

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of)
PACIFICORP for a Certificate of)
Convenience and Necessity Authorizing) Docket No. 03-035-29
Construction of the Currant Creek)
Power Project)

REBUTTAL TESTIMONY OF MELISSA SEYMOUR

FEBRUARY 11, 2004

1 **Q. Please state your name, business address and position with PacifiCorp.**

2 A. My name is Melissa A. Seymour. My business address is 825 NE Multnomah, Portland,
3 OR, 97232. I am the Manager of Planning and Financial Analysis for PacifiCorp.

4 **Q. Have you sponsored direct testimony in this proceeding?**

5 A. I adopt the direct testimony that was filed by Jon Cassity.

6 **Q. Please describe your educational background and professional experience.**

7 A. I have a Bachelor of Science in Engineering Science and Mechanics from the University
8 of Tennessee. Prior to my employment with PacifiCorp, I worked as an applications
9 engineer for Computational Systems, Inc. in Knoxville, TN and held various strategic
10 planning and analysis roles at Southern Company Energy Marketing and Georgia Natural
11 Gas in Atlanta, GA. I have been an employee of the Resource Planning department at
12 PacifiCorp since July 2001, and my primary responsibility has been delivering the
13 company's Integrated Resource Plan (IRP).

14 **Q. What is the purpose of your rebuttal testimony?**

15 A. I will address some of the concerns raised by the Committee of Consumer Services
16 relating to the Company's resources and its October 2003 Action Plan Update.

17 **Q. As a general matter, have parties disputed the Company's need for adding
18 resources to meet load in the summer of 2005?**

19 A. For the most part, parties appear to recognize the need. However, UAE suggests that the
20 constraint on the Company's ability to serve load, "if any," is a pricing issue. As
21 PacifiCorp witness, Mr. Mark Tallman notes in his rebuttal testimony, the reliability
22 issues are real.

1 **Q. Do you agree with Ms. Murray’s statement that “the Company’s updated load**
2 **forecast and deficiency calculation has not been fully vetted in a public forum”?**

3 A. No. It was made clear to parties that the October Action Plan Update would not be as
4 detailed a process as that used to develop a fully revised IRP. Rather the objective was to
5 ensure that the assumptions used in the IRP process were dynamic and were developed as
6 the Company moved forward with improvements to the IRP process. The public process
7 leading up to the October Action Plan update involved three Quarterly Public Input
8 Meetings and two Load Forecasting Technical Workshops to inform participants of
9 changes to inputs and assumptions, provide an update and status on the IRP Action Plan
10 and receive input from participants. This level of public input and debate was entirely
11 consistent with the intent of the Action Plan Update.

12 **Q. What is the explanation of the differences between the resource deficiency in your**
13 **direct testimony Exhibit UP&L___(JC-2) and exhibit UP&L___(JC-4)?**

14 A. The key difference between these two exhibits is the additional granularity that was used
15 by PacifiCorp as part of the IRP October Action Plan Update. When the IRP was
16 acknowledged, the issue of the need to consider in more detail actual transmission
17 constraints was raised by parties. As part of the Action Plan Update, PacifiCorp worked
18 to identify the actual impact of transmission constraints. This additional granularity was
19 reflected in exhibit UP&L___(JC-4).

20 **Q. Ms. Murray observes that the Company has used a different unit outage assumption**
21 **than the one used in the Gadsby CCN proceeding. Can you describe why it is**
22 **appropriate to use a different unit outage assumption?**

1 A. Certainly. The 277 MW of outage referenced in the Gadsby CCN case was based on a
2 system-wide unplanned outage rate that was applied for all years to units in the Utah area.
3 Additionally, the exhibit referenced in the Gadsby CCN testimony did not include
4 Gadsby units 1-4 (120 MW) and West Valley units 1-5 (200 MW), which would have
5 resulted in a larger thermal base from which to calculate the outage estimate. The
6 Company has since revised the method used for calculating expected outage levels to
7 more accurately reflected the expected outage performance based on the historical data
8 related to each specific unit on the system. This revised approach suggested that a
9 planning assumption of estimating two units out (~ 550 MW) would be prudent. Based
10 on five years of historical information, 13.32% of the time there have been two or more
11 units out during the summer in Utah (Exhibit UP&L_(MAS-1)). PacifiCorp therefore
12 believes that it is a prudent planning assumption to plan for an outage of this magnitude
13 when looking at resource planning.

14 **Q. Does this conclude your rebuttal testimony?**

15 A. Yes.