

From: Jan Reid
Sent: 9/27/2012 6:53:39 PM
To: Woo, Shirley A (Law) (/O=PG&E/OU=Corporate/cn=Recipients/cn=SAW0); CManzuk@SempraUtilities.com (CManzuk@SempraUtilities.com); angelica.morales@sce.com (angelica.morales@sce.com); Earl, Laura M (LEarl@semprautilities.com); paul.hunt@sce.com (paul.hunt@sce.com); mihee.moon@sce.com (mihee.moon@sce.com); Marcel Hawiger (Marcel@turn.org); ek@a-klaw.com (ek@a-klaw.com); Bromson, Jonathan (jonathan.bromson@cpuc.ca.gov); [Redacted] [Redacted] 'Hassan, Kim' (KHassan@semprautilities.com)
Cc: Hughes, John (Reg Rel) (/O=PG&E/OU=Corporate/cn=Recipients/cn=J8HS); Oh, Jerry (jerry.oh@cpuc.ca.gov); [Redacted] [Redacted] Knecht, Ron [Redacted]
Bcc:
Subject: RE: Exhibit 35A

Please add Ron Knecht to the distribution list for Exhibit 35A. Ron's email address is

[Redacted]

Thanks,

Jan Reid
Coast Economic Consulting
3185 Gross Road
Santa Cruz, CA 95062
(831) 476-5700

----- Original Message -----

From: [Redacted]
To: Marcel Hawiger ; Bromson, Jonathan ; 'Hassan, Kim' ; 'ek@a-klaw.com' ; Angelica.Morales@sce.com ; Earl, Laura M ; Woo, Shirley A (Law) ; 'janreid@coastecon.com' ; 'paul.hunt@sce.com' ; Mihee.Moon@sce.com ; Manzuk, Chuck (CManzuk@semprautilities.com)
Cc: Oh, Jerry ; [Redacted] ; Hughes, John (Reg Rel)
Sent: Thursday, September 27, 2012 5:55 PM
Subject: RE: Exhibit 35A

I'm attaching an excel workbook we've been developing to capture and simply summarize the various model inputs of the parties. As we all know, this gets very messy very quickly because very few of the ROE modelers have just one simple version of a model. We thought the intent of this exhibit is to simply

show each of the parties' inputs to the various models. Doing that may mean taking averages of several growth rates, or betas, etc. even though the ROE experts would claim that taking a simple average of their inputs does not represent how they would weigh them.

We've taken a stab at aggregating our ROE model inputs using simple averages, and they're shown in the spreadsheet as an example of how we think this could be done without overly complicating the final product.

Thinking about Jonathan Bromson's comment about showing adjustments, I'm not sure graphing them makes sense. We may want to consider using notes, e.g., a note on the CAPM page that PG&E also employed a size adjustment and state the average of it. And it's not clear how to deal with CAPMs and ECAPMs – whether to just exclude ECAPM (and other models such as PG&E's expected earnings model, Fama-French), add a fourth model (the transcript clearly contemplates just 3 models), somehow roll it into CAPM results using implied betas etc.

I realize people are very busy preparing for hearings next week, but perhaps the utilities' analysts can try and find a common ground for aggregation and presentation and then float those ideas with DRA and intervenors.

From: Marcel Hawiger [mailto:Marcel@turn.org]
Sent: Thursday, September 27, 2012 4:27 PM
To: Bromson, Jonathan; 'Hassan, Kim'; 'ek@a-klaw.com'; Angelica.Morales@sce.com; Earl, Laura M; Woo, Shirley A (Law); 'janreid@coastecon.com'; [Redacted]
'paul.hunt@sce.com'
Cc: Oh, Jerry
Subject: Re: Exhibit 35A

I believe we need to work a bit more to determine the level of aggregation that provides useful information. A single sheet for CAPM makes sense. However, for the DCF and RP we may need separate sheets for each IOU. I attach a very disaggregated spreadsheet. I think the best course is to fill this in FIRST, then determine whether we can collapse some of the DCF and RP tables

without losing relevant information (ie. Perhaps collapse the tables from different data sources into one table with a range). However, TURN cannot participate more on this prior to close of hearings. I suggest we explain to the ALJ and ask for any guidance, and propose that we submit a late-filed exhibit after close of hearings.

Marcel Hawiger

THE UTILITY REFORM NETWORK

115 Sansome Street, Suite 900

San Francisco, CA 94104

(415) 929-8876 ex. 311

(510) 684-1301 (cell)

From: "Bromson, Jonathan" <jonathan.bromson@cpuc.ca.gov>
Date: Thursday, September 27, 2012 4:07 PM
To: "Hassan, Kim" <KHassan@semprautilities.com>, Marcel Hawiger <marcel@turn.org>, "ek@a-klaw.com" <ek@a-klaw.com>, "Angelica.Morales@sce.com" <Angelica.Morales@sce.com>, "Earl, Laura M" <LEarl@semprautilities.com>, "SAW0@pge.com" <SAW0@pge.com>, Jan Reid <janreid@coastecon.com>, Redacted, "paul.hunt@sce.com" <paul.hunt@sce.com>
Cc: "Oh, Jerry" <jerry.oh@cpuc.ca.gov>
Subject: RE: Exhibit 35A

DRA would suggest that there also be a column for each method for the various adjustments parties make to the results of the models, i.e., flotation adjustments, growth adjustments, etc. The column should be to the right of the inputs and left of the final recommended ROE. Otherwise the results from the models don't equal the recommendations made by the parties.

Jonathan Bromson

Principal Counsel

DRA

From: Hassan, Kim [<mailto:KHassan@semprautilities.com>]
Sent: Thursday, September 27, 2012 1:37 PM
To: 'Marcel@turn.org'; 'ek@a-klaw.com'; Angelica.Morales@sce.com; Earl, Laura M; Bromson, Jonathan; 'SAW0@pge.com'; 'janreid@coastecon.com'; Redacted
'paul.hunt@sce.com'
Subject: Exhibit 35A

Commissioner Ferron asked for an exhibit (Exhibit 35A), which provides the inputs for the various formulas used by the parties. Attached is a spreadsheet for the CAPM, DCF, and RP models. Because there are modeling variations, ranges are used to reflect parties' various growth rates, dividend rates, risk premiums, and resultant ROE estimates. Assuming, parties agree with the template, please insert the relevant data for your party. Thank you.

Kim F. Hassan
Senior Regulatory Counsel
Southern California Gas Company
555 W. Fifth Street - GT14E7
Los Angeles, CA 90013
Tel. (213) 244-3061

Fax. (213) 629-9620

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