

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

3 A. My name is A. Robert Lasich. My business address is 1407 West North Temple,
4 Suite 320, Salt Lake City, Utah. My position is president of PacifiCorp Energy.

5 **Qualifications**

6 **Q. Please briefly describe your education and business experience.**

7 A. I have a Bachelor of Arts degree from Indiana University, a master's degree in
8 business administration from the University of Cincinnati and a law degree from
9 Indiana University. I joined MidAmerican Energy Company in October 1997 and
10 have held positions of increasing responsibility, including senior attorney, vice
11 president, gas supply and trading and vice president, MidAmerican Energy
12 Holdings Company, responsible for integration and transition matters related to
13 the acquisition of PacifiCorp. Prior to that, I was with the law firm of Dale & Eke
14 P.C., where I focused on real estate and corporate law. Prior to admission to the
15 practice of law, I held several accounting and financial positions with Cabot
16 Corporation and its successor organizations. I was appointed president of
17 PacifiCorp Energy in August 2007 after 1 1/2 years as vice president and general
18 counsel, and was elected to the PacifiCorp board of directors in March 2006. As
19 president, I have responsibility for the electric generation, commercial and energy
20 trading, and coal-mining operations of the Company.

21 **Q. What is the purpose of your testimony?**

22 A. The purpose of my testimony is to (i) demonstrate the prudence of the McFadden
23 Ridge I wind-powered supply-side resource addition, (ii) the associated increase

24 to generation-related operation and maintenance (O&M) expense included in this
25 application, and (iii) the prudence of additional generation plant capital
26 investments placed in service during the test period.

27 **Q. Please briefly explain how you will support the prudence of this supply-side**
28 **resource in your testimony.**

29 A. I will start by describing the Integrated Resource Plan (IRP) and how that
30 strategic tool is utilized to assist the Company in identifying and quantifying the
31 need and timing of new supply-side resources. I will also provide an overview of
32 the relevant MidAmerican Energy Holdings Company (MEHC) transaction
33 commitments. I will provide a description of the McFadden Ridge I resource
34 acquired by the Company and the decision-making process that led to the
35 acquisition. I conclude with a brief discussion of the other generation related
36 projects that are scheduled to be placed in service by the end of the test period.

37 **Integrated Resource Plan**

38 **Q. Please briefly describe the Integrated Resource Plan.**

39 A. The Integrated Resource Plan (IRP) is a strategic planning tool that presents a
40 framework of future actions for resource acquisitions to ensure the Company
41 continues to provide reliable, low-cost service with manageable and reasonable
42 risk to its customers. The IRP builds on the Company's prior resource planning
43 efforts and reflects significant advancements in portfolio modeling and risk
44 analysis.

45 **Q. What is the main purpose of the IRP?**

46 A. The mandate for an IRP is to assure that the company has, on a long-term basis,

47 an adequate and reliable electricity supply at the lowest reasonable cost and to
48 ensure that such supply is provided or fulfilled in a manner consistent with the
49 long-run public interest. The main role of the IRP is to serve as a strategic
50 roadmap to assist the Company in determining and implementing the Company's
51 long-term resource strategy. In doing so, it accounts for state commission IRP
52 requirements, a current view of the planning environment, corporate business
53 goals and MEHC transaction commitments that are related to IRP activities, such
54 as the acquisition of renewable resources.

55 As a strategic business planning tool, the IRP supports informed decision-
56 making on resource procurement by providing an analytical framework for
57 assessing resource investment tradeoffs. As an external communications tool, the
58 IRP engages numerous stakeholders in the planning process and guides them
59 through the key decision points leading to the Company's preferred portfolio of
60 generation, demand-side management activities and transmission resources.

61 The emphasis of the IRP is to determine the most robust resource plan for
62 a reasonably wide range of potential outcomes. The modeling is intended to
63 inform and support the expert judgment of the Company's decision-makers. The
64 preferred portfolio is not intended to be static, but rather is expected to evolve as
65 part of the ongoing planning process as new information becomes available and
66 new circumstances evolve. As a multi-objective planning effort, the IRP must
67 balance several priorities and account for diverse and sometimes conflicting
68 stakeholder views. However, the IRP cannot be all things to all people. As the
69 owner of the IRP, the Company, with input from stakeholders, and other

70 interested parties, is uniquely positioned to determine the resource plan that best
71 accomplishes IRP objectives on a system-wide basis, and meets customer,
72 community and investor obligations collectively.

73 **Q. What is the outcome of the IRP process?**

74 A. The result is a preferred portfolio that represents a balance of resource additions
75 that meet future customer needs, minimize cost, balance diverse stakeholder
76 interests and address environmental concerns.

77 To follow through on the findings of the resource plan, the Company's
78 IRP includes an action plan that is intended to inform and provide guidance for
79 the Company's resource procurement activities over the next few years.

80 **Q. Is there participation by others in the creation of the Company's IRP?**

81 A. Yes. Customer interest groups, regulatory staff, regulators and other stakeholders
82 provide considerable guidance and input into the development of the IRP. The
83 analytical approach used conforms to all state standards and guidelines.

84 **Q. How did the most recent IRP address renewable resources?**

85 A. The 2007 IRP identifies 2,000 megawatts (MW) of cost-effective renewable
86 resources to be acquired by 2013. Under this plan, the Company will seek to
87 acquire 1,400 megawatts of new renewable resources by 2010, with an additional
88 600 megawatts in place by 2013. The 2,000 megawatts of renewable resources is
89 inclusive of the 1,400 megawatts of cost-effective renewable resources identified
90 in the Company's 2004 IRP.

91 **Q. How did the 2007 IRP address the procurement of renewable resources?**

92 A. The 2007 IRP procurement plan recognized the challenge of acquiring the

93 committed levels of renewable resources plus the additional targeted amount.

94 Specifically, the 2007 IRP said:

95 *“In order to fill this requirement, the company will continue to*
96 *aggressively pursue the acquisition of these resources through various*
97 *approaches including new request for proposals, bi-lateral negotiations,*
98 *the Public Utilities Regulatory Policy Act, and self-development.” (2007*
99 *IRP at p. 229)*

100 **Q. What state commissions acknowledged the 2007 IRP and its action plan on**
101 **renewable resource acquisition?**

102 A. The state commissions of Oregon, Washington and Idaho acknowledged the 2007
103 IRP and its action plan, including pursuit of 2,000 MW of cost-effective
104 renewables by 2013. The states of California and Wyoming do not require formal
105 filing of the Company’s 2007 IRP. In a Report and Order issued
106 February 6, 2008, the Public Service Commission of Utah indicated that it did not
107 acknowledge the 2007 IRP.

108 **Q. Has the Company aggressively pursued renewable resources via each**
109 **acquisition strategy listed in the 2007 IRP?**

110 A. Yes, the Company has acquired renewable resources via each and every
111 acquisition strategy listed in the 2007 IRP. The Company has acquired renewable
112 resources via new Requests for Proposals (RFP), bi-lateral negotiations, the
113 Public Utilities Regulatory Policy Act and self-development.

114 **Q. Please describe the Company’s most recent activity with respect to renewable**
115 **resource RFPs to implement the 2007 IRP action plan.**

116 A. The Company has had three recent renewable resource RFPs. First, the Company
117 issued an RFP on January 31, 2008 for long-term renewable resources less than

118 100 MW in generating capability that could be available by December 31, 2009.¹
119 The Company identified this RFP as “RFP 2008R”. Developers and other bidders
120 were invited to submit proposals in the form of a power purchase agreement
121 (PPA) or build-own-transfer agreement (BOT). Bids under RFP 2008R were due
122 on March 31, 2008. As a result of RFP 2008R, the Company executed a PPA for
123 the entire output from a 99 MW wind-powered generation resource with Three
124 Buttes Windpower LLC, an entity owned by Duke Energy Corp.

125 **Q. Please describe the second RFP.**

126 A. On March 4, 2008, the Company filed an application with the Oregon Public
127 Utility Commission to open a docket for approval of a RFP process targeting 500
128 MW of renewable resources that could be available by December 31, 2011. The
129 Company identified this RFP as “RFP 2008R-1”. On April 15, 2008, the
130 Company filed, in compliance with Utah Code Ann. . § 54-17-502(2)(a)(ii)(A), a
131 notice with the Public Service Commission of Utah indicating that it intended to
132 issue the RFP 2008R-1 in the second quarter of 2008. The RFP 2008R-1 solicited
133 system wide renewable resources capable of delivery in or into PacifiCorp’s
134 network transmission system. Each renewable resource within the RFP 2008R-1
135 is limited in size to no more than 300 MW, in compliance with Utah Code Ann. §
136 54-17-502(2)(a)(i). On October 6, 2008, the Company issued RFP 2008R-1 to the
137 market and the Company received bids December 22, 2008.

138 **Q. Has the Company recently refreshed RFP 2008R-1?**

139 A. Yes. The Company provided bidders with an opportunity to refresh their bids, or

¹ The Company also considered offers for renewable resources of 100 MW or greater if the term was less than five years.

140 for new or existing bidders to provide new proposals. The amended RFP,
141 2008R-1 constitutes the third RFP. The deadline for updated or new bids was
142 February 27, 2009, and the Company is currently in the process of reviewing the
143 information supplied by bidders. The Company anticipates that it will continue to
144 issue a RFP for renewable resources each year to acquire needed resources to
145 serve customers and/or comply with renewable portfolio standard (RPS) or
146 emission-related laws.

147 **Q. Please describe the third RFP.**

148 A. On April 28, 2009, the Company filed a petition with the Public Utilities
149 Commission of Oregon to open a docket for the approval of a solicitation process
150 for new renewable resources (2009R RFP); and appoint Boston Pacific Company
151 as the independent evaluator for the 2009R RFP. The Company provided notice
152 of its intent to issue the 2009R RFP to the Public Service Commission of Utah
153 April 28, 2009. The 2009R RFP will solicit up to 500 MW of system-wide
154 renewable resources, with no single resource exceeding 300 MW.

155 **MEHC Transaction commitments**

156 **Q. Please provide an overview of the MEHC transaction commitments related**
157 **to the acquisition of renewable resources.**

158 A. As part of the regulatory approvals related to the acquisition of the Company,
159 MEHC and the Company committed to:

- 160 • Bring at least 100 MW of cost-effective wind resources in service within one
161 year of the close of the transaction;
- 162 • Have 400 MW of cost-effective new renewable resources in the Company's
163 generation portfolio by December 31, 2007, and

- 164 • Reaffirm the Company’s commitment to acquire 1,400 MW of cost-effective
165 new renewable generation resources.

166 The resource described below has been acquired consistent with these
167 commitments.

168 **Supply-Side Resources**

169 **Q. Please describe the McFadden Ridge I wind-powered generation resources.**

170 A. The McFadden Ridge I resource will be a wind-powered generation project with a
171 capacity of approximately 28.5 MW consisting of nineteen wind turbine
172 generators, an electrical collector system, access roads, and required
173 communication and control facilities (metering, hardware, software, and
174 associated communication circuits).

175 **Q. Where is the McFadden Ridge I Wind Project located?**

176 A. The McFadden Ridge I resource will be located approximately three miles east of
177 McFadden, Wyoming on a site that consists of private and public lands adjacent
178 to the High Plains wind-powered generation resource. Exhibit RMP___(ARL-1)
179 shows a map of the plant location.

180 **Q. Please describe the benefits of the McFadden Ridge I resource to Utah
181 customers.**

182 A. Utah customers benefit from the McFadden Ridge I resource because it represents
183 a better long-term cost/risk balance for the Company to generate electricity with
184 this resource than to make purchases in the open market. The 2004 and 2007 IRPs
185 specify that renewable resources (using wind resources as a proxy) are steadily
186 added to the system with the target of reaching 1,400 MWs or more of renewable
187 resources.

188 **Q. How else will the McFadden Ridge I resource benefit Utah customers?**

189 A. This renewable resource further benefits Utah customers by providing the
190 Company with (i) a zero incremental cost fuel source (thus reducing commodity
191 risk exposure), (ii) multi-shafted generation resources (thus diversifying the
192 impact of individual generator failures), and (iii) additional valuable ownership
193 and operational experience with utility scale wind projects. This resource utilizes
194 General Electric Company (GE) wind turbines, thus giving the Company the
195 opportunity to use valuable experience from other GE-based wind-powered
196 generation resources and further optimize spare parts and O&M resources across
197 the portfolio. Further, as a result of long-term planning and the reasonable
198 expectation that additional state and/or federal renewable portfolio standards will
199 be established, the Company is expecting to have a robust need for renewable
200 resources in the coming years.

201 **Q. What factors did the Company consider before acquiring the McFadden**
202 **Ridge I resource?**

203 A. Upon undertaking a thorough analysis which included (i) reviewing a detailed
204 overview of the project including the contract support and counterparty
205 guarantees, (ii) consideration of the risks, (iii) consideration of the need as
206 established by the IRP, (iv) financial assessments, and (v) consideration of the
207 justification for the project, Company executives made the decision that it would
208 be in the best interests of our customers to proceed with the acquisition of this
209 resource. The Company followed this process in determining that the resource,
210 discussed in more detail below, is prudent and in the public interest.

211 **Q. What investment related to the McFadden Ridge I resource is included in the**
212 **revenue requirement?**

213 A. The Company has included \$70.2 million for the McFadden Ridge I resource in
214 this application. The O&M costs included in this case associated with McFadden
215 Ridge I is approximately \$0.5 million for wind turbine-generator maintenance,
216 permitting obligations, local levy tax and land royalties and easements.

217 The McFadden Ridge I resource is scheduled to begin operating during
218 October 2009. As discussed in Mr. Gregory N. Duvall's testimony, the
219 Company's net power cost calculation reflects the inclusion of McFadden Ridge I.
220 Mr. Steven R. McDougal's testimony includes the revenue requirement
221 calculations associated with the inclusion of this resource.

222 **Q. What other generation plant capital investments are included in this**
223 **application?**

224 A. Excluding investments in new supply side resources, the Company plans to place
225 approximately \$608 million of generation related projects in service between the
226 historical base period and the test period ending June 30, 2010.

227 **Q. Please briefly describe the types of capital investments being made.**

228 A. These other investments fall within four major categories: (i) environment plan
229 projects, (ii) hydro relicensing implementation projects, (iii) turbine upgrade
230 projects, and (iv) repair and replacement projects.

231 **Q. What is the amount of capital investments that the Company intends to place**
232 **in service in each category?**

233 A. The Company plans to invest the following levels of expenditure for each

234 category:

- 235 • Environmental plan projects - \$66 million
- 236 • Hydro relicensing implementation projects - \$37 million
- 237 • Turbine upgrade projects - \$51 million
- 238 • Repair and replace projects - \$453 million

239 **Q. How will customers benefit from these capital expenditures?**

240 A. These capital expenditures enable the Company to maintain overall reliability of
241 the aging fleet. As a result, the Company plants produce energy at a lower cost
242 than the market, enabling the Company to serve its customers at some of the
243 lowest retail electric prices in the western United States. Continued safe operation
244 and reliability of the Company's existing generating units requires capital
245 spending.

246 **Conclusion**

247 **Q. Please summarize your conclusions.**

248 A. The McFadden Ridge I resource represents a significant investment the Company
249 is making on behalf of its customers to meet their energy needs on a prudent and
250 cost-effective basis. Customers will receive the output of this facility during the
251 rate-effective period and, therefore, are expected to pay for the costs associated
252 with the facility. The Company has been prudent in securing McFadden Ridge I
253 for the benefit of its Utah customers and is justified in seeking and obtaining full
254 cost recovery. Also, the Company is making other prudent capital expenditures in
255 its existing generation fleet that represent a significant investment that will benefit
256 the customer by maintaining a safe, reliable, cost-effective generating resource

257 and should be granted full recovery for these costs.

258 **Q. Does this conclude your testimony?**

259 A. Yes.