Davison Van Cleve PC
Attorneys at Law
TEL (503) 241-7242 ● FAX (503) 241-8160 ● mail@dvclaw.com
Suite 400
333 SW Taylor
Portland, OR 97204

May 21, 2013

Via Electronic and U.S. Mail

Public Utility Commission of Oregon
Attn: Filing Center
550 Capitol St. NE #215
P.O. Box 2148
Salem, OR 97308-2148

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY
2013 Net Variable Power Costs (NVPC) and Annual Power Cost Update (APUC)
Docket No. UE 266

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the original and five (5) copies the Direct Testimony and Exhibits of Michael C. Deen on behalf of the Industrial Customers of Northwest Utilities.

Thank you for your assistance, and please don't hesitate to contact our office with any questions.

Sincerely yours,

/s/ Jesse Gorsuch
Jesse Gorsuch

Enclosures

cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Direct Testimony and Exhibits of Michael C. Deen upon the parties on the service list via electronic mail only, as all parties have waived paper service.

Dated at Portland, Oregon, this 21st day of May, 2013.

/s/ Jesse Gorsuch
Jesse Gorsuch

(W) PACIFIC POWER
R. BRYCE DALLEY
SARAH WALLACE
825 NE MULTNOMAH STE 1800
PORTLAND OR 97232
bryce.dalley@pacificorp.com
sarah.wallace@pacificorp.com

(W) PACIFICORP, DBA PACIFIC POWER
OREGON DOCKETS
825 NE MULTNOMAH ST, STE 2000
PORTLAND OR 97232
oregondockets@pacificorp.com

(W) PUBLIC UTILITY COMMISSION OF OREGON
JUDY JOHNSON **(C)**
PO BOX 2148
SALEM OR 97308-2148
judy.johnson@state.or.us

(W) PUC STAFF--DEPARTMENT OF JUSTICE
JOHANNA RIEMENSCHNEIDER **(C)**
STEPHANIE S. ANDRUS **(C)**
1162 COURT ST NE
SALEM OR 97301-4096
johanna.riemenschneider@doj.state.or.us
stephanie.andrus@state.or.us

(W) BEERY, ELSNER & HAMMOND LLP
NANCY L WERNER **(C)**
1750 SW HARBOR WAY, SUITE 380
PORTLAND OR 97201-5016
nancy@gov-law.com

(W) BOEHM KURTZ & LOWRY
KURT J BOEHM **(C)**
ATTORNEY
JODY KYLER COHN **(C)**
ATTORNEY
36 E SEVENTH ST - STE 1510
CINCINNATI OH 45202
kboehm@bkllawfirm.com
jkyler@bkllawfirm.com

(W) CABLE HUSTON BENEDICT HAAGENSEN & LLOYD
TOMMY A BROOKS
CHAD M STOKES
1001 SW FIFTH AVE, STE 2000
PORTLAND OR 97204-1136

(W) CITIZENS' UTILITY BOARD OF OREGON
OPUC DOCKETS
ROBERT JENKS **(C)**
G. CATRIONA MCCRACKEN **(C)**
610 SW BROADWAY, STE 400

tbrooks@cablehuston.com
cstokes@cablehuston.com

(W) CITY OF HILLSBORO
ANDREW BARTLETT **(C)**
150 EAST MAIN ST.
HILLSBORO OR 97123
andrew.bartlett@hillsboro-oregon.gov

(W) CITY OF PORTLAND - PLANNING & SUSTAINABILITY
DAVID TOOZE
1900 SW 4TH STE 7100
PORTLAND OR 97201
david.tooze@portlandoregon.gov

(W) FRED MEYER STORES/KROGER
NONA SOLTERO
3800 SE 22ND AVE
PORTLAND OR 97202
nona.soltero@fredmeyer.com

(W) LEAGUE OF OREGON CITIES
MAJA HAIUM
TRACY RUTTEN
PO BOX 928
SALEM OR 97308
mhaium@orcities.org
trutten@orcities.org

(W) NOBLE AMERICAS ENERGY SOLUTIONS, LLC
GREG BASS
401 WEST A ST., STE. 500
SAN DIEGO CA 92101
gbass@noblesolutions.com

(W) PORTLAND GENERAL ELECTRIC
DOUGLAS C TINGEY **(C)**
JAY TINKER **(C)**
121 SW SALMON 1WTC13
PORTLAND OR 97205
dockets@oregoncub.org
bob@oregoncub.org
catriona@oregoncub.org

(W) CITY OF PORTLAND - CITY ATTORNEY'S OFFICE
BENJAMIN WALTERS **(C)**
1221 SW 4TH AVE - RM 430
PORTLAND OR 97204
ben.walters@portlandoregon.gov

(W) ENERGY STRATEGIES LLC
KEVIN HIGGINS
215 STATE ST - STE 200
SALT LAKE CITY UT 84111-2322
khiggins@energystrat.com

(W) RENEWABLE NORTHWEST PROJECT
MEGAN WALSETH DECKER
900 WASHINGTON ST., STE 780
VANCOUVER, WA 98660-3455
megan@rnp.com

(W) MCDOWELL RACKNER & GIBSON PC
LISA F RACKNER
419 SW 11TH AVE., SUITE 400
PORTLAND OR 97205
dockets@mcd-law.com

(W) NORTHWEST NATURAL
MARK R THOMPSON
220 NW 2ND AVE
PORTLAND OR 97209
efiling@nwnatural.com
mark.thompson@nwnatural.com

(W) REGULATORY & COGENERATION SERVICES INC
DONALD W SCHOENBECK **(C)**
900 WASHINGTON ST STE 780

PORTLAND OR 97204
doug.tingey@pgn.com
pge.opuc.filings@pgn.com

VANCOUVER WA 98660-3455
dws@r-c-s-inc.com

(W) RICHARDSON & O'LEARY
GREGORY M. ADAMS
PO BOX 7218
BOISE ID 83702
greg@richardsonandoleary.com

BEFORE THE OREGON PUBLIC UTILITY COMMISSION

UE 266

In the Matter of	)
	)
PORTLAND GENERAL ELECTRIC	)
	)
	)
Net Variable Power Costs and Annual Power Cost Update	)
	)

DIRECT TESTIMONY OF MICHAEL C. DEEN

ON BEHALF OF

THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

May 21, 2013

I. INTRODUCTION AND SUMMARY

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Michael C. Deen, and my business address is 900 Washington Street, Suite 780, Vancouver, Washington 98660. I am employed by Regulatory and Cogeneration Services, Inc. ("RCS"), a utility rate and consulting firm.

Q. PLEASE DESCRIBE YOUR BACKGROUND AND EXPERIENCE.

A. I have been involved in the energy industry for over 6 years. During that time, I have served as an analyst and expert on a variety of power supply, cost, ratemaking, and policy topics—primarily regarding the Bonneville Power Administration and Pacific Northwest utilities. I have provided testimony on behalf of the Industrial Customers of the Northwest Utilities ("ICNU") before the Oregon Public Utilities Commission (the "Commission" or "OPUC") in various proceedings regarding Portland General Electric Company ("PGE" or the "Company") and PacifiCorp. I have also provided testimony on behalf of ICNU before the Washington Utilities and Transportation Commission ("WUTC") regarding Avista, PacifiCorp, and Puget Sound Energy. I have also provided testimony on natural gas matters regarding Avista on behalf of the Northwest Industrial Gas Users ("NWIGU") before the WUTC. A further description of my educational background and work experience can be found in Exhibit ICNU/101.

Q. ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?

A. I am testifying on behalf of ICNU. ICNU is a non-profit trade association whose members are large industrial consumers of electricity throughout the Pacific Northwest, including customers served by PGE.

Q. WHAT IS THE PURPOSE OF THIS TESTIMONY?

A. My testimony addresses PGE's annual filing to update its net variable power costs ("NVPC") for the 2014 rate year. PGE's initial February 15th filing included an NVPC of $639.2 million and the April 1st update supported a slightly higher value of $642.5 million.

Q. PLEASE BRIEFLY SUMMARIZE YOUR RECOMMENDATIONS IN THIS PROCEEDING

A. ICNU recommends the following:

- **Transmission Resale Revenues.** PGE should include a credit in its NVPC for expected transmission resale revenues based on the most recent four years of actual data. The resale revenues are reasonably known, measurable, and consistent through time. This adjustment will better match system costs with system benefits in rates and reduces NVPC by approximately $4.95 million.

- **Wind Energy Forecast.** The Commission should reject PGE's proposed changes to its forecasted energy amounts for the Biglow Canyon wind project and Vansycle Ridge wind energy contracts. Use of a five-year average is too short to set normalized rates for wind projects, given the potential for inter-annual variation in output. Rejecting PGE's proposed changes would lower NVPC by approximately $4.38 million.

- **Wind Day-Ahead Forecast Error Cost.** PGE's proposal to change the cost for day-ahead forecast error in July after any opportunity by parties to file responsive testimony in this proceeding is inappropriate and should be rejected the Commission.

- **Boardman Biomass Test Burn.** Given the experimental nature of this test, ICNU is concerned the test burn may not occur as scheduled in 2014. If the test burn does not occur, ICNU recommends that customers not be charged the forecasted costs.

II. TRANSMISSION RESALE REVENUES

Q. WHAT ARE TRANSMISSION RESALE REVENUES IN THE CONTEXT OF PGE'S NET VARIABLE POWER COSTS?

A. Transmission resale revenues are proceeds that PGE receives as a result of its ability to make short-term sales of its transmission rights to third parties during periods when PGE does not need to utilize its full transmission capacity. As such, transmission resale revenues represent a financial benefit to the Company that is achieved as a consequence of its transmission rights that are paid for by customers.

Q. WHAT IS PGE'S CURRENT TREATMENT OF TRANSMISSION RESALE REVENUES FOR RATEMAKING PURPOSES?

A. PGE does not include a forecast of transmission resale revenues in its net power costs. As described by PGE in response to ICNU Data Request No. 002:

> For reliability reasons, PGE's practice is to obtain transmission rights necessary to meet 1-in-5 peak load in both summer and winter. As such, PGE does not forecast transmission resale revenues as part of its net variable power cost (NVPC) forecast in MONET or in the non-NVPC portion of this proceeding (Docket No. UE 262). Similar to gas resales, PGE reclassifies any actual transmission resales to NVPC in its Results of Operations report and in actual NVPC as a power cost adjustment mechanism adjusting item ("PCAM", Schedule 126). These amounts are partially offset in the PCAM by lost revenues associated with customers that choose to go with an energy service supplier as can be seen in Attachment 003-A.

ICNU/102, Deen/1.

Q. IS THIS TREATMENT APPROPRIATE?

A. No. A fundamental premise of ratemaking is the matching principle, that costs and revenues must be matched appropriately for the rate year. By not including a reasonable forecast of these revenues in base rates and instead passing actuals through the PCAM, the revenues are

subject to sharing and deadbands which inappropriately prevents customers from receiving full benefits of PGE's transmission rights to offset the costs of these rights included in notes.

Q. HAVE TRANSMISSION RESALE REVENUES BEEN CONSISTENT IN LEVEL OVER RECENT YEARS?

A. Yes. In response to ICNU Data Request No. 003, PGE provided actual transmission resale revenue results from the past four years. ICNU/102, Deen/3. PGE's revenues from transmission resale have been very consistent, averaging approximately $4.95 million over the past four years. The table below presents these results.

Table 1. PGE ANNUAL TRANSMISSION RESALE REVENUE ($$$)

Description	2009	2010	2011	2012	Average
Resale Revenues	$ (6,549)	$ (5,390)	$ (6,276)	$ (5,297)	$ (5,878)
Lost Revenues	$ 988	$ 740	$ 1,176	$ 810	$ 928
Net	$ (5,560)	$ (4,650)	$ (5,100)	$ (4,487)	$ (4,950)

Q. WHAT IS YOUR RECOMMENDATION REGARDING THE TREATMENT OF TRANSMISSION RESALE REVENUES?

A. A reasonable value for transmission resale revenues should be included as an offset to the Company's NVPC collected through rates. Since PGE declined to include a forecast value for 2014, ICNU recommends that the average value of $4.95 million from the 2009-2012 period be included in this case. This represents a fair average value based on known and measurable results from recent years.

III. WIND ENERGY FORECAST

Q. HAS PGE PROPOSED ANY CHANGES TO ITS METHOD FOR FORECASTING THE AMOUNT OF EXPECTED ENERGY FROM ITS WIND RESOURCES?

A. Yes. PGE is proposing the use of a five-year rolling average of actual generation data for the Biglow Canyon wind project (which includes Phase I, Phase II, and Phase III of the project) and the Vansycle Ridge wind energy contract. For Biglow Canyon, PGE had

previously used annual and monthly capacity factors based on a study completed in 2005 by Garrad Hassan America ("GH"). For the Vansycle Ridge project, PGE had previously used actual data since the beginning of the contract in 1999.

Q. WHAT IS THE IMPACT OF THE PROPOSED CHANGES?

A. For Biglow Canyon, PGE's proposed methodological change increases NVPC by approximately $4.32 million. For the Vansycle Ridge contract, the proposed changes increase NVPC by approximately $58,000. The two changes in total are approximately $4.38 million.

Q. PLEASE DESCRIBE THE CHANGE IN FORECAST METHODOLOGY FOR THE BIGLOW CANYON PROJECT IN MORE DETAIL.

A. The Biglow Canyon project consists of three phases placed into service at different dates. Phase I was placed into service in 2007, Phase II was placed into service in 2009, and Phase III was placed into service in 2010. PGE is planning to move from forecasted generation values based on the 2005 GH study to a rolling five-year average of actual generation data for each phase. Based on PGE's April update, this five-year period would encompass the 2008 through 2012 period. For years in which there is no operating data, PGE is proposing to fill in values based on the GH study that was previously used to forecast NVPC.

Q. WHAT IS THE PLANNING BASIS ON WHICH THE BIGLOW PROJECT WAS ACCEPTED AS A PRUDENT GENERATION INVESTMENT?

A. My understanding is that Biglow Canyon Phases II and III were predicated on the assumption of a 33% average annual capacity factor, "which reflects the average capacity factor of the short-listed Pacific Northwest wind projects from PGE's 2008 Renewables RFP." PGE 2009 Integrated Resource Plan, Chapter 7.1 "Renewable Options", page 124.

In the 2007 Integrated Resource Plan, PGE analyzed the economic value of the Biglow Canyon Project based on an even higher capacity factor, stating that: "An expansion of PGE's Biglow Canyon Project (to full site build-out) represents Tier I due to its relatively high forecast capacity factor of 35% . . . ." PGE 2007 Integrated Resource Plan, Chapter 7.1 "Renewable Options", page 104.

Q. WHAT IS PGE'S RATIONALE FOR THE PROPOSED CHANGES?

A. PGE contends in PGE/400, Niman-Peschka/10 that:

> A forecast based on actuals is fair, transparent, reflects changing operational experiences, incorporates the effects of recent environmental conditions, is not tied solely to outdated forecasting techniques, and is consistent with other aspects of PGE's power cost forecast where actuals serve as the basis for the forecasted value (e.g., thermal forced outage rates, generation under certain wind PPAs (Klondike II), and the BPA imbalance premium).

Q. ARE PGE'S PROPOSED CHANGES APPROPRIATE?

A. No. Forecasting normalized annual generation for large-scale wind projects in the United States is very much a science still in development. However, it is clear that wind power resources can display a high level of variability in inter-annual generation. For example, a recent technical report titled "Long-Term Wind Power Variability" published by the National Renewable Energy Laboratory ("NREL"), a national lab of the Department of Energy, concluded that the variation in production at wind power plants between years was most comparable to run-of-river hydro. The conclusion of the report states as follows regarding the wind power plants ("WPP") studied:

> The wind power data from WPPs in different parts of the country suggest that one can expect relatively large inter-annual changes. The climate and regional weather pattern are the driving forces behind wind and wind plant outputs. Changes in climate and weather patterns will be reflected in the longer-term performance of WPPs. In this

> respect, wind power is similar to hydropower, especially run-of-the-river type, in that there are high energy production (wet) years and low energy production (dry) years. The available data show that during the highest production year, total wind energy from the same WPP can be almost 40% higher than the annual production of the lowest production year. The available data do not appear to be enough to establish a long-term pattern or trend.[1/]

In other words, only a few years of data is inadequate to conclude that the planning basis on which the plant investment was determined prudent should be abandoned for rate making purposes at the expense of customers. For normalized hydro forecasting, it has been my experience that use of average generation over 20, 30, or even more years is common.

Q. CAN YOU PROVIDE AN EXAMPLE OF HOW ACTUAL GENERATION FROM BIGLOW CANYON DOES NOT FALL OUTSIDE A REASONABLY EXPECTED RANGE OF VARIABILITY?

A. Yes. Take for example Biglow Canyon Phase III. The nameplate of this facility is 161 MW and the estimated capacity factor based on the 2005 GH study was approximately 33%, yielding an expected average generation of 53 aMW. Actual 2011 and 2012 generation from Phase III were approximately 44 aMW and 41 aMW respectively. This represents 17% lower in 2011 and 22% lower in 2012 than the normalized expected value based on the 2005 GH study. This is consistent with the level of inter-annual variability of wind output shown in the NREL study. In other words, two years of data that happen to be below the expected average is insufficient evidence to establish that value as incorrect for normalized ratemaking purposes.

[1/] Long-Term Wind Power Variability. Y. H. Wan. Technical Report, NREL/TP-5500-53637. Retrieved online at http://www.nrel.gov/docs/fy12osti/53637.pdf

Q. WHAT DOES ICNU RECOMMEND REGARDING PGE'S PROPOSED CHANGES TO ITS WIND ENERGY FORECAST?

A. The proposed changes should be rejected in this proceeding. The Company's NVPC is set on a normalized basis, and PGE has not provided compelling evidence that the planning numbers from its earlier consultant study are still not the best number to use for ratemaking purposes for Biglow Canyon. If the Company is concerned that the forecasting methods in the 2005 GH study are somehow outdated or inappropriate, it should commission or conduct a new forecast study. However, given the potential for inter-annual variability at wind projects, I would not recommend using actual values to set the forecast, without at least 10 years of actual data. For this reason PGE's proposed change to the Vansycle Ridge forecast should also be rejected. Data from the life of the contract is more likely to be appropriate on a normalized basis than the last 5 years.

WIND DAY-AHEAD FORECAST ERROR

Q. WHAT IS THE ISSUE OF WIND DAY-AHEAD FORECAST ERROR?

A. The basic issue is that the difference between day-ahead and hour-ahead wind schedules may lead to sub-optimal resource commitments by the Company. The value currently included in rates and in PGE's initial filings for day-ahead forecast error in this proceeding is $0.50/MWh of wind generation. This is a stipulated value from Docket No. UE 250, the 2013 AUT proceeding.

Q. DOES PGE PLAN TO CHANGE THIS VALUE LATER IN THE PROCEEDING?

A. Yes. PGE plans to file an "update" to this value in July.

Q. IS THIS PROPOSAL APPROPRIATE?

A. Absolutely not. PGE's proposed change to this value is not merely a mechanical change to the inputs in an accepted methodology. PGE's wind integration modeling has never been accepted by parties or approved by the Commission for purposes of establishing costs in rates for wind day-ahead forecast error. In both the UE 198 and UE 250 dockets, the value was stipulated. In UE 250, both ICNU and Commission Staff raised significant objections to PGE's methodology before the stipulation was reached. Further, PGE's proposed change comes after any opportunity for parties to file testimony in this proceeding. In other words, PGE is proposing to change a stipulated value in its initial proposal using a controversial modeling method without any opportunity by parties to review, analyze, and present evidence on the results. As a procedural matter, if PGE wished to update the value for wind day-ahead forecast error in its rates, the Company needed to file a study with its initial proposal. The AUT procedural schedule is already shorter than a general rate case, and there will be insufficient time to review a new proposal in this case.

Q. PLEASE SUMMARIZE YOUR RECOMMENDATION CONCERNING PGE'S PROPOSED UPDATE TO WIND DAY-AHEAD FORECAST ERROR COSTS?

A. PGE's proposed update of a stipulated value for these costs using a new and controversial study after the conclusion of parties' ability to file testimony is completely inappropriate from a procedural perspective, and would prevent ICNU from adequately reviewing a new study. The Commission should disallow PGE's proposed update. If PGE wished to file an update to this value, it should have done so as part of its initial filing. As matters stand, the stipulated value should be adopted in this proceeding, and PGE may file a new study as part of its initial filing in next year's NVPC proceeding.

BOARDMAN BIOMASS TEST BURN

Q. WHAT IS THE BOARDMAN BIOMASS TEST BURN?

A. The Boardman biomass test burn is part of the process in which PGE is seeking to convert the Boardman facility from coal fuel to biomass for use after the year 2020 to meet the Oregon renewable portfolio standard. Specifically, in 2014 PGE is anticipating conducting test operations of the plant using torrefied biomass fuel. Per agreement in the UM 1571 Docket and in OPUC Order No. 12-141, PGE is treating the costs associated with this test as a fuel expense in base NVPC for 2014. The cost of the test burn is estimated at approximately $5.2 million relative to standard operations.

Q. DOES ICNU HAVE CONCERNS REGARDING THE COST TREATMENT OF THE TEST BURN IN RATES?

A. Yes. Although PGE currently anticipates the test burn will occur in 2014, it is my understanding that there are still a number of contingent steps which need to be completed ahead of that time, particularly with regard to fuel procurement and processing. Given the experimental nature of the test burn, ICNU is concerned that there is a significant chance that the test burn may not occur as scheduled in 2014. In this case, there should be a method in place to assure that customers do not pay for costs of a test burn that does not actually occur during the rate year.

Q. WHAT DOES ICNU RECOMMEND?

A. If the Commission wishes to go down the road of including a forecast of these costs in the NVPC forecast, ICNU recommends that the costs associated with the test burn be excluded from rates unless PGE can prove that they will occur in 2014. To the extent the

test burn does occur, then it should be handled per usual under the standard PCAM process for power cost variance.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

BEFORE THE OREGON PUBLIC UTILITY COMMISSION

UE 266

In the Matter of	)
	)
PORTLAND GENERAL ELECTRIC	)
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	)
Net Variable Power Costs and Annual Power Cost Update	)
	)

EXHIBIT ICNU/101

QUALIFICATIONS OF MICHAEL C. DEEN

May 21, 2013

April 10, 2013

TO: Irion Sanger
Melinda Davison
Davison Van Cleve, PC

Michael Deen
Regulatory & Cogeneration Services, Inc.

FROM: Patrick Hager
Manager, Regulatory Affairs

PORTLAND GENERAL ELECTRIC
UE 266
PGE Response to ICNU Data Request No. 002
Dated March 27, 2013

Request:

Please provide PGE's anticipated transmission resale revenues for 2014. Please provide any workpapers or other documentation used to support this forecast.

Response:

For reliability reasons, PGE's practice is to obtain transmission rights necessary to meet 1-in-5 peak load in both summer and winter. As such, PGE does not forecast transmission resale revenues as part of its net variable power cost (NVPC) forecast in MONET or in the non-NVPC portion of this proceeding (Docket No. UE 262). Similar to gas resales, PGE reclassifies any actual transmission resales to NVPC in its Results of Operations report and in actual NVPC as a power cost adjustment mechanism adjusting item ("PCAM", Schedule 126). These amounts are partially offset in the PCAM by lost revenues associated with customers that choose to go with an energy service supplier as can be seen in Attachment 003-A.

April 10, 2013

TO: Irion Sanger
Melinda Davison
Davison Van Cleve, PC

Michael Deen
Regulatory & Cogeneration Services, Inc

FROM: Patrick Hager
Manager, Regulatory Affairs

PORTLAND GENERAL ELECTRIC
UE 266
PGE Response to ICNU Data Request No. 003
Dated March 27, 2013

Request:

Please provide PGE's transmission resale revenue for 2009, 2010, 2011, and 2012. Please provide a summary by year and also underlying transaction level data.

Response:

Attachment 003-A contains a summary of transmission resale revenues for 2009 through 2012. Attachment 003-B contains transaction level data for 2009 through 2012. Attachment 003-C contains journal entries supporting the accounting detail for 2012 provided in Attachment 003-B. Attachment 003-C is confidential and subject to Protective Order No. 13-042.

Other Revenues

Description	2009 Actuals	2010 Actuals	2011 Actuals	2012 Actuals
OthElecRev-TransmissionResale	$ (6,548,910)	$ (5,390,250)	$ (6,275,911)	$ (5,296,820)
Lost Revenues	$ 988,418	$ 739,948	$ 1,175,805	$ 809,537
Net	$ (5,560,492)	$ (4,650,302)	$ (5,100,106)	$ (4,487,283)