

September 25, 2020

GRIDLIANCE WEST LLC PROJECTED 2021 REVENUE REQUIREMENT

Pursuant to GridLiance West LLC’s (GridLiance West) formula rate protocols (Protocols), and consistent with the commitments made by GridLiance West in Docket No. ER17-706-000, GridLiance West hereby presents its projected revenue requirement for the 2021 rate year (Rate Year).

I. INTRODUCTION & BACKGROUND

On December 29, 2016, pursuant to Section 205 of the Federal Power Act and Part 35 of the Federal Energy Regulatory Commission’s (Commission) regulations, GridLiance West filed with the Commission its Transmission Owner Tariff (TO Tariff), including a formula rate template (Template) and implementation protocols (Protocols) (together, Formula Rate).¹ GridLiance West also sought approval of certain transmission incentive rate treatments, including Construction Work in Progress (CWIP) for the Sloan Canyon Switching Station transmission project and authorization to create a regulatory asset for all its prudently incurred non-capitalized costs to start-up its business, including pre-commercial and formation costs (the Start-Up Regulatory Asset), and defer recovery until GLW exceeds a total rate base of \$100.0 million.² GridLiance West’s TO Tariff and Formula Rate are designed to calculate and recover the annual transmission revenue requirement associated with GridLiance West’s acquisition of the High Voltage Transmission System (HVTS) from Valley Electric Transmission Association, LLC (VETA), as well as future GridLiance West projects.

On February 24, 2017, the Commission issued a Letter Order Accepting and Suspending Filing, Subject to Refund and Further Commission Order.³ In the February 24 Letter Order, the Commission accepted GridLiance West’s TO Tariff for filing and suspended it for a nominal period, to be effective as set forth in the February 24 Letter Order, subject to refund and further Commission order.⁴ On August 17, 2017, the Commission issued an Order on Incentives and Participating Transmission Owner Tariff, and Establishing Hearing and Settlement Judge Procedures.⁵ In the August 17 Order, the Commission set GridLiance West’s proposed TO Tariff, Formula Rate, and projected cost of service for hearing and settlement judge procedures, to be effective as set forth in the February 24 Letter Order.⁶

¹ *GridLiance West Transco LLC*, Application for Acceptance of Transmission Owner Tariff, Transmission Formula Rate and Approval of Transmission Rate Incentives, Docket No. ER17-706-000 (Dec. 29, 2016) (205 Application).

² The Sloan Canyon Switching Station was previously called the Bob Switching Station.

³ *GridLiance West Transco LLC*, Order Accepting and Suspending Filing, Subject to Refund and Further Commission Order, 158 FERC ¶ 62,136 (2017) (February 24 Letter Order).

⁴ *Id.* at 2.

⁵ *GridLiance West Transco LLC*, Order on Incentives and Participating Transmission Owner Tariff, and Establishing Hearing and Settlement Judge Procedures, 160 FERC ¶ 61,003 (2017) (August 17 Order).

⁶ *Id.* at P 67.

On March 14, 2018, GridLiance West filed an Offer of Settlement that fully resolved each of the issues set for hearing with respect to its 205 Application. As part of this Offer of Settlement, GridLiance West submitted an updated 2017 populated Template to reflect the agreed-upon terms, including a lower return on equity (ROE). On April 30, 2018, the settlement judge issued a Certification of Uncontested Settlement. On June 21, 2018, the Commission issued a letter order approving the Offer of Settlement and directing GridLiance West to make certain agreed upon revisions in a subsequent compliance filing.⁷

On May 25, 2018, GridLiance West filed an Application for Transmission Rate Incentives,⁸ requesting approval of (1) inclusion of 100% CWIP in rate base for costs incurred to develop the Sloan Canyon Switching Station to Mead Substation 230 kV Line Upgrade (Sloan Canyon-Mead); (2) recovery of 100% of all prudently incurred construction costs in the event the Sloan Canyon-Mead project is abandoned or cancelled, in whole or in part; and (3) authorization for an incentive adder of 50 basis points to its authorized ROE in recognition of its status as an independent transmission company, subject to the Commission's requirement that GridLiance West's requested total ROE of 10.6% does not exceed the top end of the zone of reasonableness.

On July 24, 2018, the Commission issued an order granting GridLiance West's requests for inclusion of 100% CWIP in rate base and 100% recovery of prudently incurred abandoned plant costs.⁹ The Commission also granted GridLiance West's request for a 50 basis points incentive adder for its status as a Transco and accepted and suspended the proposed total ROE of 10.6% for a nominal period, subject to refund, and established hearing and settlement judge procedures to determine whether the total ROE falls within the zone of reasonableness.¹⁰ On September 28, 2018, GridLiance West filed an Offer of Settlement that fully resolved each of the issues set for hearing with respect to its total ROE. The settlement set GridLiance West's total ROE at 10.60 percent, effective July 25, 2018, and established a rate moratorium on the total ROE as described in the settlement.

On September 30, 2018, GridLiance West ended its accrual of costs to the Start-Up Regulatory Assets and, on October 25, 2018, submitted its Section 205 filing seeking Commission authorization to recover in rates the \$20.3 million in costs accrued to the regulatory asset. In December 2018, the FERC approved GridLiance West's regulatory asset recovery filing for the \$20.3 million accrued to the regulatory asset to be amortized over a ten-year period beginning on January 1, 2019.

On December 19, 2019, the Commission approved the Unopposed Offer of Settlement and Settlement Agreement ("Settlement") filed by GridLiance Heartland LLC, GridLiance High Plains LLC and GridLiance West on July 31, 2019.¹¹ The Settlement resolved the sole issue set for hearing and settlement procedures in the consolidated dockets, Docket Nos. ER18-2342 and EL19-29. In compliance with the Settlement, GridLiance West submitted compliance filings in Docket No. ER20-1040 on February 19, 2020

⁷ *GridLiance West Transco LLC*, 163 FERC ¶ 61,203 (2018).

⁸ *GridLiance West Transco LLC*, Application for Transmission Rate Incentives, Docket No. ER18-1693-000 (May 25, 2018) (Application).

⁹ *GridLiance West Transco LLC*, Order on Transmission Rate Incentives and Establishing Hearing and Settlement Judge Procedures, 164 FERC ¶ 61,049 at PP 19, 25 (2018).

¹⁰ *Id.* at P 40.

¹¹ *GridLiance West Transco LLC*, Letter Order, Docket Nos. ER18-2342 and EL19-29, dated December 19, 2019.

and April 28, 2020, to modify its Income Tax Allowance (ITA) in its transmission formula rate template to 72.13% effective through June 30, 2020 and to 53.29% thereafter.

GridLiance West's Protocols require that GridLiance West post a projected revenue requirement for the upcoming rate year (Annual Projection) no later than September 30, provided that if the date for posting falls on a weekend or holiday recognized by FERC, then the Annual Projection shall be posted no later than the next business day. GridLiance West is posting its Annual Projection for 2021 on Friday September 25, 2020. The Annual Projection is required to include (i) all inputs in sufficient detail to identify the components of GridLiance West's projected net revenue requirement, and (ii) explanations of the bases for the projections and input data. The Formula Rate Template posted herewith has been populated with GridLiance West's projected 2021 inputs and produces GridLiance West's projected 2021 revenue requirement. The explanations for the bases for the projections and input data are provided herein.

II. ANNUAL PROJECTION

GridLiance West projects that its net revenue requirement for the 2021 Rate Year will be \$37,638,003. This projection reflects adjustments to GridLiance West's projected gross revenue requirement for the 2021 Rate Year True-Up and total transmission revenue credits that GridLiance West expects to receive for 2021. The discussion below sets forth the bases for the components of the Annual Projection.

A. Rate Base

Total rate base, under GridLiance West's formula rate is the sum of net plant, any adjustments to rate base, land held for future use, and total working capital.¹² The total rate base reflected in GridLiance West's 2021 Annual Projection is \$165,988,627.

1. Net Plant

GridLiance West's 2021 Annual Projection is based upon an average net plant value of \$153,581,204 for 2021. The average net plant value reflected in the Annual Projection is equal to the difference between the original cost of constructing the assets, including the value of the requisite right-of-way and the cost of all renewal and replacements (\$174,948,808), and the average accumulated depreciation of those assets (\$21,367,604). The accumulated depreciation consists of the accumulated depreciation carried forward from 2020, plus the depreciation that will occur in 2021, consistent with the approved depreciation rates. GridLiance West projects that accumulated depreciation at the end of 2021 will equal \$23,246,473.

2. Adjustments to Rate Base

Under the formula rate, the total adjustments to rate base comprise: (1) accumulated deferred income taxes (ADIT); (2) Account No. 255 (accumulated deferred investment tax credits); (3) CWIP; (4) unfunded reserves; (5) unamortized regulatory assets; and (6) unamortized abandoned plant. However, GridLiance West projects zero balances for all of the above, except ADIT and unamortized regulatory assets.

¹² GridLiance West does not expect to own any land held for future use in the 2021 Rate Year.

In Docket No. ER19-191, the Commission approved the requested recovery of the Start-Up Regulatory Asset, as described above. GridLiance West estimates an average unamortized Start-up Regulatory Asset balance of \$15,251,349 as included in the 2021 Projection.

The Annual Projection reflects an ADIT liability balance of \$5,779,540. ADIT was calculated as the difference between the straight-line book depreciation expense, and the accelerated depreciation recognized for tax purposes.

3. Working Capital

Pursuant to GridLiance West's formula rate, total working capital is equal to the sum of cash working capital, materials and supplies, and prepayments. GridLiance West projects a total working capital of \$2,935,614 for the 2021 Rate Year.

GridLiance West projects a cash working capital balance of \$2,238,887, which is equal to the projected total operations and maintenance (O&M) and administrative and general (A&G) expenses, less the amortization of any regulatory asset, times one eighth (1/8). GridLiance West's projected O&M and A&G expenses are discussed in greater detail below.

The projected balance for materials and supplies is \$81,426. This projection is based on the expected value of the materials and supplies.

GridLiance West expects to have made an average of \$615,301 in prepayments for the 2021 Rate Year, which consists mainly of a pre-paid annual fee for right-of-way and insurance prepaids. Some of the assets that GridLiance West acquired from VETA are located on easements and other rights-of-way.

A. Expenses

GridLiance West expects to incur \$19,944,607 in total O&M and A&G expenses, and \$3,683,238 in depreciation expense in the 2021 Rate Year.

The 2021 Annual Projection includes \$8,440,761 of O&M expense, which comprises internal direct labor costs, external costs, insurance, and amortization of prepayments. The external component of this projection is based on the budget expected to be agreed upon as part of the Operations and Maintenance Agreement negotiated by GridLiance West and VETA's parent, Valley Electric Association, Inc. GridLiance also expects regulatory asset amortization expenses of \$2,033,513.

GridLiance West also anticipates \$9,470,333 of A&G expenses, which consist of internal costs and external costs projected to be directly incurred by GridLiance West. The 2021 Annual Projection A&G amounts include allocations of indirect costs from GridLiance West's affiliates, which were previously recorded to a regulatory asset prior to the 2019 Rate Year.

GridLiance West's anticipated depreciation expense reflects the application of the depreciation rates filed in the 205 Application to the GridLiance West assets, which totals \$3,683,238.

B. Taxes

The 2021 Annual Projection includes taxes other than income taxes of \$1,378,448, which comprises property and gross receipts taxes.

GridLiance West calculated property taxes of \$1,333,914 by applying an estimated local tax rate to the projected assessed value of the acquired utility plant assets. Gross receipt taxes of \$44,534 relate to the Nevada Commerce Tax and are estimated by applying the applicable Commerce Tax rate for utilities to GridLiance West's projected gross revenue.

Pursuant to its formula rate, GridLiance West also projects a recovery for income taxes of \$1,318,550, which is estimated by applying the applicable tax rate to the projected return on rate base allocable to taxable ownership.

C. Return and Capital Structure

GridLiance West's return is equal to its weighted average cost of capital of 7.96%. GridLiance West's capital structure and the applicable cost of debt derives from the debt expense that GridLiance West expects to incur as a result of the debt issued. The debt issuance was approved by the Commission in Docket No. ES19-30-000.¹³ The 10.6% return on equity is consistent with the Settlement Agreements reached in Docket Nos. ER17-706 and ER18-1693, which set GridLiance West's base ROE at 9.6% and its total ROE, inclusive of all incentive rate adders, at 10.6%. The total return on rate base reflected in the Annual Projection is \$13,212,695, which is the product of its return and total rate base.

D. True-Up Adjustment

Under GridLiance West's formula rate, all True-Up Adjustments are added to the gross revenue requirement to calculate the net revenue requirement for the Rate Year. GridLiance West projects (\$1,860,877) in True-Up Adjustments related to 2019 Rate Year to be included in the net revenue requirement for Rate Year 2021.

III. COMMUNICATIONS

Please direct any questions regarding GridLiance West's 2021 projected revenue requirement to the contacts below.

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¹³ *GridLiance West LLC*, 168 FERC ¶ 62,032 (2019) (delegated letter order).

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