

PRE-FILED TESTIMONY OF
P. LEE
IN REGARD TO MANITOBA HYDRO
2014/15 & 2015/16 GENERAL RATE APPLICATION

Submitted to:

The Manitoba Public Utilities Board

on behalf of

Manitoba Industrial Power Users Group

And

The Coalition

April 24, 2015

1 I. BACKGROUND AND EXPERIENCE

2
3 Q. PLEASE STATE YOUR NAME AND ADDRESS

4 A. My name is Patricia S. Lee. My address is 116 SE Villas Court, Unit C, Tallahassee,
5 Florida 32303.

6
7 Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

8 A. I am employed by BCRI Inc. as a BCRI associate.
9

10 Q. PLEASE DESCRIBE BCRI.

11 A. BCRI is a consulting and research company founded in 1998 by Stephen Barreca. The
12 company specializes in assessing technological change and appraising utility property.
13

14 Q. PLEASE DESCRIBE YOUR EDUCATION AND PROFESSIONAL EXPERIENCE.

15 A. I graduated from Appalachian State University in Boone, North Carolina in December
16 1970, receiving a Bachelor's degree in mathematics. I was employed as a high school
17 mathematics teacher from 1971-1974, when I began working in the area of statistical analysis for
18 the State of Florida. I joined the Public Service Commission staff in 1978. While my position
19 changed over the years, my areas of primary focus were depreciation and capital recovery. I also
20 reviewed and analyzed cost studies for the purpose of determining unbundled network element
21 prices and universal service cost levels as well as for the purpose of determining the appropriate
22 nuclear decommissioning and fossil dismantlement annual accrual levels. In that regard, I was
23 responsible for depreciation issues and other issues such as determining the appropriate cost
24 model inputs. I retired after over 30 years of service on September 30, 2011. In March 2012, I
25 began working with BCRI Inc., d/b/a BCRI Valuation Services.
26

27 Q. WHAT WERE YOUR DUTIES AT THE FLORIDA PUBLIC SERVICE
28 COMMISSION?

29 A. I reviewed, analyzed, and presented testimony and recommendations concerning
30 depreciation rates and the capital recovery positions of Florida regulated utilities and the
31 valuation of assets in a competitive market. In this capacity, I investigated, analyzed, and
32 evaluated valuation and depreciation methods, procedures, and concepts. The determination of
33 appropriate depreciation lives and salvage values requires an understanding of the plans, needs,
34 and pressures facing an individual company. It also requires knowledge of the various types of
35 plant under study or review and the various factors impacting the depreciation parameters, such
36 as competition, and technological advancements.
37

38 I also assisted in the promulgation of Florida Public Service Commission rules regarding
39 depreciation study requirements, depreciation sub-account requirements, capitalization and
40 expensing requirements, and dismantlement and decommissioning study requirements.

41 Additionally, I conducted various Public Service Commission staff training sessions regarding
42 depreciation.
43

1 Additionally, I conferred with company officials, other state and federal agency personnel, and
2 consulting firms on capital recovery matters in both the regulated and deregulated environments.
3 On behalf of the Commission, I participated as a faculty member of the National Association of
4 Regulatory Utility Commissioners (NARUC) Annual Regulatory Studies Program and as a
5 trainer for the Society of Depreciation Professionals (SDP) in the area of depreciation. I was also
6 a member of the NARUC Staff Subcommittee on Depreciation and Technology. In this regard, I
7 co-authored the NARUC 1996 Public Utility Depreciation Practices manual and three NARUC
8 papers that addressed the impact of depreciation on infrastructure development, economic
9 depreciation, and stranded investment. Two of these papers were published in the 1996-1997 and
10 1998 Journals.

11

12 Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE?

13 A. Yes, I have. I proffered testimony in the 2012 depreciation application proceeding of
14 Newfoundland and Labrador on behalf of the Island Industrial Customers in which both a change
15 in depreciation methodology and changes in asset lives were being recommended by the
16 company. That case was eventually settled without any ensuing hearing.¹ Additionally, I
17 proffered testimony in telecommunications, electric, and gas cases regarding depreciation-related
18 issues before the Florida Public Service Commission. A complete list of all dockets in which I
19 was assigned or in which I presented testimony is attached as Exhibit PSL-1 to this testimony.

20

21 Q. WHAT MATERIALS HAVE YOU REVIEWED SPECIFICALLY FOR THE 2014/15
22 AND 2015/16 MANITOBA HYDRO GENERRAL RATE APPLICATION?

23 A. I have reviewed the following documents at a summary level for the purposes of a policy
24 type review of the methods used:

- 25 • Appendix 5.6 Depreciation Rates & Depreciation Study for the year ending
26 March 31, 2014;
- 27 • Appendix 11.49 Depreciation Method Comparison;
- 28 • MIPUG Round 1 IRs relating to depreciation topics;
- 29 • Appendix 5.7 Depreciation Rates & Depreciation Study for the year ending
30 March 31, 2010 and Appendix 16 from the 2012/13 and 2013/14 Manitoba
31 Hydro General Rate Application;
- 32 • Transcript from the 2012/13 & 2013/14 GRA with Larry Kennedy, specifically
33 for December 18, 2012, December 19, 2012, and January 14, 2013.

34

35 Q. PLEASE BRIEFLY DESCRIBE THE TERMS OF THE RETAINER THAT YOU
36 HAVE AGREED TO FOR THE PURPOSES OF THIS REVIEW.

37 A. I agreed to retention jointly by COALITION and MIPUG in the 2014/15 and 2015/16
38 Manitoba Hydro General Rate Application. In participation, I declared that it is my duty to
39 provide evidence in relation to this proceeding as follows:

- 40 • To provide opinion evidence that is fair, objective and non-partisan;

¹ See Order No. P.U. 40(2012) issued by Newfoundland & Labrador Board of Commissioners of Public Utilities.

- 1 • To provide opinion evidence that is related only to matters that are within my area of
- 2 expertise; and,
- 3 • To provide such additional assistance as the Public Utilities Board may reasonably
- 4 require to determine an issue.

5 Q. FROM YOUR PERSPECTIVE WHAT ARE THE MOST IMPORTANT
 6 CHARACTERISTICS FOR SELECTING AN APPROPRIATE DEPRECIATION
 7 METHODOLOGY FOR USE IN RATE SETTING?

8 A. From my perspective, I believe the most important characteristics in selecting an
 9 appropriate depreciation methodology are:

- 10 • Matching costs with benefits;
- 11 • Avoiding intergenerational equity issues;
- 12 • Transparency of the method, calculations, intentions, and resulting expenses for use
- 13 in setting customer rates; and
- 14 • Quality of data in determining an appropriate retirement pattern and life.
- 15

16 II. OVERVIEW AND IMPLICATIONS OF ELG

17 Q. CAN YOU PROVIDE AN OVERVIEW OF THE THEORY BEHIND THE EQUAL
 18 LIFE GROUP (ELG) PROCEDURE AND THE HISTORICAL IMPLEMENTATION OF ELG
 19 IN THE UNITED STATES?

20 A. YES. ELG is a method of calculating depreciation expenses and resulting depreciation
 21 rates based on the life expectations of each of the equally-lived sub-groups constituting a vintage
 22 group – or composited to an account or category rate. That is, the vintage group is divided into
 23 sub – groups, or in the case of MH, components, each of which is expected to live an equal life.
 24 Each item in any given equal life group is expected to have the same life as each other item in
 25 that group. The required depreciation expenses or accruals for the vintage is then the summation
 26 of the requirements for each contained equal life group; each individual equal life group is
 27 expected to recover its invested capital during the period that group is in service.

28 As an example, consider a vintage that consists of three \$100 units, A, B, and C, expected to live
 29 2, 4, and 5 years. To recover each unit during its own service life will require annual accruals of
 30 \$50, \$25, and \$20, respectively, as shown below.

Table 1: Accruals in Years					
	1	2	3	4	5
A	\$50	\$50			
B	25	25	25	25	
C	<u>20</u>	<u>20</u>	<u>20</u>	<u>20</u>	<u>20</u>
Vintage Totals	95	95	45	45	20

31

1 In its pure form, ELG is an ideal model for the proper recovery of invested capital, a major point
2 opined by Mr. Kennedy. By separating the vintage into the equal life groups, each of those
3 groups is assigned a rate in accord with its life. Therefore each asset (or as in the above example,
4 each \$100 unit) is recovered during its specific period of service – the epitome of the matching
5 principle (matching expenses to consumption).

6 To guard against over or under recovery, the original ELG concept called for the separate
7 monitoring of each vintage annually as to both the activity of the assets and the reserve level. If
8 projected life patterns were not realized there would be an end-of-year correction to each vintage
9 of the accrued depreciation expense and likewise to the reserve. Perfection was assured.

10 The conceptual perfection of ELG was impressed on a number of U.S. utility and regulatory
11 personnel through the years. In the '60s-'70s the ELG controversy became a ground swell which
12 led to acceptance by the Federal Communication Commission (FCC) in the early '80s for
13 telecommunications companies. ELG was adopted on a going-forward basis for new additions
14 with embedded vintages utilizing remaining life.² A three-year phase-in period was determined
15 to be needed to reduce the immediate impact on depreciation expense and revenue requirements.³
16 A number of state regulatory agencies soon followed. ELG was adopted for telephone companies
17 specifically for the following reasons⁴:

18 In 1980 the commission adopted major changes in the way depreciation rates were to be
19 calculated. In response to changes in competitive and technological conditions in the
20 market for telephone services, the FCC authorized the use of “equal life group” (“ELG”)
21 depreciation accounting for all new plant acquisitions. On reconsideration, the
22 Commission emphasized that the use of ELG was necessary to bring depreciation
23 accounting “more in line with today’s technology and economic conditions” and “**to**
24 **improve capital recovery promptly in light of competitive and technological**
25 **conditions in the marketplace.**” [emphasis added]

26 The FCC also adopted the “remaining life” method of accounting for correcting errors
27 made in estimating the useful life of both embedded and new plant. Under the previous
28 “whole life” method, depreciation charges were calculated each year as if the useful life
29 of the asset had been estimated correctly from the beginning. Under the remaining life
30 method, when new information leads to a different estimate of the asset’s useful life, the
31 remaining unrecovered depreciation is allocated over the actual remaining life, so that
32 100% of the asset’s value is depreciated.

² See Report and Order, FCC Docket No. 20188 adopted November 6, 1980, released December 5, 1980. The FCC ordered the use of ELG for the telephone industry on new plant additions beginning in 1981 over a three-year phase-in period.

³ NARUC Public Utility Depreciation Practices, August 1996.

⁴ Regarding Docket No. 20,188; Summarized in 781 F. 2d 209 – Southern Bell Telephone and Telegraph Company v. Federal Communications Commission, United States Court of Appeals, District of Columbia Circuit No. 84-1638. Decided January 17, 1996 as amended January 7, 1986. Accessed online: <http://openjurist.org/781/f2d/209/southern-bell-telephone-and-telegraph-company-v-federal-communications-commission>.

1 The Commission adopted the remaining life method in recognition of depreciation
2 reserve deficiencies which had developed under whole life accounting. Beginning in the
3 late 1960's, asset lives had consistently turned out to be shorter than the original estimate
4 creating depreciation reserve deficiencies which, the FCC found, would continue to grow
5 absent corrective action. The Commission acknowledged that responding to these
6 deficits by using the remaining life method "might result in sharp increases in revenue
7 requirements and in user charges were necessary:

8 With respect to telecommunications investment, the impact of new technology and the
9 transition from a monopoly to a competitive environment have led to an overall
10 shortening of life estimates. . . Absent a reversal of current trends and without corrective
11 action, the amount of the difference due to errors of life estimate will continue to grow,
12 and upon ultimate retirement the reserve provisions will not be adequate.

13 The trend for the telecommunications industry was to shorten lives, causing reserve deficits upon
14 asset retirements to remain competitive and widen profitability margins in the short-term. The
15 reverse is just as plausible in different environments, with life extensions that later create a
16 reserve surplus.

17 With respect to applying ELG to new additions only, the Supreme Court in *US West*
18 *Communications Inc. v Washington Utilities and Transportation Commission* affirmed that
19 applying ELG to the embedded investments would be inappropriate. Specifically, the Court held
20 that to use one method or procedure of depreciation for the first part of a vintage's life and then
21 change to a more accelerated procedure such as ELG for the later portion of life would result in
22 recovery that would be neither straight line nor based on any measure of life and would not
23 reasonably balance the interests of the company and the interests of ratepayers given the
24 intergenerational inequities it would create.⁵

25 Almost immediately on the FCC adopting the ELG procedure, it became apparent to utilities that
26 a mechanism must be developed that would be practicable enough to be implemented.⁶ That was
27 simple enough: the retirement pattern inherent in any standard Iowa curve was analyzed to
28 develop the implied equal life groups; that is, if there were a decrease of 1% between ages 4 and
29 5, that meant that 1% of the assets would have a life of 4.5 years – and then that ELG group life
30 went into developing the account life and rate.

31 A fundamental requirement for ELG was that actuarial vintage data would be maintained. Such data
32 includes records that show the age of the retirements (and the transfers/adjustments) being experienced.
33 The record-keeping problem of maintaining actuarial vintage data caused the dropping of the requirement
34 for vintage asset and reserve records – a requirement of the feature of an annual vintage reserve true-up.

⁵ Supreme Court of Washington, En Banc. *US West Communications, Inc., a Colorado corporation, Appellant, v. Washington Utilities and Transportation Commission, Respondent*, No. 64821-2, Decided December 24, 1997.

⁶ The initial ELG rates ordered by the FCC were individual ELG whole-life rates for each age within each plant account.

1 The shortcoming of now having no reserve-sensitivity introduced the solution of coupling ELG with the
 2 Remaining Life formula⁷ to provide reserve corrections.

3 Because ELG applied to new additions, only the survivors from the more recent vintages were used in
 4 developing an ELG service life, and the older vintages kept the traditional average service life approach.
 5 Then when the average service life of the entire account/category was composited, development of a
 6 remaining life for the account/category added the reserve sensitive feature. The bottom line being that the
 7 conceptual perfection of ELG was quickly abandoned to practicality – and the only result was that the new
 8 hybrid mechanism was simply one which shortened the life. That is, ELG, as brought into use, became
 9 merely a somewhat more complex remaining life rate development, using a shorter remaining life.

10 Q. CAN YOU PROVIDE A PRACTICAL EXAMPLE OF WHY THE EFFECT OF ELG
 11 FRONT LOADS COSTS AND SHORTENS THE REMAINING LIFE?

12 A. Yes. The table below compares the ELG and ASL depreciation rate in an example containing
 13 three vintages, each with a different life. As shown the ELG depreciation rate for 2010 is 45.7%
 14 compared to an ASL rate of 33.3%.

Table 2: Effect of Procedures on Depreciation Rates									
Vintage	Total Amount Placed	Average Life	Depr. Rate	ELG Depreciation Rates					
				2010	2011	2012	2013	2014	2015
2010	50,000	3.0	33.3%	45.7%	32.1%	26.1%	22.5%	20.0%	0.0%
2011	80,000	4.5	22.2		34.0	24.5	20.3	17.7	13.9
2012	100,000	5.5	18.2			29.3	21.4	17.9	15.7

15
 16 Table 2A details the total depreciation expenses for all three vintages 2010-2012 calculated under
 17 the ELG procedure using the depreciation rates shown. Table 2B details the total depreciation
 18 expenses for all three vintages under the ASL procedure. A comparison of the depreciation rate
 19 and expenses for each activity year using both ELG and ASL procedures is given below. As
 20 shown, when plant is growing (activity years 2010-2012) the ELG rate and expenses will always
 21 exceed the ASL rate and expenses.

⁷ The remaining life formula measures the unrecovered cost yet to be recovered (investment less reserve less net salvage) and recovers that over the remaining period the related assets will be serving the public. For example, investment of \$1,000 less reserve as of the study date of \$500 yields a cost yet to be recovered of \$500. Assuming a the remaining period of service is estimated to be 10 years results in annual remaining life expenses \$50.

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Table 2A: Depreciation Expenses – ELG Method

Beginning of Year	Placements	Retirements	Depreciable Base	ELG Depr. Rate	ELG Expenses
	(\$)	(\$)	(\$)	(%)	(\$)
<u>1-1-2010</u>	50,000				
2010 Vintage		10,000	50,000	45.7	22,850
<u>1-1-2011</u>	80,000				
2010 Vintage		10,000	40,000	32.1	12,840
2011 Vintage		10,000	80,000	34.0	27,200
2011 Composite			120,000	33.4	40,040
<u>1-1-2012</u>	100,000				
2010 Vintage		10,000	30,000	26.1	7,830
2011 Vintage		10,000	70,000	24.5	17,150
2012 Vintage		10,000	100,000	29.3	29,300
2012 Composite			200,000	27.1	54,280
<u>1-1-2013</u>	0				
2010 Vintage		10,000	20,000	22.5	4,500
2011 Vintage		10,000	60,000	20.3	12,180
2012 Vintage		10,000	90,000	21.4	19,260
2013 Composite			170,000	21.1	35,940
<u>1-1-2014</u>	0				
2010 Vintage		10,000	10,000	20.0	2,000
2011 Vintage		10,000	50,000	17.7	8,850
2012 Vintage		10,000	80,000	17.9	14,320
2014 Composite			140,000	18.0	25,170
<u>1-1-2015</u>	0				
2010 Vintage		0	0	0	0
2011 Vintage		10,000	40,000	15.9	6,360
2012 Vintage		10,000	70,000	15.7	10,990
2015 Composite			110,000	15.8	17,350

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3

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Table 2B: Depreciation Expenses – ASL Method

Beginning of Year	Placements	Retirements	Depreciable Base	ASL Depr. Rate	ASL Expenses
	(\$)	(\$)	(\$)	(%)	(\$)
<u>1-1-2010</u> 2010 Vintage	50,000	10,000	50,000	33.3	16,650
<u>1-1-2011</u> 2010 Vintage 2011 Vintage	80,000	10,000 10,000	40,000 80,000	33.3 22.2	13,320 17,760
2011 Composite			120,000	25.9	31,080
<u>1-1-2012</u> 2010 Vintage 2011 Vintage 2012 Vintage	100,000	10,000 10,000 10,000	30,000 70,000 100,000	33.3 22.2 18.2	9,990 15,540 18,200
2012 Composite			200,000	21.9	43,730

2

3 Q. IN YOUR EXPERIENCE, WHAT WAS THE KEY IMPETUS FOR IMPLEMENTING
4 ELG FOR CERTAIN UTILITIES IN THE US CONTEXT?

5 A. ELG was originally implemented for telecommunications companies where increased
6 competition and technological changes were resulting in large retirements being experienced at a
7 faster pace than perceived in the then approved life estimates. Initially, telecommunications
8 companies proposed individual ELG whole-life rates for each age within a given
9 account/category. The ELG depreciation rate was calculated for each age within the category in a
10 similar manner to that shown below.

Age	Amount Surviving	Amount Retired	Age of Amount Retired	Accruals		Depreciation Rate
				Each Group	Total	
A	B	C(A)= B(A)-B(A+1)	D=A+0.5	E=C/D	F=Sum E (A to end)	G=F/B%
0.0	1,500	0	0.5	0	685	
0.5	1,500	300	1.0	300	685	46.0
1.5	1,200	300	2.0	150	385	32.0
2.5	900	300	3.0	100	235	26.0
3.5	600	300	4.0	75	135	23.0
4.5	300	300	5.0	60	60	20.0
5.5	0	0	6.0	0		
Total	4,500	1,500		685		

11

12 For example, if 2015 were the first ELG year, the ELG rate in 2015 would be 46.0% for plant
13 placed in 2015. In 2016, the ELG rate would be 46.0% for plant placed in 2016 and 32.0% for
14 that investment remaining from the 2015 year placed, and so on. In 2017, the ELG rate would be
15 46.0% for plant placed in that year, 32.0% for that investment remaining from 2016, and 26.0%
16 for that investment remaining from the 2015 year placed.

1 One can quickly see that by 2024, this theoretically superior depreciation procedure would result
2 in ten separate ELG rates being required for each account/category/component. In addition, a
3 remaining life depreciation rate for the surviving investments prior to 2015 was required for each
4 account/category/component which costly and burdensome to implement. In order to reduce the
5 number of depreciation rates for each vintage and make the procedure simpler, a single ELG rate
6 representing the composite of the individual ELG rates developed for each vintage within the
7 account/category was developed.

8 A few years later (1985), the FCC decided to approve a composite ELG rate by prescribing a
9 single composite remaining life rate in which the vintage group and ELG vintages were
10 composited into a single average service life and average remaining life for each plant account.
11 So now, back to one rate applied to each account/category/component. So the theoretically pure
12 procedure that was touted as the most correct procedure, in reality became a hybrid mechanism
13 that produced shorter lives and resulting higher depreciation rates.

14

15 Q. CAN YOU COMMENT ON THE REPRESENTATION THAT HYDRO HAS
16 CHANGED TO THE ELG PROCEDURE TO AVOID THE ESTIMATED TWO YEARS AND
17 \$2 MILLION IT WOULD TAKE TO CORRECTLY COMPONENTIZE ASL SINCE THE ELG
18 PROCEDURE CALCULATES DEPRECIATION AT A MORE GRANULAR LEVEL WITHIN
19 EXISTING ASSET COMPONENT GROUPS, SATISFYING THE COMPONENTIZATION
20 REQUIREMENTS OF IFRS?

21 A. The statement that the ELG procedure avoids time and costs that would otherwise be
22 spent to componentize ASL is curious. As far as I can discern from the review of the documents I
23 have, Hydro has not determined how much more componentization, if any, will be required if the
24 status quo is held, that is no ELG procedure. So it is interesting to me that Hydro is claiming
25 there will be an undue expense incurred when it has no idea the extent of the additional
26 componentization. I am of the opinion that companies should componentize/sub-categorize,
27 when it is determined that investments are not living in a similar manner. One does not need
28 ELG for this.

29 The problem with ELG is one of practicality. As described above, the level/detail/accuracy of
30 record-keeping required for accurate use of ELG is neither practicable nor cost-effective. The
31 curve shapes and asset lives used in the current Hydro depreciation study should be based on and
32 adequately supported by actual information of the company's assets. Hydro's argument that the
33 required level of information needed for IFRS compliant ASL is concerning given the level of
34 change proposed in its current depreciation study that is not being driven by Manitoba Hydro
35 specific asset data. It would appear that accurate and relevant record-keeping are not necessary
36 for the purpose of this depreciation study. One needs only to apply a curve shape that first
37 determines the equal life groups for each vintage then depicts the retirement pattern each group
38 will experience. However, without maintaining the necessary data, one will not know if the equal
39 life groups are actually retiring in the manner estimated.

1 Major effective differences between ELG and ASL, insofar as the manner or allocation of
2 expense/recovery for viable plant classes (accounts/components/groupings for which a separate
3 depreciation rate is proposed), is in the timing of that recovery. This difference should only be of
4 major consequence in plant classes experiencing appreciable early retirements or infant mortality
5 and not in very long lived plant experiencing very few retirements, like Manitoba Hydro.

6 An **essential requirement** for ELG (if it is to meet its alleged characteristic of being the best
7 mechanism for matching recovery to consumption) is the ability to measure that recovery and
8 consumption. That is, the knowledge of how many items/dollars of plant have lived the predicted
9 age – which is to say, the knowledge of the age of the assets which have retired during any given
10 year. To the extent the actual investment/age mix of plant retiring during a year does not equal
11 the amount of retirements at the age-mix predicted under the ELG rates (curve), there has been an
12 over or under recovery. As in Whole Life rates⁸ (i.e. ELG rate applied from the onset of an asset
13 coming in service, there is no provision in the ELG formula to accommodate/correct over or
14 under recovery. This requires an annual, or other periodic, reserve true-up to match actual versus
15 predicted activity (this was the originally proposed approach in the telecommunications example),
16 or reliance on a blending of ELG/Remaining Life mechanisms (which was the approach
17 ultimately adopted by the FCC).

18 Q. WHAT DATA WOULD HYDRO REQUIRE IN ORDER TO PROPERLY
19 IMPLEMENT THE ELG PROCEDURE?

20 A. The ELG procedure is very sensitive to retirement patterns or curve shapes. Therefore, as
21 noted by NARUC in its Public Utility Depreciation Practices publication, detailed vintage plant
22 mortality data must be maintained from which future retirement patterns can be estimated.⁹ In
23 order for Hydro to implement the ELG procedure, I believe that it should be able to identify and
24 track the units that would be placed in each equal life group. Hydro's 2005 depreciation study
25 implies that historical data is a mix of aged and unaged data. However, there is no mention of
26 this in the 2014 depreciation study. In fact, the 2014 depreciation study almost implies that all
27 the data is aged. Unaged data does not become aged without some synthesization intervention.¹⁰
28 Additionally, there should be a regular reassessment of asset data to ensure that the property is
29 actually retiring in the fashion underlying the curve/life.

30 The amounts to be divided into equal life groups depend directly on the curve shape selected.
31 The table below demonstrates the sensitivity of the ELG procedure.

32

⁸ Whole Life depreciation rate – the whole life depreciation rate is calculated as the investment divided by the average service life in years. Whole life depreciation rates are not reserve-sensitive and so do not consider the need to recover any reserve imbalance that may exist.

⁹ NARUC Public Utility Depreciation Practices, August 1996, page 165.

¹⁰ Synthesized – where unaged activity (additions, retirements, and adjustments/transfers) are allocated to various vintages based on a curve shape and life value. The data is synthesized or aged in accord with a curve shape and life.

Activity Year	Age	Selected Curve Shape					
		Iowa L0		Iowa S1		Iowa R5	
		Expenses \$	Rate %	Expenses \$	Rate %	Expenses \$	Rate %
1	0.5	30,632	31.5	25,099	25.1	20,491	20.5
2	1.5	20,475	23.5	22,201	22.9	20,491	20.5
3	2.5	14,372	19.2	18,188	20.5	20,491	20.5

1

2 The above three curves illustrate the difference in depreciation expenses and rates resulting from
3 using curves with different shapes. The table shows that using the L family of curves will result
4 in greater depreciation expenses in the early years using ELG. The sensitivity of ELG to curve
5 shapes cannot be ignored. If a company was looking for a way to increase its depreciation rates
6 and cash flows, then it would be advantageous for them to select an L family curve that indicates
7 high infant mortality, translating into higher depreciation rates. Even when a curve shape is
8 chosen based on informed judgment, plant generally does not retire precisely in accord with the
9 shape selected. The resulting reserve imbalance between projected and actual retirement
10 experience should either be addressed through recovery over the remaining life or recovery over a
11 shorter period of time.

12 For ELG to be properly applicable, actuarial (aged data) vintage activity data should be available
13 for each vintage to which the procedure is applied, as should vintage reserve activity data. To the
14 extent this data is not available, computer programs are used to synthesize (or age) the data based
15 on a given curve shape and life. Retirements are distributed (aged) in accord with an Iowa curve
16 shape, key to the life indication of the activity during the period being studied.

17 The curve shape being used tells us that, for a given service life value, a certain percent of the
18 survivors at a given age will retire. The calculation, when completed will indicate that too many
19 or too few retirements result from the chosen curve shape and life value. The shape and/or the
20 life value can then be changed until the proper number of retirements are calculated. Then, from
21 that, it can be said that if this investment experiences this many retirements in the pattern of this
22 curve shape, there is an indication that it will live this period of time.

23 Consider the situation that ELG is touted as the best mechanism for accurate recovery but,
24 lacking the proper measurement of recovery which is up to its standard of presumed perfection,
25 ELG has come to rely on a blending with remaining life to assure correction for its under/over
26 recovery. In which case, accept the ELG mechanism as one to produce increased cash flow, and
27 forget the purist argument of ideally matching recovery with consumption.

28 An infirmity shared by each of these formulae is that mortals must estimate the expected lives and
29 curve shapes of the plant. Because of the nature of the ELG formula, it is more sensitive to errors
30 in projected lives and/or mortality dispersions (retirement patterns). To the extent a category has
31 had miniscule retirements, fitting an appropriate Iowa curve becomes very subjective.

1 It is clear that for many of Hydro’s accounts, there has been insufficient retirement activity from
2 which to derive a future pattern. In many accounts, the data indicates that 90 percent or more of
3 the curve must be estimated as there is only 10 percent actual retirement data. This leaves a
4 considerable amount of the curve to be estimated which opens the door to much subjectivity. A
5 limited amount of retirement experience lends itself to a wide array of possible curve shape/life
6 combinations, one of which Mr. Kennedy has selected. The choice of curve shape can influence
7 the life indication substantially and ultimately the depreciation expense used to set revenue rates.

8 Although I do not recommend that the Board approve Manitoba’s proposal to move to the ELG
9 depreciation procedure for ratemaking purposes, if it does I would urge the Board to

- 10 • Adopt ELG for new additions only.
- 11 • Adopt a 3-year phase in approach.
- 12 • Require Manitoba to maintain the requisite actuarial data for each vintage to which an
13 ELG rate is applied as well as vintage reserve data.
- 14 • Require a depreciation study at least once every three years to monitor the status and to
15 address any needed adjustments.

16 Q. HYDRO HAS STATED THAT THE COMPANY IS IN A PERIOD CALLED THE
17 “DECADE OF INVESTMENT”, THAT IS TO SAY THAT HYDRO CONTINUES TO
18 INVEST IN NEW ASSETS BE IT FOR GENERATION, TRANSMISSION OR SUSTAINING
19 CURRENT CAPITAL RESOURCES. WITHIN THIS PERIOD OF HIGH GROWTH THAT
20 RATEPAYERS ARE EXPECTED TO PAY FOR OVER THE NEXT SEVERAL DECADES
21 CAN YOU COMMENT ON THE IMPLICATIONS FOR RATEPAYERS OF USING ELG
22 VERSUS ASL?

23 A. Yes. When plant investment is growing the ELG rate and accruals will always exceed
24 the vintage group ASL rate and accruals thereby causing an increase in revenue requirements.
25 Not until the investment begins to decline will the ASL rate and accruals increase and eventually
26 exceed the ELG rate and accruals. In an account experiencing high growth, a crossover point
27 may never occur. The resulting effect is a higher current ratepayer cost without any
28 corresponding increased asset use. The next generation of ratepayers, who are presumably
29 supposed to experience lower costs, may not reap those benefits for a much longer period of time
30 as lower costs may not occur until after the plant investment ceases. The FCC recognized that the
31 ELG procedure results in annual depreciation expenses that are higher in the early years of a
32 vintage’s life, thereby putting pressure on customer rates. It is for this reason that when the FCC
33 adopted the ELG procedure, it did so on a 3-year phase-in period to reduce the immediate impact
34 on depreciation expense and revenue requirements.¹¹

¹¹ NARUC Public Utility Depreciation Practices, August 1996, page 176.

Table 5: EFFECT OF DIFFERENT PROCEDURES ON DEPRECIATION RATES AND EXPENSES				
Activity Year	ELG		ASL	
	Depreciation		Depreciation	
	Rate	Expenses	Rate	Expenses
2011	45.7%	\$22,850	33.3%	\$16,650
2012	33.4	40,040	25.9	31,080
2013	27.1	54,280	21.9	43,730
2014	21.1	35,940	21.4	36,360
2015	18.0	25,170	20.7	28,990
2016	15.8	17,350	19.7	21,620

1 Source: NARUC Public Utility Depreciation Practices, page 178.

2 As shown above, when investments are growing (activity years 2011-2013) the ELG rate and
 3 expenses are higher than the ASL depreciation rate and expenses. It is not until the plant begins
 4 declining (2014-2016) that the ASL rate and expenses increase and are eventually higher than the
 5 ELG rate and expenses. In a growing account, a crossover point may not occur for a very long
 6 time if ever.

7 Q. WHAT ARE THE LASTING CONSEQUENCES OF HYDRO’S PROPOSAL ON
 8 RATEPAYERS IF ELG IS ADOPTED FOR RATEMAKING PURPOSES?

9 A. The lasting consequences of Hydro’s proposal on ratepayers if ELG is adopted for
 10 ratemaking purposes will be higher depreciation expenses and higher revenue rates. There are
 11 also intergenerational equity and fairness issues if the Board approves Hydro’s proposal to apply
 12 ELG to not only new additions but also to embedded plant.

13

14 III. APPROPRIATENESS OF ASL FOR RATE REGULATION PURPOSES

15 Q. IN YOUR VIEW, IS THE AVERAGE SERVICE LIFE (ASL) PROCEDURE AS IT IS
 16 CURRENTLY EMPLOYED BY MANITOBA HYDRO AN APPROPRIATE DEPRECIATION
 17 PROCEDURE FOR UTILITY RATE SETTING?

18 A. Yes, the Average Service Life procedure as currently employed by Manitoba Hydro is
 19 appropriate for ratemaking purposes. In the 2005 depreciation study, Mr. Kennedy stated that
 20 “the average service life procedure was used in order to conform to past Company practices and
 21 for consistency with the practices of other subsidiary companies.” In the 2014 depreciation study,
 22 ELG is recommended to comply with IFRS. It is my opinion that IFRS should not dictate
 23 ratemaking policy. The company asserts that it does not want to keep two sets of books – one for
 24 financial accounting and one for regulatory. Hydro and Mr. Kennedy do not view ELG
 25 implementation as being burdensome because the computer calculates everything. For this
 26 reason, I do not understand the adversity to keeping two sets of books as this can also be handled
 27 by the computer. Many telecommunications carriers maintained two and often three sets of
 28 books prior to deregulation – one for federal interstate, one for intrastate, and one for financial

1 reporting purposes. Some electric companies in the United States already have maintain two sets
2 of books, one for regulatory and one for financial reporting.

3 ELG is not the standard for electric, gas, or water companies across the United States. For
4 telecommunications companies, a hybrid of ELG was implemented mainly to increase cash flow
5 with increased competition and technological changes. As Hydro is a monopoly and
6 technological changes do not have immediate impacts on its proven useful long-lived asset base,
7 neither of these claims should be driving the change for the Corporation.

8 Hydro's argument that gains and/or losses on retirement that would be seen under the ASL
9 procedure would result in rate instability does not logically make sense at the current level of
10 componentization with ELG. It is my opinion that companies should componentize,
11 subcategorize, or subaccount as the need arises for separating out investments expected to live in
12 a different fashion from the group. Gains and losses are recognized on a current year basis and a
13 depreciation study for rate setting purposes looks at what will be lost or gained prospectively. It
14 is speculative.

15 In response to PUB/MH 1-37c, Hydro states that:

16 The ASL based Gannett Fleming depreciation study filed in the previous GRA
17 was not IFRS compliant as the level of asset componentization was not at a
18 sufficient level to satisfy the componentization requirements of IFRS due to the
19 wide dispersion in service lives that exist in many asset groups. An in-depth
20 depreciation study and auditor review would need to be conducted to identify all
21 new asset components that would be required to develop IFRS compliant ASL
22 based depreciation rates.

23 Hydro has not sufficiently shown that additional asset componentization, if any, would be
24 required using the ASL procedure. It is my opinion that Hydro should be allowed to implement
25 ELG for IFRS purposes if it deems appropriate but continue with the ASL procedure for rate
26 setting purposes. Regulatory accounting does not have to match financial accounting. However,
27 when the two are different, there should be a good reason for doing so. For all the reasons
28 discussed above, it is my opinion that these justify the two being different in this case.

29

30 IV. DEPRECIATION RESERVE SURPLUS

31 Q. WHAT IS YOUR RECOMMENDATION REGARDING THE TREATMENT OF THE
32 RESERVE SURPLUS REGARDLESS OF WHICH DEPRECIATION PROCEDURE IS USED?

33 A. There are a couple of different approaches to treating the reserve surplus – recovery over
34 the remaining life or recovery over a shorter period of time. I believe either approach is
35 satisfactory. It can be argued that a reserve surplus is not that important to deviate from recovery
36 over the remaining life. The perceived over-recovery has already been paid by past customers
37 and they may not be the ones to receive the benefits of reduced expenses. The rate base is at a
38 reduced level and it can be advantageous to retain that position. The perceived over-recovery

1 may not be real; there appears to be more tendency to understate requirements than to overstate.
2 On the other hand, the matching concept would argue for a quick write-off of any surplus, the
3 quicker the better in order that the ratepayers who may have overpaid would have a chance of
4 benefitting.

5 The company will continue to effectively pay ratepayers on the surplus until it is corrected. A
6 reserve imbalance, whether it is a deficiency or a surplus, has been brought about by such things
7 as miss-estimates of life/salvage. It is a misstatement of the rate base and a failure of the
8 matching principle. If there is an immediate or short-term correction, it will benefit current
9 customers who may or may not be those who paid the surplus. If the correction is made over the
10 remaining life, intergenerational inequity still exists; the impact is lessened because the correction
11 is made over a longer period of time, assuming the current life projections do not change.

12 There may seem to be a conflict between a rapid corrective amortization of a reserve imbalance
13 and the matching principle. A reserve imbalance is an indication of a historic failure of the
14 matching principle. The depreciation expenses of the past were misstated. There is no way we
15 can go back to the past and correct that, so we should make the correction now, as quickly as
16 practicable, to reduce the spread of misstatement into the future. Also the reserve, ergo rate base,
17 is currently misstated, and we should correct that as quickly as practicable, whether that is over
18 the remaining life or a shorter period of time. These corrections are not life related, in that they
19 do not relate to a period of service remaining to the embedded plant - they are corrections of the
20 past. They are a step toward a return to the matching principle as quickly as can be
21 accomplished.

22 A word of caution concerning reliance on the remaining life mechanism to correct a reserve imbalance. If
23 the group/account/component experiences substantial growth, the remaining life of tomorrow could be
24 longer than it is today. This is because new additions have a much younger age than the embedded
25 investments. If additions are substantial, the age of the account/component/group at the next depreciation
26 review could in fact be younger than today. This would translate to a longer average remaining life, all
27 other things being equal. In such a case, correction of the reserve imbalance over the remaining life could
28 result in a correction spread over a longer period of time, perhaps even the remaining life of the utility.

29 There is also the possibility of withdrawing perceived major reserve imbalances to an
30 amortization schedule, and writing them off over a shorter period. In this case, since the
31 imbalance is not associated with the life of the currently embedded assets, this shorter period can
32 be as short as financial practicability permits.

33 It can be argued that this practice results in an inter-generational unfairness to the ratepayers of
34 yesterday versus tomorrow. That situation already exists, as witness the existence of a reserve
35 imbalance. The only question is how long will we take to correct the situation?

1 V. NET SALVAGE

2 Q. WHILE HYDRO IS PROPOSING TO REMOVE THE NET SALVAGE PROVISION
3 IN ORDER TO COMPLY WITH IFRS, IS THERE ALUE IN REMOVING THE NET
4 SALVAGE PROVISION FOR RATE SETTING PURPOSES?

5 A. Utilities are generally not dismantling major generation sites but are rather using the site
6 for other generation purposes. For example, it is not uncommon electric companies to convert a
7 steam generating site to gas. While there will be retirements involved in this process, there is no
8 “return to greenfield” and it has been recognized that the alternative of a new site with the costs
9 for the required land, permits, licensing, rights of way, roads, etc. are too expensive. When this is
10 done often the majority of the associated costs are recorded as new costs, not as retirement costs
11 of the old asset. Therefore the reuse of existing sites has become more common. Any required
12 dismantlement costs associated with the final retirement of the site can still be properly accounted
13 for using an Asset Retirement Obligation (ARO).

14

15 VI. GLOSSARY

16 Average Remaining Life Technique – the remaining undepreciated plant (net book value – plant
17 investment less reserve less any salvage) in each account is depreciated over the current estimate
18 of the remaining life of that account.

19 Average Service Life – all assets acquired in a given year (vintage) are grouped into a category
20 and then the lives are averaged.

21 Actuarial data – requires aged data in which the age of each retirement is known. For example,
22 \$20,000 that retired in 2009 was originally placed in service in 2000, thus it was 9.5 years of age
23 when it retired. The original placements in 2000 are reduced by the \$20,000 retirement.

24 Capital recovery – the process of including revised resulting depreciation expenses in revenue
25 rates.

26 Equal Life Group (ELG) – ELG is a procedure of calculating a depreciation rate based on
27 this life expectations of each of the equally-lived sub-groups constituting a vintage group
28 - or composited to an account or category rate. That is, the vintage group is divided into
29 sub-groups, each of which is expected to live an equal life. That is to say that each item in
30 any given equal life group is expected to have the same life as each other item in that group.
31 The required capital recovery for the vintage is then the summation of the requirements for
32 each contained equal life group; each individual equal life group is expected to recover its
33 invested capital during the period that group is in service.

34 Survivor curve – a graphical picture of the amount of property surviving at each age through the
35 life of the property group. The graph plots the percents surviving on the y-axis and the age on the
36 x-axis. The survivor curve depicts the expected retirement distribution (or survival distribution)
37 of plant in an account over time.

- 1 Vintage – year of placement of a group of property.
- 2 Whole Life Technique – the whole life technique bases the depreciation rate on the estimated
- 3 average service life of the plant.

UTILITY PROCEEDINGS
IN WHICH PAT LEE PARTICIPATED OR
PRESENTED TESTIMONY AT THE FLORIDA PUBLIC SERVICE COMMISSION

2011

Docket 110233 -- Petition for approval of 2011 Depreciation Study by Sebring Gas Systems, Inc.

Docket 110207 -- 2011 depreciation study by Florida Public Utilities Company.

Docket 110131 -- Petition for approval of 2011 depreciation study and annual dismantlement accrual amounts by Tampa Electric Company.

2010

Docket 100461 -- Petition for approval of nuclear decommissioning cost study, by Progress Energy Florida, Inc.

Docket 100458 -- Petition for approval of 2010 nuclear decommissioning study, by Florida Power & Light Company.

Docket 100368 -- Request for approval to initiate depreciation of a Landfill Gas to Energy Facility in Escambia County by Gulf Power Company.

Docket 100136 -- Petition for approval of an accounting order to record a depreciation expense credit, by Progress Energy Florida, Inc.

2009

Docket 090403 -- Request for approval to begin depreciating West County Energy Center Units 1 and 2 combined cycle units using whole life depreciation rates currently approved for Martin Power Plant Unit 4, by Florida Power & Light Company.

Docket 090319 -- Depreciation and dismantlement study at December 31, 2009, by Gulf Power Company.

Docket 090144 -- Petition for limited proceeding to include Bartow repowering project in base rates, by Progress Energy Florida, Inc.

Docket 090130 -- 2009 depreciation and dismantlement study by Florida Power & Light Company.

Docket 090125 -- Petition for increase in rates by Florida Division of Chesapeake Utilities Corporation.

Docket 090079 -- Petition for increase in rates by Progress Energy Florida, Inc.

UTILITY PROCEEDINGS
IN WHICH PAT LEE PARTICIPATED OR
PRESENTED TESTIMONY AT THE FLORIDA PUBLIC SERVICE COMMISSION

2008

Docket 080677 -- Petition for increase in rates by Florida Power & Light Company.

Docket 080548 -- 2008 depreciation study by Florida Public Utilities Company.

Docket 080366 -- Petition for rate increase by Florida Public Utilities Company.

Docket 080317 -- Petition for rate increase by Tampa Electric Company.

2007

Docket 070736 -- Petition by Intrado Communications, Inc. for arbitration of certain rates, terms, and conditions for interconnection and related arrangements with BellSouth Telecommunications, Inc. d/b/a AT&T Florida, pursuant to Section 252(b) of the Communications Act of 1934, as amended, and Sections 120.80(13), 120.57(1), 364.15, 364.16, 364.161, and 364.162, F.S., and Rule 28-106.201, F.A.C.

Docket 070699 -- Petition by Intrado Communications, Inc. for arbitration of certain rates, terms, and conditions for interconnection and related arrangements with Embarq Florida, Inc., pursuant to Section 252(b) of the Communications Act of 1934, as amended, and Section 364.162, F.S.

Docket 070671 -- Petition for approval to eliminate intraLATA toll customer contact protocols, by Verizon Florida LLC.

Docket 070646 -- Petition for approval to revise customer contact protocol by BellSouth Telecommunications, Inc. d/b/a AT&T Florida.

Docket 070552 -- Petition and complaint for expedited proceeding or, alternatively, petition and complaint or petition for declaratory statement, by MetroPCS Florida, LLC, requiring BellSouth Telecommunications, Inc. d/b/a AT&T Florida d/b/a AT&T Southeast; TDS Telecom d/b/a TDS Telecom/Quincy Telephone; Windstream Florida, Inc.; Northeast Florida Telephone Company d/b/a NEFCOM; GTC, Inc. d/b/a GT Com; Smart City Telecommunications, LLC d/b/a Smart City Telecom; ITS Telecommunications Systems, Inc.; and Frontier Communications of the South, LLC, to submit agreements for transit services provided by AT&T Florida for approval.

Docket 070408 -- Petition by Neutral Tandem, Inc. and Neutral Tandem-Florida, LLC for resolution of interconnection dispute with Level 3 Communications, LLC, and request for expedited resolution.

UTILITY PROCEEDINGS
IN WHICH PAT LEE PARTICIPATED OR
PRESENTED TESTIMONY AT THE FLORIDA PUBLIC SERVICE COMMISSION

Docket 070295 -- Request for approval of traffic termination agreement between Neutral Tandem-Arizona, LLC, Neutral Tandem-Colorado, LLC, Neutral Tandem-Florida, LLC, Neutral Tandem-Georgia, LLC, Neutral Tandem-Maryland, LLC, Neutral Tandem-Nevada, LLC, Neutral Tandem-South Carolina, LLC, Neutral Tandem-Tennessee, LLC, Neutral Tandem-Texas, LLC, Neutral Tandem-Virginia, LLC, Neutral Tandem-Washington, D.C., LLC, and Xspedius Management Co. Switched Services, LLC, Xspedius Management Co. of D.C., LLC, and Xspedius Management Co. of Virginia, LLC.

Docket 070295 -- Request for approval of traffic termination agreement between Neutral Tandem-Arizona, LLC, Neutral Tandem-Colorado, LLC, Neutral Tandem-Florida, LLC, Neutral Tandem-Georgia, LLC, Neutral Tandem-Maryland, LLC, Neutral Tandem-Nevada, LLC, Neutral Tandem-South Carolina, LLC, Neutral Tandem-Tennessee, LLC, Neutral Tandem-Texas, LLC, Neutral Tandem-Virginia, LLC, Neutral Tandem-Washington, D.C., LLC, and Xspedius Management Co. Switched Services, LLC, Xspedius Management Co. of D.C., LLC, and Xspedius Management Co. of Virginia, LLC.

Docket 070127 -- Petition for interconnection with Level 3 Communications and request for expedited resolution, by Neutral Tandem, Inc.

2006

Docket 060767 -- Petition of MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services for arbitration of disputes arising from negotiation of interconnection agreement with Embarq Florida, Inc.

Docket 060644 -- Petition to recover 2005 tropical system related costs and expenses, by Embarq Florida, Inc.

Docket 060598 -- Petition to recover 2005 tropical system related costs and expenses, by BellSouth Telecommunications, Inc.

Docket 060479 -- Petition by Verizon Florida Inc. for resolution of dispute with XO Communications Services, Inc. concerning non-UNE transport facilities retained at UNE prices.²

Docket 060296 -- Referral by the Circuit Court of Baker County, Florida to determine whether or not Southeastern Services, Inc. is legally responsible for payment to Northeast Florida Telephone for originating intrastate access charges under Northeast Florida Telephone's Public Service Commission approved tariff for the long distance calls provided by Southeastern Services, Inc. as alleged in the Amended Complaint.

UTILITY PROCEEDINGS
IN WHICH PAT LEE PARTICIPATED OR
PRESENTED TESTIMONY AT THE FLORIDA PUBLIC SERVICE COMMISSION

Docket 060083 -- Complaint of Northeast Florida Telephone Company d/b/a NEFCOM against Southeastern Services, Inc. for alleged failure to pay intrastate access charges pursuant to NEFCOM's tariffs, and for alleged violation of Section 364.16(3)(a), F.S.

2005

Docket 050419 -- Petition by MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services for arbitration of certain terms and conditions of proposed interconnection agreement with BellSouth Telecommunications, Inc.

Docket 050297 -- Emergency petition by Saturn Telecom Services Inc. d/b/a STS Telecom to require BellSouth Telecommunications, Inc. to allow additional lines and locations to STS's embedded base, and for expedited relief.

Docket 050172 -- Emergency petition of Ganoco, Inc. d/b/a American Dial Tone, Inc. for Commission order directing Verizon Florida Inc. to continue to accept new unbundled network element orders pending completion of negotiations required by "change of law" provisions of interconnection agreement in order to address the FCC's recent Triennial Review Remand Order (TRRO).

Docket 050119 -- Joint petition by TDS Telecom d/b/a TDS Telecom/Quincy Telephone; ALLTEL Florida, Inc.; Northeast Florida Telephone Company d/b/a NEFCOM; GTC, Inc. d/b/a GT Com; Smart City Telecommunications, LLC d/b/a Smart City Telecom; ITS Telecommunications Systems, Inc.; and Frontier Communications of the South, LLC ["Joint Petitioners"] objecting to and requesting suspension and cancellation of proposed transit traffic service tariff filed by BellSouth Telecommunications, Inc.

Docket 050059 -- Petition to reform unbundled network element (UNE) cost of capital and depreciation inputs to comply with Federal Communications Commission's guidance in Triennial Review Order, by Verizon Florida Inc.

2004

Docket 041338 -- Joint petition by ITC^DeltaCom Communications, Inc. d/b/a ITC^DeltaCom d/b/a Grapevine; Birch Telecom of the South, Inc. d/b/a Birch Telecom and d/b/a Birch; DIECA Communications, Inc. d/b/a Covad Communications Company; Florida Digital Network, Inc.; LecStar Telecom, Inc.; MCI Communications, Inc.; and Network Telephone Corporation ("Joint CLECs") for generic proceeding to set rates, terms, and conditions for hot cuts and batch hot cuts for UNE-P to UNE-L conversions and for retail to UNE-L conversions in BellSouth Telecommunications, Inc. service area.

UTILITY PROCEEDINGS
IN WHICH PAT LEE PARTICIPATED OR
PRESENTED TESTIMONY AT THE FLORIDA PUBLIC SERVICE COMMISSION

Docket 041269 -- Petition to establish generic docket to consider amendments to interconnection agreements resulting from changes in law, by BellSouth Telecommunications, Inc.

Docket 040927 -- Complaint of Saturn Telecommunications Services, Inc. d/b/a STS Telecom against BellSouth Telecommunications, Inc. for declaratory relief regarding BellSouth's request for amendment pursuant to "change of law" provision of interconnect agreement.

Docket 040530 -- Petition for expedited ruling requiring BellSouth Telecommunications, Inc. and Verizon Florida Inc. to file for review and approval any agreements with CLECs concerning resale, interconnection, or unbundled network elements, by Florida Competitive Carriers Association, AT&T Communications of the Southern States, LLC d/b/a AT&T, MCImetro Access Transmissions Services LLC, and MCI WorldCom Communications, Inc.

Docket 040520 -- Emergency petition seeking order requiring BellSouth Telecommunications, Inc. and Verizon Florida Inc. to continue to honor existing interconnection obligations, by the Florida Competitive Carriers Association, AT&T Communications of the Southern States, LLC, MCImetro Access Transmission Services, LLC, and MCI WorldCom Communications, Inc.

Docket 040489 -- Emergency complaint seeking order requiring BellSouth Telecommunications, Inc. and Verizon Florida Inc. to continue to honor existing interconnection obligations, by XO Florida, Inc. and Allegiance Telecom of Florida, Inc. (collectively, Joint CLECs).

Docket 040156 -- Petition for arbitration of amendment to interconnection agreements with certain competitive local exchange carriers and commercial mobile radio service providers in Florida by Verizon Florida Inc.

2003

Docket 031125 -- Complaint against BellSouth Telecommunications, Inc. for alleged overbilling and discontinuance of service, and petition for emergency order restoring service, by IDS Telcom LLC.

Docket 031047 -- Request for approval of interconnection agreement between Sprint-Florida, Incorporated, KMC Telecom III LLC, KMC Telecom V, Inc. and KMC Data LLC.

Docket 030852 -- Implementation of requirements arising from Federal Communications Commission's triennial UNE review: Location-Specific Review for DS1, DS3 and Dark Fiber Loops, and Route-Specific Review for DS1, DS3 and Dark Fiber Transport.

UTILITY PROCEEDINGS
IN WHICH PAT LEE PARTICIPATED OR
PRESENTED TESTIMONY AT THE FLORIDA PUBLIC SERVICE COMMISSION

Docket 030851 -- Implementation of requirements arising from Federal Communications Commission's triennial UNE review: Local Circuit Switching for Mass Market Customers.

Docket 030715 -- Proposed amendment of Rule 25-30.140, F.A.C., Depreciation.

Docket 030714 -- Proposed adoption of Rule 25-6.04364, F.A.C., Electric Utilities Dismantlement Studies.

Docket 030558 -- Request for approval of revised fossil dismantlement studies by Florida Power & Light Company.

Docket 030512 -- Request for approval to begin depreciating Fort Myers Combustion Turbines 3A and 3B using whole life depreciation rates currently approved for Martin Power Plant, Unit No. 4, by Florida Power & Light Company.

Docket 030409 -- Petition for approval of 2003 depreciation study by Tampa Electric Company.

Docket 030222 -- Request for approval of change in depreciation rates to be implemented as of 10/1/03, by City Gas Company of Florida.

Docket 030139 -- Request for approval to begin depreciating Sanford Unit No. 4 using whole life depreciation rates currently approved for Martin Power Plant, Unit No. 4, by Florida Power & Light Company.

Docket 030048 -- 2003 depreciation study for Indiantown Gas Company.

2002

Docket 021014 -- Petition for approval to amortize gain on sale of property by Florida Public Utilities Company.

Docket 020943 -- Petition for approval of Agreement for Purpose of Ensuring Compliance with Ozone Ambient Air Quality Standards between Gulf Power Company and Florida Department of Environmental Protection pursuant to Section 366.8255(1)(d)7, F.S., for purposes of cost recovery of related expenditures and expenses through environmental cost recovery clause.

Docket 020853 -- 2002 depreciation filing by Florida Public Utilities Company.

UTILITY PROCEEDINGS
IN WHICH PAT LEE PARTICIPATED OR
PRESENTED TESTIMONY AT THE FLORIDA PUBLIC SERVICE COMMISSION

Docket 020726 -- Petition for approval of new environmental program for cost recovery through environmental cost recovery clause by Tampa Electric Company.

Docket 020648 -- Petition for approval of environmental cost recovery of St. Lucie Turtle Net Project for period of 4/15/02 through 12/31/02 by Florida Power & Light Company.

Docket 020566 -- Petition for approval of recovery schedule for two Gannon Station generating units, effective January 1, 2002, by Tampa Electric Company.

Docket 020340 -- Request by Florida Public Utilities Company for depreciation rates to reflect acquisition of Atlantic Utilities, a Florida Division of Southern Union Company d/b/a South Florida Natural Gas.

Docket 020332 -- Request for approval to begin depreciating Sanford Unit No. 5, using whole life depreciation rates currently approved for Martin Power Plant, Unit No. 4 and Common, and expand Ft. Myers depreciation rates to include heat recovery steam generators (HRSGs), effective with in-service date of unit, by Florida Power & Light Company.

Docket 020304 -- 2002 depreciation filing by Florida Division of Chesapeake Utilities Corporation.

2001

Docket 011595 -- Request for depreciation rates for new accounts, by Indiantown Gas Company.

Docket 010949 -- Request for rate increase by Gulf Power Company.

Docket 010906 -- Request for approval of depreciation study for five-year period 1996 through 2000 by Sebring Gas System, Inc.

Docket 010789 -- 2001 Depreciation and Dismantling Study by Gulf Power Company.

Docket 010669 -- Request for approval of implementation date of January 1, 2002, for new depreciation rates for Marianna Electric Division by Florida Public Utilities Company.

Docket 010668 -- Petition for approval of recovery schedule for three generating units, effective January 1, 2001, by Tampa Electric Company.

Docket 010383 -- Application for approval of new depreciation rates by Tampa Electric Company d/b/a Peoples Gas System.

UTILITY PROCEEDINGS
IN WHICH PAT LEE PARTICIPATED OR
PRESENTED TESTIMONY AT THE FLORIDA PUBLIC SERVICE COMMISSION

Docket 010261 -- Petition by Florida Power & Light Company for waiver of certain requirements of Rule 25-6.0436, F.A.C., as they apply to filing of depreciation study.

Docket 010107 -- Request for approval to begin depreciating Martin Simple Cycle Expansion Project by use of Whole Life Depreciation Rates currently approved for Martin Power Plant, Unit No. 4 and Common effective with in-service dates of units, by Florida Power & Light Company.

Docket 010031 -- 2000 Fossil Dismantlement Cost Study by Florida Power Corporation.

2000

Docket 001835 -- Petition for approval of revised annual accrual for nuclear decommissioning costs by Florida Power Corporation.

Docket 001608 -- Petition for approval of depreciation rates for new plant subaccounts by Florida Power Corporation.

Docket 001447 -- Request for rate increase by St. Joe Natural Gas Company, Inc.

Docket 001437 -- Request by Florida Power & Light Company for approval to begin depreciating Ft. Myers Power Plant using whole life depreciation rates currently approved for Martin Power Plant, Unit No. 4.

Docket 001148 -- Review of the retail rates of Florida Power & Light Company.

Docket 000824 -- Review of Florida Power Corporation's earnings, including effects of proposed acquisition of Florida Power Corporation by Carolina Power & Light.

Docket 000686 -- Revised depreciation study for Gannon Station by Tampa Electric Company.

Docket 000543 -- Proposed Rule 25-6.04365, F.A.C., Nuclear Decommissioning.

Docket 000518 -- Revised depreciation study for Sanford Site by Florida Power & Light Company.

Docket 000108 -- Request for rate increase by Florida Division of Chesapeake Utilities Corporation.

UTILITY PROCEEDINGS
IN WHICH PAT LEE PARTICIPATED OR
PRESENTED TESTIMONY AT THE FLORIDA PUBLIC SERVICE COMMISSION

1999

Docket 991931 -- Determination of appropriate method of recovery for the last core of nuclear fuel for Florida Power & Light Company and Florida Power Corporation.

Docket 990947 -- Petition for a full revenue requirements rate case for Gulf Power Company by the Citizens of the State of Florida.

Docket 990707 -- Proposed amendments to Rule 25-6.0142, F.A.C., Uniform Retirement Units for Electric Utilities.

Docket 990649B -- Investigation into pricing of unbundled network elements (Sprint/Verizon track).

Docket 990649A -- Investigation into pricing of unbundled network elements (BellSouth track).

Docket 990529 -- Petition for 1999 depreciation study by Tampa Electric Company.

Docket 990324 -- Disposition of Florida Power & Light Company's accumulated amortization pursuant to Order PSC-96-0461-FOF-EI.

Docket 990321 -- Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for generic investigation to ensure that BellSouth Telecommunications, Inc., Sprint-Florida, Incorporated, and GTE Florida Incorporated comply with obligation to provide alternative local exchange carriers with flexible, timely, and cost-efficient physical collocation.

Docket 990302 -- Depreciation study by Florida Public Utilities Company.

Docket 990229 -- Depreciation study by City Gas Company of Florida.

Docket 990067 -- Petition by The Citizens of the State of Florida for a full revenue requirements rate case for Florida Power & Light Company.

1998

Docket 981834 -- Petition of Competitive Carriers for Commission action to support local competition in BellSouth Telecommunications, Inc.'s service territory.

Docket 981390 -- Investigation into the equity ratio and return on equity of Florida Power & Light Company.

UTILITY PROCEEDINGS
IN WHICH PAT LEE PARTICIPATED OR
PRESENTED TESTIMONY AT THE FLORIDA PUBLIC SERVICE COMMISSION

Docket 981246 -- Petition by Florida Power & Light Company for approval of annual accrual for Turkey Point and St. Lucie nuclear decommissioning unit costs.

Docket 981166 -- Request for approval of revised fossil dismantlement expense accruals, effective 1/1/99, by Florida Power & Light Company.

Docket 980845 -- 1998 Depreciation Study by Indiantown Gas Company.

Docket 980733 -- Discovery related to study on fair and reasonable rates and on relationships among costs and charges associated with certain telecommunications services provided by local exchange companies (LECs), as required by Chapter 98-277, Laws of Florida.

Docket 980723 -- Petition for approval of accounting methodology for Year 2000 costs by City Gas Company of Florida.

Docket 980700 -- 1997 depreciation study by Atlantic Utilities, a Florida Division of Southern Union Company d/b/a South Florida Natural Gas.

Docket 980696 -- Determination of the cost of basic local telecommunications service, pursuant to Section 364.025, Florida Statutes.

Docket 980583 -- 1998 depreciation study by Florida Public Utilities Company, Fernandina Beach Division.

Docket 980366 -- Request by Gulf Power Company for approval to initiate amortization of a cogeneration facility projected to be placed in service in April 1998.

Docket 980103 -- 1997 depreciation study by St. Joe Natural Gas Company, Inc.

Docket 980000A -- UNDOCKETED SPECIAL PROJECT: Fair and Reasonable Residential Basic Local Telecommunications Rates.

1997

Docket 971660 -- 1997 depreciation study by Florida Power & Light Company.

Docket 971608 -- Petition of AmeriSteel Corporation for limited proceeding to reduce Florida Power & Light Company's annual revenues by \$440 million.

Docket 971570 -- 1997 depreciation study by Florida Power Corporation.

UTILITY PROCEEDINGS
IN WHICH PAT LEE PARTICIPATED OR
PRESENTED TESTIMONY AT THE FLORIDA PUBLIC SERVICE COMMISSION

Docket 971495 -- Request for approval of capital recovery schedules by Northeast Florida Telephone Company, Inc.

Docket 971396 -- Investigation of 1996 earnings of Northeast Florida Telephone Company, Inc.

Docket 970785 -- Depreciation studies by Florida Power & Light Company for specific (steam) generation sites.

Docket 970643 -- 1997 depreciation filing by Gulf Power Company.

Docket 970537 -- 1997 depreciation study by Florida Public Utilities Company, Marianna Division.

Docket 970428 -- 1996 depreciation filing by Florida Division of Chesapeake Utilities Corporation.

Docket 970410 -- Proposal to extend plan for recording of certain expenses for years 1998 and 1999 for Florida Power & Light Company.

1996

Docket 961515 -- Proposed amendment of Rule 25-6.0142, F.A.C., Uniform Retirement Units for Electric Utilities.

Docket 961230 -- Petition by MCI Telecommunications Corporation for arbitration with United Telephone Company of Florida and Central Telephone Company of Florida concerning interconnection rates, terms, and conditions, pursuant to the Federal Telecommunications Act of 1996.

Docket 960847 -- Petition by AT&T Communications of the Southern States, Inc. for arbitration of certain terms and conditions of a proposed agreement with GTE Florida Incorporated concerning interconnection and resale under the Telecommunications Act of 1996.

Docket 960833 -- Petition by AT&T Communications of the Southern States, Inc. for arbitration of certain terms and conditions of a proposed agreement with BellSouth Telecommunications, Inc. concerning interconnection and resale under the Telecommunications Act of 1996.

Docket 960797 -- 1996 depreciation study of Indiantown Telephone System, Inc.

Docket 960794 -- Request for approval of remaining life rates by Quincy Telephone Company.

UTILITY PROCEEDINGS
IN WHICH PAT LEE PARTICIPATED OR
PRESENTED TESTIMONY AT THE FLORIDA PUBLIC SERVICE COMMISSION

Docket 960788 -- 1996 depreciation study by Frontier Communications of the South, Inc.

Docket 960775 -- 1996 depreciation filing by Sebring Gas System, Inc.

Docket 960715 -- Proposed amendment of Rules 25-4.0174, F.A.C., Uniform System and Classification of Accounts - Depreciation, and 25-4.0175, F.A.C., Depreciation; and Repeal of Rule 25-4.176, F.A.C., Recovery Schedules.

Docket 960527 -- Request for approval of site specific depreciation studies by Florida Power & Light Company.

Docket 960409 -- Prudence review to determine regulatory treatment of Tampa Electric Company's Polk Unit.

Docket 960404 -- Application for approval of new depreciation rates by Peoples Gas System, Inc.

1995

Docket 951433 -- Petition for approval of special accounting treatment of expenditures related to Hurricane Erin and Hurricane Opal by Gulf Power Company.

Docket 951167 -- Petition for authorization to increase the annual storm fund accrual commencing January 1, 1995 to \$20.3 million; to add approximately \$51.3 million of recoveries for damage due to Hurricane Andrew and the March 1993 Storm; and to re-establish the storm reserve for the costs of Hurricane Erin by increasing the storm reserve and charging to expense approximately \$5.3 million, by Florida Power & Light Company.

Docket 951069 -- Petition and complaint of Harris Corporation against BellSouth Telecommunications, Inc. concerning complex inside wiring.

Docket 950948 -- Proposed amendment of Rule 25-30.140, F.A.C., Depreciation.

Docket 950887 -- Request for approval of 1995 Depreciation Study by ALLTEL Florida, Inc.

Docket 950776 -- Request for approval of 1995 Depreciation Study by West Florida Natural Gas Company.

Docket 950696 -- Determination of Funding for Universal Service and Carrier of Last Resort Responsibilities.

UTILITY PROCEEDINGS
IN WHICH PAT LEE PARTICIPATED OR
PRESENTED TESTIMONY AT THE FLORIDA PUBLIC SERVICE COMMISSION

Docket 950640 -- Triennial depreciation study for approval by Northeast Florida Telephone Company, Inc.

Docket 950506 -- Application to amortize depreciation reserve imbalance and to change depreciation rates and schedules by BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company.

Docket 950499 -- Petition for approval of 1995 Depreciation Study by Tampa Electric Company.

Docket 950381 -- Request for approval of depreciation rates for newly established accounts by Sebring Gas System, Inc.

Docket 950344 -- Petition to implement triennial depreciation represcription by GTE Florida Incorporated.

Docket 950283 -- Investigation into 1994 earnings of United Telephone Company of Florida.

Docket 950270 -- Petition for approval of accounting treatment for funds expended on Lake Tarpon-Kathleen transmission line by Florida Power Corporation.

Docket 950213 -- Petition for approval of recovery schedule for energy management system by Tampa Electric Company.

Docket 950071 -- Modified Minimum Filing Requirements in compliance with Section 366.06(3)(a), F.S., by Florida Power & Light Company.

1994

Docket 941352 -- Petition for approval of increase in accrual for nuclear decommissioning costs by FLORIDA POWER CORPORATION.

Docket 941350 -- Petition for increase in annual accrual for Turkey Point and St. Lucie Nuclear Unit Decommissioning Costs by FLORIDA POWER & LIGHT COMPANY.

Docket 941343 -- Request for approval of Fossil Dismantlement Studies by FLORIDA POWER & LIGHT COMPANY.

Docket 941317 -- Petition for approval of 1995 depreciation rates for Martin Units 3 and 4 by FLORIDA POWER & LIGHT COMPANY.

UTILITY PROCEEDINGS
IN WHICH PAT LEE PARTICIPATED OR
PRESENTED TESTIMONY AT THE FLORIDA PUBLIC SERVICE COMMISSION

Docket 941229 -- Request for approval of 1994 Depreciation Study by UNITED TELEPHONE COMPANY OF FLORIDA and CENTRAL TELEPHONE COMPANY OF FLORIDA.

Docket 941023 -- Petition to recover Operator Systems investment by GTE FLORIDA INCORPORATED.

Docket 940826 -- Request for approval of capital recovery requirements by INDIANTOWN TELEPHONE SYSTEM, INC.

Docket 940580 -- Request for approval of 1993 depreciation study for Fernandina Beach Division of FLORIDA PUBLIC UTILITIES COMPANY.

Docket 940374 -- Request for approval of 1993 depreciation study by FLORIDA PUBLIC UTILITIES COMPANY.

Docket 940353 -- Request for change in depreciation rate effective 10/1/94 by ST. JOSEPH TELEPHONE & TELEGRAPH COMPANY.

Docket 940284 -- Request to prescribe depreciation rate for the new plant account by WEST FLORIDA NATURAL GAS COMPANY.

Docket 940165 -- Request to amortize the negative depreciation reserve for the Sanderson Digital Remote Switch in 1993 by NORTHEAST FLORIDA TELEPHONE COMPANY, INC.

Docket 940161 -- 1994 Depreciation Study of CITY GAS COMPANY OF FLORIDA.

1993

Docket 931231 -- Request for approval of change in depreciation rates by FLORIDA POWER & LIGHT COMPANY.

Docket 931217 -- Request for approval of depreciation rates for Martin Power Plant Units 3 and 4 by FLORIDA POWER & LIGHT COMPANY.

Docket 931150 -- Petition to approve an amortization period for acquisition adjustment associated with purchase of Sebring Utilities Commission electric system by FLORIDA POWER CORPORATION.

Docket 931142 -- Request for approval of 1993 depreciation study by FLORIDA POWER CORPORATION.

UTILITY PROCEEDINGS
IN WHICH PAT LEE PARTICIPATED OR
PRESENTED TESTIMONY AT THE FLORIDA PUBLIC SERVICE COMMISSION

Docket 930611 -- Investigation into deferral of implementation of any change to methodology used in establishing current depreciation, dismantlement, and decommissioning rates in FLORIDA POWER & LIGHT COMPANY's next general base rate proceeding.

Docket 930566 -- Request for approval to begin depreciating Ft. Lauderdale Power Plant, Units 4 & 5, using Whole Life Depreciation Rates approved for Putnam Power Plant effective with in-service dates of units by FLORIDA POWER & LIGHT COMPANY.

Docket 930453 -- Depreciation study as of 12/31/92 for Marianna Electric Division of FLORIDA PUBLIC UTILITIES COMPANY.

Docket 930230 -- 1993 Depreciation Study of VISTA-UNITED TELECOMMUNICATIONS.

Docket 930221 -- 1993 Depreciation Study of GULF POWER COMPANY.

Docket 930170 -- 1993 Depreciation Study of GULF TELEPHONE COMPANY.

Docket 930063 -- 1992 Depreciation Study for INDIANTOWN GAS COMPANY.

1992

Docket 921337 -- Request for review of five-year comprehensive study of depreciable property for period ending 12/31/92 by ST. JOE NATURAL GAS COMPANY, INC.

Docket 921278 -- Review of capital recovery requirements of INDIANTOWN TELEPHONE SYSTEM, INC.

Docket 920618 -- Depreciation study for Big Bend Station and Gannon Station by TAMPA ELECTRIC COMPANY.

Docket 920589 -- Triennial depreciation study for 1989, 1990, and 1991 for NORTHEAST FLORIDA TELEPHONE COMPANY, INC.

Docket 920389 -- Request for approval of depreciation rates and a dismantlement accrual for Scherer Unit 4 by FLORIDA POWER & LIGHT COMPANY.

Docket 920385 -- Application to change depreciation rates and schedules effective 1/1/92 by BELLSOUTH TELECOMMUNICATIONS, INC. d/b/a SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY.

Docket 920324 -- Application for a rate increase by TAMPA ELECTRIC COMPANY.

UTILITY PROCEEDINGS
IN WHICH PAT LEE PARTICIPATED OR
PRESENTED TESTIMONY AT THE FLORIDA PUBLIC SERVICE COMMISSION

Docket 920284 -- Petition to implement Triennial Depreciation Represcription by GTE FLORIDA INCORPORATED.

Docket 920096 -- Petition to reverse the transfer of reserve account surpluses required by Order No. 23957 and to represcribe depreciation rates based on the revised account balances, by FLORIDA POWER CORPORATION.

1991

Docket 911229 -- 1991 Depreciation Study of GULF POWER COMPANY.

Docket 911199 -- Petition to prescribe depreciation rates for new plant accounts by FLORIDA POWER CORPORATION.

Docket 911101 -- Request for consolidated depreciation rates by CITY GAS COMPANY OF FLORIDA.

Docket 910988 -- Petition requesting special reserve amortizations by GTE FLORIDA INCORPORATED.

Docket 910981 -- Nuclear Decommissioning Cost Studies by FLORIDA POWER CORPORATION and FLORIDA POWER & LIGHT COMPANY.

Docket 910747 -- Proposed revision to Rules 25-4.0175, 25-6.0436, and 25-7.045, F.A.C., Depreciation for Telephone, Electric, and Gas Utilities.

Docket 910725 -- 1991 Depreciation Study for UNITED TELEPHONE COMPANY OF FLORIDA.

Docket 910686 -- Petition for approval of 1991 Depreciation Study by TAMPA ELECTRIC COMPANY.

Docket 910319 -- Application for New Depreciation Rates by PEOPLES GAS SYSTEM INC.

Docket 910154 -- Petition of FLORIDA POWER CORPORATION for a limited proceed- ing to consider their request for an increase in revenues to offset any additional depreciation expense that the Commission might approve related to fossil plant dismantlement costs.

Docket 910081 -- 1991 Depreciation Study for FLORIDA POWER & LIGHT COMPANY.

UTILITY PROCEEDINGS
IN WHICH PAT LEE PARTICIPATED OR
PRESENTED TESTIMONY AT THE FLORIDA PUBLIC SERVICE COMMISSION

1990

Docket 901001 -- Request for change in depreciation rates for Putnam and St. Johns River Power Park generating stations by FLORIDA POWER & LIGHT COMPANY.

Docket 900794 -- Request for approval of change in depreciation rates for Martin and Turkey Point generating sites, to become effective 1/1/91, by FLORIDA POWER & LIGHT COMPANY.

Docket 900607 -- 1991 Depreciation Study for Fernandina Beach electric division of FLORIDA PUBLIC UTILITIES COMPANY.

Docket 900605 -- Petition for approval to implement triennial depreciation re prescription by GTE FLORIDA INCORPORATED.

Docket 900600 -- 1990 Depreciation Study of FLORIDA PUBLIC UTILITIES COMPANY.

Docket 900599 -- 1990 Depreciation Study of GULF TELEPHONE COMPANY.

Docket 900597 -- 1990 Depreciation Study of WEST FLORIDA NATURAL GAS COMPANY.

Docket 900555 -- 1990 Depreciation and Decommissioning Studies for Manatee Power Plant, Riviera Power Plant and Sanford Power Plant of FLORIDA POWER & LIGHT COMPANY.

Docket 900495 -- Request for change in depreciation rates for Fort Myers Power Plant by FLORIDA POWER & LIGHT COMPANY.

Docket 900348 -- Petition for approval of depreciation rates for Energy Management System by TAMPA ELECTRIC COMPANY.

Docket 900164 -- Request for change in depreciation rates for Fort Lauderdale and Port Everglades Power Plants by FLORIDA POWER & LIGHT COMPANY.

Docket 900163 -- Request for approval to recover cost to decommission facilities at Palatka Generating Site by FLORIDA POWER & LIGHT COMPANY.

Docket 900162 -- 1990 Depreciation Study for VISTA-UNITED TELECOMMUNICATIONS.

UTILITY PROCEEDINGS
IN WHICH PAT LEE PARTICIPATED OR
PRESENTED TESTIMONY AT THE FLORIDA PUBLIC SERVICE COMMISSION

Docket 900057 -- Proposed revisions to Rule 25-6.0142, F.A.C., pertaining to Uniform Retirement Units for Electric Utilities.

1989

Docket 891373 -- INDIANTOWN TELEPHONE SYSTEM, INC. - 1990 Depreciation Study.

Docket 891370 -- ST. JOSEPH TELEPHONE AND TELEGRAPH COMPANY - 1990 Depreciation Study.

Docket 891154 -- Request by FLORIDA POWER & LIGHT COMPANY for approval of depreciation rates for St. Johns River Coal Terminal.

Docket 891115 -- SOUTHLAND TELEPHONE COMPANY - 1989 depreciation study.

Docket 891098 -- Request by FLORIDA POWER & LIGHT COMPANY for change in depreciation rates for Cape Canaveral generating station.

Docket 891050 -- FLORALA TELEPHONE COMPANY - 1989 depreciation study.

Docket 891026 -- Request by ALLTEL FLORIDA, INC. for new depreciation rates.

Docket 890788 -- NORTHEAST FLORIDA TELEPHONE COMPANY, INC. - 1989 Depreciation Study.

Docket 890725 -- FLORIDA PUBLIC UTILITIES COMPANY, Marianna Electric Division - 1989 Depreciation Study.

Docket 890256 -- Review of SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY's capital recovery position.

Docket 890186 -- Investigation of the ratemaking and accounting treatment for the dismantlement of fossil-fueled generating stations.

1988

Docket 881543 -- CENTRAL TELEPHONE COMPANY OF FLORIDA - 1988 Depreciation Study.