead of the existing declining block rate  
11 structure at the May 2009 rate level. As shown,  
12 the SC7 residential space heating class would  
13 continue to have declining block rate in the  
14 winter, the SC2 and SC9 rate classes would need  
15 a further study and the summer/winter  
16 differential for all classes would still exist.

17 Q. Please describe your proposed changes to the SC1  
18 class?

19 A. Under my proposed flat rate structure, SC1 would  
20 have the same flat rate of for all winter usage  
21 blocks and for the first 250 kilowatt hour (kWh)  
22 in the summer. For the summer, I propose the  
23 Commission maintain the current inclining block  
24 rate design for the summer block over 250 kWh.

1 This rate structure maintains the differential  
2 between summer and winter rates, thereby keeping  
3 summer rates higher than winter rates.

4 Q. Please describe your proposed changes to the SC7  
5 class.

6 A. Consistent with the current rate design  
7 methodology, the summer per kWh rates in SC7 for  
8 all usage blocks and SC7 winter rates for usage  
9 up to 360 kWh should be set identical to the  
10 redesigned SC1 Rate. The SC7 customer charge  
11 should remain equal to the SC1 customer charge.  
12 The remaining revenue requirement for SC7 should  
13 be allocated to the over 360 kWh winter  
14 declining block rate. While the intent of my  
15 proposed rate design is to remove all declining  
16 block rates, the elimination of this declining  
17 block would increase the SC7 customer's bills up  
18 to 10% in the winter, therefore I propose to  
19 phase-out the over 360 kWh usage winter  
20 declining block over a four year period. The  
21 effect of the four years phase-out is  
22 approximately 2% per year and is shown in  
23 response to DPS-450, Exhibit\_\_ (LAR-1).

24 Q. Please describe your proposed changes to the SC2

1 and SC9 classes.

2 A. I propose that the SC2 and SC9 winter rate per  
3 kWh be set to the same flat rate for all blocks  
4 and summer rate be set to the same flat rate for  
5 the summer usage blocks, while still maintaining  
6 the summer/winter differential. As the Company  
7 noted in its response to DPS-361, Exhibit \_\_  
8 (LAR-1), however, adoption of a flat rate  
9 structure in SC2 and SC9 classes requires  
10 further analysis to ensure that it does not lead  
11 to a perverse incentive for customers to switch  
12 back and forth between these two classes and to  
13 further examine the bill impacts of the high  
14 usage customers. I have had initial discussions  
15 with the Company on this issue and plan to  
16 continue those discussion after this testimony  
17 is filed. Based on these discussions and any  
18 further analysis completed by the Company, the  
19 Company should provide additional information in  
20 its rebuttal/update testimony. In addition, I  
21 could provide an update to my testimony on this  
22 issue at the hearings.

23 Q. What are the potential bill impacts on customers  
24 of eliminating the declining block rates?

1 A. In response to the DPS-361 and DPS-449,  
2 Exhibit\_\_ (LAR-1), the Company provided a summary  
3 and comparison of bills at the current rates and  
4 bills assuming a flat rate block rate structure,  
5 using the current rates.

6 Bill impacts for the SC1 rate class for the  
7 winter period range from a -0.6% decrease for a  
8 typical customer using 300 kWh to a 1.4%  
9 increase for high usage customers of 40,000 kWh.  
10 The bill impacts for the summer period range  
11 from a -0.6% decrease to a 0.9% increase  
12 respectively. The bill impacts for the SC7  
13 space heating rate class for the winter period  
14 range from a -0.2% decrease for a customer using  
15 10 kWh to a 0.2% increase for a high usage  
16 customer using 120,000 kWh. The bill impacts  
17 for the summer period range from a -0.2%  
18 decrease to a 0.9% increase respectively. The  
19 bill impacts for SC2, SC4&SC9, SC7, SC8 and SC  
20 12 could be found in the Company's responses to  
21 DPS-361, 449 and 450 (Exhibit\_\_ (LAR-1)).

22 Revenue Forecast

23 Q. Have you reviewed Con Edison's forecasted rate  
24 year revenues at current rate levels?

1 A. Yes. As reflected in Company Exhibit\_\_ (FP-8),  
2 page 3, the Company forecasts collecting \$4.057  
3 billion in T&D revenues during the rate year at  
4 current rate levels based on its sales forecast  
5 of 57,722 Gigawatt hours (GWhs).

6 Q. Does Staff propose a different sales forecast  
7 for Rate Year 1 (April 1, 2010 to March 31,  
8 2011)?

9 A. Yes. Staff witness Liu is proposing a sales  
10 forecast that is higher than the level of sales  
11 reflected in the Company's forecast by 148 GWhs.

12 Q. Have you developed an adjustment to the rate  
13 year revenues based on Staff's forecast of  
14 increased sales?

15 A. Yes. I estimated that the rate year revenues at  
16 current rates forecasted by the Company should  
17 be increased by \$11.02 million.

18 Q. Please explain how you arrived at your  
19 adjustment.

20 A. In response to DPS-1, Exhibit\_\_ (LAR-1), the  
21 Company provided a model that priced out the  
22 rate year revenues at current rates based on its  
23 forecasted customer and sales levels. I used  
24 this model to calculate the level of rate year

1 non-competitive delivery revenues that would be  
2 collected at current rates based on Staff's  
3 sales forecast. My adjustment does not reflect  
4 taxes. I provided my price-out of the increase  
5 in sales to the Staff Accounting Panel.

6 Plant in Service Model

7 Q. Please explain the Plant-in-Service forecast  
8 model?

9 A. The Company provided a detailed Plant-in-Service  
10 model in response to DPS-3 (Exhibit\_\_ (LAR-1)).  
11 The model included projections of the specific  
12 date when each individual capital project will  
13 go into service for the years 2009 through 2015.  
14 The Plant-in-Service model arrives at the  
15 projected average net plant and estimated  
16 monthly balances that serve as a basis for the  
17 rate year projections.

18 Q. Have you developed adjustments to the Plant-in-  
19 Service model?

20 A. Yes. Various staff witnesses examined the  
21 forecasted cost and projected in-service dates  
22 of each capital project proposed by Con Edison  
23 in this case. I was given specific adjustments  
24 to the capital expenditures from the Staff



1       Infrastructure Investment Panel, the Staff  
2       Electric Interference Panel, the Staff  
3       Accounting Panel and Mr. Insogna. I  
4       incorporated those adjustments into the Plant-  
5       in-Service model. The average net plant in-  
6       service for the twelve months ending March 31,  
7       2011 is \$15.5 billion, as shown in Exhibit\_\_  
8       (LAR-4). I provided the average net plant and  
9       depreciation expense to the Staff Accounting  
10      Panel to be used in Staff's Revenue Requirement  
11      Model. Exhibit\_\_ (LAR-5) shows specific the  
12      forecasted Plant-in-Service by category.

13    Q.   Does this conclude your testimony at this time?

14    A.   Yes.

