

1 **Q. Are you the same David L. Taylor who filed direct and rebuttal testimony in**
2 **this case?**

3 A. Yes.

4 **Q. What is the purpose of your surrebuttal testimony?**

5 A. My surrebuttal testimony presents a revised version of proposed Schedule 32 that
6 incorporates the changes to the tariff that I addressed in my rebuttal testimony in
7 this docket. The revised schedule is attached as RMP Exhibit___(DLT-1SR) and
8 RMP Exhibit___(DLT-2SR).

9 **Q. Please describe RMP Exhibit___(DLT-1SR) and RMP Exhibit___(DLT-**
10 **2SR).**

11 A. RMP Exhibit___(DLT-1SR) is a revised version of proposed Schedule 32. RMP
12 Exhibit___(DLT-2SR) is a redline version of Schedule 32 that shows the
13 changes from the version of Schedule 32 presented as RMP Exhibit___(DLT-1)
14 in my direct testimony in this docket. The revisions to Schedule 32 reflect the
15 proposed changes that I discussed in my rebuttal testimony in this docket.

16 **Q. What are the specific revisions to Schedule 32?**

17 A. There are three revisions to proposed Schedule 32. First, the proposed tariff now
18 includes prices for service to customers smaller than 1MW. Second, the sections
19 of the tariff that referred to Back-up or Maintenance Service have been removed.
20 Third, the prices for Daily Power Charges, as shown in RMP Exhibit___(DLT-
21 1R) and Table 1 of my rebuttal testimony, have been incorporated into the tariff.
22 This change is a result of the removal of the Generation Back-up Facilities
23 Charge. Each of these changes was discussed in detail in my rebuttal testimony.

24 **Q. Since all of these changes were addressed in your rebuttal testimony, why**
25 **was the revised Schedule 32 not included with your rebuttal testimony?**

26 A. There are two reasons I did not include the revised tariff sheets with my rebuttal
27 testimony. First, at the time rebuttal testimony was filed, the parties in the case
28 were involved in settlement discussions which may have resulted in different or
29 additional revisions to proposed Schedule 32 from those I presented in my
30 rebuttal. Second, some of the parties may have made arguments or proposals in
31 their rebuttal testimony that would convince the Company to consider additional
32 modifications to proposed Schedule 32. Either of these would have required that
33 the Company file yet another revision to the tariff.

34 **Q. Were the parties able to reach a settlement in the docket?**

35 A. No.

36 **Q. Did any of the parties present arguments or proposals in their rebuttal**
37 **testimony that caused the Company to further revise its position on Schedule**
38 **32?**

39 A. No.

40 **Q. Does this conclude your surrebuttal testimony?**

41 A. Yes.