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Witnesses: Greg Campbell
Jeff Kijanka



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Liberty Utilities®

(U 933-E)

2019 General Rate Case

Before the California Public Utilities Commission

Chapter 6: Revenue Requirement, Sales, Revenue, and Customer Forecast

Tahoe Vista, California

November 30, 2018

Liberty CalPeco-06: Revenue Requirement

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I.

REVENUE REQUIREMENT

A. Proposed Revenue Requirement

Liberty CalPeco's requested revenue requirements for Test Years 2019 to 2021 incorporates its forecasts of Operating Expenses (namely, operations and maintenance ("O&M") and administrative and general ("A&G") expenses), Depreciation Expense, Income Taxes, Property Taxes, and Rate Base. These forecasts are detailed below. The following is a summary of the results of operations for test years 2019-2021 levels using a rate of the return of 7.79%. The results of operations for 2019 through 2021 are summarized in Table I-1 below.

Table I-1
Forecast California Operating Revenues and Expenses
(Revenues and Expenses \$000)

Line No.	Development of Return	Test Year 2019 Total Revenue Requirement	Test Year 2020 Total Revenue Requirement	Test Year 2021 Total Revenue Requirement	Line No.
1	Operating Revenues				1
2	Sales Revenue	81,860	87,769	92,560	2
3	Other Operating Revenue	691	691	691	3
4	Revenue Credits	1,362	1,362	1,362	4
5	Energy Efficiency (EE)	791	791	791	5
6	Solar Initiative Program (SIP)	985	985	985	6
7	Vegetation Management (VM)	4,000	4,000	4,000	7
8	Other Memo Accts	1,035	985	17	8
9	Total Operating Revenues	90,723	96,583	100,406	9
11	Operating Expenses				11
12	Fuel & Purchased Power	17,787	17,787	17,787	12
13	ECAC	0	0	0	13
14	Total Fuel & Purchased Power Expense	17,787	17,787	17,787	14
18	VM, CEMA, EE, SIP	6,811	6,761	5,793	15
15	Other O&M Expense	21,399	21,885	22,382	16
16	Total Operation & Maintenance	45,997	46,432	45,962	17
17	Depreciation & Amortization Expense	11,370	12,543	14,216	18
19	Taxes Other Than Income	4,994	5,183	5,404	19
20	Deferred Income Taxes	2,449	4,084	3,148	20
21	EADIT Amortization	(180)	(180)	(180)	21
22	Federal Income Tax	3,275	3,965	4,259	22
23	California Corporate Franchise Tax	1,511	1,776	2,024	23
24	Total Operating Expenses	69,415	73,804	74,833	24
25					25
26	Operating Income	21,309	22,779	25,572	26

B. Rate Base

Liberty CalPeco proposes \$273.6 million for its test year 2019 rate base in the California jurisdiction as shown below in Table I-2. This total primarily consists of plant-related rate base of \$421.9 million, and other than plant related items, including working cash, materials and supplies. The largest component of rate base is comprised of distribution plant items such as poles, overhead lines, underground lines, and transformers. As shown below, rate base is expected to increase to nearly \$328.5 million by end of test year 2021. The gross plant in service for the California jurisdiction is forecast to increase by approximately \$83 million, representing an approximate 19.7% increase from test year 2019

to 2021.

Table I-2
Total Proposed California Rate Base and Rate of Return
(\$000)

		Test Year 2019 Total Rate Base	Test Year 2020 Total Rate Base	Test Year 2021 Total Rate Base	Line No.
28	Rate Base				28
29	Gross Plant in Service	421,857	454,442	504,998	29
30	Accum Prov for Depr & Amort	(92,861)	(99,376)	(103,700)	30
31	Net Plant in Service	328,997	355,066	401,299	31
32					32
33	Additions				33
34	Construction Work In Progress	0	0	0	34
35	Materials & Supplies	4,547	4,795	4,824	35
36	Prepayments	935	986	992	36
37	Other Additions	0	0	0	37
38	Working Capital	482	497	511	38
39	Total Additions	5,965	6,278	6,328	39
40					40
41	Deductions				41
42	Customer Advances for Construction	(14,269)	(14,778)	(15,304)	42
43	Accumulated Deferred Income Tax	(18,469)	(23,401)	(31,208)	43
44	Other Deductions - COR & EADIT	(28,593)	(30,526)	(32,616)	44
45	Total Deductions	(61,331)	(68,705)	(79,127)	45
46					46
47	Rate Base	273,630	292,639	328,499	47
48					48
49	Rate of Return (%)	7.79%	7.78%	7.79%	49

1. Weighted Average Net Plant Balances

Liberty CalPeco's determination of 2019-2021 weighted average plant balances is based on the recorded 2018 plant-in-service balances as of August 2018.¹ Liberty CalPeco then took the estimated capital expenditures detailed in Mr. Jeff Matthews's direct testimony for projects closing through year-end 2021 to develop the forecast capital additions used in this General Rate Case filing.² The company utilized the capital additions and forecast retirement ratios to project monthly plant balances through the end of 2021.³ The plant balances were then used to forecast depreciation expenses⁴ and estimate the

¹ In addition, the company forecast the recorded CWIP balance to close in November 2018. See Table I-2.

² See workpapers.

³ See workpapers for retirement forecast percentages by FERC account. Retirement percentages are applied to forecast capital additions to determine the forecast retirement dollar amount. The retirement study was performed by the depreciation consultant, Gannett Flemming based on Liberty CalPeco's historic average retirements to capital additions activity.

⁴ Liberty CalPeco used authorized depreciation rates to calculate the 2018 depreciation expense. Proposed depreciation rates, discussed in Mr. Richard Clarke's workpapers, were used for test years 2019-2021.

1 reserve activity for the accumulated depreciation reserve balances.

2 **2. Net Capital Additions**

3 Net capital additions were developed using the capital expenditure forecast for the period and
4 estimated closing dates associated with each project. These additions include loaders for Allowances for
5 Funds Under Construction (AFUDC) and capitalized A&G expenses. The AFUDC rate applied to
6 capital expenditures was 3.22%.

7 **3. Depreciation Expense**

8 Table I-3 below displays the authorized and requested depreciation rates for Liberty CalPeco.

Table I-3
Proposed Depreciation Rates

Line No.	Depreciation Group Description	Authorized Rate	Proposed Rate
1			
2	302 CA Franchises & Consents		
3	303 CA Software	9.61%	9.39%
4	340.1 CA Land		
5	341 CA Structures & Imp	1.96%	1.91%
6	342 CA Fuel Hldrs, Prod & Acc	1.96%	1.92%
7	344 CA Generators	1.94%	1.89%
8	346 CA Misc Power Equipment	1.82%	1.76%
9	360.1 CA Land		
10	360.2 CA Land Rights	1.22%	0.56%
11	361 CA Structures & Imp	1.68%	1.75%
12	362 CA Station Equipment	1.39%	1.40%
13	364 CA Poles, Twrs & Fixtures	2.19%	2.31%
14	365 CA OH Cond & Devices	2.41%	2.59%
15	366 CA Underground Conduit	1.41%	1.41%
16	367 CA UG Cond & Devices	2.27%	2.53%
17	368 CA Line Transformers	1.77%	1.97%
18	369 CA Services	1.29%	1.53%
19	370 CA Meters	2.46%	2.28%
20	371 CA Installs Cust Premise	2.07%	2.51%
21	373 CA Street Lghy & SigSys	2.24%	2.38%
22	389 CA Land in Fee		
23	389 CA Land Rights	1.85%	1.35%
24	390 CA Structures & Imp	1.59%	1.63%
25	391 CA Office Furn & Equip	5.00%	5.00%
26	392.1 CA Autos	7.14%	5.83%
27	393 CA Stores Equipment	5.00%	5.00%
28	394 CA Tool, Shop & Garage Eq	4.00%	4.00%
29	396 CA Power Operated Equip	7.14%	1.92%
30	397 CA Communication Equip	6.67%	6.67%
31	398 CA Miscellaneous Equip		5.00%
32	* Life span procedure is used for Other Production with a 50 year life span		

1 **4. Weighted Average Accumulated Depreciation Reserve**

2 Accumulated depreciation is forecast to be \$93.5 million for the 2019 test year. Of the \$93.5
3 million, \$92.9 million is allocated to the California jurisdiction as shown in Table I-4 above. The
4 majority of the California jurisdiction's depreciation reserve is made up of intangible plant (\$5.5
5 million), other production (\$9.2 million), substation equipment (\$8.7 million), poles/towers/fixtures
6 (\$13.4 million), overhead conductors and devices (\$16.8 million), line transformers (\$11.3 million),
7 services (\$7.3 million), and general plant (\$4.7 million) accounts for the 2019 test year. Accounts
8 contributing to the increase from test year 2019 until the end of test year 2021 are software and solar
9 plant-related plant depreciation.

Table I-4
Forecast California Accumulated Depreciation Reserve for Test Years 2019-2021
(\$000)

FERC	Accumulated Depreciation Reserve	2019 Base Year California	2020 Test Year California	2021 Test Year California
	Intangible Plant			
302	302 Intang Plant-Franchise			
303	303 CA Software	5,531	6,508	7,534
	303 Software Solar Plant	3	4	5
	TOTAL INTANGIBLE	5,534	6,512	7,539
	Other Production			
340	340.1 CA Land	0	0	0
341-348	341 Structures & Imp	1,249	1,336	1,423
	341 Structures & Imp Solar Plant	703	1,224	1,769
	342 CA Fuel Hldrs,Prod & Acc	13	16	19
	344 CA Generators	2,505	2,674	2,843
	344 Generators Solar Plant	2,307	3,262	4,217
	345 Accessory Equip. Solar Plant	1,071	1,514	1,957
	345 Accessory Equip. Solar Plant (20 YR)	1,133	1,602	2,071
	346 CA Misc Power Equipment	63	66	70
	346 Misc. Power Equip Solar Plant	153	216	279
	348 Energy Storage Equipment	8	417	1,593
	TOTAL OTHER	3,838	4,509	5,947
	TOTAL SOLAR	5,367	7,818	10,293
	TOTAL PRODUCTION	9,205	12,327	16,240
	Distribution Plant			
360	360.1 CA Land	0	0	0
361	360.2 CA Land Rights	940	947	955
362	361 CA Structures & Imp	(176)	(131)	(85)
364	362 CA Station Equipment	8,701	8,970	9,250
365	364 CA Poles,Twrs & Fixtures	13,427	14,602	15,871
366	365 CA OH Cond & Devices	16,831	17,621	18,327
367	366 CA Underground Conduit	4,035	4,208	4,376
368	367 CA UG Cond & Devices	4,955	5,591	5,912
369	368 CA Line Transformers	11,254	11,826	12,413
370	369 CA Services	7,330	6,831	6,288
371	370 CA Meters	4,518	3,471	(557)
373	371 CA Installs Cust Premise	1,011	1,014	1,008
	373 CA Street Lighy & SigSys	539	551	562
	TOTAL DISTRIBUTION	73,366	75,500	74,320
	Regional Transmission			
382	Computer Hardware	8	23	38
383	Computer Software	40	120	200
384	Communication Equipment	13	39	66
	TOTAL TRANSMISSION	61	182	304
	GENERAL PLANT			
389	389 CA Land in Fee	0	0	0
389-399	389 CA Land Rights	26	28	29
	390 CA Structures & Imp	2,104	2,203	2,330
	391 CA Office Furn & Equip	577	667	761
	392.1 CA Autos	773	367	211
	393 CA Stores Equipment	47	68	88
	394 CA Tool,Shop & Garage Eq	141	176	212
	396 CA Power Operated Equip	419	429	439
	397 CA Communication Equip	587	894	1,202
	398 CA Miscellaneous Equip	22	23	24
	TOTAL GENERAL	4,696	4,856	5,296
	TOTAL PLANT IN SERVICE	92,861	99,376	103,700

1. Other Rate Base

Other rate base forecast results are shown below. Total additions are set to remain fairly constant increasing from \$6 million to \$6.3 million from 2019 to 2021. As mentioned below, liberalized depreciation is forecast to have a large effect reducing the CalPeco rate base looking ahead. As a result, nearly \$18 million will be reduced from the CalPeco rate base from the 2019 test year until the end of 2021.

Table I-5
Forecast California Other Rate Base
(\$000)

	2019 Test Year	2020 Test Year	2021 Test Year
	Total	Total	Total
Additions to Rate Base			
Materials & Supplies	4,547	4,684	4,824
Prepayments	935	963	992
Cash Working Capital	482	497	511
Total Additions	5,965	6,144	6,328
Deductions to Rate Base			
Customer Advances for Construction	(14,269)	(14,778)	(15,304)
Accumulated Deferred Income Taxes			
Liberalized Depreciation	(12,935)	(18,020)	(25,978)
Excess ADIT	(5,534)	(5,382)	(5,229)
CIAC & Customer Advances	0	0	0
Uncollectibles Reserve	0	0	0
TOTAL	(18,469)	(23,401)	(31,208)
Other Deductions			
Customer Advances - Tax Gross-Up	(2,673)	(2,774)	(2,879)
CIAC - Tax Gross-Up	0	0	0
Uncollectibles	(160)	(165)	(170)
Cost of Removal	(25,760)	(27,587)	(29,567)
TOTAL	(28,593)	(30,526)	(32,616)
TOTAL DECUCTION RATE BASE	(61,331)	(68,705)	(79,127)

2. Accumulated Deferred Taxes – Plant, ITC, and CIAC

Accumulated Deferred Income Taxes reflects the net of Liberty CalPeco's deferred tax assets and liabilities. Deferred tax assets are determined from net operating losses (NOL's) and deferred tax liabilities from federal and state liberalized depreciation. The balances also include accumulated excess deferred taxes resulting from the new federal income tax rate enacted in the 2017 Job and Tax Cut Act. Accumulated excess deferred income taxes are amortized over the weighted average remaining life of plant assets.⁵ For 2019 test year, Liberty CalPeco's California jurisdiction forecasts (\$18.47 million) as shown in Table I-5 above. This amount is forecast to increase to (\$25.98 million) by the end of test year 2021.

a) Customer Advances

Customer Advances represents the 2019 forecast of customer advances are set to be estimated at approximately \$2.67 million, and to steadily increase to close to \$2.9 million by test year 2021.

b) Materials and Supplies

Liberty CalPeco forecast \$4.55 million to be allocated to the California jurisdiction. This amount will gradually rise to approximately \$4.82 million by test year 2021.

c) Prepayments

Liberty CalPeco's forecast California jurisdiction will be allocated \$0.94 million of the total. The largest components of the prepayments are property taxes (\$0.46 million), injuries and damages (\$0.12 million), and miscellaneous (\$0.15 million).

d) Working Cash

Working cash is projected to be approximately \$0.48 million allocated to the California jurisdiction. This amount will remain relatively constant being forecast forward with the forecast projecting working cash of roughly \$0.51 million in the 2021 test year.

⁵ Amortization is reflected as a reduction to expenses in the Taxes Other Than Income section. See workpapers.

e) Deductions – Customer Advances for Construction, Liberalized Depreciation, Customer Advances tax gross-up, CIAC tax gross-up, Uncollectables, Cost of Removal

Forecast deductions to rate base for the test year 2019 are estimated to be \$61.3 million in the California jurisdiction. Looking ahead, the company projects more deductions to rate base totally \$79.1 million by the end of test year 2021.

f) Further Tax Discussion

Liberty CalPeco currently pays Property Taxes in California and Nevada. California tax was calculated using final 2017 enrollment and escalated with a 3 year average and other adjustments. California adjustment weightings are applied, and then county property splits and local tax rates are used. Liberty also pays property taxes at its solar generation facility in Luning, Nevada. These taxes were forecasted based on 2017 assessments and local rates.

Payroll Taxes are the combination of forecasted wages and applicable payroll tax rates. City and County Franchise Taxes are based on existing franchise agreements. Deferred Income Taxes are the portion of Income Tax Expense arising from the change in Liberty's estimated deferred tax liability.

The calculation for Federal Income Taxes begins at Book Income before Federal Income Tax and Book Depreciation. Federal tax adjustments such as depreciation, repair deduction, and state income tax are then made to arrive at Federal Taxable Net Income. This figure is then multiplied by the current federal tax rate of 21% to determine current Federal Income Tax. State of California Income Taxes begin with the same figure as above and are adjusted by California depreciation to arrive at California Taxable Net Income. This figure is then multiplied by the current California tax rate of 8.84% to determine California Corporate Franchise Tax.

Accumulated Deferred Income Taxes reflect the net of Liberty Utilities deferred tax assets and liabilities. Deferred tax assets arise from net operating losses (NOLs) and deferred tax liabilities arise from federal and state liberalized depreciation. They also include accumulated excess deferred taxes arising from the now lower federal income tax rate enacted in the 2017 Job and Tax Cut Act.

Accumulated excess deferred income taxes are amortized over the weighted average remaining life of plant assets. Amortization is reflected as a reduction to expenses in the Taxes Other Than Income section.

C. Ratemaking Overview

Liberty CalPeco's proposed revenue requirement also includes costs for programs outside of the regular O&M costs, such as vegetation management and public purpose programs discussed by Mr. Eliot Jones in Chapter 4 and Mr. Olijar in Chapter 5. These program costs are tracked in balancing accounts, as described below.

1. Vegetation Management Balancing Account ("VMBA")

Liberty CalPeco's VMBA records the difference between the authorized and recorded expenses associated with Liberty CalPeco's Vegetation Management program, which is discussed in Chapter 4. Liberty CalPeco's authorized annual expenses for this program is \$2.523 million. Liberty CalPeco has requested an increase in annual spending to \$4.000 million per year.

2. Energy Efficiency Balancing Account ("EEBA")

Liberty CalPeco's EEBA records the difference between the authorized and recorded expenses associated with Liberty CalPeco's Energy Efficiency program, which is discussed in Chapter 5. Liberty CalPeco's authorized annual expenses for this program is \$0.471 million. Liberty CalPeco has requested an increase in annual spending to \$0.791 million per year.

3. Solar Initiative Program Balancing Account ("SIPBA")

Liberty CalPeco's SIPBA records the difference between the authorized and recorded expenses associated with Liberty CalPeco's Solar Initiative program, which is discussed in Chapter 5. Liberty CalPeco's authorized annual expenses for this program is \$0.371 million. Liberty CalPeco has requested an increase in annual spending to \$0.985 million per year.

1 II.

2 **SALES, CUSTOMER, AND REVENUES FORECASTS**

3 **A. Sales and Customers Forecast**

4 Ken Parris of Business Economic Analysis and Research develops Liberty CalPeco's sales and
5 customer forecasts. Mr. Parris has over 38 years of experience in the utility industry and has been the
6 Principal of Business Economic Analysis and Research since 1985.

7 Mr. Parris used the following methodology to forecast sales for Liberty CalPeco:

- 8 1. For the residential and commercial rate classes, Mr. Parris used historic calendar
9 month customer class billing data to develop monthly use and customer counts by
10 class. Using billing period start and end dates, Mr. Parris calculated daily use for
11 each customer and then totaled daily use by calendar month for all retail
12 customers. He then used these usage and customer counts to develop customer
13 and usage models specific to each rate group and converted the total monthly
14 calendar use to use per customer.
- 15 2. Mr. Parris developed class specific sales and customer forecasts using the results
16 from customer and use-per-customer regression models for each rate class.
- 17 3. The first regression model forecasts the number of customers by class (existing
18 and proposed) in the service territory. The regression model projects future
19 customer counts based on a time trend of customer growth. The actual customer
20 class-specific forecast then applies the monthly growth in new customers to the
21 existing customer count for each customer class.
- 22 4. The second regression model forecasts the use per customer for each customer
23 class. Several variables factor into the use-per-customer model including:

- monthly intercept adjustments,
- heating degree days (“HDD”),
- cooling degree days (“CDD”), and
- a time trend to capture changes in market conditions due to new technologies and energy conservation.

5. These two regression models (the customer forecast by class and the use-per-customer) are combined and used to estimate the total sales forecast for the forecast years.

6. In addition, Liberty CalPeco developed sales forecasts for the irrigation, outside lighting, and street lighting customer classes based on the recorded data of average sales by month for the 2015-2017 time period.

B. Revenue Forecast

Liberty CalPeco forecast total revenues of \$84 million in the 2019 Test Year for its California jurisdiction. In addition to retail sales to its customers, and cost recovery in rates from targeted programs such as Energy Efficiency and the Solar Incentive Program, Liberty CalPeco also derives revenues from wholesale customers, the Distribution Capacity Agreement (“DCA”), and the Emergency Backup Services Agreement (“EBSA”). The revenue forecast by customer class will be part of Phase II of this General Rate Case. Liberty CalPeco forecast revenues from wholesale customers in 2019 of \$0.61 million based upon Mr. Parris’ forecasted energy usage projection multiplied by the average energy usage rate charged to our wholesale customers in 2017.

Under the DCA, Liberty CalPeco allows NV Energy to use a small amount of capacity on Liberty CalPeco’s distribution facilities to serve a small number of NV Energy’s retail electric customers in Nevada and near the California and Nevada border. NV Energy requested that Liberty CalPeco provide this service as it can more cost-effectively to serve these customers by having its power flow into California and on to Liberty CalPeco’s facilities and then having the energy flow back into the

1 NV Energy facilities in Nevada. Both the Commission and FERC approved the DCA between the
2 parties.⁶ Liberty CalPeco forecasts DCA revenues in 2019 of \$47,000 based on forecasted throughput.
3 Liberty CalPeco forecasts revenues from EBSA to be on the order of \$1.33 million for the 2019 test
4 year. The EBSA revenues are a function of NV Energy supporting CalPeco's system costs during
5 backup generating hours when the company runs its backup diesel generators.

⁶ See, D.10-10-017, mimeo at 47-48, 58-59 (Findings of Fact 34, 39) 62 (Conclusions of Law 16), and 63 (Ordering Paragraph 2). See also, December 7, 2010 FERC Letter order accepting Liberty CalPeco's November 10, 2010 filing of the executed DCA and a Reliability Support Agreement with Sierra Pacific Power Company in Docket No. ER11-2081; see also D.11-02-015, mimeo at 4-6 (Findings of Facts 1-3; Ordering Paragraph 1).

Appendix A
Witness Qualifications

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC
QUALIFICATIONS AND PREPARED TESTIMONY
OF GREG CAMPBELL

Q. Please state your name and business address for the record.

A. My name is Greg Campbell and my business address is 9750 Washburn Rd., Downey, California 90241.

Q. Briefly describe your present responsibilities at Liberty Utilities (CalPeco Electric) LLC.

A. I am currently a Sr. Rate Analyst for Liberty Utilities (CalPeco Electric) LLC, ("Liberty CalPeco") and am responsible for Liberty CalPeco's rate and regulatory affairs including but not limited to compliance, applications, and risk management and mitigation.

Q. Briefly describe your educational and professional background.

A. I graduated from Michigan State University in 2005 with a Bachelor of Arts Degree in Economics, and received a Master's of Science Degree in Economics from the University of Illinois at Urbana-Champaign in 2007. I have held a variety of positions within the Electric Utility Industry including positions with DTE Energy, the Maryland Public Service Commission, Tacoma Power, and Liberty CalPeco.

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

A. The purpose of my testimony in this proceeding is to present the cost basis for Liberty CalPeco's rate increase pertinent to the company's revenue requirement, purchased power, fuel cost, Energy Cost Adjustment Clause ("ECAC"), sales, revenue and customer forecast, and Greenhouse Gas ("GHG") Rate adjustment.

Q. Was this material prepared by you or under your supervision?

A. Yes, it was.

Q. Insofar as this material is factual in nature, do you believe it to be correct?

A. Yes, I do.

Q. Insofar as this material is in the nature of opinion or judgement, does it represent your best judgement?

1 A. Yes, it does.

2 Q. Does this conclude your qualifications and prepared testimony?

3 A. Yes, it does.

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC
QUALIFICATIONS AND PREPARED TESTIMONY
OF JEFF KIJANKA

Q. Please state your name and business address for the record.

A. My name is Jeff Kijanka and my business address is 701 National Avenue, Tahoe Vista, California 96148.

Q. Briefly describe your present responsibilities at Liberty Utilities (CalPeco Electric) LLC.

A. I am currently the Manager of Finance. I am responsible for all aspects of Finance and Accounting for Liberty Utilities (CalPeco Electric) LLC.

Q. Briefly describe your educational and professional background.

A. I hold a Bachelor of Science Degree in Accounting with emphasis in Business Law from the Pennsylvania State University. I have over 20 years of Finance and Accounting experience in various industries ranging from Travel and Leisure to Smart Meter Engineering firms.

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

A. The purpose of my testimony in this proceeding is to sponsor Chapter 6 – Revenue Requirement, Sales, Revenue, and Customer Forecast.

Q. Was this material prepared by you or under your supervision?

A. Yes, it was.

Q. Insofar as this material is factual in nature, do you believe it to be correct?

A. Yes, I do.

Q. Insofar as this material is in the nature of opinion or judgement, does it represent your best judgement?

A. Yes, it does.

Q. Does this conclude your qualifications and prepared testimony?

A. Yes, it does.