

Regulatory Risk Assessment

| Ultimate Parent | Ticker | Electric Operating Subsidiary | S&P Rating | Electric Jurisdiction | Electric Distribution | Gas Distribution | Regulated Generation | BRA Ranking | Rate Base Method | | | Test Period | | | Most Recent Rate Case | | | Alternative Regulatory Plan | | | | | | | | | | |
|---------------------------------------|--------|--|------------|-----------------------|-----------------------|------------------|----------------------|-------------------|--------------------|------------|----------------------------|----------------------|----------------------|------------------|-----------------------|---------|------------------|-----------------------------|----------------------|---------------------|-------------------|------------------|-----------------|--------------|-------------------|----------------------------------|----|---|
| | | | | | | | | | Original Cost | Fair Value | Known & Measurable Adjust. | Historical Test Year | Partially-Forecasted | Fully-Forecasted | Authorized Date | ROE (%) | Equity Ratio (%) | Rate Base (\$M) | Multi-Year Rate Plan | Formula-Based Rates | Formula-Based ROE | Earnings Sharing | Rate Freeze/Cap | Rate Credits | Svc. Qual./ Perf. | Shared Savings/ Incentive Adders | | |
| ALLETE, Inc. | ALE | ALLETE (Minnesota Power) | BBB+ | Minnesota | Yes | No | Yes | Average / 2 | ✓ | | | | ✓ | ✓ | 3/12/2018 | 9.25 | 53.81 | 2,052 | | | | | | | | ✓ | ✓ | |
| Alliant Energy Corporation | LNT | Interstate Power and Light Company | A- | Iowa | Yes | Yes | Yes | Average / 1 | ✓ | | ✓ | | | | 2/2/2018 | 9.98 | 49.02 | 4,231 | | | | | | | | ✓ | ✓ | |
| | | Interstate Power and Light Company | A- | Minnesota | Yes | Yes | Yes | Average / 2 | ✓ | | | ✓ | ✓ | | 8/12/2011 | 10.35 | 47.74 | 126 | | | | | | | ✓ | ✓ | | |
| | | Wisconsin Power and Light Company | A | Wisconsin | Yes | Yes | Yes | Above Average / 2 | ✓ | | | | | | 11/18/2016 | 10.00 | 52.20 | 2,851 | | | ✓ | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Ameren Corporation | AEE | Ameren Illinois Company | BBB+ | Illinois | Yes | Yes | No | Average / 2 | Formula-Based Plan | ✓ | | | ✓ | ✓ | 12/6/2017 | 8.40 | 50.00 | 2,739 | ✓ | | ✓ | | ✓ | | | ✓ | ✓ | |
| | | Union Electric Company | BBB+ | Missouri | Yes | Yes | Yes | Below Average / 1 | ✓ | ✓ | | ✓ | ✓ | | 3/8/2017 | NA | NA | NA | | | | | | | | ✓ | | |
| American Electric Power Company, Inc. | AEP | AEP Texas, Inc. | A- | Texas | No | No | Yes | Average / 3 | ✓ | | ✓ | ✓ | | | 12/13/2007 | 9.96 | 40.00 | 1,566 | | | | | | | | | | |
| | | Appalachian Power Company | A- | Virginia | Yes | No | Yes | Above Average / 2 | ✓ | | ✓ | ✓ | | | 4/2/2018 | NA | NA | NA | | | ✓ | | | | ✓ | ✓ | ✓ | |
| | | Appalachian Power/Wheling Power | A- | West Virginia | Yes | No | Yes | Below Average / 1 | ✓ | | ✓ | ✓ | | | 6/30/2016 | 9.75 | NA | NA | | | | | ✓ | ✓ | | | ✓ | |
| | | Indiana Michigan Power Company | A- | Indiana | Yes | No | Yes | Average / 1 | ✓ | ✓ | ✓ | ✓ | | | 2/13/2013 | 10.20 | 42.67 | 2,399 | | | | | | | ✓ | ✓ | | |
| | | Indiana Michigan Power Company | A- | Michigan | Yes | No | Yes | Above Average / 3 | ✓ | | | | ✓ | ✓ | 4/12/2018 | 9.90 | 36.38 | 985 | | | | | | | | ✓ | ✓ | |
| | | Kentucky Power Company | A- | Kentucky | Yes | No | Yes | Average / 1 | ✓ | | ✓ | ✓ | | | 1/18/2018 | 9.70 | 41.68 | 1,192 | | | | | | | | ✓ | ✓ | |
| | | Kingport Power | n/a | Tennessee | Yes | No | No | Above Average / 3 | ✓ | | | | ✓ | | 8/9/2016 | 9.85 | 40.25 | 83 | | | | | | | | | | |
| | | Ohio Power Company | A- | Ohio | Yes | No | Yes | Average / 2 | ✓ | | ✓ | ✓ | | | 12/14/2011 | 10.30 | 53.79 | 1,004 | ✓ | | | ✓ | | | | ✓ | ✓ | |
| | | Public Service Company of Oklahoma | A- | Oklahoma | Yes | No | Yes | Average / 3 | ✓ | | ✓ | ✓ | | | 1/31/2018 | 9.30 | 48.51 | 2,465 | | | | | | | | ✓ | ✓ | |
| | | Southwestern Electric Power Company | A- | Arkansas | Yes | No | Yes | Average / 1 | ✓ | | | | ✓ | ✓ | 11/24/2009 | 10.25 | 33.99 | 612 | | | ✓ | | | | | | | |
| | | Southwestern Electric Power Company | A- | Louisiana | Yes | No | Yes | Average / 2 | Formula-Based Plan | ✓ | | ✓ | ✓ | | 5/18/2017 | 9.80 | NA | NA | ✓ | | ✓ | | ✓ | ✓ | ✓ | | | |
| | | Southwestern Electric Power Company | A- | Texas | Yes | No | Yes | Average / 3 | ✓ | | ✓ | ✓ | | | 12/14/2017 | 9.60 | 48.46 | 1,492 | | | | | | | | | | |
| Duke Energy Corporation | DUK | Duke Energy Carolinas, LLC | A- | North Carolina | Yes | No | Yes | Average / 1 | ✓ | | ✓ | ✓ | | | 9/24/2013 | 10.20 | 53.00 | 11,513 | | | | | | | | ✓ | ✓ | |
| | | Duke Energy Carolinas, LLC | A- | South Carolina | Yes | No | Yes | Average / 2 | ✓ | | ✓ | ✓ | | | 9/11/2013 | 10.20 | 53.00 | 4,229 | | | | | | | | ✓ | ✓ | |
| | | Duke Energy Florida, LLC | A- | Florida | Yes | No | Yes | Above Average / 2 | ✓ | | | | ✓ | ✓ | 10/25/2017 | 10.50 | NA | NA | | | | | ✓ | | | ✓ | ✓ | |
| | | Duke Energy Indiana, LLC | A- | Indiana | Yes | No | Yes | Average / 1 | ✓ | ✓ | ✓ | ✓ | | | 5/18/2004 | 10.50 | 44.44 | 3,642 | | | | | | | | ✓ | ✓ | |
| | | Duke Energy Kentucky, Inc. | A- | Kentucky | Yes | Yes | Yes | Average / 1 | ✓ | | ✓ | ✓ | | ✓ | 4/13/2018 | 9.73 | 49.25 | 648 | | | | | | | | ✓ | ✓ | |
| | | Duke Energy Ohio, Inc. | A- | Ohio | Yes | Yes | Yes | Average / 2 | ✓ | | ✓ | | | ✓ | 5/1/2013 | 9.84 | 53.30 | 1,045 | ✓ | | | ✓ | | | | | ✓ | ✓ |
| | | Duke Energy Progress, LLC/Carolina Power & Light | A- | North Carolina | Yes | No | Yes | Average / 1 | ✓ | | ✓ | ✓ | | | 2/23/2018 | 9.90 | 52.00 | 8,153 | | | | | | | | ✓ | ✓ | |
| | | Duke Energy Progress, LLC/Carolina Power & Light | A- | South Carolina | Yes | No | Yes | Average / 2 | ✓ | | ✓ | ✓ | | | 12/7/2016 | 10.10 | 53.00 | 1,306 | | | | | | | | ✓ | ✓ | |
| El Paso Electric Company | EE | El Paso Electric Company | BBB | New Mexico | Yes | No | Yes | Below Average / 2 | ✓ | | ✓ | ✓ | ✓ | 6/8/2016 | 9.48 | 49.29 | 414 | | | | | | | | | ✓ | | |
| | | El Paso Electric Company | BBB | Texas | Yes | No | Yes | Average / 3 | ✓ | | ✓ | ✓ | | | 12/14/2017 | 9.65 | 48.35 | NA | | | | | | | | | | |
| Hawaiian Electric Industries, Inc. | HE | Hawaiian Electric Light Company, Inc. | BBB- | Hawaii | Yes | No | Yes | Average / 2 | ✓ | | | | ✓ | | 2/6/2018 | 9.50 | 57.10 | NA | | | | ✓ | | | | ✓ | ✓ | |
| | | Hawaiian Electric Company, Inc. | BBB- | Hawaii | Yes | No | Yes | Average / 2 | ✓ | | | | ✓ | | 8/31/2017 | 9.50 | 56.69 | NA | | | | ✓ | | | | ✓ | ✓ | |
| | | Maul Electric Company, Limited | BBB- | Hawaii | Yes | No | Yes | Average / 2 | ✓ | | | | ✓ | | 5/31/2013 | 9.00 | 56.86 | NA | | | | ✓ | | | | ✓ | ✓ | |
| IDACORP, Inc. | IDA | Idaho Power Co. | BBB | Idaho | Yes | No | Yes | Average / 2 | ✓ | | ✓ | ✓ | | ✓ | 12/30/2011 | 10.00 | NA | 2,356 | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | |
| | | Idaho Power Co. | BBB | Oregon | Yes | No | Yes | Average / 2 | ✓ | | | | ✓ | ✓ | 2/23/2012 | 9.90 | 49.90 | 105 | | | | ✓ | | | | | | |
| NextEra Energy, Inc. | NEE | Florida Power & Light Company | A- | Florida | Yes | No | Yes | Above Average / 2 | ✓ | | | | ✓ | ✓ | 11/29/2016 | 10.55 | NA | NA | | | | | | ✓ | | ✓ | ✓ | |
| OGE Energy Corporation | OGE | Oklahoma Gas and Electric Company | A- | Arkansas | Yes | No | Yes | Average / 1 | ✓ | | ✓ | | | ✓ | 5/18/2017 | 9.50 | 36.38 | 507 | | | ✓ | | | | | ✓ | ✓ | |
| | | Oklahoma Gas and Electric Company | A- | Oklahoma | Yes | No | Yes | Average / 3 | ✓ | | ✓ | ✓ | | | 3/20/2017 | 9.50 | 53.31 | 4,202 | | | | | | | | ✓ | ✓ | |
| Pinnacle West Capital Corp. | PNW | Arizona Public Service Company | A- | Arizona | Yes | No | Yes | Average / 3 | | ✓ | ✓ | ✓ | | | 8/15/2017 | 10.00 | 55.80 | NA | | | | | | | | | | |
| PNM Resources, Inc. | PNM | Public Service Company of New Mexico | BBB+ | New Mexico | Yes | No | Yes | Below Average / 2 | ✓ | | ✓ | ✓ | ✓ | | 12/20/2017 | 9.58 | 49.61 | NA | | | | ✓ | | | | ✓ | ✓ | |
| | | Texas-New Mexico Power | BBB+ | Texas | NA | NA | NA | Average / 3 | ✓ | | ✓ | ✓ | | | 1/20/2011 | 10.13 | 45.00 | 332 | | | | | | | | | | |
| Portland General Electric Company | POR | Portland General Electric Company | BBB | Oregon | Yes | No | Yes | Average / 2 | ✓ | | | | ✓ | ✓ | 12/18/2017 | 9.50 | 50.00 | 4,506 | | | | ✓ | | | | | | |
| PPL Corporation | PPL | Kentucky Utilities Company | A- | Kentucky | Yes | No | Yes | Average / 1 | ✓ | | ✓ | ✓ | | ✓ | 6/22/2017 | 9.70 | NA | NA | | | | | | | | ✓ | ✓ | |
| | | Kentucky Utilities Company | A- | Tennessee | Yes | No | Yes | Above Average / 3 | ✓ | | | | | ✓ | NA | NA | NA | NA | | | | | | | | ✓ | ✓ | |
| | | Kentucky Utilities Company | A- | Virginia | Yes | No | Yes | Above Average / 2 | ✓ | | ✓ | ✓ | | | 2/2/2016 | NA | NA | NA | | | | | | | ✓ | ✓ | | |
| | | Louisville Gas and Electric Company | A- | Kentucky | Yes | Yes | Yes | Average / 1 | ✓ | | ✓ | ✓ | | ✓ | 6/22/2017 | 9.70 | NA | NA | | | | | | | ✓ | ✓ | | |
| | | PPL Electric Utilities Corporation | A- | Pennsylvania | Yes | No | No | Above Average / 3 | ✓ | | | | | ✓ | 11/19/2015 | NA | NA | NA | | | | | | | | | | |
| Southern Company | SO | Alabama Power Company | A- | Alabama | Yes | No | Yes | Above Average / 1 | ✓ | | ✓ | ✓ | | | 10/12/1982 | NA | NA | NA | ✓ | | ✓ | | ✓ | ✓ | | ✓ | ✓ | |
| | | Georgia Power Company | A- | Georgia | Yes | No | Yes | Above Average / 2 | ✓ | | | | ✓ | ✓ | 12/17/2013 | 10.95 | 50.84 | NA | ✓ | | | | | | ✓ | ✓ | ✓ | |
| | | Gulf Power Company | A- | Florida | Yes | No | Yes | Above Average / 2 | ✓ | | | | ✓ | ✓ | 4/4/2017 | 10.25 | NA | NA | | | | | | | ✓ | ✓ | ✓ | |
| | | Mississippi Power Company | BBB+ | Mississippi | Yes | No | Yes | Average / 1 | Formula-Based Plan | ✓ | | ✓ | ✓ | ✓ | 12/3/2001 | 12.88 | 53.68 | 732 | ✓ | | ✓ | | ✓ | ✓ | | ✓ | ✓ | |
| Xcel Energy Inc. | XEL | Northern States Power Company - MN | A- | Minnesota | Yes | Yes | Yes | Average / 2 | ✓ | | | | ✓ | ✓ | 5/11/2017 | 9.20 | 52.50 | 7,202 | ✓ | | ✓ | | | | ✓ | ✓ | ✓ | |
| | | Northern States Power Company - MN | A- | North Dakota | Yes | Yes | Yes | Average / 1 | ✓ | | ✓ | ✓ | | | 2/24/2014 | 10.25 | 52.56 | NA | | | | | | | ✓ | ✓ | ✓ | |
| | | Northern States Power Company - MN | A- | South Dakota | Yes | Yes | Yes | Average / 2 | ✓ | | ✓ | ✓ | | | 6/15/2015 | 9.25 | NA | 412 | | | | ✓ | ✓ | | | ✓ | ✓ | |
| | | Northern States Power Company - WI | A- | Michigan | Yes | Yes | Yes | Above Average / 3 | ✓ | | | | ✓ | ✓ | NA | NA | NA | NA | | | | | | | | ✓ | ✓ | |
| | | Northern States Power Company - WI | A- | Wisconsin | Yes | Yes | Yes | Above Average / 2 | ✓ | | | | | ✓ | 12/7/2017 | 9.80 | 51.45 | 1,195 | | | | | | | | | | |
| | | Public Service Company of Colorado | A- | Colorado | Yes | Yes | Yes | Average / 2 | ✓ | | | ✓ | ✓ | | 2/24/2015 | 9.83 | 56.00 | NA | | | | ✓ | ✓ | | | ✓ | ✓ | |
| | | Southwestern Public Service Company | A- | New Mexico | Yes | No | Yes | Below Average / 2 | ✓ | | ✓ | ✓ | ✓ | | 3/26/2014 | 9.96 | 53.89 | NA | | | | | | | | | | |
| | | Southwestern Public Service Company | A- | Texas | Yes | No | Yes | Average / 3 | ✓ | | ✓ | ✓ | | | 1/26/2017 | NA | NA | NA | | | | | | | | | | |
| Proxy Group Total | | | Average | A- | Total Count | 58 | 58 | 58 | Average / 1 | 58 | 58 | 58 | 58 | 58 | Average | 9.90 | 49.39 | | 58 | 58 | 58 | 58 | 58 | 58 | 58 | 58 | 58 | |
| | | | | | 14 | 55 | | | | 56 | 4 | 34 | 32 | 26 | 25 | | | | 8 | 8 | 3 | 18 | 11 | 3 | 35 | 37 | | |
| | | | | | Percentage | 93% | 24% | 91% | | 97% | 7% | 59% | 55% | 45% | 43% | | | | 14% | 14% | 5% | 31% | 19% | 5% | 60% | 64% | | |
| Green Mountain Power | | | | | | | | | ✓ | | | | ✓ | | | | | | ✓ | | ✓ | ✓ | | | | | | |

Notes

- [1] Source: S&P Financial, S&P Long-Term Rating
- [2] - [5] Source: S&P Financial
- [6] - [12] Source: Regulatory Research Associates
- [13] - [16] Source: S&P Financial
- [17] - [24] Source: Regulatory Research Associates
- [25] - [33] Source: "Adjustment Clauses: A State-by-State Overview," Regulatory Research Associates, September 12, 2017 and S&P Financial and S&P Regulatory Research Associates
- 1/ Iowa: IP&L has a mechanism in place to recover variations in certain taxes and franchise fees.
- 2/ Wisconsin: All of the utilities have a mechanism in place to recover variations in certain taxes and franchise fees.
- 3/ Illinois: As permitted by state statutes, Ameren Illinois utilizes riders to facilitate recovery of variations in bad-debt costs and has a mechanism in place to recover variations in certain taxes and franchise fees.
- 4/ Last rate decision was silent on ROE, but the implied ROE incorporated into the settlement was in the range of 9.2% and 9.7%. Union Electric has a mechanism in place to recover variations in certain government mandated investments, taxes and franchise fees.
- 5/ Virginia: APFCO's most recent rate case/biennial review decision was issued in 2014. The SCC set a 9.7% ROE as the baseline for APFCO's biennial earnings review for 2014 and 2015, and prospective adjustments to its rate adjustment clauses. In October 2016, the SCC issued an order in a generic proceeding establishing a 9.4% base ROE to be used in APFCO's rider mechanisms. APFCO has a mechanism in place to recover variations in certain taxes and franchise fees.
- 6/ West Virginia: The utilities have mechanisms in place to recover variations in certain taxes and franchise fees. CWP treatment was authorized for installation of scrubbers at two generation units. Environmental compliance riders have been legislated by the State for approved applications, but no such applications have been approved.
- 7/ Indiana: IWP is permitted to equally share with ratepayers, through a rider, off-system sales, or OSS, margins that vary from the amount reflected in the companies' base rates; IWP uses a rider for recovery of costs associated with the AEP Power Pool capacity cost-sharing arrangement.
- 8/ Kentucky: Off-system sales, or OSS, sharing mechanisms are in place for KP; KU allocates a portion of their off-system sales margins to ratepayers through the fuel adjustment clause proceedings; KU how a mechanism in place to recover variations in certain taxes and franchise fees.
- 9/ Ohio: All of the utilities have a mechanism in place to recover variations in certain taxes and fees. OP has riders in place to recover variations in uncollectible expense.
- 10/ Oklahoma: Ratepayers' share of OSS margins flow through PSO's FCA rider; PSO has a mechanism in place to recover variations in certain taxes and franchise fees.
- 11/ Arkansas: Southwestern Electric Power has a mechanism in place to recover variations in certain taxes and franchise fees.
- 12/ Louisiana: Customers' share of Southwestern Electric Power's off-system sales margins flow through the company's fuel adjustment clause; Economic development riders are in place for Southwestern Electric Power.
- 13/ Florida: Certain fees and taxes, such as franchise fees and gross receipts taxes, are recovered through a line item on customer bills, with the charge adjusted based on customer usage.
- 14/ Indiana: DEI is permitted to equally share with ratepayers, through a rider, off-system sales, or OSS, margins that vary from the amount reflected in the companies' base rates.
- 15/ Kentucky: Off-system sales, or OSS, sharing mechanisms are in place for DEK's electric operations; 100% of DEK's emission allowance sales margins flow to ratepayers through the OSS mechanism; DEK has a mechanism in place to recover variations in certain taxes and franchise fees.
- 16/ Ohio: All of the utilities have a mechanism in place to recover variations in certain taxes and fees; DEO uses Rider Manufactured Gas Plant, or MGP, to recover PUC-approved costs associated with the company's environmental remediation of MGP sites; DEO recovers variations in uncollectible expense.
- 17/ New Mexico: All of the utilities have a mechanism in place to recover variations in certain taxes and franchise fees.
- 18/ Texas: EPE has a rider in place to recover lost revenue associated with the provision of discounted service to military bases.
- 19-21/ Hawaii: All companies operate under All Regulation framework, with full decoupling and cost of service recovery mechanisms. Also have a Major Project Interim Recovery Mechanism for where utilities may recover for eligible projects which exceed the cost of service recovery mechanism caps. Earnings sharing mechanisms are asymmetrical and have sharing fees that shift to ratepayers as earnings increase over ROE, with highest tier of 300 bps with 90% going to ratepayers. There is no sharing if the utility underperforms. An integrated resource planning, or IRP, cost recovery rider is in place for the state's utilities to facilitate recovery of the planning costs associated with the IRP process. Did not reach settlement of ROE in last rate case. Interim increase approved for HE and HEL at 9.5% on 57.10% and 56.69% equity, respectively. Maui Electric ROE has not been decided and no interim rate has been approved. Assume that last ROE issued for Maui Electric will continue.
- 22/ Florida: see note 13/
- 23/ Arkansas: OG&E uses a "Short Grid" rider and has a mechanism in place to recover variations in certain taxes and franchise fees.
- 24/ Oklahoma: OG&E uses a storm-cost recovery rider to reflect any differences between the level of storm costs reflected in base rates and the level of such costs actually incurred in a given year; OG&E has a mechanism in place to recover variations in certain taxes and franchise fees.
- 25/ Arizona: All of the utilities recover franchise fees on a current basis through an adjustable line item on the monthly bill.
- 26/ New Mexico: see note 17/
- 27/ Texas: TNMP has adjustment clauses in place to reflect changes in municipal franchise fees and riders to recover extraordinary storm costs.
- 28/ Kentucky: KU allocates a portion of their off-system sales margins to ratepayers through the fuel adjustment clause proceedings; KU has a mechanism in place to recover variations in
- 29/ Virginia: KU's most recent rate case decision in Virginia was issued in February 2016, when the SCC adopted a settlement that was silent as to ROE. However, the parties agreed that an ROE range of 9.5% to 10.5% is to be used for annual information filings and other monitoring purposes. In a 2011 case, KU was authorized a 10.3% ROE.
- 30/ Kentucky: LG&E allocates a portion of their off-system sales margins to ratepayers through the fuel adjustment clause proceedings. LG&E has a mechanism in place to recover variations in certain taxes and franchise fees.
- 31/ Pennsylvania: On May 3, 2018, the PUC voted to issue a policy statement allowing the states utilities to pursue alternative ratemaking mechanisms such as revenue decoupling. All of the utilities have a mechanism in place to recover variations in certain taxes and franchise fees. PPL-E recovers universal service program costs through a rider.
- 32/ Alabama: adjustment provisions to reflect changes in income taxes, and certain general and local taxes; Alabama Commission adopted a rate stabilization approach to the cost of equity when it sets rates based on a weighted cost of equity range (ROE x Equity Ratio) most recently, 5.75% to 6.21%, with an adjusting point of 5.98%, subject to an annual rate increase cap of 5% or 4% per year if averaged over 2 years. If Alabama Power's projected WCE is outside the authorized WCE range, rates are to be adjusted, subject to the above limits on rate increases, to establish a 5.98% WCE. If the actual earned WCE is above 6.21%, Alabama Power is to refund the incremental revenues to customers unless the PSC directs otherwise. However, there is no provision for recovering prior-year shortfalls if the earned WCE is below 5.75%. The Rate RSE framework includes a performance-based adder of seven basis points, or 0.07%, that may be added to the WCE adjusting point if the company has an "A" credit rating equivalent with at least one of the rating agencies or is in the top one-third of a designated customer satisfaction benchmark survey.
- 33/ Florida: see note 13/
- 34/ Mississippi: MP has riders in place related to the securitization of storm costs. EM uses an ad valorem tax adjustment rider. A similar mechanism has been in place for MP for many years.
- 35/ North Dakota: Through NSP-M's fuel and purchased power adjustment, or PPPA, clause, the company shares equally with ratepayers prospective "non-asset-based" wholesale power margins, or WPMs.
- 36/ South Dakota: Through its fuel and purchased power adjustment clause, or PPPAC, BHP credits ratepayers a portion of the margins from renewable energy credit sales and power marketing income. NSP-M operates under certain
- 37/ Wisconsin: see note 2/
- 38/ Colorado: PSCO utilizes an adjustment clause for steam service, under which it recovers the difference between its actual cost of fuel and the costs recovered in base rates. PSCO shares with customers margins from generation-based short-term energy trading and proprietary trading through its fuel and purchased power adjustment mechanism.
- 39/ New Mexico: see note 17/
- 40/ Texas: SP5 recovers lost revenue associated with the provision of discounts to state universities through a rider.