

BEFORE THE GUAM PUBLIC UTILITIES COMMISSION

IN THE MATTER OF:) GWA Docket 19-08
)
PUC PETITION FOR APPROVAL OF)
GWA'S THIRD FIVE-YEAR FINANCIAL) **ALJ REPORT RE: ANNUAL**
PLAN (BASE RATE INCREASES)) **TRUE-UP FOR FY2024 RATES**
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)
)



INTRODUCTION

This matter comes before the Guam Public Utilities Commission ["PUC"] pursuant to the PUC's Rate Decision dated September 22, 2022 ["Rate Decision"].¹ Pursuant to the Rate Decision GWA was required to provide the PUC with an updated True-Up projection for FY2024.

BACKGROUND

Pursuant to the September 22, 2022 Rate Decision, the PUC approved a rate increase of 5.5% for FY2024. On June 1, 2023 GWA submitted its Annual True-Up Submission, Projection, and Request for Fiscal Year 2024 Rates ["2024 True-Up"].² Thereafter the Administrative Law Judge of the PUC ["ALJ"] transmitted GWA's True-Up submission to PUC Consultant Georgetown Consulting Group ["GCG"] for its review. The ALJ and GCG conducted an extensive review of GWA's filing. The PUC undertook investigatory discovery, and the ALJ engaged in discussions with GWA with

¹ Rate Decision, GWA Docket 19-08, dated September 22, 2023.

² Annual True-Up Submission, Projection and Request for Fiscal Year 2024 Rates, GWA Docket 19-08, filed June 1, 2023.

respect to the issues related to GWA's submission. On September 13, 2023 GCG provided the ALJ with a report regarding its review of the FY2024 True-Up.³

DISCUSSION

A. FY2023 Annual True-Up (for FY2024 Rates)

Base Lifeline and Non-Lifeline Rates

In FY2024, GWA will be completing the fifth year of its third 5-year financial plan (FY2020 through FY2024) and rate relief application with the PUC. In its True-Up GWA submits that it has thoroughly reviewed its revenue requirements and other requisites such as rate covenants and financial policies and considered known and measurable changes in costs and conditions. Based on these analyses, GWA has determined and recommends a 27.0% rate increase for basic lifeline and non-lifeline rates for FY2024 for all rate classes, effective October 1, 2023. GWA submits that the recommended rate increase is needed to meet increased power costs and existing debt service coverage. GWA states that the proposed rate increases are projected to increase system rate revenues by \$28.8 million and will allow GWA to fund necessary O & M expenses, and internally financed capital improvements, rebuild a modest level of rate stabilization reserves, and enable incremental improvement in debt service coverage levels.

B. Annual True-Up Review

1. Overview

As indicated, GWA has requested a rate increase of 27% for FY2024; GCG has proposed an increase of 16.1%. The ALJ concurs with the rate increase proposed by

³ Georgetown Consulting Group, Staff Report Responding to GWA's Petition for a 27% Across the Board True-Up Increase in Rates for FY 2024.

GCG. The GCG Report presents detailed reasoning for its conclusions on the specific revenue and expense items for which rate increases should be allowed, and for the total increase approved. The ALJ adopts the GCG Report, and the schedules presented, and recommends that the PUC likewise do so. The ALJ notes that, if the PUC approves the 16.1% rate increase for FY 2024, it will be the largest true-up increase granted in the history of the PUC.⁴

2. GWA True-Up Submission exceeds the Scope of an ordinary true-up review.

Ordinarily, a true-up is based upon an update to the schedules approved in the last rate case. A true-up is an “update” to revenues, expenses and other items referenced in the prior schedules. GWA’s submission goes far beyond an ordinary true up filing. It is more in the nature of a “mini rate case”. GWA’s filing includes an FY 2024 revenue forecast which employs a “enhanced methodology”, with new assumptions about residential account growth, water demand and wastewater flows, and price elasticity.⁵ The enhanced methodology” considers key trends and price responses. A change in how revenues are determined, and new forecast models, would normally be appropriate in a rate case, but not a true-up proceeding.

The ALJ and GCG have not had sufficient time to fully explore GWA’s new assumptions and methodology, and do not necessarily accept them. However, for purposes of this true-up, the ALJ and GCG have not challenged such assumptions and methodology and have used them in arriving at an appropriate rate increase. The ALJ and GCG have focused on specific changes in revenues or expenses that would justify a rate increase.

3. Revenues

⁴ See PUC Order, GWA Docket 15-04, dated September 29, 2016; there the PUC granted a 14.5% true-up rate increase.

⁵ Annual True-Up Submission, at pgs. 5-6

GWA has estimated a total revenue requirement of approximately \$137.57M; GCG has estimated a total revenue requirement of \$128.33M. Exhibits "1" and "2", attached hereto, are GCG's proposed True-Up Schedule A-1 and True-Up Schedule A-1 GWA-As Filed. The GCG schedule indicates the changes that it has made to GWA's rate request.

4. Operating Expenses for FY2024

GWA has proposed operating expenses of \$80.7M. GCG has approved operating expenses of \$78.3M.

5. Adjustments proposed by GCG

(a) Revenues from the Badger Meter Case Settlement.

GWA secured an additional \$1.9M of revenues because of the settlement in the Badger Meter Case. Although GWA has not clarified the details of the award or indicated fees and expenses, it has proposed to place \$950,000 in the Rate Stabilization Fund for FY2024. GCG could have proposed that GWA deposit the full award of \$1.9M into the Rate Stabilization Fund for FY2024, which would have further reduced the potential rate increase sought by GWA. However, GCG approves the proposal of GWA.

**(b) Deposit into the Rate Stabilization Fund
["RSF"] for FY2024**

GWA has proposed that it deposit \$7.5M into the RSF by charging its customers in FY2024 an additional \$7.5M in rates. If approved, such funding of the RSF through ratepayer rate increases would represent an almost 8% increase in GWA rates. As GCG points out, a double-digit rate increase is generally classified as a "rate shock" and a 27% proposed increase would fall into that category. For several reasons, the ALJ concurs that the PUC should not approve the proposed increase of \$7.5M into the RSF for the following reasons:

(1) The timing of this requested increase is not beneficial, as the Guam economy is still recovering from the COVID Pandemic and Typhoon Mawar. A 27% rate increase is too great a burden for the ratepayers.

(2) The history of the Rate Stabilization Fund does not support the request. The Rate Stabilization was established by the Guam Consolidated Commission on Utilities in various Resolutions: GWA Resolution 17-FY2020, GWA 11-FY2021, and GWA Resolution 06-FY2022. The Resolutions make it clear that the funding was and is intended to come from GWA revenues. The RSF was established from GWA bond reserve fund balances of \$11.4M; : **"any additional amounts (if needed) will come from Operating Revenues."**⁶ GWA did further fund the RSF with ARPA funds that it received as revenues. All funds in the RSF have come from GWA.

(3) In accordance with Section 5.02 of GWA's Bond Covenant, GWA plans for transfers in and out of the RSF consistent with GWA's annual budget in an amount specified for such month.⁷

(4) What GWA seeks to recover in rates is a portion of the amount of \$23.8M it claims was required to be paid out of the rate stabilization fund in FY2022 and FY2023 for necessary payments for power purchase expenses and debt service coverage. However, GWA is not asking for retroactive payment of such earlier year expenses, but that the \$7.5M be available for expenses in FY2024, expenses which are not yet identified. There is a general ratemaking prescription against retroactive rate making for prior year expenses.

(5) There is no legal requirement that PUC "fill up" the RSF.

⁶ Issues for Decision, Guam Consolidated Commission on Utilities, GWA Resolution No. 17-FY2020, at p. 144 of the CCU Commissioner Board Packet dated March 24, 2020.

⁷ Guam Consolidated Commission on Utilities, GWA Resolution No. 11-FY2021 at p. 65 of the CCU Commissioner Board Packet dated February 16, 2021.

The funds for the RSF have all come from GWA reserve fund balances and the RSF was designed to deal with the effect of Covid pandemic on GWA revenues and debt service coverage.⁸

(6) The RSF is also designed to mitigate rate spikes and allow the smoothing of annual rate increases, not to cause such spikes.⁹ Furthermore, transfers will only be made by GWA out of the RSF "if it appears the DSC may fall below the required 1.25 coverage."¹⁰

(7) If the PUC adopts a requirement that it should, in a true proceeding, implement rate increases to fill up the RSF, in every true-up proceeding this will create a "rate case within a rate case" requirement. In other words, not only will the PUC need to determine the debt service coverage for the upcoming rate year, it will also have to determine whether additional rate increases will be needed to fill up the RSF. Power bill expense and debt service coverage requirements for the upcoming fiscal year should be addressed in terms of necessary revenues for the upcoming fiscal year, not as duplicative funding requirements for the RSF.

(8) GWA's primary reason for increasing the RSF is to provide it with "flexibility" in advance of the FY2025-FY2029 rate case and anticipated further increases in debt service coverage. However, GWA can request such debt service coverage in its five-year FY2025-FY2029 rate case.

(c) Power Purchase Expense

GCG has recommended that GWA's computation of power cost for FY2023 and FY2024 should be revised: "for FY2023, GWA did not reflect the approved

⁸ Issues for Decision, Guam Consolidated Commission on Utilities, GWA Resolution No. 11-FY2021 Work Session, at p. 62 of the CCU Commissioner Board Packet dated February 16, 2021.

⁹ Guam Consolidated Commission on Utilities, GWA Resolution No. 11-FY2021 at p. 65 of the CCU Commissioner Board Packet dated February 16, 2021.

¹⁰ Issues for Decision, Guam Consolidated Commission on Utilities, GWA Resolution No. 06-FY2022, at p. 322 of the CCU Commissioner Board Packet dated January 25, 2022.

and implemented GPUC reduction of the electric LEAC for June 2023 and beyond.”¹¹ For FY2024, GWA requested \$24,169,088; GCG has approved \$22,764,673 for FY2024.¹² GCG also proposes to grant GWA a 20% increase for power expenses for the period of February 2024 through September 2024, although there has of yet been no PUC action on the LEAC for that period. To date diesel fuel prices have increased approximately 20% since the PUC reduced the LEAC rate in June of 2023.¹³

6. Salaries and Benefits

GWA recommended that the staffing level in FY2024 be increased from 365 to 379 employees, an increase of 14 employees. For FY2023, GWA had 365 employees. GCG now recommends that for FY2024, GWA should be allowed to increase its staffing level from 365 to 371 employees. GWA proposed a total salaries and benefits budget of \$29,732,853 for FY2024; GCG has adjusted that amount by \$627,606, to a total Salary and Benefits cost of \$29,105,247 for FY2024. The GCG recommendation is appropriate as it restores GWA's employee level to the pre-pandemic level.

7. Contractual Expenses

GCG concurs with GWA's request for \$7.465 million for FY2024 contractual expenses. However, GCG and the ALJ recognize the importance of the Northern District Waste water and waste water litigation and would authorize over \$1 million for such expenses in FY2024. GCG proposes that a “regulatory asset” be established for the litigation expenses for the NDWW Litigation.

8. Debt Service.

¹¹ Georgetown Consulting Group, Staff Report Responding to GWA's Petition for a 27% across the Board True-Up Increase in Rates for FY2024, dated August 31, 2023, at p. 3.

¹² See Exhibit “3” attached hereto, which sets forth GCG calculations on the power purchase expenses.

¹³ Morgan Stanley, Asia Morning Call, September 14, 2023.

GCG has agreed to the debt service coverage amount requested for FY2024 of \$39.042M.

9. **Legislative Surcharge**

GCG has approved a legislative surcharge of \$3.8M, which includes retiree COLA an end-of-year pension and other adjustments.

RECOMMENDATION

A. **Findings**

Based on the record, the ALJ finds that the adjustments recommended by GCG for GWA's FY2024 revenue requirements are just and reasonable. These adjustments were arrived at after thorough review and detailed consideration of GWA's funding needs for FY2024. The ALJ recommends that the PUC adopt the recommendations in the GCG Report. The ALJ also recommends that the PUC adopt the Staff FINAL RAM FY2024 True-Up and the adjustments and schedules set forth therein.

B. **Rates**

Based on the administrative record established in this docket, the ALJ hereby finds that the proposed rates contained in the GCG report are just and reasonable. Accordingly, the ALJ recommends that the PUC approve the GCG recommendations relating to rate relief. In particular, the ALJ recommends that the PUC adopt an across-the-board increase of 16.1% be approved by the PUC for implementation on October 1, 2023. The system-wide rate increase will apply to basic, lifeline, and non-lifeline rates and charges.

C. **Multi-Year Rate Filing**

GWA should file its next multi-year rate plan on or before April 1, 2024. In accordance with 12 GCA §12102.2, a staffing study should be required for GWA's next multi-year rate case.

Respectfully submitted this 15th day of September, 2023.

Frederick J. Horecky
Chief Administrative Law Judge

Staff Proposed True-Up Schedule A-1

Historical and Forecasted Operating Results with FY 2024 Rate Adjustment Request

	Unaudited Historical Year	Annualized Current Year	Forecast Next Year	
	FY 2022	FY 2023	FY 2024	
Non-Lifetime Rate Increase	0.0%	5.5%	16.1%	Required Rate Increase for 1.355 DSC
Lifetime Rate Increase	0.0%	0.0%	16.1%	
Surcharge	3.6%	3.5%	3.8%	
CASH SOURCES				
Water Service Revenues	64,607,199	68,999,129	80,127,231	
Legislative Surcharge	2,007,183	2,335,332	2,945,827	
Water SDC Revenues	498,145	550,000	489,600	
Water Rate Revenues	\$ 67,112,526	\$ 71,884,461	\$ 83,562,458	
Wastewater Service Revenues	27,039,855	30,991,533	36,319,315	
Legislative Surcharge	1,003,591	763,370	972,635	
Navy Service Revenues (inc. surcharge)	5,902,921	6,244,199	7,311,694	
Wastewater SDC Revenues	747,217	990,000	734,400	
Wastewater Rate Revenues	\$ 35,593,485	\$ 38,989,103	\$ 45,338,044	
Other Revenues	464,488	1,415,000	474,300	Add Badger Meter Settlement \$.95 million in FY 2023
Bad Debt Adjustment	(2,028,510)	(2,118,815)	(2,262,236)	
Total Operating Revenues ¹	\$ 101,143,989	\$ 110,279,749	\$ 127,112,566	
Interest / Investment Income	275,879	275,000	275,000	
Rate Stabilization Transfers / ARPA Funds in (Out) ²	5,750,000	18,050,000	950,000	Eliminate Rate Stabilization Funding \$7.5 Million, add \$.95 million from RSF
TOTAL SOURCES	\$ 107,169,868	\$ 128,604,749	\$ 128,337,566	
CASH USES				
Power Purchases ³	18,577,440	25,388,436	23,221,568	Reduce for updated LEAC Primary 13.8kV \$2.24219/kWh - \$1,925,848 in FY 23, and \$947,520 in FY 24
Water Purchases	5,656,471	6,379,055	5,900,000	
Salaries & Benefits ⁴	24,985,288	25,874,596	29,105,247	Reduce S&B by \$627,606
Admin & General ⁵	7,956,423	9,179,209	9,687,858	
Contractual Expense	4,492,845	5,901,272	7,484,494	
Retiree Expense	7,439,742	3,755,617	3,755,617	
O&M Subtotal	\$ 69,108,209	\$ 76,478,185	\$ 79,134,784	
Debt Service	33,458,069	39,036,678	39,042,065	
Internally Funded Capital (IFCIP)	1,598,655	4,804,084	8,784,879	
TOTAL USES	\$ 104,164,933	\$ 120,318,946	\$ 126,961,728	
Net Annual Cash Flow	\$ 3,004,935	\$ 8,285,803	\$ 1,375,838	
DEBT SERVICE COVERAGE				
Net Revenues	\$ 38,059,659	\$ 52,126,584	\$ 49,282,782	
Adjustment: System Development Charges	(1,245,362)	(1,650,000)	(1,224,800)	
Adjustment: Capitalized Labor	3,699,767	2,273,431	4,159,140	Increase Capitalized Labor by \$459,140
Adjustment: Other ⁶	3,303,593	673,200	729,706	
Net Revenues Available for Debt Service	\$ 43,817,657	\$ 53,423,195	\$ 52,867,628	
Total Debt Service	33,458,069	39,036,678	39,042,065	
Debt Service Coverage	1.310	1.369	1.354	

1. Reflects non-revenue water and non-revenue wastewater billing adjustments; includes leachate revenues

2. Per auditor opinion, ARPA funds will be considered as revenues when calculating debt service coverage

3. FY 2024 estimate reflects Guam Power Authority's reduced LEAC; FY 2023 is CCU-approved budget amount

4. Capitalized labor, which does not represent a cash impact, is not included in this calculation of annual net cash flow

5. Excludes bad debt expense since this line item is included as an offset to rate revenues (per audited financials)

6. Includes retiree COLA and end-of-year pension and OPEB adjustments

True-Up Schedule A-1 GWA - As Filed

Historical and Forecasted Operating Results with FY 2024 Rate Adjustment Request

	Unaudited Historical Year	Annualized Current Year	Forecast Next Year
	FY 2022	FY 2023	FY 2024
Non-Lifeline Rate Increase	0.0%	5.5%	27.0%
Lifeline Rate Increase	0.0%	0.0%	27.0%
Surcharge	3.6%	3.5%	3.8%
CASH SOURCES			
Water Service Revenues	64,607,199	68,999,129	86,611,560
Legislative Surcharge	2,007,183	2,335,332	3,185,435
Water SDC Revenues	498,145	660,000	489,600
Water Rate Revenues	\$ 67,112,526	\$ 71,994,461	\$ 90,286,595
Wastewater Service Revenues	27,939,855	30,991,533	39,299,585
Legislative Surcharge	1,003,591	763,370	1,047,659
Navy Service Revenues (inc. surcharge)	5,902,821	6,244,199	7,995,558
Wastewater SDC Revenues	747,217	990,000	734,400
Wastewater Rate Revenues	\$ 35,593,485	\$ 38,989,103	\$ 49,077,202
Other Revenues	464,488	465,000	474,300
Bad Debt Adjustment	(2,028,510)	(2,118,815)	(2,262,236)
Total Operating Revenues ¹	\$ 101,141,989	\$ 109,329,749	\$ 137,575,861
Interest / Investment Income	275,879	275,000	275,000
Rate Stabilization Fund Transfers In (Out)	5,750,000	18,050,000	(7,500,000)
TOTAL SOURCES	\$ 107,167,868	\$ 127,654,749	\$ 130,350,861
CASH USES			
Power Purchases ²	18,577,440	27,871,109	24,169,088
Water Purchases	5,656,471	6,379,055	5,900,000
Salaries & Benefits ³	24,985,288	25,874,596	29,732,853
Admin & General ⁴	7,956,423	9,179,209	9,687,858
Contractual Expense	4,492,845	5,901,272	7,464,494
Retiree Expense	7,439,742	3,755,617	3,755,617
O&M Subtotal	\$ 69,108,209	\$ 78,960,858	\$ 80,709,910
Debt Service	33,458,069	39,036,678	39,042,065
Internally Funded Capital (IFCIP)	1,598,655	4,804,084	8,784,879
TOTAL USES	\$ 104,164,933	\$ 122,801,619	\$ 128,536,854
Net Annual Cash Flow	\$ 3,002,935	\$ 4,853,130	\$ 1,814,007
DEBT SERVICE COVERAGE			
Net Revenues	\$ 38,059,659	\$ 48,693,891	\$ 49,640,951
Adjustment, System Development Charges	(1,245,362)	(1,650,000)	(1,224,000)
Adjustment, Capitalized Labor	3,699,767	2,273,431	3,700,000
Adjustment, Other ⁵	3,303,593	673,200	729,706
Net Revenues Available for Debt Service	\$ 43,817,657	\$ 49,990,522	\$ 52,846,657
Total Debt Service	33,458,069	39,036,678	39,042,065
Debt Service Coverage	1.310	1.281	1.354

1 - Reflects non-revenue water and non-revenue wastewater billing adjustments; includes leachate revenues

2 - FY 2024 estimate reflects Guam Power Authority's reduced LEAC; FY 2023 is CCU-approved budget amount

3 - Capitalized labor, which does not represent a cash impact, is not included in this calculation of annual net cash flow

4 - Excludes bad debt expense since this line item is included as an offset to rate revenues (per audited financials)

5 - Includes retiree COLA and end-of-year pension and OPEB adjustments

GWA As Filed True-Up Power Purchases Adjustment

	FY 2022			FY 2023			FY 2024		
Month	kWh	Cost	\$/kWh	kWh	Cost	\$/kWh	kWh	Cost	\$/kWh
Oct.	4,699,905	\$1,312,892	\$0.2793	5,477,410	\$2,325,344	\$0.4245	5,346,548	\$1,993,409	\$0.3728
Nov	4,506,546	1,260,650	0.2797	5,055,315	2,259,326	0.4469	5,266,362	1,963,512	0.3728
Dec	4,550,861	1,367,694	0.3005	5,308,974	2,374,793	0.4473	5,182,145	1,932,113	0.3728
Jan	4,504,694	1,353,257	0.3004	5,384,655	2,405,910	0.4468	5,346,815	1,978,321	0.3700
Feb	4,102,792	1,284,452	0.3131	4,845,746	2,171,162	0.4481	5,115,200	2,046,080	0.4000
Mar	4,468,141	1,385,118	0.3100	5,078,740	2,271,740	0.4473	4,962,243	1,984,897	0.4000
Apr	4,562,165	1,548,685	0.3395	5,134,686	2,259,262	0.4400	5,106,713	2,042,685	0.4000
May	4,709,340	1,596,895	0.3391	5,150,560	2,266,247	0.4400	5,142,623	2,057,049	0.4000
Jun	4,697,209	1,595,734	0.3397	5,118,877	2,252,306	0.4400	5,134,719	2,053,888	0.4000
Jul	4,885,609	1,861,516	0.3810	5,065,722	2,228,918	0.4400	5,092,300	2,036,920	0.4000
Aug	4,716,967	1,806,696	0.3830	5,109,717	2,248,276	0.4400	5,087,720	2,035,088	0.4000
Sep	5,215,685	2,203,851	0.4225	5,115,913	2,251,002	0.4400	5,112,815	2,045,126	0.4000
Total	55,619,915	\$18,577,440	\$0.3340	61,846,316	\$27,314,284	\$0.4416	61,896,202	\$24,169,088	\$0.3905

Staff Proposed Power Purchases Adjustment

	FY 2022			FY 2023			FY 2024		
Month	kWh	Cost	\$/kWh	kWh	Cost	\$/kWh	kWh	Cost	\$/kWh
Oct.	4,699,905	\$1,312,892	\$0.2793	5,477,410	\$2,325,344	\$0.4245	5,346,548	\$1,847,997	\$0.3456
Nov	4,506,546	1,260,650	0.2797	5,055,315	2,259,326	0.4469	5,266,362	1,820,281	0.3456
Dec	4,550,861	1,367,694	0.3005	5,308,974	2,374,793	0.4473	5,182,145	1,791,172	0.3456
Jan	4,504,694	1,353,257	0.3004	5,384,655	2,405,910	0.4468	5,346,815	1,848,089	0.3456
Feb	4,102,792	1,284,452	0.3131	4,845,746	2,171,162	0.4481	5,115,200	1,940,072	0.3793
Mar	4,468,141	1,385,118	0.3100	5,078,740	2,271,740	0.4473	4,962,243	1,882,059	0.3793
Apr	4,562,165	1,548,685	0.3395	5,134,686	2,259,262	0.4400	5,106,713	1,936,853	0.3793
May	4,709,340	1,596,895	0.3391	5,150,560	2,266,247	0.4400	5,142,623	1,950,473	0.3793
Jun	4,697,209	1,595,734	0.3397	5,118,877	1,769,304	0.3456	5,134,719	1,947,475	0.3793
Jul	4,885,609	1,861,516	0.3810	5,065,722	1,750,931	0.3456	5,092,300	1,931,386	0.3793
Aug	4,716,967	1,806,696	0.3830	5,109,717	1,766,138	0.3456	5,087,720	1,929,649	0.3793
Sep	5,215,685	2,203,851	0.4225	5,115,913	1,768,279	0.3456	5,112,815	1,939,167	0.3793
Total	55,619,915	\$18,577,440	\$0.3340	61,846,316	\$25,388,436	\$0.4105	61,896,202	\$22,764,673	\$0.3678

	FY 2023	FY 2024	Total
Staff Proposed Adjustment	\$1,925,848	\$1,404,415	\$3,330,263

Staff Notes and Assumptions on Power Purchases Adjustment

- 1 GPA LEAC when GWA prepared True-Up \$0.318576 per kWh
- 2 GPA LEAC as of June 2023, Primary - 13.8kV \$0.224219 per kWh
- 3 Difference -\$0.094357 per kWh
- 4 GPA LEAC Adjustment (June 2023) -\$0.094357 per kWh
- 5 GWA did not apply this adjustment in for Jun-Nov 2023 in the True-up filing
- 6 GWA assumed a \$.0672/kWh decrease beginning Oct 2023
- 7 GWA assumed a \$.03/kWh increase beginning Feb 2024

Staff Proposed Adjustments

- | | |
|---|--------------------|
| 8 Reduce GPA rate by \$.094357/kWh For June 23 - Feb 24 | \$0.345643 per kWh |
| 9 Increase LEAC by 15% for Feb - Sept 2024 | \$0.257852 per kWh |
| 10 Increase in Current LEAC | \$0.033633 per kWh |
| 11 Revised GPA Rate for Feb -Sep 2024 | \$0.379276 per kWh |
| | \$0.033633 |