

**MINUTES**  
of the  
**LEGISLATIVE CONSUMER COMMITTEE**

December 9, 2010

State Capitol, Room 422, Helena, MT

**COMMITTEE MEMBERS PRESENT**

Senator Terry Murphy, Chairman  
Representative Pat Noonan, Vice Chairman  
Senator Joe Tropila  
Representative Tom Berry

**STAFF PRESENT**

Robert A. Nelson, Consumer Counsel  
Mandi Shulund Hinman, Secretary  
Mary Wright, Attorney  
Paul Schulz, Rate Analyst

**VISITORS PRESENT**

Quinn Holzer, Legislative Fiscal Division  
Mike Pichette, NorthWestern Energy

**CALL TO ORDER**

The meeting was called to order at 10:00 a.m. by Senator Murphy.

**MINUTES OF THE PREVIOUS MEETING**

MOTION: Representative Noonan moved approval of the September 8, 2010 meeting minutes.

VOTE: The motion passed unanimously.

**BOB NELSON PROVIDED THE FOLLOWING HIGHLIGHTS OF CASES**

**CURRENTLY PENDING:**

**NorthWestern Energy (NWE)**

**D2009.9.129 Application for Electric and Natural Gas Delivery Rate Increase and ACOS and Rate Design Changes-NWE** filed this application on 10/16/2009 for

an electric and gas rate increase. A \$2 million, or a 2% overall increase was requested for the gas utility and NWE proposed allocating that increase so the residential class would receive a 3% overall increase while other classes would have different levels of increases or decreases. NWE also proposed an inverted, or inclining, block rate design. An increase of \$15.5 million was proposed for the electric utility, which would be a 7% increase overall, regarding the fixed costs component of the rates. The Public Service Commission (PSC or Commission) addresses commodity costs in the annual trackers, so the proposed increases in this application would result in a roughly 1% total increase on gas and 3.5% on electric. NRDC/HRC District 11 in their testimony, proposed full decoupling, meaning that all sales differences, regardless of the cause, are included in decoupling adjustments. NWE does currently have a type of decoupling in place and MCC filed testimony on 6/03/2010 opposing NRDC's decoupling proposal. Dr. Wilson explained, in his testimony, that full decoupling would weaken productivity incentives. It would also violate the matching principal, which requires matching of revenues, expenses and volumes. The Commission has refrained from only looking at one particular cost or revenue change because, in theory, that would lead to unjust and unreasonable rates if all costs and revenues were not studied at the same time. Dr. Wilson also

pointed out that NWE already has a lost revenue adjustment mechanism in place that is intended to restore fixed costs associated with lost sales in between rate cases, and that the purpose of decoupling is to remove disincentives for energy efficiency investments and NWE is already performing at the top level of utilities around the United State with respect to energy efficiency programs. Shortly before the hearing in September, MCC entered into discussions with NWE and a stipulated settlement was filed regarding the revenue requirement request. The settlement agreed to a \$7.7 million increase for electric, or roughly 3.45%, contingent on the Commission's actions on decoupling. If the Commission adopted decoupling, parties were free to advocate reducing NWE's return on equity allowance. On the gas utility, the stipulation agreed to a \$1 million decrease instead of the \$2 million increase. The stipulation agreed to a 10.25% return on equity. MCC entered into another stipulation with NWE, The Large Customer Group (LCG) and NRDC/HRC regarding cost allocation issues, which is how the revenue requirement would be distributed. The stipulation agreed that embedded cost studies should be used instead of marginal cost studies and specific class revenue allocations were agreed upon. The 3.4% increase for electric customers would be spread more equally instead of NWE's original proposal to allocate more of the costs to residential customers, and customers of the gas utility would see roughly a 1% reduction in the fixed cost component of their bill. Senator Murphy asked Bob how NWE's SmartGrid program was progressing. Bob said many utilities in the United States are moving toward SmartGrid and that quite a bit of money in the ARRA Recovery Act was distributed to utilities and Commissions to promote SmartGrid development. NWE received several million dollars and is working with a regional group of utilities on this project that also received money so the project is progressing in Montana. The National Association of State Utility Consumer Advocates (NASUCA), which MCC belongs to, was asked by the White House to perform a study and provide comments on the SmartGrid efforts around the United States. Representative Berry asked Bob how often George Donkin is called upon to assist MCC with cases. Bob said that George Donkin is an Economist with John Wilson and Associates who specializes in gas issues and has worked with MCC for many years.

**D2008.8.95 NWE Application for Approval to Construct and Operate the Mill Creek Generating Station to Supply Regulation Service-**

This project was for a gas plant to primarily provide regulation services for variable generation on NWE's system. In the past, this service had been provided through NWE owned resources but availability and cost became a factor so NWE proposed and received approval to build Mill Creek. This application was approved by the Commission in 2009 and Mill Creek is scheduled to start running on 1/1/2011. NWE requested interim approval for a \$45.3 million revenue requirement increase and the Commission issued Interim Order 6943b on 11/17/10 approving an interim increase effective 1/1/2011 of \$44.9 million, making a small adjustment for a debt cost component. The Commission repeated, from Final Order 6943a, the requirement that NWE file a final revenue requirement proposal within 90 days of commercial operations.

**D2010.5.50 NWE Annual Electric Tracker-**Annual trackers are filed in order to trueup the monthly trackers and this filing covers 7/2009 through 6/2010 plus the projected period of 2010-2011. MCC filed testimony of Dr. John Wilson on 9/16/2010. Dr. Wilson recounted the history of the supply component cost changes for the last four annual tracker periods and in comparing those changes, concluded that electric commodity costs for NWE and its customers have been relatively stable during this time period due to increasing costs for Colstrip 4 and decreasing market costs, which together have resulted in stable overall commodity costs. Dr. Wilson also stated that, in his opinion, Colstrip 4 revenue requirement was being over-recovered because the unit costs were based on 2007 volumes but were applied to 2008 costs and implemented in 2009. A hearing is scheduled for 1/19/2011.

**N2010.6.57 NWE 2009 Electric Default Supply Resource Planning and**

**Procurement Plan-**These are planning documents that NWE and Montana-Dakota Utilities (MDU) are required by Commission rule to file every two years to provide information on resource planning, including how the utilities will be meeting resource procurement obligations. In this filing, NWE indicated that it would be evaluating rate basing additional gas generation and increasing its demand side management

(DSM) energy efficiency investment target from 5 average megawatts per year to 6 average megawatts and intends to add 50-75 megawatts of wind. MCC filed comments of Larry Nordell on 10/1/2010. Larry noted that the purpose of this filing was planning yet NWE had the continued responsibility of making day to day decisions. In the plan, NWE raised the issue of whether there should be a premium for vertically integrated resources as opposed to contracted resources, and Larry stated that any premium for such vertically integrated resources should be rigorously justified. Larry requested more information on the economic dispatch of Colstrip 4, the cost of hedging, and incremental costs of wind regulation. Larry also requested information on potentially using Mill Creek as a base load resource rather than a regulation resource to the extent that there are cost effective integration resources available still to be contracted. These dockets are not contested cases and the Commission will consider all comments filed before issuing final comments on NWE's plan.

**D2010.7.77 Application for Approval of Revised QF-1 Rates**-The Commission has established a QF rate for wind based on the conclusion that NWE had to acquire, under the renewable portfolio standards, certain amounts of renewable resources. The Commission therefore established a separate category of avoided costs for non avoidable renewable resources. In this case, the wind rate for those renewable resources is an Option 3 rate of \$68.42 per megawatt hour and NWE has proposed avoided cost rates of \$72.65 per megawatt hour. The \$68.42 does not include any wind integration costs, or firming costs, compared to the \$72.65 for the other QF Options. The Commission did not include those costs in the Option 3 QF rate because NWE did not include them separately in the portfolio plan. MCC filed testimony of Dr. John Wilson on 11/10/2010. Dr. Wilson noted that forecasted costs for electric generation have come down so the increases that NWE calculated for avoided costs were not warranted. The Montana Small Independent Renewable Generators (MSIRG), a QF Wind Association, also filed testimony on 11/10/2010 and said that the Option 3 cost of wind should be about \$79.00 to account for different capacity factors and suggested that Option 3 should be offered to small

hydro, including \$15.00 per megawatt hour for wind integration costs that would not be incurred.

**D2010.6.62 2010 Annual Avoided Cost Compliance Filing for QFLT-1 Rates-**

This case relates to a grandfathered tariff for QF rates that existed prior to the restructuring of NWE in 1997. A portion of those costs, due to a settlement between MCC and NWE, became stranded costs because they were deemed more expensive than market costs. There has been an ongoing dispute with NWE's QF providers regarding these rates and arbitration has been entered into. This docket is intended to implement the rates resulting from the arbitration proceedings and adjustments to those QFLT-1 rates. MCC is monitoring this case but is not actively participating because the prior settlement means these rates do not have a direct impact on customers.

**D2010.7.74 NWE Monthly Electric Trackers-**The October Electric Tracker filed 9/15/2010 resulted in a residential rate decrease to \$.055363/Kwh; The November Electric Tracker filed 10/15/2010 resulted in a residential rate decrease to \$.0543/Kwh; The December Electric Tracker filed 11/15/2010 resulted in a residential rate decrease to \$.053924/Kwh.

**Williamson, et al. v. MPSC and NWE, Petition for Review of 7084a and 7084d and Complaint for Declaratory Judgment, Action to Compel Performance and Request for Temporary Rate, Cause No. DV-10-1450, 13<sup>th</sup> Judicial District**

**Reduction-**This is the complaint of Dr. Williamson and others that Russ Doty has been heavily involved in. The complainants are trying to compel reductions for street lighting rates in order to use the money saved for installation of LED lamps. The Commission rejected this complaint for lack of standing so the complainants have appealed the case to District Court. Both NWE and the Commission have filed Motions with the court to dismiss the case.

**FERC Docket No. ER10-1138-000, Revisions to Schedule 3, Regulation and Frequency Response Service of NWE's OATT-**

This case is NWE's application before the Federal Energy Regulatory Commission (FERC) to increase and recover rates that apply to FERC jurisdictional customers who obtain transmission service, which is regulated by the FERC. MCC is interested in this case primarily because of the allocation of costs between FERC jurisdictional and state jurisdictional customers and once FERC determines an allocation to its jurisdiction, potential arguments could be made regarding state jurisdiction being pre-empted from any other allocation. There are several parties participating in this case, including the Montana Commission. FERC issued an order on 10/15/2010 accepting NWE's filed tariffs but also suspending them subject to a hearing, which is typical FERC practice. FERC has since found that NWE's proposals have not been shown to be just and reasonable, and raise material issues of fact, including revenue requirement that is impacted by the requested return on equity and NWE's proposed allocation of both fixed and variable costs. FERC also questioned the propriety of charging energy rates to regulation customers that are subject to FERC jurisdiction, and the level of regulation service obligations and ceiling rates for regulation service. FERC appointed a settlement judge and the first settlement conference was held 11/4/2010. A technical conference is scheduled for 2/1/2011, which is a meeting of the parties to discuss issues raised through discovery, and an additional settlement conference is scheduled for 3/8/2011. Senator Murphy asked Bob if Judith Gap wind power is being supplied for \$29.00 per megawatt hour. Bob said his recollection from several years ago was that the agreed rate for Judith Gap was around \$31.00 per megawatt hour, which is a very low rate that will probably never be seen again. Senator Murphy directed that same question to Mike Pichette of NorthWestern Energy. Mr. Pichette said that he is not sure what the current price of Judith Gap is but agreed with Bob that the \$31.00 will most likely never happen again.

**N2008.12.138 Natural Gas Biennial Procurement Plan-**Every two years NWE files a procurement planning document for the gas utility, which MCC has had ongoing

concern about. This concern began with a docket where the Commission discovered that gas commodity costs had increased substantially and some parties, including a state agency, had entered into long term contracts for gas that had, at that time, protected them from any price increases. Because of this, the Commission found that NWE's failure to enter into long term contracts was imprudent and disallowed several million dollars of commodity costs. That case was ultimately settled in court but created tension with gas purchasing practices for NWE and as a result, NWE proposed a hedging program that was approved by the Commission. In that hedging program, NWE entered into longer term purchases and fixed price swaps for gas that locked prices in. As this continued, MCC observed that this was causing price increases because NWE was locking in prices during high cost periods. MCC felt that NWE should go back to spot market purchases, as other utilities were doing, so customers would be able to participate in market price declines but the Commission did not favor this approach due to price volatility. MCC suggested that if NWE was going to engage in hedging, call options could be considered, which for many years the Commission has viewed as more of a financial derivative strategy and has told NWE not to even address. This situation persisted for several years and as part of this gas biennial procurement plan MCC again entered into discussions with NWE and filed comments of Mr. George Donkin. Mr. Donkin discussed this history in detail and analyzed how price swaps and call options would work. On 10/29/2010, MCC entered into a stipulation and settlement with NWE covering this biennial procurement plan and some annual trackers that were pending. In that stipulation, NWE agreed to reduce the fixed price swap activity to a maximum of 2 million dekatherms per year to mitigate the impacts of that activity, and to phase this level in over the next few years. NWE also agreed not to enter into any fixed price swaps when commodity prices are greater than \$7.00 per dekatherm and agreed to document any analysis associated with the timing and execution of fixed price swaps and to survey other local gas distribution companies to determine what standard industry practices are or what developing industry practices might be. NWE did agree that increased risk could be mitigated by the use of call options, based on information received from third parties, and indicated that call options would have

cost less than the fixed price swaps during the time that NWE had used fixed price swaps and agreed to include a plan for a two year study on call options in the next biennial procurement plan. MCC agreed, on the other hand, that the annual tracker applications for both 2009 and 2010 should be approved as filed.

**D2009.5.63 and D2010.5.49 NWE Annual Gas Trackers-**The settlement in the previous case included these two annual trackers.

**D2010.7.75 Monthly Gas Trackers-** The October Gas Tracker filed 9/15/2010 resulted in a residential rate decrease from \$8.54 to \$8.42; The November Gas Tracker filed 10/15/2010 resulted in a residential rate decrease from \$8.42 to \$8.30; The December Gas Tracker filed 11/12/2010 resulted in a residential rate increase from \$8.30 to \$8.38.

**D2010.11.110 Petition for Authority to Issue Securities-**NWE requires Commission approval for securities issuances and in this docket, NWE requested authority to issue long term financing not to exceed \$850 million through 12/31/2012. The intended use of the financing is general corporate purposes and a breakdown of the \$850 million is equity security not to exceed \$250 million, secured debt not to exceed \$250 million, and unsecured debt not to exceed \$350 million. Senator Tropila asked Bob if the BTU content of gas is ever a factor in calculating costs. Bob said that it is, explaining that utilities have therm zones and rates are different in each zone based on the BTU content and source of gas supply in each zone.

### **Montana-Dakota Utilities (MDU)**

**D2010.8.82 General Electric Rate Application-**On 8/11/2010, MDU filed an electric rate application requesting a \$5.5 million increase, or 13% increase overall. The increase for residential customers would be 14.5% due to some cost allocation changes that would allocate more of that increase to residential customers. MDU stated that the primary reasons for this increase are the expansion of wind

generation projects, a reduction in wholesale margin, and recovery of some deferred generation costs associated with plants that have been cancelled. MDU is also proposing to implement two new tracker mechanisms relating to renewable resources and transmission cost recovery. MCC testimony is due on 12/17/2010.

**D2010.6.66 Monthly Electric Trackers-** The October Electric Tracker filed 9/17/2010 resulted in an increase of \$.125/kwh; The November Electric Tracker filed 10/14/2010 resulted in a decrease of \$.222/kwh; The December Electric Tracker filed 11/17/2010 resulted in an increase of \$.002/kwh.

**D2010.9.92 Monthly Gas Trackers-** The October Gas Tracker filed 09/10/2010 resulted in a decrease of \$.71/Dkt; The November Gas Tracker filed 10/07/2010 resulted in an increase of \$.64/Dkt; The December Gas Tracker filed 11/12/2010 resulted in a decrease of \$.33/Dkt.

### **Energy West Montana (EWM)**

**D2010.9.90 General Rate Increase-** This general rate case was filed on 9/2/2010 and is currently in the discovery phase.

**D2010.6.70 Application for Approval of USB Account and Reduction of USB Charge-** MCC intervened in this case but did not file testimony. The Commission issued Final Order 7116 on 11/9/2010 approving this application.

**D2010.3.34 Monthly Gas Trackers-** The October Gas Tracker filed 9/15/2010 resulted in a residential rate increase to \$6.31/Mcf; The November Gas Tracker filed 10/22/2010 resulted in a residential rate increase to \$6.38/Mcf; The December Gas Tracker filed 11/16/10 resulted in a residential rate increase to \$6.49/Mcf.

### **Cut Bank Gas Company (CBG)**

**D2010.3.25 Gas True-Up for 7/2006-12/2009**-This filing is a gas cost true-up for the period of 7/2006-12/2009 and is also a request to implement a tracker. MCC conducted discovery in this docket but did not file testimony. The Commission issued Order 7086a on 9/28/2010 approving the application and implementing a monthly tracker.

### **Avista**

**D2010.11.107 Electric Rate Increase Request**-Avista is an Idaho and Washington provider that does have generation facilities in Montana so technically is a regulated utility in Montana. This is a filing for an electric rate increase for operations in Montana, requesting a 50% increase for 19 customers. MCC is reviewing the application.

### **Havre Pipeline Company (HPC)**

**D2010.7.78 Gas Cost Tracker for Farmstead Service**-HPC provides service to some farmstead connections and, based on a stipulation from many years ago, submits filings showing the flow through of any changes in gas costs. In this case, HPC requested a decrease in gas costs and the Commission issued Final Order 7107a on 10/26/2010 approving that request.

### **Mountain Water Company (MWC)**

**D2010.4.41 Application to Increase Rates**-MWC is located in Missoula and is the largest private water utility in Montana. In this application, MWC is requesting a \$2 million increase, or 12%. MCC filed testimony on 10/15/2010 of Dr. John Wilson on cost of capital and Paul Schulz on rate of return. Dr. Wilson testified that a reasonable return on equity would be in the 7%-10% range and that MWC

unnecessarily refinanced a large portion of debt in 2008 that was not due until 2014. At the time of the refinance the interest rate went from 8% to 9.7% which Dr. Wilson believes, under current conditions, would be lower so the effect of that action was an increase in debt capital cost. Because of this, Dr. Wilson recommended that the Commission either disallow the debt refinancing costs and set the return on equity at 9.5% or set the return on equity at 9% in recognition of the company's inefficient refinancing activities and allow a 50/50 capital structure as opposed to MWC's proposed 54% equity. Paul's testimony incorporated Dr. Wilson's cost of capital with several other adjustments, recommending an increase of \$1.2 million as opposed to the \$2 million increase requested. A hearing is scheduled for 12/15/2010.

**D2010.6.59 Application for Distribution System Improvement Charge Tariff-**

MWC also filed an application for a distribution system improvement charge tariff, which would be a tracker-type surcharge mechanism. MCC intervened and the Commission incorporated this case into the general rate filing but MWC withdrew this request, notifying the Commission on 9/10/2010.

**D2010.9.94 Application for Power Cost Tracking Adjustment-**MWC has a tracker

in place for power costs, which are the pumping costs for water, since electricity is a large component of costs for MWC. This tracker requests recovery of a change in power costs of about \$340,000, or an increase of 2% on consumer bills. The Commission issued notice of this proposal stating that the rate would become effective 9/17/2010 unless otherwise directed by the Commission.

**Big Mountain Water (BMW)**

**D2010.1.9 Application to Increase Water Rates-**BMW filed this application to

increase water rates in the Flathead area. MCC entered into a stipulation with BMW agreeing on a revenue requirement of roughly \$193,000. A hearing was held on 8/25/2010 and the Commission issued Final Order 7077b on 9/13/2010 accepting that stipulation.

### **Landmark Water Company(LWC)**

**D2009.9.117 Application to Increase Rates**-LWC also applied to increase rates. MCC has intervened and is reviewing this application.

### **Wettington Acres Water District (WWD)**

**D2010.9.93 Application to Implement Increased Rates**-WWD filed an application to implement increased rates in Kalispell, requesting a roughly 22% increase. MCC has intervened and is reviewing this application.

### **Treeline Springs, LLC**

**D2010.9.98 Application for Increased Water and Sewer Service Rates**-Treeline Springs is a utility serving the Moonlight Basin area near Big Sky. This application is requesting a \$204,000 increase, or roughly 122%. MCC has intervened.

### **Aquanet**

**D2009.12.156 Application for Initial Water Rates**-Aquanet is a small water utility in the Billings area. The initial application in this case was rejected for failure to meet minimum requirements so an amended application has been filed, requesting an increase of 91% from existing rates. MCC intervened on 11/30/2010.

### **North Star Planned Unit Development (NSPUD)**

**D2010.6.60-Initial Rate Application for Water and Sewer**-NSPUD is a water utility providing service in the Helena area, requesting a flat rate of \$30.00 per customer. MCC intervened on 11/22/2010.

## **Municipal Water**

**City of Laurel, Water Rate Complaint-**This case involves a municipal utility, which MCC has an obligation to represent consumer interests in. MCC received complaints after the City of Laurel adopted some rate changes and it eventually came to light that MCC had not been notified of the proposed changes as required by law. MCC began reviewing the proposed increase and the complaints and responded to the City of Laurel with a letter that included analysis of Larry Nordell. Rates had been adopted for the city residents but a rate roughly 4 times higher was adopted for resellers of water and Larry concluded, in his opinion, that the adopted rate structure was not reasonable. The Laurel City Council voted to hold another hearing on 9/21/2010, which Mary attended, and on advice from the city attorney, the Laurel City Council reversed the previous decision.

## **MARY WRIGHT PROVIDED THE FOLLOWING HIGHLIGHTS OF CASES**

### **CURRENTLY PENDING:**

#### **HLH, LLC**

**D2008.10.123 Water Rate Increase-**MCC entered into a settlement with HLH and the Commission has twice rejected that stipulation, indicating that the case should start over from the beginning. These issues are still ongoing.

#### **Utility Solutions, LLC**

**D2005.11.163 and D2005.11.164 Utility Solutions, LLC Amended Application to Increase Water and Sewer Rates-**Utility Solutions serves a subdivision near Bozeman. MCC entered into a stipulation with Utility Solutions, but in a related case, the Commission issued an order that caused Utility Solutions to ask for copies of all emails from the Commission relating to the footnote. So far the Commission has not released any emails, so the case cannot be completed at this time.

**D2010.5.55-Merger of CenturyLink and Qwest**-MCC filed testimony of George Donkin on 9/17/2010. Mr. Donkin reviewed a number of risks inherent in the proposed merger and concluded that the Commission should either reject the stipulation or approve it with a number of conditions that MCC felt protected consumers. Qwest and CenturyLink both filed rebuttal testimony, opposing almost all of the conditions that MCC proposed, but a settlement agreement was eventually made with Qwest and CenturyLink accepting all but one of those conditions and some of the conditions were modified in the final stipulation. A hearing was held on 11/22/2010. Representative Berry asked how many customers in Montana would be affected by this merger. Mary said that CenturyLink has about 50,000 customers in the Flathead area and Qwest has about 230,000 customers throughout Montana. Representative Berry asked if this merger will make much difference regarding protection for consumers. Mary said that MCC entered into an alternate form of regulation (AFOR) with Qwest and one of the features of that AFOR is a rate freeze until 2014. CenturyLink has not filed a rate case since 1982 so in 2014 both Qwest and CenturyLink will be filing rate cases.

### **Financial Report**

The report provided to the Committee was dated 12/1/2010. Bob said that personal services is running behind due to a vacant position that will be advertised soon. Communications is at 60% because of postage for filings processed due to additional work load, and the "other expenses" category is a little high due to most items being paid in advance. The category that makes the most difference in the budget is contracted services. \$212,000 has been expended in the first four months of this year and that amount annualized would be \$636,000. The budget for contracted services, which was reduced by roughly 25% last session, is \$460,000 so the \$636,000 would result in \$176,000 of the \$250,000 contingency needing to be used. Bob does not see any major changes for the remainder of the year so this should be a fairly accurate estimate. Representative Berry asked Bob how MCC's budget request was managed in the Governor's Budget Office. Bob said that since

MCC is a legislative agency the budget that is approved by this Committee is what is published in the Governor's budget book. Quinn Holzer, Legislative Fiscal Analyst, agreed with Bob, saying that the Govenor's office presents MCC's budget exactly as presented to them.

**HIRING OF EXPERT WITNESSES**

**MOTION:** Senator Tropila moved approval to hire the services of the following expert witnesses:

NWE Transmission and Distribution Project Filing: John Wilson and Al Clark

Bob said that he appreciated Senator Tropila's participation on the Committee and his support for the activities of MCC. Senator Tropila thanked the staff for the fine job that they have done.

**Public Comments**

Based on HB94 requirements, a public comment period was offered, but none was given.

**Adjournment**

There being no further business to come before the Committee, the meeting adjourned.

Respectfully submitted,

\_\_\_\_\_, Robert Nelson, Consumer Counsel

Accepted by the Committee this \_\_\_\_ day of \_\_\_\_\_, 2011

\_\_\_\_\_, Chairman.