

Capital Module and Stretch Factor

Presentation to the OEB Stakeholder Conference on 3rd Generation Incentive Regulation August 5-8, 2008

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Presentation Roadmap

Stretch Factor

- Principles
- Numbers

Incremental Capital Module

- IRM Result
- Historical Data

Stretch Factor Principles

- Ratepayer Benefit
 - No ESM
 - Rebasing benefit unlikely

Meaningful Incentive

- Compare to Z Factor materiality
- Regulatory precedent

Stretch Factor Numbers

Materiality Threshold

- How much actually matters?
- Z Factor analysis determines materiality
- Difference between Group II and Group I Or III should be material, ie. 50 bp
- Regulatory Precedent
 - 0.5% is typical average stretch factor

Stretch Factor SEC Proposal

Proposed Stretch Factors

- Group I 0.0%
- Group II 0.5%
- **Group III** 1.0%

- Components of Rev. Req.
 - Operating expenses ~ 50%
 - Annual costs of capital ~ 50%

Annual Costs of Capital

- Old capital assets
- New capital assets

Old Capital Assets

- Depreciation
- Interest
- ROE
- PILs

• All Decrease Annually

- Decrease equals average depreciation rate
- Simplify by assuming in-service on January 1

New Capital Assets

- Revenue Requirement 12.5% of capex
- Capital budget about 8 times available RR

IRM provides funds three ways

- Reduced cost of old capital @ avg. dep. rate
- Inflation Factor
- Organic growth in revenues

<u>P x R x (d+i+(g x 1.5))</u> (d+c)

Where:

- P = % of rev. req. capital driven (ie. R less OM&A)
- **R** = revenue requirement of prior year
- d = depreciation exp. as % of rate base (avg. dep. rate)
- i = inflation factor in IRM
- g = organic growth in revenue
- c = interest + ROE + PILs as % of rate base



Assumptions:

P = 50%	2007 actual is 48.9%
I = 2%	Bank of Canada target rate
d = 4%	2007 actual is 6.57%
c = 8.7%	6% interest on 60%, 8.5% ROE on 40%,
	33% combined income tax rate

• IRM provides capex budget of:

- 24% of revenue requirement plus 6% for each 1% growth
- 148% of depreciation expense plus 36% for each 1% of growth

Capital Module Historical Data

• Average Capex 2005-2007

- 158.9% of depreciation expense
- 39.3% of revenue requirement

Distribution for 2007 – 71 LDCs

- Based on 148% of depreciation +/- growth
- 34% over the standard, 66% under
- If capital module threshold at +33% of standard
 - 14% over (ie. +200% of depreciation +/- growth)
 - 21% under (ie. -100% of depreciation +/- growth)



Capital Module SEC Proposal

Proposed Threshold

Prior year depreciation expense, times 200% plus/minus 50 times the average three year % organic revenue growth

Capital Module Historical Data

Assymmetrical Result

- Threshold based on IRM calcs, plus one-third
- +15% of utilities will still qualify for additional budget
- Two-thirds of utilities will underspend and keep the extra money from ratepayers
- Board should establish monitoring function to police underspending



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