

IN THE MATTER OF THE PETITION OF
PIVOTAL UTILITY HOLDINGS INC. D/B/A
ELIZABETHTOWN GAS FOR APPROVAL OF
INCREASED BASE TARIFF RATES AND
CHARGES FOR GAS SERVICE AND
OTHER TARIFF REVISIONS

BPU DOCKET NO. GR09 _____

DIRECT TESTIMONY

OF

JODI GIDLEY

On Behalf Of
Pivotal Utility Holdings, Inc.
d/b/a Elizabethtown Gas

Exhibit P-1

March 3, 2009

**Pivotal Utility Holdings, Inc
d/b/a Elizabethtown Gas
Direct Testimony of Jodi Gidley**

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Jodi Gidley. My business address is 150 West
3 Main Street, Suite 1510, Norfolk, Virginia 23510.

4 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5 A. I am a senior vice president with responsibilities for Mid-
6 Atlantic Operations for AGL Resources Inc. ("AGLR") and the
7 president of Elizabethtown Gas ("Elizabethtown" or
8 "Company"), Virginia Natural Gas, located in Virginia and
9 Elkton Gas, located in Maryland.

10 **Q. WHAT ARE YOUR PROFESSIONAL AND EDUCATIONAL QUALIFICATIONS?**

11 A. I have over 22 years experience in the natural gas
12 industry, primarily in natural gas utility operations and
13 management. I previously served in several positions at
14 Virginia Natural Gas, including vice president, operations
15 and director of financial planning and budgets. With
16 AGLR's merger with NUI Corporation in November 2004, I was
17 named vice president, gas operations and business process
18 services for AGLR. I was responsible for gas supply and
19 capacity planning, gas control and measurement, LNG and
20 propane peak shaving operations, and business support
21 systems at AGLR's six utilities. I assumed my current

1 position in June 2007. Collectively, the three gas
2 utilities for which I am responsible serve approximately
3 539,000 customers.

4 I have a bachelor's degree in mathematics from the
5 University of Pittsburgh and a master's degree in
6 mechanical engineering from Old Dominion University.

7 **Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?**

8 A. The purpose of my direct testimony is to support
9 Elizabethtown's March 2009 filing with the New Jersey Board
10 of Public Utilities ("Board" or "BPU") to increase the
11 Company's base delivery rates. Specifically, I will (i)
12 explain why Elizabethtown is seeking to increase base rates
13 at this time, (ii) describe the changes that have taken
14 place since AGLR's acquisition of Elizabethtown in 2004,
15 (iii) describe AGLR's corporate structure, Elizabethtown's
16 position within that structure and the benefits that have
17 accrued and will continue to accrue to Elizabethtown and
18 its customers as a result of AGLR's centralized management
19 structure, (iv) discuss various Company initiatives to
20 enhance customer service, encourage conservation and carbon
21 abatement and promote economic development in New Jersey,
22 (v) outline some of the challenges and risks that the
23 Company and our customers face in the current economic
24 climate, the ways that Elizabethtown is addressing those

1 risks and the implication that those risks have for this
2 base rate proceeding, and (vi) introduce various rate
3 design changes, as well as the need for the Company's
4 Efficiency and Usage Adjustment, a mechanism that will
5 separate the link between sales and fixed cost recovery and
6 encourage Elizabethtown to promote energy efficiency,
7 allowing us to send a stronger message to our customers
8 regarding conservation and ways to save on their gas bills.

9 **Q. PLEASE DESCRIBE ELIZABETHTOWN'S OPERATIONS.**

10 A. Elizabethtown was founded in 1855 to fuel the 300 gaslights
11 that then lined the streets of the City of Elizabeth.
12 Today, the Company provides natural gas distribution
13 service to approximately 274,000 residential, business and
14 industrial customers in parts of Union, Middlesex, Sussex,
15 Warren, Hunterdon, Morris and Mercer counties.
16 Elizabethtown delivers approximately 32 billion cubic feet
17 (Bcf) of natural gas annually through more than 3,000 miles
18 of distribution mains.

19 **Q. WHY IS ELIZABETHTOWN MAKING THIS BASE RATE FILING?**

20 A. By order issued November 17, 2004 in BPU Docket No.
21 GM04070721, the BPU authorized the change in ownership of
22 Elizabethtown from NUI Corporation to AGLR. As a condition
23 of the order, Elizabethtown was required to implement a
24 five year base rate stay out and to make a base rate filing

1 no later than March of 2009 for rates to be effective in
2 January of 2010. Elizabethtown's base rate filing in this
3 case is being made in compliance with that order.

4 **Q. WHY IS ELIZABETHTOWN PROPOSING TO INCREASE BASE RATES?**

5 **A.** As discussed by other Company witnesses, while a number of
6 factors are driving the proposed base rate increase, the
7 primary drivers are the need to reflect in base rates (i)
8 the costs associated with significant incremental
9 investment in utility infrastructure that has been made
10 over the past several years and is not currently reflected
11 in Elizabethtown's base rates; (ii) costs associated with
12 continued investment in improving service to our customers
13 including a proposal to open a new customer call center in
14 New Jersey that will create over 50 new jobs in the state,
15 (iii) a higher cost of capital driven by the recent turmoil
16 in the world's financial markets, (iv) certain increased
17 costs that are primarily associated with higher commodity
18 gas costs including greater fuel inventory costs and
19 greater uncollectibles expense, (v) increased depreciation
20 expense, and (vi) a modest increase in operations and
21 maintenance expenses. AGLR and Elizabethtown remain
22 committed to continued investment in utility operation in a
23 manner and at a level that will benefit our customers and
24 the State of New Jersey economically and environmentally

1 for many years to come. The Company seeks to establish
2 rates in this proceeding that will compensate the Company
3 for the costs and risks of its investments in New Jersey.

4 **Q. PLEASE BRIEFLY DESCRIBE ELIZABETHTOWN'S FILING IN THIS**
5 **PROCEEDING.**

6 **A.** Elizabethtown is seeking to increase its base delivery
7 rates by \$24.8 million or 4.7%. This base rate increase
8 will allow Elizabethtown to continue to invest in New
9 Jersey, build infrastructure, maintain its existing
10 distribution system and build on our track record of
11 improved service and reliability for our 274,000 customers.

12 **Q. WHAT IS YOUR UNDERSTANDING OF ELIZABETHTOWN'S RECENT**
13 **HISTORY WITH RESPECT TO BASE RATE CHANGES?**

14 **A.** It is my understanding that Elizabethtown has not increased
15 its base rates since November, 2002, when the Board
16 authorized Elizabethtown to increase its base rates by
17 approximately 4.9% in BPU Docket No. GR02040245. As part
18 of the Board's order approving the Elizabethtown
19 acquisition by AGLR in 2004, the Company was required to
20 freeze base rates for the five year period following the
21 closing of that transaction and to make this filing in
22 March 2009.

1 Q. HAS AGLR'S ACQUISITION OF ELIZABETHTOWN PROVIDED BENEFITS
2 TO ELIZABETHTOWN, ITS CUSTOMERS AND THE STATE OF NEW
3 JERSEY?

4 A. Yes. Since acquiring Elizabethtown in 2004, AGLR has been
5 fully committed to investing in the State and investing in
6 our customers. Since the acquisition, we have invested
7 over \$124 million in new capital to extend service, improve
8 operations and system reliability and upgrade equipment
9 used by our workforce. At the time that AGLR acquired the
10 Company, Elizabethtown was facing significant financial and
11 regulatory difficulties. While Elizabethtown had a strong
12 workforce focused on serving its customers, the problems
13 associated with activities of Elizabethtown's parent
14 company undermined the interests of utility operations and
15 Elizabethtown's customers. As a result of the acquisition,
16 Elizabethtown has been able to obtain considerable funding
17 for utility operations and enhance customer service and
18 system safety and reliability.

19 Q. PLEASE ELABORATE ON THESE EFFORTS.

20 A. Our first priority was to provide support, training and
21 equipment necessary to restore the confidence of the
22 utility workforce and our customers' confidence in the
23 Company. At the same time, we focused on improving the
24 financial condition of Elizabethtown. To that end, we were

1 able to restructure Elizabethtown's finances and secure low
2 cost tax-exempt financing through the New Jersey Economic
3 Development Authority to refinance a portion
4 Elizabethtown's existing long term debt. High interest
5 bridge loans that NUI had carried were paid off, resulting
6 in a \$6 million annual savings in financing costs. In
7 addition, AGLR enhanced the pension plan funding for
8 Elizabethtown employees and provided monetary and
9 outplacement enhancements to the Company's severance plan,
10 and provided Elizabethtown access to low cost commercial
11 paper programs and a captive insurance program. Today,
12 Elizabethtown, as part of Pivotal Utility Holdings, Inc.
13 and AGLR, enjoys a solid investment grade bond rating.
14 This investment grade debt rating has helped Elizabethtown
15 to achieve a reasonable cost of long-term debt that helps
16 to reduce its overall cost of capital.

17 **Q. PLEASE DESCRIBE THE CORPORATE RELATIONSHIP BETWEEN AGLR AND**
18 **ELIZABETHTOWN AND THE BENEFITS OF THAT RELATIONSHIP TO**
19 **ELIZABETHTOWN'S CUSTOMERS.**

20 **A.** Regulated utility operations are AGLR's core business.
21 AGLR is a utility holding company having regulated
22 businesses and those with highly regulated characteristics
23 that comprise approximately 90% of our operations. Our
24 main focus is on distribution operations and related

1 businesses. Elizabethtown is one of the six AGLR wholly
2 owned utilities operating in states along the east coast
3 from Florida to New Jersey. AGLR utilizes a service
4 company structure in order to provide many services that
5 can be performed on a cost-effective basis through a
6 centralized service organization. The service company
7 framework enables AGLR, Elizabethtown and AGLR's other
8 operating companies to realize economies of scope and
9 scale, cost mitigation and uniform application of industry-
10 leading "best practices" measures, all of which provide
11 tremendous financial benefits to AGLR's utility companies
12 and their customers. Access to low cost commercial paper
13 and a captive insurance program are some of the real ways
14 in which Elizabethtown reaps the financial benefits of
15 being part of AGLR's holding company structure.

16 **Q. CAN YOU QUANTIFY THE FINANCIAL BENEFITS THAT HAVE ACCRUED**
17 **TO ELIZABETHTOWN AS A RESULT OF ITS AFFILIATION WITH AGLR?**

18 A. As discussed in the testimony of Company witness Michael
19 Morley, Baryenbruch & Company, LLC performed an extensive
20 study of the shared services provided to Elizabethtown by
21 AGSC. The conclusion of that study is that, on an overall
22 basis, the annual cost of the services provided by AGSC to
23 Elizabethtown are \$12 million below market, as compared to
24 outsourcing the same services. Further, the study shows

1 that Elizabethtown's service company cost per customer is
2 \$68 compared to the average cost per customer of \$127 of
3 similar utility holding companies. These results are the
4 product of Elizabethtown's affiliation with ALGR and AGLR's
5 substantial investment in technology and implementation of
6 industry "best practices" during the past five years.

7 **Q. BRIEFLY DESCRIBE AGLR'S COMMITMENT TO CORPORATE GOVERNANCE.**

8 A. A number of corporate governance-related safeguards are in
9 place to ensure and maintain the financial integrity of our
10 utility operations. AGLR has an engaged and separate Board
11 of Directors that consists of a majority of independent,
12 non-employee directors. Also, the audit committee,
13 compensation committee and nominating committee of AGLR's
14 Board of Directors are each composed of independent, non-
15 employee directors.

16 We also employ a number of ring-fencing measures,
17 consistent with various New Jersey rules and Standard &
18 Poors "best practices" to ensure that our utility
19 operations are sufficiently separated from the parent and
20 unregulated affiliate activities. Some noteworthy
21 practices include the maintenance of target utility
22 capitalization ratios, restrictions on utility loans and
23 guarantees and regulatory oversight of affiliate
24 transactions and dividend payments.

1 In addition, we distribute a copy of our Code of
2 Business Conduct and Ethics to all employees and Board
3 members each year and we also require our employees to take
4 on-line Code of Conduct training. We provide an annual
5 update to the Board regarding the Company's ethics and
6 compliance program. The Chief Ethics and Compliance
7 Officer meets in executive session with the Board's Audit
8 Committee each quarter and provides an update on the ethics
9 and compliance program. The Company maintains an Ethics and
10 Compliance Helpline accessible via toll-free number as well
11 as the internet. Employees, customers and other interested
12 parties may access the Helpline in order to ask questions
13 and to report concerns anonymously. Also, our Chief
14 Executive Officer and our Senior Financial Officers are
15 subject to a Code of Ethics and must certify their
16 compliance. Finally, all interested parties may
17 anonymously communicate directly with (i) our Board of
18 Directors generally, (ii) the presiding director of
19 executive sessions of non-management directors, or (iii)
20 non-management directors as a group via our Ethics and
21 Compliance Helpline.

22 **Q. WHAT IMPROVEMENTS HAVE BEEN MADE TO OPERATIONS AND CUSTOMER**
23 **SERVICE SINCE THE ACQUISITION OF ELIZABETHTOWN?**

1 A. We have maintained or enhanced utility operations and
2 customer service through improved technology and a never-
3 ending commitment to operational excellence. Today, we
4 operate a system that is safer and more reliable and
5 technologically advanced. Our customers experience shorter
6 wait times with our call center, better appointment
7 attainment, faster leak response and more accurate billing.
8 We continue to strive for safe and reliable service at the
9 best and most reasonable cost. Witnesses Donald Carter and
10 Connie McIntyre detail the number of improvements to
11 operational safety and reliability and customer service
12 that we have made in the past five years, as well as the
13 plans we have to continue these efforts in the future.

14 **Q. IS ELIZABETHTOWN PURSUING OTHER INITIATIVES TO CONTINUE**
15 **IMPROVING THE SERVICE IT PROVIDES TO ITS CUSTOMERS AND THE**
16 **STATE OF NEW JERSEY?**

17 **A.** Elizabethtown has a number of proposals before the Board in
18 this case, and other pending cases, directed toward
19 ensuring that the Company is able to provide quality
20 service in a changing energy environment. We have seen a
21 general movement toward conservation and increased
22 environmental stewardship from our customers and our
23 regulators. Elizabethtown supports these efforts and has
24 proposed a number of its own infrastructure and energy

1 efficiency programs geared toward improving customer
2 service, promoting conservation and reducing carbon
3 emissions to meet the goals mandated by the State. These
4 proposals may also have the added benefit of boosting
5 economic development in the State.

6 **Q. PLEASE IDENTIFY THESE PROPOSALS.**

7 **A.** These proposals include the establishment of the Company's
8 proposed customer service call center in New Jersey and
9 other customer service improvements reflected in this
10 filing, and the programs proposed in the Company's Utility
11 Infrastructure Enhancement and Regional Greenhouse Gas
12 Initiative filings that are currently pending before the
13 Board.

14 **Q. WHY HAS THE COMPANY PROPOSED TO ESTABLISH THE CUSTOMER
15 SERVICE CALL CENTER IN NEW JERSEY?**

16 **A.** As detailed in Ms. McIntyre's testimony, the Company's
17 recent focus has been on improving the customer experience
18 and our efforts are paying off. We have discernibly
19 improved our call center operations, including decreased
20 hold and wait times, with call service levels improving
21 from 39.9% answered in 60 seconds or less to 84.2%. We
22 want to further improve our customer service and believe
23 that establishing call center operations in New Jersey
24 would help our efforts.

1 Q. HOW WOULD THE RETURN OF THE CALL CENTER HELP IMPROVE
2 CUSTOMER SERVICE?

3 A. Our New Jersey customer base presents certain unique
4 challenges for our call center operations. Elizabethtown
5 has unique system and operational issues compared with our
6 other five gas utilities, particularly the prevalence of
7 indoor meters that create more challenging access and
8 appointment scheduling, as well as a much colder Northeast
9 climate and a more complex rate structure. A local customer
10 call center, with employees who would be part of the local
11 community and better able to understand its distinct needs,
12 is a more suitable approach to serving our New Jersey
13 customers.

14 Q. DOES THE ESTABLISHMENT OF THE CALL CENTER IN NEW JERSEY
15 CREATE OTHER BENEFITS?

16 A. The location of the call center in New Jersey will also
17 have the added benefit of creating over 50 new jobs in New
18 Jersey, consistent with the Governor's call for utilities
19 to promote economic growth and employment opportunities in
20 their service territories. These plans are described in
21 greater detail in Ms. McIntyre's testimony.

22 Q. WHAT OTHER CUSTOMER SERVICE IMPROVEMENTS DOES THE COMPANY
23 PROPOSE?

1 A. Improvements to our Interactive Voice Response ("IVR")
2 system and enhancements to our on-line customer tools and
3 bill payment options are among the notable changes we
4 propose in order to offer customers more choices and
5 improve their overall experience. Ms. McIntyre describes
6 these proposals in greater detail in her testimony.

7 Q. PLEASE DESCRIBE THE COMPANY'S UTILITY INFRASTRUCTURE
8 ENHANCEMENT PROPOSAL.

9 A. In response to the Governor's Economic Stimulus Package, in
10 late January, the Company filed its Utility Infrastructure
11 Enhancement or "UIE" proposal, which, in addition to
12 providing environmental benefits and enhancing the safety,
13 reliability and integrity of Elizabethtown's distribution
14 system, is designed to promote economic recovery and
15 employment growth in the Company's service territory. In
16 that filing, Elizabethtown proposed several capital
17 projects outside the scope of its projected normal 2009
18 capital budget, to be completed over the next two years at
19 a projected cost of \$60.4 million. These projects are
20 expected to create approximately 70 new jobs. The proposed
21 projects involve an assortment of gas distribution system
22 infrastructure-related work, such as new pipeline
23 interconnects and the replacement of certain large and
24 small diameter mains and gate station heating equipment.

1 Company witness Donald Carter provides further details
2 concerning Elizabethtown's filing.

3 **Q. PLEASE DESCRIBE THE COMPANY'S REGIONAL GREENHOUSE GAS**
4 **INITIATIVE PROPOSALS.**

5 A. We recognize that conservation and energy efficiency
6 programs can play a significant role in helping customers
7 reduce their natural gas costs. They also play an
8 important part in reducing greenhouse gas emissions and
9 preserving our environmental resources. In early February,
10 the Company made a filing in accordance with the Global
11 Warming Response Act in which it proposed to implement a
12 series of programs designed to make greater progress toward
13 achieving the State's energy efficiency and gas emission
14 abatement goals. Our proposed energy efficiency programs
15 have been designed to fully complement the existing New
16 Jersey Clean Energy Programs and will assist residential
17 and other customers in auditing the energy efficiency of
18 their homes and facilities and weatherizing those premises.
19 Elizabethtown will also offer rebates and other incentives
20 designed to encourage the replacement of less energy
21 efficient gas burning equipment with higher efficiency
22 equipment. Instead of promoting the sale and use of gas,
23 Elizabethtown is encouraging conservation to help customers
24 reduce their costs while also assisting the State in

1 achieving the statewide goal of reducing energy usage 20
2 percent by 2020. Mr. Carter provides a further
3 explanation of the Company's initial and longer-term energy
4 efficiency plans.

5 **Q. IN WHAT WAYS DOES ELIZABETHTOWN SUPPORT THE NEW JERSEY**
6 **ECONOMY AND LOCAL NEW JERSEY COMMUNITIES?**

7 A. Elizabethtown had a large and significant presence in the
8 community when AGLR acquired it. However, because AGLR had
9 not previously done significant business in New Jersey, it
10 took steps to increase Elizabethtown's presence and expand
11 the Company's involvement in the community and with
12 community leaders. These efforts were consistent with the
13 Board's order approving the change in control of
14 Elizabethtown and AGLR's philosophy on community
15 involvement. AGLR and Elizabethtown are responsible
16 corporate citizens and play an active part in supporting
17 economic development in the State.

18 **Q. PLEASE ELABORATE.**

19 A. The Company plays an important part of the New Jersey
20 economy, starting with its role as a natural gas
21 distribution company for more than 274,000 customers. The
22 Company also works closely with state and local agencies on
23 economic community development projects and is actively
24 involved in giving back to New Jersey's communities. We

1 have enhanced our commitment to the state through increased
2 charitable giving, volunteer activities and energy
3 assistance. Since 2004, Elizabethtown has invested nearly
4 \$1.5 million in New Jersey community service organizations,
5 and our employees have served on 18 different community
6 organization and non-profit boards and spent nearly 2,000
7 hours mentoring students through a partnership with
8 Elizabeth High School.

9 We have also established what is known as the "V
10 Force", our community affairs team comprising employees
11 from all levels of the Company who provide volunteer
12 services throughout the local community. Our "V Force"
13 members take great pride in being strong community partners
14 in our service territory, freely donating their time and
15 talent to a number of causes, including high school
16 mentoring mentioned above, coats for kids drives,
17 Thanksgiving food drives, blood drives and cancer walks.
18 Elizabethtown plans to continue to play a meaningful role
19 in both the charitable and business communities in the
20 future.

21 **Q. DOES THE COMPANY FACE ANY SPECIFIC RISKS IN IMPLEMENTING**
22 **ITS PLANS TO CONTINUE TO INVEST IN PROVIDING SAFE AND**
23 **ADEQUATE SERVICE IN NEW JERSEY?**

1 **A.** Yes. The first and foremost risk that the Company faces
2 today is the consequence of the relatively recent turmoil
3 that has affected financial markets throughout the world.
4 In today's financial environment, it is more important than
5 ever that utilities that continue to need access to capital
6 to fund infrastructure investments maintain strong
7 financial profiles and balance sheets and investment grade
8 bond ratings. The consequences of a downgrading of a
9 utility's debt in today's financial markets would be
10 severe. In order to avoid such adverse impacts, utilities
11 must be provided with a return on equity that fully
12 compensates their shareholders for risks inherent in the
13 current financial environment. As discussed by Company
14 witness, Dr. Roger Morin, a return on equity of 11.25% is
15 fully justified and required in the current environment to
16 compensate the Company's shareholders for the risks that
17 they have assumed.

18 **Q. ARE THERE ANY FACTORS THAT COMPLICATE ELIZABETHTOWN'S**
19 **EFFORTS TO INVEST IN UTILITY INFRASTRUCTURE AND GREATER**
20 **ENERGY EFFICIENCY?**

21 **A.** As I discussed earlier, the Company is proposing an RGGI
22 program to help our customers reduce their energy
23 consumption. However, under the Company's current rate
24 design, a significant amount of the utility's cost of

1 service is recovered through tailblock usage charges.
2 Thus, as the Company's cost of service increases and its
3 use per customer declines, it becomes more and more
4 difficult for the Company to recover its cost of service.
5 In order to encourage continued investment in both
6 infrastructure and energy efficiency, we urge approval of
7 the Company's proposed Efficiency and Usage Adjustment,
8 sponsored by witness Daniel P. Yardley. Implementation of
9 a full, permanent Efficiency and Usage adjustment is
10 essential if the Company is to continue to aggressively
11 pursue investments in energy efficiency. This mechanism is
12 an enabling mechanism that is consistent with the State's
13 policy on energy consumption because it aligns the
14 utility's recovery mechanism with a declining throughput
15 model. Adoption of this mechanism will allow the utility
16 to continue to invest in needed infrastructure and energy
17 efficiency without suffering a margin loss as is the case
18 with the current rate design.

19 **Q. DOES ELIZABETHTOWN PROPOSE ANY FURTHER CHANGES TO ITS**
20 **TARIFF?**

21 A. Yes. As explained in Mr. Yardley's testimony and reflected
22 in the tariff revisions sponsored by Mr. Kaufmann, the
23 Company is proposing various rate design changes designed
24 to further refine and better align the Company's rates with

1 cost causation principles. The Company is also
2 proposing a number of tariff changes described by Mr.
3 Kaufmann which are designed to simplify tariff
4 administration, and make it more customer friendly.

5 **Q. WHO ARE THE OTHER WITNESSES PROVIDING TESTIMONY IN SUPPORT**
6 **OF THE COMPANY'S DIRECT CASE.**

7 A. The other witnesses offering testimony in the Company's
8 direct case, and the subjects addressed in their testimony,
9 are as follows:

- 10 • Donald Carter - Field operations and capital
11 expenditures;
- 12 • Connie McIntyre - Customer Service and the relocation
13 of the New Jersey call center;
- 14 • Michael Morley - Cost of Service/Revenue Requirement
- 15 • Robert DePriest (Work & Greer, PC) - Lead Lag study
- 16 • Dr. Kimbugwe A. Kateregga (Foster & Associates) -
17 Depreciation
- 18 • Dr. Roger A. Morin (Utility Research International) -
19 Cost of Capital
- 20 • Daniel P. Yardley (Yardley and Associates)-Rate Design
- 21 • Thomas Kaufmann - Revenue Forecast/Rates and Tariff

22 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

23 A. Yes, it does.