

Application: 17-11-XXX
Exhibit No.: SDGE-X
Witness: John W. Wilson

Application of San Diego Gas & Electric
Company (U 902 E) and Citizens Energy
Corporation for Authorization Pursuant to
Public Utilities Code Section 851 to Lease
Transfer Capability Rights to Citizens
Sycamore-Penasquitos Transmission LLC

DIRECT TESTIMONY OF

DR. JOHN W. WILSON

ON BEHALF OF CITIZENS ENERGY

November 13, 2017

J.W. Wilson & Associates, Inc.

Economic Counsel

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1 **Q. PLEASE STATE YOUR NAME, OCCUPATION, AND ADDRESS.**

2 A. My name is John W. Wilson. I am an economist and President of J.W.
3 Wilson & Associates, Inc. Our offices are at 1621 North Kent Street, Suite
4 602, Arlington, Virginia, 22209. I am testifying in this proceeding on behalf
5 of Citizens Energy Corporation in support of the Application of San Diego
6 Gas & Electric Company (U 902 E) for approval pursuant to Public Utilities
7 Code Section 851 to lease transfer capability rights to Citizens Sycamore-
8 Penasquitos Transmission, LLC.

9 **Q. PLEASE OUTLINE YOUR EDUCATIONAL BACKGROUND.**

10 A. I hold a B.S. degree with senior honors and a Masters Degree in Economics
11 from the University of Wisconsin. I have also received a Ph.D. in Economics
12 from Cornell University. My major fields of study were industrial
13 organization and public regulation of business, and my doctoral dissertation
14 was a study of utility pricing and regulation.

15 **Q. HOW HAVE YOU BEEN EMPLOYED SINCE THAT TIME?**

16 A. After completing my graduate education I was an officer in the U.S. Army
17 and an assistant professor of economics at the United States Military
18 Academy, West Point, New York. In that capacity, I taught courses in both
19 economics and government. While at West Point, I also served as an

1 economic consultant to the Antitrust Division of the United States
2 Department of Justice.

3 After leaving West Point, I was employed by the Federal Power Commission,
4 first as a staff economist and then as Chief of FPC's Division of Economic
5 Studies. In that capacity, I was involved in regulatory matters involving most
6 phases of FPC regulation of electric utilities and the natural gas industry.
7 Since 1973 I have been employed as an economic consultant by various
8 clients, including federal, state, provincial and local governments, private
9 enterprise and nonprofit organizations. This work has pertained to a wide
10 range of issues concerning public utility regulation, insurance rate regulation,
11 antitrust matters and economic and financial analysis. In 1975 I formed J.W.
12 Wilson & Associates, Inc., a Washington, D.C. corporation.

13 **Q. WOULD YOU PLEASE DESCRIBE SOME OF YOUR ADDITIONAL**
14 **PROFESSIONAL ACTIVITIES?**

15 A. I have authored a variety of articles and monographs, including a number of
16 studies dealing with utility regulation and economic policy. I have consulted
17 on regulatory, financial and competitive market matters with the Federal
18 Communications Commission, the National Academy of Sciences, the Ford
19 Foundation, the National Regulatory Research Institute (NRRI), the National
20 Association of Regulatory Utility Commissioners (NARUC), the Electric

1 Power Research Institute (EPRI), The Edison Electric Institute (EEI), the
2 American Public Power Association (APPA), the National Rural Electric
3 Cooperative Association (NRECA), the U.S. Department of Justice Antitrust
4 Division, the Federal Trade Commission Bureau of Competition, the
5 Commerce Department, the Department of the Interior, the Department of
6 Energy, the Small Business Administration, the Department of Defense, the
7 Tennessee Valley Authority, the Federal Energy Administration, and
8 numerous state and provincial agencies and legislative bodies in the United
9 States and Canada.

10 Previously, I was a member of the Economics Committee of the U.S. Water
11 Resources Council, the Federal Power Commission (FPC) Coordinating
12 Representative for the Task Force on Future Financial Requirements for the
13 National Power Survey, the Advisory Committee to the National Association
14 of Insurance Commissioners (NAIC) Task Force on Profitability and
15 Investment Income, and the NAIC's Advisory Committee on Nuclear Risks.

16 In addition, I have testified as an expert witness in regulatory and court
17 proceedings dealing with competition and financial matters in the electric
18 power industry and other public utility industries and on regulatory matters
19 before more than 50 Federal and State regulatory bodies throughout the
20 United States and Canada. I have also appeared on numerous occasions as
21 an expert witness at the invitation of U.S. Senate and Congressional

1 Committees dealing with antitrust and regulatory legislation. In addition, I
2 have been retained as an expert on regulatory matters by more than 25 State
3 and Federal regulatory agencies. I have also participated as a speaker,
4 panelist, or moderator in many professional conferences and programs
5 dealing with business regulation, financial issues, economic policy and
6 antitrust matters. I am a member of the American Economic Association and
7 an associate member of the American Bar Association and the ABA's
8 Antitrust, Insurance and Regulatory Law Sections.

9 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

10 A. Citizens' participation in the Sycamore-Penasquitos Transmission project
11 will produce three major economic impacts. First, Citizens' financing will
12 replace SDG&E financing for Citizens' share of the project. Since Citizens'
13 financing will be accomplished at costs that are fixed at today's very low
14 rates for the full life of its project participation, Citizens' financing may be
15 less costly to ratepayers over time as compared to SDG&E financing, which
16 is subject to change as money costs change in the future.

17 Second, Citizens will implement levelized recovery of its capital costs. This
18 may result in lower charges for consumers in early years and provide for
19 more equitable treatment of all project beneficiaries over time.

20 Third, Citizens will contribute half of its after-tax project profits (estimated

1 to be about \$400,000 annually) to energy programs for low income
2 ratepayers in San Diego County. This would not occur without Citizens’
3 participation in the project, and it will assist the Commission in meeting its
4 obligations under The Clean Energy and Pollution Reduction Act of 2015
5 (“SB 350”), which places specific emphasis on assisting those in
6 disadvantaged communities.¹

7 **Q. PLEASE DESCRIBE THE ANALYSES THAT YOU HAVE**
8 **PERFORMED.**

9 A. I have evaluated the net benefit (if any) that Citizens participation adds to the
10 Sycamore-Penasquitos Transmission project, as compared to a scenario in
11 which the project would be solely owned by SDG&E. This benefit includes
12 both the support that Citizens will contribute to low income ratepayers in the
13 San Diego region (estimated to be about \$400,000 annually) and the
14 likelihood that Citizens’ financing of its share of the project will reduce
15 overall project costs for ratepayers.

16 **Q. PLEASE DESCRIBE HOW CITIZENS’ FINANCING OF ITS SHARE**
17 **OF THE PROJECT IS LIKELY TO REDUCE OVERALL PROJECT**
18 **COSTS.**

¹ Under SB 350, the CPUC must, among other things, implement programs that “promote greater project penetration in disadvantaged communities. Cal. Pub. Res. Code § 25943(d)(7).

1 A. Most significant in this regard is the fact that Citizens' authorized capital cost
2 revenue requirement and actual debt cost will be locked in for the full 30-
3 year term of Citizens' participation in the project. While the U.S. economy
4 is currently experiencing record low money costs because of the federal
5 government's very aggressive monetary policy, that is beginning to change
6 and will not continue unabated in the long run. Also, it is likely that
7 continued federal deficit financing will exert upward long-run pressure on
8 money costs. Thus, while most utility service providers, including SDG&E,
9 can be expected to seek rate relief when money costs rise, Citizens will lock-
10 in its capital cost revenue requirement for a 30 year term.

11 **Q. TO WHAT LEVEL WILL MONEY COSTS RISE IN THE FUTURE?**

12 A. While I am not in a position to forecast what might be approved in the way
13 of ROE increases for SDG&E in the future, there is simply no denying that
14 the risks of substantially higher future money costs are now a recognized
15 economic probability. For the purpose of the illustrations here, I have
16 assumed that SDG&E's equity and debt costs may increase by 2% and 1%,
17 respectively, several years in the future. If these costs were to increase by
18 larger amounts then Citizens' fixed capital cost revenue requirement may be
19 even lower than SDG&E's costs in the future.

20 **Q. DOES HISTORY PROVIDE ANY PERSPECTIVE AS TO WHAT**

1 **THE PARAMETERS OF THIS RISK MAY BE?**

2 A. History does give us some perspective in this regard. Thirty years ago, after
3 a period of federal deficit spending in the late 1970s and early 1980s, money
4 costs increased substantially. During that period, utilities throughout the
5 country, including SDG&E, sought ROE allowances of 17% to 18% or more,
6 and the CPUC, like regulatory commissions everywhere, approved ROE
7 allowances of 15% to 16% or more for a number of years for all of the major
8 electric and gas utilities in the State. During that period, interest rates rose
9 by even wider margins.

10 While any current forecast of a repetition of that historical experience would
11 be extremely unpopular and controversial, and I am not suggesting that
12 capital cost increases of that magnitude are currently expected to occur, I
13 believe it cannot be reasonably denied that the risk of substantially higher
14 future money costs is a financial risk. In that regard, California ratepayers
15 may benefit from Citizens' locked-in capital cost revenue requirement and
16 debt cost for the next 30 years.

17 **Q. IS IT CERTAIN THAT SDG&E'S MONEY COSTS WILL INCREASE**
18 **IN THE FUTURE?**

19 A. While there are always differences in economists' views of the future, it is
20 clear, from what we are now reading and hearing daily, that there are very

1 few who would argue today that the probability of higher money costs in the
2 future is small, or that the likelihood of money cost increases is the same as
3 the likelihood of money cost reductions. Certainly, there is now far more
4 probability and expectation of money cost increases than of money cost
5 reductions.

6 **Q. OTHER THAN CITIZENS' FIXED CAPITAL COST REVENUE**
7 **REQUIREMENTS AND CONTRIBUTIONS IN SUPPORT OF LOW**
8 **INCOME RATEPAYERS IN THE SAN DIEGO AREA, ARE THERE**
9 **ADDITIONAL CONSUMER COST BENEFITS ATTRIBUTABLE TO**
10 **CITIZENS PARTICIPATION IN SYCAMORE-PENASQUITOS AND**
11 **CITIZENS' PROPOSED RATEMAKING APPROACH FOR ITS**
12 **INVESTMENT IN THE PROJECT?**

13 A. Yes. Another important cost factor is the ratepayer advantage attributable to
14 Citizens' levelized capital cost rate approach over the thirty year period of its
15 project participation. In contrast to conventional utility ratemaking, which is
16 "front end loaded" for newer plant additions (i.e., revenue requirements are
17 greater in the early years of a project's life as rate base gradually depreciates),
18 Citizens' annual capital cost revenue requirements will be levelized (i.e.,
19 equal) over the 30-year period. Beyond 30 years, Citizens' interest in
20 Sycamore-Penasquitos will be turned over to SDG&E at no cost to
21 ratepayers, with a remaining rate base of zero.

1 This is important for several reasons. First, in any long term projection it is
2 the early year results that are most reliably predictable. As an economist who
3 has worked with and observed these kinds of projections for many years, I
4 have very little, if any, confidence in projected values for 30, 40 or 50 years
5 in the future. It has been my experience that such distant forecasts are
6 scarcely worth the air on which they ride. In contrast, especially in this case,
7 there is little doubt that because of levelized ratemaking, SDG&E ratepayers
8 may benefit in the early years of Citizens participation in the project, and
9 there will be a far better and more equitable distribution of ratepayer benefits
10 and costs over the project's life.

11 **Q. PLEASE DESCRIBE THE FINANCIAL SUPPORT, IN ADDITION**
12 **TO PROJECT FINANCING, THAT CITIZENS WILL CONTRIBUTE**
13 **TO LOW INCOME RATEPAYERS IN THE SYCAMORE-**
14 **PENASQUITOS REGION AS A RESULT OF ITS PARTICIPATION**
15 **IN THE PROJECT.**

16 A. One of Citizens' unique features is that, unlike most private corporations that
17 are in business to earn profits so they can pay dividends and build equity-
18 funded asset value through retained earnings for the benefit of their
19 stockholders, Citizens' business purpose is to earn profits to support its
20 charitable activities. In this case, for example, half of Citizens' after-tax
21 profits are pledged to support low-income ratepayers and disadvantaged

1 communities in San Diego County, where Citizens’ transmission investment
2 will be developed. Citizens has pledged to invest these after-tax profits in
3 transportation electrification investments targeted to SDG&E ratepayers in
4 low income families and disadvantaged communities.

5 The other half of Citizens’ after-tax profits will be used to support Citizens’
6 other charitable causes throughout California and the rest of the nation. This
7 distribution of profits is typical of Citizens’ capital investment endeavors
8 throughout the past three decades, and it explains why, unlike stockholder-
9 owned corporations, Citizens has not accumulated a much larger retained
10 earnings asset balance over time.

11 In this regard, the Clean Energy and Pollution Reduction Act of 2015 (“SB
12 350”) places specific emphasis on assisting those in disadvantaged
13 communities. Under SB 350, the CPUC must, among other things,
14 implement programs that “promote greater project penetration in
15 disadvantaged communities.”² Additionally, the Legislature has recognized
16 the need for “widespread transportation electrification” in order to meet SB
17 350’s clean energy and efficiency goals.³

18 Citizens’ agreement with SDG&E in the Sunrise project is now producing
19 approximately \$1.5 million in annual support to install rooftop solar on low-

² Cal. Pub. Res. Code § 25943(d).

³ Cal. Pub. Util. Code §740.12(a)(1)(B).

1 income homes in Imperial County, at no cost to the homeowner. Here,
2 Citizens is again committed to investing 50 percent of its after tax profits
3 from this Project to assisting ratepayers in low income families and
4 disadvantaged communities in San Diego County in the area of
5 transportation electrification, as noted above and discussed in more detail in
6 the testimony of John Jenkins and Peter Smith. As SB 350 recognizes,
7 “widespread transportation electrification requires increased access for
8 disadvantaged communities, low- and moderate income communities.”⁴
9 Citizens estimates that its participation in the Sycamore-Penasquitos
10 Transmission project will generate approximately \$400,000 a year for the
11 lifetime of its 30 year lease to invest on behalf of the low income ratepayers
12 of San Diego County. This is a ratepayer benefit that would not occur
13 without Citizens’ participation in the project. As a result, Citizens’
14 participation in this project furthers the goals and requirements of SB 350.

15 **Q. WILL INCREMENTAL COSTS ASSOCIATED WITH CITIZENS’**
16 **PROJECT PARTICIPATION RESULT IN ADDED RATEPAYER**
17 **COSTS OVER THE LIFE OF THE PROJECT?**

18 A. I do not believe so.

19 **Q. PLEASE EXPLAIN.**

⁴ Cal. Pub. Util. Code §740.12(a)(1)(C).

1 A. SDG&E has provided, through the testimony of Amanda White, an SDG&E
2 “snap shot” initial base case cost comparison, assuming the continuation of
3 current low money costs throughout future periods. As summarized in Table
4 1 below and in Attachment JWW-1, this base case cost comparison shows
5 that the present value of Citizens’ capital cost revenue requirement could
6 exceed the present value of SDG&E’s stand alone “snap shot” capital cost
7 revenue requirement by \$200,204, and a variance in total revenue
8 requirement of \$348,318, if money costs remain unchanged and SDG&E
9 seeks no rate increases over time. In my opinion, this could be considered a
10 possible outcome. However, I believe it is not a probable outcome, as it
11 assumes that SDG&E’s capital cost rates will be frozen at their current “snap
12 shot” levels for the next 58 years. While the capital cost recovery in the rates
13 that Citizens will charge will be fixed for the term of 30 years, the rates that
14 SDG&E will charge may change as money costs change.

TABLE JWW-1

**SDG&E and CITIZEN's - Base Case
Revenue Requirement Summary**

Cost Category	SDG&E	CITIZEN'S	Variance	
	NPV 58 Yrs Annual Levelized 30 Yrs	NPV 58 Yrs Annual Levelized 30 Yrs	Higher / (Lower)	%
Capital Related Costs:				
Cost Of Transfer Capability	\$2,777,855	\$2,978,059	\$200,204	
Subtotal Capital Related Revenue Requirement	\$2,777,855	\$2,978,059	\$200,204	7.2%
Expense Related Costs:				
O&M, A&G, & General & Common Plant	\$63,626	\$63,626	\$0	
Incremental A&G Costs - Citizens	\$0	\$150,000	\$150,000	
Debt Service Costs - SDG&E	\$1,887	\$0	(\$1,887)	
Subtotal Expense Related Costs	\$65,512	\$213,626	\$148,113	
Total Revenue Requirement on All Costs	\$2,843,367	\$3,191,685	\$348,318	12.3%
Discount Rates	7.43%	7.43%		

1 Thus, Citizens' fixed return has the potential to provide an advantage to
2 customers if SDG&E's cost of equity and debt capital were to increase. At
3 this juncture, while SDG&E is not prepared to forecast what might be
4 approved in the way of allowed capital costs in the future, I believe SDG&E's
5 cost of equity and debt will change over time based on future capital markets.
6 If this were to occur, then the current snap shot case for SDG&E may
7 increase above that of Citizens, providing increased benefits to customers
8 from Citizens' project participation and fixed cost financing over the 30 year
9 contract period. Further, it must also be recognized that the benefit that
10 Citizens will provide in low income assistance (estimated to be about
11 \$400,000 per year) will more than offset the variances shown in Table JWW-
12 1, with respect to both capital cost revenue requirement and the total revenue
13 requirement.

1 **Q. HAVE YOU DONE ADDITIONAL COMPARATIVE COST**
2 **ANALYSIS USING DIFFERENT ASSUMPTIONS FROM THOSE**
3 **UNDERLYING AMANDA WHITE’S COST ANALYSIS?**

4 A. Yes. Ms. White’s analysis focuses only on a present-day “snap shot” view
5 of what comparative costs may be at the inception of the Lease. It does not
6 address how SDG&E’s comparative costs may change over the life of the
7 Lease. My analysis which follows focuses on probable costs over the life of
8 the Lease, including SDG&E’s possible capital cost changes after Lease
9 inception. Since Citizens’ capital costs are fixed for the life of its Lease, but
10 SDG&E’s capital costs are not fixed, these possible cost changes over time
11 are an important consideration in evaluating the consumer benefits
12 attributable with Citizens’ Project participation.

13 **Q. IS IT LIKELY THAT SDG&E’S CAPITAL COSTS WILL REMAIN**
14 **CONSTANT OVER TIME?**

15 A. No. We are currently in one of the lowest money cost periods that has
16 prevailed in our economy in more than half a century. It is well known and
17 highly publicized that money costs have been aggressively held down by
18 federal government monetary policies in an effort to stimulate economic
19 recovery. Particularly in view of the very large ongoing federal deficits,
20 amounting to trillions of dollars, that are now occurring and are expected to

1 continue for at least several more years, it is extremely unlikely that current
2 money costs will continue at their present levels far into the future.

3 **Q. IF CONSIDERATION IS GIVEN TO THE RISK OF HIGHER**
4 **FUTURE MONEY COSTS FOR SDG&E, WOULD THERE BE A**
5 **SUBSTANTIAL DIFFERENCE IN THE FORECASTED REVENUE**
6 **REQUIREMENT COMPARISONS FOR CITIZENS AND SDG&E?**

7 A. Yes. For example (as summarized in Table 2 below and in Attachment
8 JWW-2), if one were to assume that SDG&E's equity and debt costs will rise
9 modestly by 2% and 1%, respectively, in year 4, the capital cost revenue
10 requirement variance between Citizens and SDG&E would change from a
11 plus \$200,204 to a minus \$114,701, and there would be a net annual ratepayer
12 gain. The variance in total revenue requirement would be a relatively small
13 plus \$33,413.

TABLE JWW-2

**SDG&E Adjusted for increases of 2% ROE and 1% Debt Cost at Year 4
Revenue Requirement Summary**

Cost Category	SDG&E NPV 58 Yrs Annual Levelized 30 Yrs	CITIZEN'S NPV 58 Yrs Annual Levelized 30 Yrs	Variance Higher / (Lower)	%
Capital Related Costs:				
Cost Of Transfer Capability	\$3,092,760	\$2,978,059	(\$114,701)	
Subtotal Capital Related Revenue Requirement	\$3,092,760	\$2,978,059	(\$114,701)	-3.7%
Expense Related Costs:				
O&M, A&G, & General & Common Plant	\$63,626	\$63,626	\$0	
Incremental A&G Costs - Citizens	\$0	\$150,000	\$150,000	
Debt Service Costs - SDG&E	\$1,887	\$0	(\$1,887)	
Subtotal Expense Related Costs	\$65,512	\$213,626	\$148,113	
Total Revenue Requirement on All Costs	\$3,158,272	\$3,191,685	\$33,413	1.1%
Discount Rates	7.43%	7.43%		

1

2 **Q. HOW DO YOU INTERPRET THESE RESULTS?**

3 A. The indication of a net gain for ratepayers under a scenario with modestly
4 higher money costs is an illustration of how the comparative analysis changes
5 as assumptions are modified. In fact, these results reflect a smaller gain to
6 ratepayers than would be calculated with money cost assumptions reflecting
7 past historical experience.

8 **Q. YOU NOTED THE HIGH HISTORICAL MONEY COSTS AND ROE**
9 **ALLOWANCES THAT PREVAILED IN THE 1980s; WERE THERE**
10 **ALSO HIGHER DEBT COSTS IN THE ECONOMY AND HIGHER**

1 **ROE ALLOWANCES FOR SDG&E WITHIN MORE RECENT**
2 **DECADES?**

3 A. Yes. The interest rate on long term (30-year) U.S. Treasury bonds is now
4 about 2.9%. In 2007 it was about 5.0%, and in the early 1990s it was over
5 8.0%. SDG&E's most recent ROE allowance in a CPUC rate case was
6 10.30% in 2013. In 2008 it was 11.10%, and in 1995 it was 12.05 percent.
7 As I noted above, in the 1980s most U.S. utilities, including those in
8 California under CPUC jurisdiction, had ROE allowances above 15% and
9 debt costs were in the 15-20% range.

10 **Q. IN ADDITION TO THIS HISTORICAL RECORD, ARE THERE**
11 **ALSO CURRENT CAPITAL COST FORECASTS THAT SUPPORT**
12 **YOUR CONCLUSIONS?**

13 A. Yes. In its July 7, 2017 edition, *Value Line* projects that the interest rate on
14 AAA corporate bonds will increase from 3.7% in 2016 to 5.7% in 2020-2022
15 and that the yield on ten-year Treasuries will increase from 1.9% to 4.2%
16 over the same period. Similarly, in its 2017 *Annual Energy Outlook*
17 (published in January) the U.S. Energy Information Administration (EIA)
18 forecasts that interest rates for AA utility bonds will rise from 3.65% in 2016
19 to 8.36% in 2025 under low economic growth or to 5.64% under high
20 economic growth. EIA also forecasts that interest rates for 10-year

1 Treasuries will increase from 1.73% to 6.00% (low growth) or 3.68% (high
2 growth) over the same period.

3 In summary, both from an historical perspective and based on current
4 projections, it is reasonable to expect that SDG&E's market-based money
5 costs will increase in the future in contrast to Citizens' fixed debt cost and
6 capital cost revenue requirement.

7 **Q. WHAT DO YOU CONCLUDE FROM THESE ANALYSES?**

8 A. Under the ratepayer protection constraints of the SDG&E Representative
9 Rate Model specified in the Lease, and in view of Citizens' locked-in capital
10 cost revenue requirement, I believe the comparative rate outcome between
11 SDG&E and Citizens will favor Citizens in the early years and potentially
12 overall. The bottom line will be substantially dependent on one's
13 assumptions about how money costs and SDG&E's rate of return
14 requirements will change in the future. Under these circumstances, the
15 merits of Citizens' participation in Sycamore-Penasquitos, and the
16 Commission's decision to approve SDG&E's Application for approval
17 pursuant to Public Utilities Code Section 851 to lease transfer capability
18 rights to Citizens in the Sycamore-Penasquitos Transmission Project, cannot
19 be reasonably determined solely on the basis of a present day "snap shot"
20 comparison. The net benefit to ratepayers will depend upon changes in

1 SDG&E’s capital cost over time. In addition, the Commission should give
2 appropriate consideration to the \$400,000 of support annually that Citizens’
3 profits will provide to low-income families and disadvantaged communities
4 in San Diego County in the area of transportation electrification, consistent
5 with the goals of SB 350. This is an important ratepayer benefit that would
6 more than offset the variances shown in the present day “snap shot” cost
7 comparisons and would not be achieved without Citizens’ project
8 participation.

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

10 **A. Yes; it does.**

