

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

3 A. My name is Peter C. Eelkema, my business address is 825 N.E. Multnomah, Suite
4 600, Portland, Oregon 97232, and my present position is Lead/Senior Consultant,
5 Load and Revenue Forecasting.

6 **Qualifications**

7 **Q. Briefly describe your education and business experience.**

8 A. I received an undergraduate degree in Economics from San Jose State University
9 in San Jose, California. I also received a PhD in Economics from the University
10 of Kansas.

11 From September 1989 to October 1993, I was a Managing Research Economist at
12 the Kansas Corporation Commission. From October 1993 to March 1996, I was
13 an Economist at the Nevada Office of Advocate for Customers of Public Utilities.
14 From March 1996 to March 1998, I was a Senior Economist, Forecasting, at
15 Sierra Pacific Power/Nevada Power Company, and from March 1998 to January
16 2005, I was a Staff Economist, Forecasting at Sierra Pacific Power/Nevada Power
17 Company. From January 2005 to May 2008, I was a Consultant, Load and
18 Revenue Forecasting at PacifiCorp. I was promoted to my current position in May
19 2008.

20 **Q. Please describe your current duties.**

21 A. I am the senior consultant of the Load and Revenue Forecasting group. The Load
22 and Revenue Forecasting group is responsible for the development of the test year
23 kilowatt-hour sales, number of customers, system loads, and system peaks for the

24 Company's six retail jurisdictions.

25 **Q. Have you previously testified before a regulatory commission?**

26 A. Yes. I have testified before the Idaho Public Utilities Commission, the Public
27 Service Commission of Utah, the Wyoming Public Service Commission, the
28 Nevada Public Service Commission, and the Kansas Corporation Commission.

29 **Purpose and Summary of Testimony**

30 **Q. Please explain the purpose of your testimony in this proceeding.**

31 A. The purpose of my testimony is to explain how Rocky Mountain Power ("the
32 Company") developed the forecasts of the number of customers, kilowatt-hour
33 sales at the meter ("sales"), and system loads and system peak loads at the system
34 input level ("loads"), and number of bills for the 12-month period ending, May
35 31, 2013. The Company produces these forecasts for all six states in which the
36 Company serves retail customers to develop jurisdictional allocation factors,
37 forecasted revenues, and net power costs. In addition to the class level forecasts
38 for bills and sales, the Company has developed a forecast of bills and kilowatt-
39 hour sales by rate schedule for Utah.

40 **Q. How are the forecasts utilized in preparation of this general rate case?**

41 A. The forecasted loads for the 12 months ending 2013 were used by Company
42 witness Mr. Gregory N. Duvall to calculate net power costs, and by Company
43 witness Mr. Steven R. McDougal to calculate the revenue requirement and
44 jurisdictional allocation factors. Additionally, forecasted sales by rate schedule
45 are used by Company witnesses Mr. William R. Griffith and Mr. C. Craig Paice to
46 allocate costs between customer classes and to design rates which correctly reflect

47 the cost of service. The sum of energy by rate schedule ties to the forecasted
48 energy by customer class.

49 **Q. Please provide a summary of the forecasted energy sales.**

50 A. Table 1 provides the forecasted energy sales for the test period for total Company
51 and Utah.

Table 1, Test Period Sales Forecast (MWh)

	June 2012 to May 2013	
	Total Company	Utah
Residential	15,824,583	6,634,404
Commercial	16,782,979	8,084,103
Industrial	19,903,472	8,376,573
Irrigation	1,214,886	187,280
Public Authority	405,770	405,770
Lighting	141,350	77,260
Total	54,273,040	23,765,390

52 **Q. How is your testimony organized?**

53 A. My testimony is organized as follows:

- 54 • I describe the major changes in forecast assumptions and data used to
55 produce the forecast.
- 56 • I describe the forecasting process for the residential, commercial,
57 irrigation, lighting, and industrial customer classes.
- 58 • I describe the hourly load forecasting process.
- 59 • I describe the rate schedule forecasting process.
- 60 • I give a summary of results where I compare the sales forecast used in the
61 2011 Utah general rate case to the sales forecast for the current rate case.
- 62 • Finally, I also compare the weather normalized base period sales to the
63 test year forecasted sales and compare how well the forecast used in the

64 2011 Utah general rate case is tracking actual sales for the last six months
65 of 2011.

66 **Summary of Changes in Forecast Assumptions**

67 **Q. Does this forecast employ the same methodology as presented to the Utah
68 Public Service Commission in the 2011 general rate case?**

69 A. Yes. The methodology is unchanged. However, the methodology used to forecast
70 the large industrial class was extended to the commercial class. I explain this
71 evolution later in my testimony.

72 **Q. Please provide a general overview of the methodology.**

73 A. In summary, this methodology consists of first developing a forecast of monthly
74 sales by customer class and monthly peak load by state. This sales forecast
75 becomes the basis of the load forecast (energy at the generator) by adding line
76 losses. The monthly loads are then spread out to each hour based on the peak load
77 forecast and typical hourly load patterns to produce the hourly load forecast.

78 **Q. Please summarize major updates in data used to produce the forecast.**

79 A. There are eight notable updates in data inputs compared to the forecast prepared
80 in the 2011 general rate case. In each of these eight updates, the Company used
81 the most recent available information.

82 1. Updated the historical data period used to develop the monthly retail sales
83 forecasts to January 1997 through July 2011. The historical data period
84 used to develop the model driven portion of industrial monthly sales is
85 from January 2002 through July 2011;

86 2. Updated the historical data period used to develop the monthly peak

- 87 forecasts to include January 1997 through December 2010;
- 88 3. Updated the economic drivers from IHS Global Insight for each of the
89 Company's jurisdictions (this was updated with the June 2011 release for
90 all states except for Utah which was updated with the August 2011
91 release);
- 92 4. Updated the forecast of existing large customer usage based on August
93 2011 data;
- 94 5. Updated the forecast of new and expanding large customer usage based on
95 August 2011 data;
- 96 6. Updated the time period used to define normal weather to the 20-year time
97 period of 1991-2010;
- 98 7. Updated the line loss calculation from the five-year period ending
99 December 2009 to the five-year period ending December 2010;
- 100 8. Updated the hourly sales by customer class used in the model by adding
101 2010 hourly data and dropping 2005 hourly data.
- 102 9. Updated the residential use per customer per day model with revised
103 appliance saturation and efficiency results.

104 **Q. Before continuing, please explain why the data ending date varies from**
105 **December 2010 to August 2011.**

106 A. The model was estimated in August 2011. At that time the most recently available
107 monthly sales data ended in July 2011; the most recently available hourly data
108 (which is used to estimate the peak) ended in December 2010; the most recently
109 available county level economic drivers (which is used in all jurisdictions except

110 Utah) from IHS Global Insight was released in June 2011; the most recently
111 available state level economic drivers (which is used in Utah) from IHS Global
112 Insight was released in August 2011; and the most recently available large
113 customer (existing, new, and expanding) forecast was completed in August 2011.

114 **Forecasts for the Residential Customer Class**

115 **Q. How are monthly sales forecasts developed by customer class?**

116 A. The residential monthly sales forecast is developed as a product of two separate
117 forecasts: (1) the number of customers; and (2) sales per customer.

118 **Q. How are the forecasts for number of residential customers developed?**

119 A. The Company forecasts the residential number of customers using a regression
120 model. The model is estimated based on historical data from the January 1997 to
121 July 2011 time period and the major economic driver is IHS Global Insight's
122 population or number of households.

123 **Q. How is average use per customer for residential customer classes forecasted?**

124 A. The Company models sales per customer for the residential class through a
125 Statistically Adjusted End-use ("SAE") model, which combines the end-use
126 modeling concepts with traditional regression analysis techniques. Major drivers
127 of the SAE-based residential model are heating and cooling related variables, end-
128 use information such as equipment shares, saturation levels and efficiency trends,
129 and economic drivers such as household size, income and energy price.

130 **Forecast for the Commercial Class**

131 **Q. How does the Company develop the monthly commercial sales forecasts?**

132 A. The monthly sales forecast for the commercial customer class is developed based

133 on three separate forecasts: (1) the number of commercial customers; (2) sales per
134 commercial customer; and (3) new and existing large commercial monthly sales.

135 **Q. How are the forecasts for number of commercial customers developed?**

136 A. The Company forecasts the commercial number of customers using a regression
137 model. The model is estimated based on historical data from the January 1997 to
138 July 2011 time period and the major economic driver is the number of residential
139 customers.

140 **Q. How does the Company forecast commercial use per customer?**

141 A. For the commercial class, sales per customer are forecasted using a regression
142 model with employment as the major economic driver.

143 **Q. How does the Company develop the forecast of new large commercial
144 customer sales?**

145 A. This forecast is developed by the Customer and Community Managers (“CCMs”)
146 with input from the customer.

147 **Q. How does the Company forecast sales for the commercial customer class?**

148 A. The monthly sales forecast is carried out in two steps. First, the sales forecast for
149 existing customers is the product of the commercial number of customers and
150 commercial use per customer. The large commercial customer additions are added
151 to the sales for existing customers to develop the commercial customer class
152 forecast.

153 **Q. Is it necessary to add the new large commercial sales to generate the
154 commercial forecast?**

155 A. Yes. There are several large data centers which are locating in the service

156 territory. Although these data centers are classified in the commercial customer
157 class, their size and characteristics are different from most of the other
158 commercial customers. It makes sense to treat the large commercial customers
159 similar to the large industrial customers as explained later in my testimony.

160 **Industrial Class Forecasts**

161 **Q. How does the Company forecast sales for the industrial customer class?**

162 A. The industrial customers are separated into three categories: (1) existing
163 customers that are tracked by the CCMs; (2) new large customers or expansions
164 by existing large customers which are also tracked by the CCMs; and (3)
165 industrial customers that are not tracked by the CCMs. Customers are tracked by
166 the CCMs if they have a peak load of one megawatt or more at a single site.

167 The Company develops the forecast for the first two categories through the data
168 gathered by the CCM assigned to each customer. The CCMs have ongoing direct
169 contact with large customers and are in the best position to know about the
170 customer's plans for changes in business processes, which might impact their
171 energy consumption. The portion of the industrial forecast related to new large
172 customers and expansion by existing large customers is also developed based on
173 information provided by the customers to the CCMs. This information would
174 include forecasted load factors and the size and timing of expansions. The CCMs
175 also provide the probability of the project completion.

176 The third category of industrial customers, smaller industrial customers, is more
177 homogeneous and is modeled using regression analysis with trend and economic
178 variables. Manufacturing employment is used as the major economic driver.

179 The total industrial sales forecast is developed by aggregating the forecast for the
180 three industrial customer categories.

181 **Q. Why do you forecast industrial sales using a different methodology than the**
182 **other customer classes?**

183 A. This class is modeled differently because of the diverse makeup of the customers
184 within the class. In the industrial class, there is no “typical” large industrial
185 customer. Large customers have very diverse usage patterns and power
186 requirements. It is not unusual for the entire class to be strongly influenced by the
187 behavior of one customer or a small group of customers. A recent example of how
188 one Utah customer’s decision can affect the industrial class sales is the decision of
189 a large industrial customer to move from a buy-all, sell-all contract for their
190 generation to a self-generation contract.

191 In contrast, customer classes that are made up of mostly smaller, homogeneous
192 customers are best forecasted as a group. Those customer classes are generally
193 composed of many smaller customers that have similar behaviors and usage
194 patterns. No small group of customers, or single customer, influences the
195 movement of the entire class. This difference for large industrial customers
196 requires the different processes for forecasting sales.

197 **Forecasts for the Irrigation, Public Authority, and Lighting Customer Classes**

198 **Q. How are monthly sales forecasts developed by customer class?**

199 A. The Public Authority monthly sales forecast is developed using a regression
200 model with the number of Public Authority customers as a driver in the model.

201 The irrigation sales forecast is developed using a regression model with weather

202 being the primary explanatory variable. Lighting monthly sales forecasts are
203 developed using a regression model with monthly binary (or dummy) variables.

204 **Q. How are the forecasts for number of customers developed?**

205 A. The Company forecasts the irrigation, Public Authority, and lighting number of
206 customers using either a time series or regression model. The model is estimated
207 based on historical data from the January 1997 to July 2011 time period.

208 **Hourly Load Forecast**

209 **Q. Please outline how you develop the hourly load forecast.**

210 A. After the Company develops the forecasts of monthly energy sales by customer
211 class, we develop a forecast of hourly loads in two steps.

212 First, monthly and seasonal peaks are forecasted for each state. The
213 monthly peak model uses historic peak load and peak-producing weather for each
214 state, and incorporates the impact of weather on peak loads through several
215 weather variables which drive heating and cooling usage. These weather variables
216 include the average temperature on the peak day and lagged average temperatures.
217 The peak forecast is based on average monthly historical peak-producing weather
218 for the period 1991-2010.

219 Second, hourly loads are forecasted for each state from hourly load models
220 using state-specific hourly load data and daily weather variables. The hourly loads
221 are developed using a model that incorporates the 20-year average temperatures, a
222 typical weather pattern for each year, and day-type variables such as weekends
223 and holidays. The hourly loads are adjusted for line losses and calibrated to
224 monthly and seasonal peaks.

225 **Q. How are monthly system coincident peaks derived?**

226 A. After the Company develops the hourly load forecasts for each state, hourly loads
227 are aggregated to the total system level. The system coincident peaks can then be
228 identified as well as the contribution of each jurisdiction to those monthly peaks.

229 **Forecasts by Rate Schedule**

230 **Q. Are there any additional forecasts that you created for this proceeding?**

231 A. Yes. As mentioned earlier, Mr. Griffith and Mr. Paice require two additional
232 forecasts that are based on the kWh sales forecast and the forecasted number of
233 customers. Once the kWh sales forecast is complete, it must be applied to
234 individual rate schedules to forecast kWh sales by rate schedule. In addition, the
235 forecasted number of customers must be expressed in number of bills.

236 **Q. How are rate schedule level forecasts produced?**

237 A. The Company develops this forecast in two steps. First, the Company forecasts
238 test year sales by rate schedule. Then, the Company proportionally adjusts the rate
239 schedule sales forecasts so that the total matches the customer class forecast.

240 **Q. How is the number of bills for each schedule forecasted?**

241 A. The forecast of the rate schedule bills forecast follows the same process as the rate
242 schedule sales forecast. First, the Company forecasts test year bills by rate
243 schedule. Then, the Company proportionally adjusts the rate schedule bills
244 forecasts so that the total matches the customer class forecast.

245 **Q. Before continuing, please tell us if there are any sales or load forecasts which
246 are used in the general rate case which you did not develop.**

247 A. Mr. Paice also needs the contribution to coincident peak by rate schedule. This

248 information is prepared by Mr. Scott D. Thornton, Manager of Load Research.

249 **Summary of Results**

250 **Q. How does the sales forecast for the 12 months ending May 31, 2013, compare**
251 **to the weather normalized MWh sales for the 12 months ending June 30,**
252 **2011, base period?**

253 A. Table 2 shows that for the total Company, test period forecasted sales are 0.5
254 percent higher than weather normalized sales for the historical base period. Table
255 3 shows that for Utah, forecasted test period sales are 2.7 percent higher than
256 weather normalized sales in the base period.

Table 2, Total Company Sales Comparison (MWh)

	July '10 to June '11 Actual	June '12 to May '13 GRC Forecast	Percentage Difference
Residential	16,007,051	15,824,583	-1.1%
Commercial	16,372,048	16,782,979	2.5%
Industrial	19,872,685	19,903,472	0.2%
Irrigation	1,180,247	1,214,886	2.9%
Public Authority	423,434	405,770	-4.2%
Lighting	145,425	141,350	-2.8%
Total	54,000,890	54,273,040	0.5%

Table 3, Utah Sales Comparison (MWh)

	July '10 to June '11 Actual	June '12 to May '13 GRC Forecast	Percentage Difference
Residential	6,656,128	6,634,404	-0.3%
Commercial	7,754,984	8,084,103	4.2%
Industrial	8,034,782	8,376,573	4.3%
Irrigation	184,375	187,280	1.6%
Public Authority	423,434	405,770	-4.2%
Lighting	80,806	77,260	-4.4%
Total	23,134,509	23,765,390	2.7%

257 **Q. How does the sales forecast for the test period compare to the sales forecast**
258 **used in the last general rate case?**

259 A. Forecast sales for the current test period (12 months ending May 2013) were

260 compared to forecast sales prepared for the 2011 Utah general rate case test
 261 period (12 months ending June 2012). As shown in Table 4, the total Company
 262 sales forecast has decreased by about 4.0 percent. And, as shown in Table 5, the
 263 Utah sales forecast has decreased by about 3.0 percent.

Table 4, Total Company Sales Forecast Comparison (MWh)

	July '11 to June '12 GRC Forecast Previous	June '12 to May '13 GRC Forecast Current	Percentage Difference
Residential	16,404,658	15,824,583	-3.5%
Commercial	17,364,358	16,782,979	-3.3%
Industrial	20,884,404	19,903,472	-4.7%
Irrigation	1,292,480	1,214,886	-6.0%
Public Authority	437,310	405,770	-7.2%
Lighting	141,300	141,350	0.0%
Total	56,524,510	54,273,040	-4.0%

Table 5, Utah Sales Forecast Comparison (MWh)

	July '11 to June '12 GRC Forecast Previous	June '12 to May '13 GRC Forecast Current	Percentage Difference
Residential	6,856,828	6,634,404	-3.2%
Commercial	8,328,358	8,084,103	-2.9%
Industrial	8,585,404	8,376,573	-2.4%
Irrigation	187,460	187,280	-0.1%
Public Authority	437,310	405,770	-7.2%
Lighting	76,840	77,260	0.5%
Total	24,472,200	23,765,390	-2.9%

264 **Q. Why is the Company forecasting a 4.0 percent decrease in system sales**
 265 **(Table 4) compared to the forecast used in the previous rate case?**

266 **A.** The residential sales decrease is attributed to lower actual retail sales from the
 267 economic slowdown and the impact of lighting efficiency changes resulting from
 268 federal lighting standards phasing out the sale of conventional incandescent light
 269 bulbs in favor of more efficient lighting. The reduction in commercial sales is
 270 largely driven by the continued effects of the recession. There were also some

271 delays in the timing for new data centers. The reduction in industrial sales is
272 largely driven by several industrial customer that chose to self generate some of
273 their requirements and displace some of their purchases from the Company. If
274 these industrial customers had not changed their purchasing pattern, system test
275 period forecast would be approximately 2.5 percent higher and system test period
276 sales would have decreased by approximately 1.6 percent from the 2010 GRC test
277 period forecast.

278 **Q. Why is the Company forecasting a 2.9 percent decrease in Utah sales (Table**
279 **5) compared to the forecast used in the previous rate case?**

280 A. This decrease is also largely driven by the several large Utah industrial customers
281 that have chosen to self generate some of their requirements and displace some of
282 their purchases from the Company. If these industrial customers had not changed
283 their purchasing pattern, Utah test period forecast would be approximately 2.2
284 percent higher and Utah test period sales would have decreased by approximately
285 0.8 percent from the 2010 GRC test period forecast.

286 **Q. How are the actual 2011 sales tracking with the previous forecast?**

287 A. Tables 6 and 7 present how the actual 2011 sales are tracking with the previous
288 forecast for the time period July through December 2011 for total Company and
289 Utah respectively. Table 6 shows that weather normalized total Company sales
290 are tracking about 2.5 percent lower than the Company's previous forecast for the
291 time period July to December 2011. Table 7 shows that weather normalized Utah
292 sales are tracking about 2.7 percent lower than the previous forecast for the time
293 period July to December 2011.

Table 6, Total Company Sales Forecast (MWh)

	July to Dec 2011		Percentage Difference
	Actual	Previous GRC	
Residential	8,082,709	8,260,512	2.2%
Commercial	8,562,609	8,900,112	3.9%
Industrial	10,063,807	10,286,506	2.2%
Irrigation	878,009	811,810	-7.5%
Public Authority	199,193	223,580	12.2%
Lighting	71,542	69,250	-3.2%
Total	27,857,869	28,551,770	2.5%

Table 7, Utah Sales Forecast (MWh)

	July to Dec 2011		Percentage Difference
	Actual	Previous GRC	
Residential	3,606,236	3,642,466	1.0%
Commercial	4,081,188	4,299,326	5.3%
Industrial	4,078,775	4,134,578	1.4%
Irrigation	124,034	114,140	-8.0%
Public Authority	199,193	223,580	12.2%
Lighting	38,139	37,440	-1.8%
Total	12,127,566	12,451,530	2.7%

294 Q. Do you consider the sales and load forecasts to be reasonable?

295 A. Yes.

296 Q. Does this conclude your direct testimony?

297 A. Yes.