Q. Please state your name, business address and present position with Rocky Mountain Power Company (the Company), a division of PacifiCorp.

A. My name is Daren H. Dixon. My business address is 825 N.E. Multnomah Street, Suite 1700, Portland, Oregon 97232. My present position is Manager of Streetlighting Policy.

Q. Briefly describe your educational and professional background.

A. Studied Electrical Engineering at the University of Maine, Orono, ME; additional engineering and business courses at Glendale Community College, Glendale, AZ and Portland Community College, Portland, OR. I have 22 years experience in electrical utility industry as groundman, estimator, analyst, and manager with Northern Line Construction, East Corinth, ME; Bangor Hydro-Electric Co, Bangor, ME; Arizona Public Service, Phoenix, AZ; and PacifiCorp, Portland, OR.

Q. Have you appeared as a witness in previous regulatory proceedings?

A. No

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to propose changes to the Utah Streetlighting Schedules and Rules for the purpose of clarifying service applicability and provisions, to align these with tariff language from our other service territories, to reflect industry standards and legislative changes, to better appropriate costs to those responsible for those costs and to propose new metal halide lamps for Schedule 11.

Q. Which Schedules are being impacted?

A. Schedules 11, 12 and 13 and Rule 12. The schedules may be found in Exhibit

RMP___(WRG-2) and Rule 12 may be found in Exhibit RMP___(FRS-3).

Q. What are the changes being proposed for Electric Service Schedule 11?

A. In addition to some minor housekeeping items, the primary changes to schedule 11 are:

- Service would be applicable only to government entities.
- Metal halide fixtures are added.
- Company-owned decorative fixture options are moved to this schedule, from schedule 13.
- Non-standard light sizes are closed to new service.
- Dawn to Dawn and Dawn to Midnight options are closed to new service.
- Steel Pole charges are not applied to new services.
- Provisions of service are added, clarifying company versus customer responsibilities.
- The term of contract requirement is extended to five years.

Q. Why is applicability described as being offered only to municipalities or agencies of municipal, county, state or federal government?

A. To avoid proliferation of this type of service to private entities such as homeowners associations, and sometimes even into individual customer names.

Q. Electric Service Schedule 11 would no longer offer service for Fluorescent, Incandescent, Mercury Vapor and certain sizes of Sodium Vapor lighting. Why is the company proposing this change?

A. As the lighting industry evolves, technologies change and some types of lighting become outdated and/or customer usage declines. That lighting becomes what is considered by our material vendors and to the company to be "non-industry standard" lighting. Non-standard lighting can become more costly to maintain, as well as difficult to obtain. In some cases, such as mercury vapor, the lighting is being phased out by law and has already been removed from our company standards. In order to become more cost efficient and improve service levels, the company is trying to promote the usage of what we consider to be industry standard sizes and types of lighting. Additionally, we are proposing to add some metal halide lights. A breakdown of the current number of lights, by size and type, and which would still be offered or classified as no new service, is provided in Exhibit RMP___(DHD–1).

Q. Please describe the additional metal halide lights that you are proposing.

A. Due to customer demand, three new metal halide lights are being proposed in Schedule 11. If approved, the Company plans to offer Company-Owned Metal Halide Lights in 12,000 lumen (175 watt), 19,500 lumen (250 watt), and 32,000 lumen (400 watt) sizes. Please refer to analysis provided in Exhibit RMP___(DHD-2).

Q. Where can the prices for these new lights be found?

A. Prices can be found on Schedule 11 in Exhibit RMP___(WRG-2).

Q. Service to 70 watt Sodium Vapor is no longer offered. Aren't these more efficient than using the larger 100 watt size?

A. The 70W HPS fixtures are actually less efficient than the 100W fixtures and yield approximately 16 percent less lumens per consumed watt. In fact, if lighting a typical residential street to IES (Illuminating Engineering Society) RP-8 standards, one would space the poles approximately 40' further apart (120' vs. 80') when using 100W fixtures, saving approximately 22 streetlights per road mile. Additionally, customers appear to be shifting away from their use. Our lighting vendor has provided sample data indicating that when comparing their sales for 70W and 100W fixtures, 91 percent of the sold units are 100W and 9 percent are 70W.

Q. Why would there no longer be a requirement for steel pole charges?

A. Metal poles do not always cost more to install than wood poles; by applying the proposed Rule 12 language costs will be better allocated to those customers with more expensive installations up front. Also, Rocky Mountain Power is shifting standards to aluminum poles instead of steel. Additionally, there are difficulties administering and tracking these charges.

Q. Describe some of the key service provisions that have been added.

A. Service provision #4 stresses the use of replacement fixtures that are in company standards. This is line with our other proposed changes that keep in focus our intent to use industry standard equipment and consequently keep costs down. Service provisions #5, #7 and #8 would specifically assess the cost to the customer for various service requests.

This discourages unnecessary experimental or cosmetic service requests, for example requesting pole re-painting well before the normal maintenance intervals, or requesting temporary disconnects to reduce billing for a short period of time.

Q. Why was the contract period extended from three to five years?

A. This is to coincide with the proposed period for calculating the revenue-based allowance in Rule 12. As the existing schedule language does not clearly define an allowance we are proposing it to be based upon five years of annual revenue.

Q. What are the changes being proposed for Electric Service Schedule 12?

A. The primary changes to schedule 12 are:

- Service would be applicable only to government entities.
- Partial and Full Maintenance options are closed to new service.
- Dawn to Dawn, Dawn to Dusk, and Dusk to Midnight service options are closed to new service.
- Metered Nighttime and Traffic Signal service is removed, and proposed to be added to a new schedule specifically for this type of metered service.
- Provisions of service are added clarifying company versus customer responsibilities.

Q. Electric Service Schedule 12, will no longer offer service providing company maintenance for new customer owned installations. Why is the company proposing this change?

A. The Company cannot control the quality of the installation or prior maintenance of the facilities it does not own, which lends itself to unpredictable maintenance costs. Where there are other qualified contractors out there to do this work, the Company as a regulated entity, should not be in competition with them. As a trend in Utah, we are seeing customers shift their lighting away from company provided maintenance. In 2004, only 26.61 percent of the kWh billed for non-metered customer owned lighting in Utah was energy only; by 2007 that number has increased to 73.2 percent. Similar changes have recently been presented and approved in the states of Oregon and Idaho, and are in the process of being proposed for the remaining states we serve.

Q. What if a customer already has lights in which the company is providing the lighting maintenance?

A. The company will continue to provide maintenance to any existing customer owned facilities that are currently on a maintenance rate. The changes would only apply, going forward, to any new installations.

Q. What if the customer is in an area where no qualified contractors exist that could provide such maintenance?

A. In areas where no qualified contractor exists the customer would still have the option of requesting lighting that is company owned and maintained, or the company could consider providing maintenance under special contract.

Q. What is the purpose of removing Traffic and Other Signal Systems and Metered Outdoor Nighttime Lighting from Electric Service Schedule 12, and proposing a new Electric Service Schedule?

A. The company is proposing this as a housekeeping change in order to simplify the presentation of Electric Service Schedule 12. The wording surrounding these type offerings essentially remains unchanged, but would be a separate, new schedule.

Q. What is the purpose of deleting Electric Service Schedule No. 13, and moving these offerings into Electric Service Schedules 11 and 12?

A. The company is proposing this as a housekeeping change. Customers and employees are both confused by ownership options in Schedule 13, as it allows company ownership or customer ownership. Schedule 11 is for exclusively company owned lights and Schedule 12 is for exclusively customer owned lights.

Q. What other related changes are being made?

A. Rule 12 is being changed to provide for a line extension allowance equal to five times the annual revenue. This minimizes the occurrences of connection charges and clarifies the extension allowance. For an example: the allowance for simple connection of a customer installed 100W HPS light will increase from $37 to $139 while the typical cost is $115. Many municipal customers have complained to Rocky Mountain Power about invoicing received after these simple connections.

Q. What is the revenue impact of these changes?

A. There is no impact for existing services being delivered.

Q. How have these filings been communicated to the cities?

A. We have met with representative community leaders and are scheduling further meetings with them throughout this process as necessary.

Q. Does this conclude your direct testimony?

A. Yes