	Growth 2009-2019	Growth 2019-2021
Gross Plant in Service	74.43%	31.63%
CWIP	44.57%	485.82%
Total	73.89%	38.51%

Gross plant and CWIP increased by 73.89% from 2009 to 2019 and is projected to increase by another 38.51% in the two-year period between the Historic Base Year and the Projected Test Year in this case. Thus, while there are 12 years between the Projected Test Year in the last case and the Projected Test Year in this case, a disproportionate amount of the rate base growth is due to the two years of projections included **by PGS in this case. It is also worth further noting that the Company has indicated it may file another rate case in 2022 with a 2023 projected test year.**[3]

Q. **How do the Company's 2020 and 2021 capital budgets compare with the amounts traditionally budgeted by PGS?**

A. As shown in its response to OPC IRR-30 and Exhibit SPH-1 (Document No. 6), the Company's capital budgets have increased dramatically over the past five years, and additional growth is projected for 2020 and 2021:

	Approved Capital Budget ($000)
2015	$103,970
2016	$106,539
2017	$148,892
2018	$195,929
2019	$240,014
2020	$358,693
2021	$263,805

3 PGS response to OPC POD No. 34 at Bates No. 5212.

Q. Doesn't your recommendation effectively move the Test Year up by one year, from calendar year December 31, 2021, to calendar year December 31, 2020?

A. No, it does not. While the Company's filing is based on the Projected Test Year ending December 31, 2021, the Company reflected average Test Year balances in its rate base claim. Assuming the Company added plant consistently during the year, the Company's filing would effectively represent plant balances at June 30, 2021, the midpoint of the Projected Test Year. Since I am recommending that the PSC utilize Projected Plant Balances at December 31, 2020, my recommendation essentially represents a difference of only six months from the Company's claim.

The purpose of my adjustments is not to change the Test Year selected by the Company. It is simply to update the capital spending anticipated for that Test Year. The data that was originally projected by the Company at December 31, 2020, is a proxy for my recommended adjustments during the Projected 2021 Test Year. Given the extremely ambitious capital program proposed in the filing, the inherent speculative nature of any projected test year, and the unique economic situation that is currently evolving in Florida, it is reasonable and appropriate for the PSC to set rates based on a less ambitious capital program. This is even more appropriate when you consider the Company intends to file another base rate case in 2022, just two years into the future, with a 2023 Projected Test Year.

Q. What is the net impact on rate base of the plant-in-service, CWIP, and reserve adjustments that you are recommending in this case?

A. As shown in Exhibit ACC-2, Schedule 3, my recommendations will result in a rate base