BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Determination of the :

Existence of Significantly Excessive Earnings for : Case No. 17-993-EL-UNC

2016 Under the Electric Security Plan of Ohio :

Edison Company, The Cleveland Electric : Illuminating Company, and the Toledo Edison :

Company. :

PREFILED TESTIMONY OF JOSEPH P. BUCKLEY

RATES AND ANALYSIS DEPARTMENT
FORECASTING, MARKETS & CORPORATE OVERSIGHT DIVISION
PUBLIC UTILITIES COMMISSION OF OHIO

Staff Exhibit _____

- 1 1. Q. Please state your name and your business address.
- A. My name is Joseph P. Buckley. My business address is 180 E. Broad
- 3 Street, Columbus, Ohio 43215.

4

- 5 2. Q. By who are you employed?
- A. I am employed by the Public Utilities Commission of Ohio (PUCO).

7

- 8 3. Q. Would you please state your background?
- A. I received a Bachelor of Science Degree in Economics from the Ohio State
- 10 University and a Master's Degree in Business Administration from the
- University of Dayton. In 2000, I earned the Certified in Financial
- Management (CFM) designation, awarded by the Institute of Management
- Accountants. Also, I attended The Annual Regulatory Studies Program
- sponsored by The National Association of Regulatory Utility Commis-
- sioners (NARUC) and The Training for Utility Management Analyst also
- sponsored by NARUC. I have been employed by the PUCO since 1987.
- 17 Since that time I have progressed through various positions and was
- promoted to my current position of Utility Specialist 3, in 2000. In addi-
- 19 tion, I have worked on several joint Federal Communication Commission
- 20 (FCC) and NARUC projects and audits and served on the Midwest ISO's
- Finance Committee as Vice-Chairman and Chairman. Also, in 2011, I was
- 22 awarded the professional designation Certified Rate of Return Analyst

1			(CRRA) by the Society of Utility and Regulatory Financial Analysts. This
2			designation is awarded based upon experience and successful completion of
3			a written examination.
4			
5	4.	Q.	What is your involvement in this proceeding?
6		A.	I am responsible for determining if Cleveland Electric Illuminating
7			Company (CEI), Ohio Edison Company (OE) and The Toledo Edison
8			Company (TE) (collectively, the Companies) exceeded the return on
9			common equity threshold to be used in its Significantly Excessive Earnings
10			Test (SEET). The adjusted returns on equity earned in 2016 by the
11			Companies were as follows: CEI earned 3.4%, OE earned 10.2%, and TE
12			earned 4.4%.
13			
14	5.	Q.	What is Staff's recommendation to the Commission in this proceeding?
15		A.	Staff recommends that the Commission find that each CEI, OE and TE did
16			not have excessive earnings in 2016.
17			
18	6.	Q.	Has the Staff reviewed CEI, OE, and TE's 2016 earnings calculations and
19			concur with their results?
20		A.	Yes. Staff has reviewed CEI, OE, and TE's calculations and supporting
21			information and finds them to be in conformity with the SEET calculation

1			provisions contained in CEI, OE, and TE's electric security plan (ESP) and
2			are an accurate representation of CEI, OE, and TE's 2016 earnings.
3			
4	7.	Q.	What methodology did Staff employ to determine significant excessive
5			earnings?
6		A.	Staff used the companies that comprise the SPDR Select Sector Fund –
7			Utility (XLU) as its comparable group (Comparable Group). The Staff then
8			totaled the net income earned by the Comparable Group and divided it by
9			the aggregate total common equity of the Comparable Group as detailed in
10			Attachment 1.
11			
12			This produced an average return on equity (ROE) of approximately 5.71
13			percent in 2016. Staff then applied an adder in 2016 of 34.00 percent,
14			which is the standard deviation of the average ROEs of the Comparable
15			Group multiplied by 1.64 (using a 95 percent confidence threshold). The
16			sum of the average ROE of the Comparable Group when combined with the
17			adder results in an earnings threshold of 39.7 percent, as shown in Attach-
18			ment 1a.
19			
20			However, Staff believes a few of the companies in the Comparable Group
21			had earnings that injected too much volatility into the average and caused

the standard deviation in 2016 earnings to be too great. These companies

were AES, FirstEnergy, and NRG Energy. Once Staff removed these companies from the calculation, the ROE became 8.67 percent and the earnings threshold became 16.08 percent. Staff believes that the adjusted earnings threshold of 16.08 percent is a more reliable number to use to determine excess earnings in 2016.

A.

8. Q. Why did Staff use the components of XLU as its comparable group?

XLU is the most widely traded utility exchange traded fund (ETF) and the components are selected by an independent third party that is not involved in this proceeding. This independence removes any bias in selecting the comparable group. That is one reason Staff would advocate having an independent party selecting the comparable companies.

In addition, Staff believes the use of XLU not only removes bias from the selection of the comparable group, but that it also fosters use of a simple and transparent process that generally produces consistent, reasonable results. Having more parties understand the process will allow greater participation in the review. Finally the Commission used this approach in multiple previous SEET cases to determine the comparable ROE.

1	9.	Q.	If Staff's goal is to remove any bias from selecting a comparable group,
2			why did they remove AES, FirstEnergy, and NRG Energy from the calcu-
3			lation?
4		A.	Staff was very reluctant to remove any companies from the Comparable
5			Group. However, Staff believes that those data points created a skewed
6			distribution that produced an unreliable result.
7			
8	10.	Q.	Why did Staff adopt the standard deviation approach in establishing the
9			adder to the ROE?
10		A.	Staff's approach is in line with prior Commission orders. In previous SEET
11			the Commission used this approach in establishing the adder to the XLU
12			comparable group ROE. ¹
13			
14	11.	Q.	Doe this conclude your testimony?
15		A.	Yes, it does. However, I reserve the right to submit supplemental testi-
16			mony as described herein, as new information subsequently becomes avail-

See In the Matter of the Application of Columbus Southern Power Company for Administration of the Significantly Excessive Earnings Test under Section 4928.143(F), Revised Code, and Rule 4901:1-35-10, Ohio Administrative Code, Case No. 11-4571-EL-UNC, et al., (Opinion and Order at 27) (Oct. 23, 2013).

able or in response to positions taken by other parties.

17

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing Prefiled Testimony of Joseph P. Buckley submitted on behalf of the Staff of the Public Utilities Commission of Ohio via electronic mail upon the following parties of record, this 8th day of December, 2017.

/s/ Thomas W. McNamee

Thomas W. McNamee Assistant Attorney General

Parties of Record:

Maureen R. Willis Assistant Consumers' Counsel Office of the Consumers' Counsel 10 West Broad Street, Suite 1800 Columbus, OH 43215-3485 maureen.willis@occ.ohio.gov

Colleen Mooney
Ohio Partners for Affordable Energy
231 West Lima Street
Findlay, OH 45840
cmooney@ohiopartners.org

Mallory Mohler Carpenter Lipps & Leland 280 North High Street, Suite 1300 Columbus, OH 43215 mohler@carpenterlipps.com

Attorney Examiner: Greta See greta.see@puco.ohio.gov Sam Randazzo
Frank P. Darr
McNees, Wallace & Nurick
21 East State Street, 17th Floor
Columbus, OH 43215
sam@mwncmh.com
fdarr@mwncmh.com

Steven T. Nourse American Electric Power Service Corp. 1 Riverside Plaza, 29th Floor Columbus, OH 43215 strourse@aep.com

Michael L. Kurtz
David Boehm
Jody Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202
mkurtz@bkllawfirm.com
dboehm@bkllawfirm.com
jkyler@bkllawfirm.com

Symbol		Net Income	Equity 2016	Equity 2015	Average Common Equity	ROA
NEE	NextEra Energy Inc	2,912,000	24,341,000	22,574,000	23,457,500	12.41
DUK	Duke Energy Corp	2,152,000	41,033,000	39,727,000	40,380,000	5.33
SO	Southern Co	2,448,000	24,758,000	20,592,000	22,675,000	10.80
)	Dominion Resources Inc	2,123,000	14,605,000	12,664,000	13,634,500	15.57
PCG	PG&E Corporation	1,393,000	17,940,000	16,576,000	17,258,000	8.07
AEP	American Electric Power	610,900	17,397,000	17,891,700	17,644,350	3.46
EXC	Exelon Corp	1,134,000	25,837,000	25,793,000	25,815,000	4.39
SRE	Sempra Energy	1,370,000	12,951,000	11,809,000	12,380,000	11.07
EIX	Edison Intl	1,311,000	11,996,000	11,368,000	11,682,000	11.22
PPL	PPL Corp	1,902,000	9,899,000	9,919,000	9,909,000	19.19
D	Consolidated Edison Inc	1,056,000	11,829,000	11,415,000	11,622,000	9.09
PEG	Public Service Enterprise Grp	887,000	13,130,000	13,066,000	13,098,000	6.77
(EL	Xcel Energy Inc	1,123,379	11,020,849	10,600,920	10,810,885	10.39
VEC	WEC Energy Group Inc	939,000	8,929,800	8,654,800	8,792,300	10.68
S	Eversource Energy	942,302	10,711,734	10,352,215	10,531,975	8.95
TE E	DTE Energy Corp	622,000	5,995,000 6,241,000	5,673,000	5,834,000	10.60
	FirstEnergy Corp	(6,177,000)	, ,	12,421,000	9,331,000	-66.2
WK	American Water Works Co Inc	468,000	5,218,000	5,049,000	5,133,500	9.12
TR	Entergy Corp	(583,618)	8,081,809	9,256,791	8,669,300	-6.73
EE MS	Ameren Corp CMS Energy Corp	653,000 551,000	7,103,000 4,253,000	6,946,000 3,938,000	7,024,500 4,095,500	9.30 13.4
NP	Centerpoint Energy Inc	432,000	4,253,000 3,460,000	3,461,000	4,095,500 3,460,500	12.4
NW	Pinnacle West Capital (AZ)	432,000 442,034	4,803,622	4,583,917	3,460,500 4,693,770	9.42
CG	SCANA Corp	595,000	5,725,000	5,443,000	5,584,000	10.6
NT	Alliant Energy Corp	371,500	3,862,000	3,724,100	3,793,050	9.79
	Nisource Inc	331,500	4,071,200	3,843,500	3,957,350	8.38
ES	AES Corp	(1,130,000)	2,794,000	319,000	1,556,500	-72.6
IRG	NRG Energy	(774,000)	6,241,000	2,707,000	4,474,000	-17.3
	Title Ellolgy	18,104,997	0,211,000	2,707,000	317,297,479	5.71
					5.71%	
						20.7
						1.6 34.0
						20.73 1.6 34.00 39.70
ttachm						1.6 34.00 39.70
ymbol	Company Name	Net Income	Equity 2016	Equity 2015	Average Common Equity	1.6 34.0 39.7
ymbol IEE	Company Name NextEra Energy Inc	2,912,000	24,341,000	22,574,000	23,457,500	1.6 34.0 39.7 ROA 12.4
ymbol EE UK	Company Name NextEra Energy Inc Duke Energy Corp	2,912,000 2,152,000	24,341,000 41,033,000	22,574,000 39,727,000	23,457,500 40,380,000	1.6 34.0 39.7 ROA 12.4 5.33
ymbol EE UK O	Company Name NextEra Energy Inc Duke Energy Corp Southern Co	2,912,000 2,152,000 2,448,000	24,341,000 41,033,000 24,758,000	22,574,000 39,727,000 20,592,000	23,457,500 40,380,000 22,675,000	1.6 34.0 39.7 ROA 12.4 5.33 10.8
ymbol EE UK O	Company Name NextEra Energy Inc Duke Energy Corp Southern Co Dominion Resources Inc	2,912,000 2,152,000 2,448,000 2,123,000	24,341,000 41,033,000 24,758,000 14,605,000	22,574,000 39,727,000 20,592,000 12,664,000	23,457,500 40,380,000 22,675,000 13,634,500	1.6 34.0 39.7 ROA 12.4 5.33 10.8 15.5
ymbol EE UK O CG	Company Name NextEra Energy Inc Duke Energy Corp Southern Co Dominion Resources Inc PG&E Corporation	2,912,000 2,152,000 2,448,000 2,123,000 1,393,000	24,341,000 41,033,000 24,758,000 14,605,000 17,940,000	22,574,000 39,727,000 20,592,000 12,664,000 16,576,000	23,457,500 40,380,000 22,675,000 13,634,500 17,258,000	1.6 34.0 39.7 ROA 12.4 5.33 10.8 15.5 8.07
ymbol EE UK O CG EP	Company Name NextEra Energy Inc Duke Energy Corp Southern Co Dominion Resources Inc PG&E Corporation American Electric Power	2,912,000 2,152,000 2,448,000 2,123,000 1,393,000 610,900	24,341,000 41,033,000 24,758,000 14,605,000 17,940,000 17,397,000	22,574,000 39,727,000 20,592,000 12,664,000 16,576,000 17,891,700	23,457,500 40,380,000 22,675,000 13,634,500 17,258,000 17,644,350	1.6 34.0 39.7 ROA 12.4 5.33 10.8 15.5 8.07 3.46
ymbol EE UK O CG EP XC	Company Name NextEra Energy Inc Duke Energy Corp Southern Co Dominion Resources Inc PG&E Corporation American Electric Power Exelon Corp	2,912,000 2,152,000 2,448,000 2,123,000 1,393,000 610,900 1,134,000	24,341,000 41,033,000 24,758,000 14,605,000 17,940,000 17,397,000 25,837,000	22,574,000 39,727,000 20,592,000 12,664,000 16,576,000 17,891,700 25,793,000	23,457,500 40,380,000 22,675,000 13,634,500 17,258,000 17,644,350 25,815,000	1.6 34.0 39.7 ROA 12.4 5.33 10.8 15.5 8.07 3.46 4.39
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ymbol EE UK O CG EP XC RE IX PL D	Company Name NextEra Energy Inc Duke Energy Corp Southern Co Dominion Resources Inc PG&E Corporation American Electric Power Exelon Corp Sempra Energy Edison Intl PPL Corp Consolidated Edison Inc	2,912,000 2,152,000 2,448,000 2,123,000 1,393,000 610,900 1,134,000 1,370,000 1,311,000 1,902,000 1,056,000	24,341,000 41,033,000 24,758,000 14,605,000 17,940,000 17,397,000 25,837,000 12,951,000 11,996,000 9,899,000 11,829,000	22,574,000 39,727,000 20,592,000 12,664,000 16,576,000 17,891,700 25,793,000 11,809,000 11,368,000 9,919,000 11,415,000	23,457,500 40,380,000 22,675,000 13,634,500 17,258,000 17,644,350 25,815,000 12,380,000 11,682,000 9,909,000 11,622,000	1.6 34.0 39.7 ROA 12.4 5.33 10.8 15.5 8.07 3.46 4.39 11.0 11.2 19.1 9.09
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in

Case No(s). 17-0993-EL-UNC

Summary: Testimony Prefiled Testimony of Joseph P. Buckley submitted by Assistant Attorney General Thomas McNamee on behalf of the Staff of the Public Utilities Commission of Ohio. electronically filed by Kimberly L Keeton on behalf of Public Utilities Commission of Ohio