



REDACTED

**STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION**

Docket No. DE 15-010

Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities
Energy Service for the Period May 1, 2015 to October 31, 2015

**DIRECT TESTIMONY
OF
HEATHER M. TEBBETTS**

March 23, 2015

1 **I. Introduction and Qualifications**

2 **Q. Please state your full name, business address and position.**

3 A. My name is Heather M. Tebbetts and my business address is 15 Buttrick Road,
4 Londonderry, NH 03053. I am a Utility Analyst for Liberty Energy Utilities (New
5 Hampshire) Corp. (“Liberty Energy NH”) which provides services to Liberty Utilities
6 (Granite State Electric) Corp. (“Granite State” or “the Company”) and in this capacity, am
7 responsible for providing rate-related services for the Company.

8 **Q. Please describe your educational background and training.**

9 A. I graduated from Franklin Pierce University in 2000 with a Bachelor of Science degree in
10 Finance. I received a Master’s of Business Administration from Southern New Hampshire
11 University in 2007.

12 **Q. Please describe your professional background.**

13 A. In October of 2014, I joined Liberty Energy NH as a Utility Analyst. Prior to my
14 employment at Liberty Energy NH, I was employed by Public Service Company of New
15 Hampshire (“PSNH”) as a Senior Analyst in NH Revenue Requirements from 2010 to
16 2014. Prior to my position in NH Revenue Requirements, I was a Staff Accountant in
17 PSNH’s Property Tax group from 2007 to 2010, and a Customer Service Representative
18 III in PSNH’s Customer Service Department from 2004 to 2007.

19 **Q. Have you previously testified before the New Hampshire Public Utilities**
20 **Commission (“the Commission”)?**

1 A. Yes, I have testified on numerous occasions before the Commission.

2 **II. Purpose of Testimony**

3 **Q. What is the purpose of your testimony?**

4 A. The purpose of my testimony is to present Granite State’s proposed Energy Service rates,
5 including adjustment factors, for service rendered on and after May 1, 2015, in
6 accordance with the Energy Service Adjustment Provision (“ESAP”) and Energy Service
7 Cost Reclassification Adjustment Provision of the Company’s retail delivery tariff on file
8 with the Commission (“Retail Delivery Tariff”) and the Settlement Agreement in Docket
9 No. DE 05-126 approved by the Commission in Order No. 24,577 (January 13, 2006)
10 (“Settlement Agreement”)¹. My testimony also presents the results of: (i) the
11 reconciliation of Energy Service power supply expense and applicable revenue for the
12 period of February 2014 through January 2015 (“Energy Service Reconciliation”); (ii) the
13 reconciliation of the Company’s cost of complying with its remaining 2013 and actual
14 and projected 2014 Renewable Portfolio Standard obligations and the applicable revenue
15 for the period of January 2014 through December 2014 (“Renewable Portfolio Standard
16 Reconciliation”); and (iii) the reconciliation of the administrative cost of providing
17 Energy Service and the applicable revenue for the period February 2014 through January
18 2015 (“Energy Service Cost Reclassification Adjustment Factor (“ESCRAF”)
19 Reconciliation”). Additionally, this filing presents the Company’s final reconciliation
20 relating to its 2013 Energy Service adjustment factor as well as the status of the

¹ The Order granted Granite State’s August 1, 2005 Petition for Post-Transition Service Default Service Proposal as amended by the Post-Transition Service Default Service Proposal Settlement Agreement filed with the Commission on November 18, 2005. Granite State’s original proposal filed August 1, 2005 and the subsequent settlement agreement will together be referred to as the “Settlement Agreement” throughout my testimony.

1 reconciliation relating to its 2014 Energy Service adjustment factor².

2 **Q. Please summarize the proposed Energy Service rates resulting from the Energy**
3 **Service procurement, adjusted by the factors which Granite State is proposing to**
4 **implement for service rendered on and after May 1, 2015.**

5 A. As I describe in more detail later in my testimony, Granite State proposes to implement
6 the following Energy Service rates beginning May 1, 2015, for service rendered on and
7 after that date:

	Residential and Small C&I	Medium & Large C&I					
	May - October 2015	May	Jun	Jul	Aug	Sep	Oct
Base Energy Service Rate	5.954 ¢	4.995¢	5.705 ¢	6.830 ¢	6.106 ¢	5.741 ¢	6.124 ¢
2014 Energy Service Adjustment Factor	0.576 ¢	0.576 ¢	0.576 ¢	0.576 ¢	0.576 ¢	0.576 ¢	0.576 ¢
Energy Service Cost Reclassification Adjustment Factor	0.142 ¢	0.011 ¢	0.011 ¢	0.011 ¢	0.011 ¢	0.011 ¢	0.011 ¢
Border Sales Settlement Adjustment Factor	(0.104) ¢	(0.104) ¢	(0.104) ¢	(0.104) ¢	(0.104) ¢	(0.104) ¢	(0.104) ¢
Renewable Portfolio Standard (“RPS”) Adder	0.358 ¢	0.358 ¢	0.358 ¢	0.358 ¢	0.358 ¢	0.358 ¢	0.358 ¢
Total Energy Service Rate	6.926 ¢	5.836 ¢	6.546 ¢	7.671 ¢	6.947 ¢	6.582 ¢	6.965 ¢

8 The Energy Service rates which the Company proposes to bill its customers receiving
9 Energy Service are also provided in Schedules HMT-1 and HMT-2.

10 **Q. Please provide the list of schedules attached to your testimony.**

11 A. Schedule HMT-1 Calculation of Large Customer Group Proposed Energy Service
12 Rates
13 Schedule HMT-2 Calculation of Small Customer Group Proposed Energy Service
14 Rates
15 Schedule HMT-3 Energy Service Reconciliation

² The orders approving the 2013 and 2014 Default Service adjustment factors were Order No. 25,476 (March 22, 2013) and Order No. 25,642 (March 27, 2014).

1	Schedule HMT-4	Renewable Portfolio Standard Reconciliation
2	Schedule HMT-5	2013 Energy Service Adjustment Factor Reconciliation
3	Schedule HMT-6	2014 Energy Service Adjustment Factor Reconciliation
4	Schedule HMT-7	Calculation of Proposed 2015 Energy Service Adjustment Factor
5	Schedule HMT-8	Energy Service Cost Reclassification Adjustment Factor
6		Reconciliation
7	Schedule HMT-9	Calculation of Proposed Energy Service Cost Reclassification
8		Adjustment Factors
9	Schedule HMT-10	Border Sales Settlement Adjustment Factor
10	Schedule HMT-11	Bill Impacts
11	Schedule HMT-12	Tariff Page 68 Summary of Rates
12	Schedule HMT-13	Quarterly Customer Migration Report

13 **III. Base Energy Service Rates**

14 **Q. What are the “base” Energy Service rates that the Company is proposing for service**
15 **rendered on and after May 1, 2015?**

16 A. Consistent with the Settlement Agreement, Granite State is proposing a fixed six-month
17 base Energy Service rate for the period May – October 2015 for the Residential and Small
18 Commercial Customer Group³ (“Small Customer Group”) based on the weighted average
19 of the six monthly contract prices contained in the supply agreement with the winning
20 Energy Service supplier for the Small Customer Group. As shown on line 21 of Schedule
21 HMT-2, the proposed Energy Service rate for the Small Customer Group is 6.876¢ per
22 kWh. The Company is also proposing monthly Energy Service rates for the Medium and
23 Large Commercial and Industrial Customer Group⁴ (“Large Customer Group”) based on
24 the six monthly contract prices contained in the supply agreement with the winning
25 Default Service supplier for the Large Customer Group. As shown on line 17 of
26 Schedule HMT-1, page 1, the proposed base Energy Service rates for the Large Customer

³ Customers taking service under Domestic Service Rate D; Domestic Service - Optional Peak Load Pricing Rate D-10; Outdoor Lighting Service Rate M; Limited Total Electrical Living Rate T; General Service Rate G-3; or Limited Commercial Space Heating Rate V of the Company’s Retail Delivery Tariff.

⁴ Customers taking service under General Long-Hour Service Rate G-2 or General Service Time-Of-Use Rate G-1 of

1 Group are 5.836¢ per kWh, 6.546¢ per kWh, 7.671¢ per kWh, 6.947¢ per kWh, 6.582¢
2 per kWh, and 6.965¢ per kWh for the months of May 2015 through October 2015,
3 respectively.

4 **IV. Reconciliations and Adjustment Factors Energy Service Adjustment Provision**

5 **Q. Please summarize the Company's obligations under the Company's ESAP.**

6 A. Pursuant to the Company's ESAP, on an annual basis, the Company performs its Energy
7 Service Reconciliation (power supply reconciliation) and Energy Service Cost
8 Reclassification Adjustment Factor Reconciliation (reconciliation of administrative costs
9 of providing Energy Service). The Company performs these reconciliations in order to
10 set factors that adjust its Energy Service rates and ensure that it recovers only the costs it
11 actually incurs to provide Energy Service to its customers, no more and no less.

12 In the Energy Service Reconciliation, the Company reconciles its power supply cost of
13 providing Energy Service with its Energy Service revenue associated with the recovery of
14 power supply costs. The excess or deficiency resulting from that reconciliation, including
15 interest at the interest rate paid on customer deposits, is returned to, or recovered from, all
16 Energy Service customers over the following 12 months through the Energy Service
17 adjustment factor. For purposes of this reconciliation, Energy Service revenue means all
18 revenue collected from Energy Service customers through the Energy Service rate for the
19 applicable twelve-month reconciliation period. The power supply cost of providing
20 Energy Service means all payments to suppliers and the Independent System Operator
21 associated with the provision of Energy Service. The power supply costs are partially

1 offset by the Regional Greenhouse Gas Initiative (RGGI) credits the Company receives.

2 In addition, New Hampshire's Electric Renewable Portfolio Standard ("RPS") statute,
3 RSA 362-F, requires providers of electric service to either purchase a portion of their
4 power from renewable sources through the acquisition of renewable energy certificates
5 ("RECs") or, if RECs are not available, make specified alternative compliance payments
6 ("ACPs") to the State renewable energy fund created by the RPS law. Accordingly,
7 power supply costs also include payments to suppliers of RECs as well as any ACP that
8 the Company makes to meet RPS obligations. As I describe later in my testimony, the
9 Company performs a separate reconciliation of the costs for complying with its RPS
10 obligations, which is included in the Energy Service adjustment factor.

11 In the Energy Service Cost Reclassification Adjustment Factor Reconciliation, the
12 Company reconciles the administrative costs associated with providing Energy Service
13 with the Energy Service revenue associated with the recovery of administrative costs.
14 Pursuant to the Energy Service Cost Reclassification Adjustment Provision, the excess or
15 deficiency resulting from that reconciliation, including interest at the interest rate paid on
16 customer deposits, is then reflected in the subsequent year's ESCRAF. Administrative
17 costs of providing Energy Service means the sum of all labor and consultant costs in
18 arranging for and administering the provision of Energy Service, any payments related to
19 the cost of providing contract security (i.e., collateral or other credit enhancements),
20 Energy Service-related working capital cost, and Energy Service-related bad debt (i.e.,
21 uncollectible account expense) cost. Revenue associated with the recovery of

1 administrative costs means the revenue generated from the ESCRAFs.

2 **Energy Service Reconciliation**

3 **Q. Is the Company presenting a reconciliation of power supply costs for Energy Service**
4 **in this filing?**

5 A. Yes. The Energy Service Reconciliation for the period February 2014 through January
6 2015 is presented in Schedule HMT-3.

7 **Q. Please explain the Energy Service Reconciliation in detail.**

8 A. Schedule HMT-3, page 1, presents the actual reconciliation of Energy Service revenue
9 and Energy Service expense by month. The detail behind each month's Energy Service
10 revenue is included on page 2 of Schedule HMT-3. The detail behind each month's
11 Energy Service expense is shown on page 3 of Schedule HMT-3. The source of the
12 Energy Service expense on page 3 is each month's invoice from the Energy Service
13 providers.

14 **Q. Is this filing's Energy Service Reconciliation prepared in the same manner as the**
15 **Energy Service reconciliation that was filed with the Commission last year?**

16 A. Yes. The current reconciliation is prepared in the same manner as the Energy Service
17 reconciliation filed with the Commission last year in Docket No. DE 14-031.

18 **Q. In Schedule HMT-3, why is the Company subtracting amounts from Energy Service**
19 **revenue for the Renewable Portfolio Standard adder revenue?**

1 A. Any revenue relating to the RPS compliance adder must be reconciled separately from
2 Energy Service revenue. To perform this separate reconciliation, the revenue for RPS
3 compliance is subtracted from the total Energy Service revenue billed to customers in
4 order to properly reflect the base Energy Service revenue for the current reconciliation
5 period. As indicated in Mr. Warshaw's pre-filed testimony, the RPS compliance adder is
6 the incremental charge associated with meeting the RPS obligation associated with the
7 Energy Service obligation. Accordingly, the Company has calculated the revenue relating
8 to the Small Customer Group RPS compliance adder and the Large Customer Group RPS
9 compliance adder and removed these components of revenue from the total Energy
10 Service revenue billed. The revenue amounts related to the RPS compliance adders are
11 included in the Renewable Portfolio Standard Reconciliation discussed below.

12 **Q. What is the result of the Company's Energy Service Reconciliation for the period**
13 **ending January 2015?**

14 A. The Company has an under recovery of Energy Service power supply costs of \$4,024,071
15 and will reflect this under recovery in its proposed Energy Service adjustment factor to
16 take effect May 1, 2015. The under recovery is primarily due to a timing difference
17 between the flat rate the Company is charging residential and small commercial
18 customers and the month in which they are being served. The flat rate to serve customers
19 in higher priced months requires the Company to pay more to suppliers than we are
20 receiving in revenues. The lower priced months provides higher revenues to the
21 Company to offset the lower revenues in the higher priced months.

1 **Renewable Portfolio Standard Reconciliation**

2 **Q. Is the Company presenting a reconciliation of the cost of complying with the**
3 **Renewable Portfolio Standard obligation in this filing?**

4 A. Yes. The Renewable Portfolio Standard Reconciliation for the period January 2014
5 through January 2015 is presented in Schedule HMT-4.

6 **Q. Please explain the Renewable Portfolio Standard Reconciliation in detail.**

7 A. Schedule HMT-4, page 1, presents the actual reconciliation of RPS compliance adder
8 revenue and expense by month. The RPS compliance adder revenue collected from
9 Energy Service customers during January through December 2014 is presented on page 2
10 of Schedule HMT-4. The RPS Obligation Expense for 2014 is presented on page 3 of
11 Schedule HMT-4. Based on actual revenue collected for the period January through
12 December 2014 and actual expenses incurred during 2014, the ending balance as of
13 December 2014 is an over recovery of \$1,211,648. Pursuant to Section 362-R:8 of the
14 RPS statute, the Company has until July 1, 2015 to procure its 2014 RPS obligation and
15 thus has not yet incurred all of the expense to meet that obligation. The Company has
16 provided an estimate of the remaining expense to meet the 2014 RPS obligation which is
17 reflected in June 2015 on Schedule HMT-4. The estimate of remaining expense includes
18 the cost of 2014 RECs under contract but not yet delivered as well as an estimate of the
19 remaining 2014 obligation volumes still to be procured valued at the estimated market
20 price for each NH RPS class. As presented in Schedule HMT-4, the Company has a
21 projected over recovery of RPS expense of \$599,755.

1 **Q. How is the Company proposing to treat the projected over recovery of RPS**
2 **expense?**

3 A. The Company is proposing to combine the over recovery of Energy Service power supply
4 costs with the projected RPS expense under recovery in the calculation of the proposed
5 2015 Energy Service adjustment factor.

6 **Reconciliation of the 2013 Energy Service Adjustment Factor**

7 **Q. Is the Company including in this filing the final results of the under recovery that**
8 **was collected through the Energy Service adjustment factors that were implemented**
9 **as of May 2013?**

10 A. Yes. The result of the recovery through the 2013 Energy Service adjustment factor is
11 presented in Schedule HMT-5.

12 **Q. What does Schedule HMT-5 illustrate?**

13 A. Schedule HMT-5 indicates that of the \$2,113 remaining refund from the February 2012
14 through January 2013 reconciliation period that was to be recovered through the 2013
15 Energy Service adjustment factor, \$512,892 was collected from customers through April
16 2014. The over recovered balance of \$2,113 including adjustments for borderline sales
17 and interest, is reflected in the Energy Service Reconciliation as an adjustment in May
18 2014.

19 **Reconciliation of the 2014 Energy Service Adjustment Factor**

20 **Q. Is the Company including in this filing the status of the over collection refunded**

1 **through the Energy Service adjustment factor that was approved for**
2 **implementation on May 1, 2014?**

3 A. Yes. The result of the refund through the 2014 Energy Service adjustment factor is
4 presented in Schedule HMT-6.

5 **Q. What does Schedule HMT-6 illustrate?**

6 A. Schedule HMT-6 indicates that of the \$761,961 over-recovery from the February 2013
7 through January 2014 reconciliation period that was to be refunded through the 2014
8 Energy Service adjustment factor, \$430,216 has been refunded to customers through
9 February 2015, with the remaining over recovery to be refunded to customers by the end
10 of April 2015. Any remaining balance, either positive or negative, will be reflected in
11 next year's Energy Service Reconciliation as an adjustment in May 2016.

12 **Proposed 2015 Energy Service Adjustment Factor**

13 **Q. Is the Company proposing to implement a 2015 Energy Service adjustment factor**
14 **beginning May 1, 2015?**

15 A. Yes. The Company proposes an Energy Service adjustment factor of 0.576 ¢ per kWh as
16 calculated in Schedule HMT-7. This schedule takes both the Energy Service under
17 recovery from Schedule HMT-3 (covering the period February 2014 through January
18 2015) and the estimated RPS under recovery from Schedule HMT-4 (covering the period
19 January 2014 through June 2015), projects accrued interest during the recovery period
20 assuming monthly recovery amounts, and divides the balance including interest by an
21 estimate of the kWh deliveries attributable to Energy Service customers for the period

1 from May 2015 through April 2016.

2 **Q. How would this factor be implemented?**

3 A. The Energy Service adjustment factor would become effective for service rendered on
4 and after May 1, 2015, the same date that the other rates proposed in this filing are
5 proposed to become effective. The proposed Energy Service adjustment factor would be
6 combined with the base Energy Service rates for billing.

7 **V. Energy Service Cost Reclassification Adjustment Factor Reconciliation**

8 **Q. Please describe the reconciliation of the administrative costs of providing Energy**
9 **Service.**

10 A. As stated earlier, pursuant to the Company's ESAP, the Company must reconcile its
11 administrative cost of providing Energy Service with its Energy Service revenue
12 associated with the recovery of administrative costs; and the excess or deficiency
13 resulting from that reconciliation, including interest at the interest rate paid on customer
14 deposits, must be reflected in the subsequent year's ESCRAF.

15 **Q. Is the Company presenting a reconciliation of administrative costs of providing**
16 **Energy Service with its Energy Service revenue associated with the recovery of**
17 **administrative costs in this filing?**

18 A. Yes. The ESCRAF Reconciliation for the period February 2014 through January 2015 is
19 presented in Schedule HMT-8.

20 **Q. Please explain the ESCRAF reconciliation in detail.**

1 A. Schedule HMT-8, page 1, presents the actual reconciliation of ESCRAF revenue and
2 administrative expense by month. The detail behind each month's ESCRAF revenue is
3 included on page 1 of Schedule HMT-8. The detail behind each month's ESCRAF
4 administrative expense is shown on page 2 of Schedule HMT-8. The calculation of the
5 cash working capital impact is presented on pages 3 and 4 of Schedule HMT-8.

6 **Q. Has the Company calculated the cash working capital impact consistent with prior**
7 **year's calculations?**

8 A. Yes. The cash working capital impact is prepared in the same manner as the cash working
9 capital impact filed with the Commission last year in Docket No. DE 14-031.

10 **Proposed Energy Service Cost Reclassification Adjustment Factors**

11 **Q. Has the Company calculated proposed ESCRAFs for the period beginning May 1,**
12 **2015?**

13 A. Yes. Schedule HMT-9 calculates the proposed ESCRAFs of 0.142¢ per kWh for the
14 Small Customer Group and 0.011¢ per kWh for the Large Customer Group for the period
15 May 2015 through April 2016. The proposed ESCRAFs would be combined with the
16 Energy Service rates for billing.

17 **Q. Has the Company calculated the ESCRAFs in the same manner as in last year's**
18 **filing?**

19 A. Yes. The Company has calculated the ESCRAFs in the same manner as in last year's
20 filing and in accordance with the methodologies approved in the Settlement Agreement.

1 **VI. Border Sales Agreement Settlement**

2 **Q. What is the Border Sales Agreement Settlement?**

3 A. On April 11, 2014, Granite State and Massachusetts Electric Company (“MECO”)
4 entered into a borderline sales agreement with respect to customers residing near the New
5 Hampshire border in Methuen, MA on or near Hampshire Road. These customers have
6 received electric service from MECO that was procured by Granite State and delivered
7 over distribution facilities and equipment owned, controlled and/or operated by Granite
8 State for a period of time commencing on or before 2003 through April 2014.

9 The settlement agreement required MECO to pay Granite State \$716,722 plus interest at
10 the prime rate for a total of \$723,890 for transmission and commodity costs incurred by
11 Granite State to provide service to MECO for these customers, of which \$609,864 is to be
12 refunded to energy service customers.

13 **Q. How does the Company propose to refund borderline sales to energy service**
14 **customers?**

15 A. The Company will credit the borderline sales refund amount of \$609,864 on a per kWh
16 basis through its energy service reconciliation mechanism. The refund is the charge to
17 MECO customers taking service since June 2006 through September 2012. The Company
18 has included a credit of (\$0.00104) cents per kWh in its energy service charge for 2015 in
19 Schedule HMT-10.

1 **VII. Effective Date and Bill Impact**

2 **Q. How and when is the Company proposing that these rate changes be implemented?**

3 A. The Company is proposing that all of the above rate changes be made effective for service
4 rendered on and after May 1, 2015.

5 **Q. Has the Company determined the impact of the energy service rate change on
6 customers' bills?**

7 A. Yes. For an Energy Service residential customer using 655 kWh, the total bill impact
8 of the energy service rate proposed in this filing, as compared to rates in effect today, is a
9 bill decrease of \$56.07 per month, or 55.2 percent, from \$158.01 to \$111.09.

10 **Q. Please explain the other rate changes that will occur on May 1, 2015.**

11 A. In its Order No. 25,745 dated December 30, 2014 in Docket No. DE 14-340, the
12 Commission directed the Company to implement revised Transmission and Stranded
13 Cost Charges on May 1, 2015, rather than the originally proposed date of January 1, 2015,
14 because of the Commission's concern over high energy service prices during the winter
15 period. The Commission noted in its Order

16 Although the costs subject to recovery will increase due to the addition of carrying
17 costs, the impact of the retail rate reconciliation on monthly bills will be mitigated
18 by the lower energy prices expected in May. Moreover, postponing the effective
19 day of the rate will keep winter rates at their current level, avoiding another
20 increase in this high energy price period. We appreciate the willingness of the
21 Company to consider deferring rate implementation in this proceeding.

22 As ordered by the Commission, the Company will be implementing these rate changes
23 effective May 1, 2015, along with the requested REP/VMP rate adjustments in Docket
24 DE 15-087.

1 **Q. Has the Company determined the impact of these rate changes on customer bills?**

2 A. Yes. These bill impacts are included in Schedule HMT-11. As shown on page 1 of
3 Schedule HMT-11, a residential customer with an average monthly usage of 655 kWh
4 would realize a bill decrease of \$46.92 (or 29.7%), from \$158.01 to \$111.09 as compared
5 to rates in effect today. For customers in the Large Customer Group, the Company has
6 provided bill impacts for illustrative load-weighted rates. The bill impacts for the six-
7 month period ending October 2015 are decreases ranging from 26% to 27% as compared
8 to the six-month period ending April 2015 (see pages 10 to 16 of Schedule HMT-11).

9 **Q. What does the Company plan to do to educate customers about the rate changes?**

10 A. On April 1, 2015 the Company will be posting information regarding this filing on its
11 website. There will be on-bill messaging on the April bills reminding customers of the
12 summer period rate change. The information will direct them to our website for more
13 information about the rate change. Once the rates are approved, they will be posted on
14 the website by May 1, 2015. The May bills will include on-bill messaging, along with a
15 bill insert reminding customers of the new rates, and directing them to the website for
16 more information.

17 **Q. Has the Company prepared a revised Summary of Rates tariff page reflecting the**
18 **proposed rates?**

19 A. Yes. It is included as Schedule HMT-12. The Summary of Rates tariff page reflects the
20 proposed Energy Service rate changes contained in this filing. Upon receiving an order in
21 this proceeding, the Company will file a Fourth Revised Page 68, Summary of Rates,

1 reflecting the appropriate approved rates.

2 **Q. Has the Company included the most recent quarterly report of migration**
3 **information based on monthly migration by customer class and load, as required by**
4 **the Commission's Order No. 24,715 in Docket No. DE 06-115?**

5 A. Yes. The quarterly report of customer migration information for the fourth quarter of
6 calendar year 2014 is included as Schedule HMT-13 page 1. Schedule HMT-13 page 2 is
7 included to show migration for January and February 2014.

8 **VII. Conclusion**

9 Q. Does this conclude your testimony?

10 A. Yes.