

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Approval of a Renewable Energy Services Contract Between Rocky Mountain Power and Facebook, Inc. Pursuant to Tariff Electric Service Schedule 34)	Docket No. 16-035-27
)	
)	Direct Testimony
)	of Donna Ramas
)	For the Office of
)	Consumer Services

CONFIDENTIAL INFORMATION REDACTED

August 2, 2016

1 **Q. WHAT IS YOUR NAME, OCCUPATION AND BUSINESS ADDRESS?**

2 A. My name is Donna Ramas. I am a Certified Public Accountant licensed in
3 the State of Michigan and Principal at Ramas Regulatory Consulting, LLC,
4 with offices at 4654 Driftwood Drive, Commerce Township, Michigan
5 48382.

6 **Q. HAVE YOU PREPARED A SUMMARY OF YOUR QUALIFICATIONS
7 AND EXPERIENCE?**

8 A. Yes. I have attached Appendix I, which is a summary of my regulatory
9 experience and qualifications.

10 **Q. ON WHOSE BEHALF ARE YOU APPEARING?**

11 A. I was retained by the Utah Office of Consumer Services (OCS) to review
12 Rocky Mountain Power's (the Company or RMP) request for approval of a
13 Renewable Energy Service Contract with Facebook, Inc. ("Facebook")
14 pursuant to Schedule 34. Accordingly, I am appearing on behalf of the
15 OCS.

16 **Q. WHAT WAS THE FOCUS OF YOUR REVIEW?**

17 A. The focus of my review was the potential impacts of the proposed contract
18 on the jurisdictional allocation factors impacting Utah customers and
19 whether, based on the information and scenarios provided in the
20 Company's testimony and workpapers, the potential revenues offset the
21 potential negative impacts associated with greater cost allocations to the
22 Utah jurisdiction.

REDACTED

23 **Q. WHAT INFORMATION DID YOU REVIEW IN PERFORMING YOUR**
24 **ANALYSIS?**

25 A. I reviewed the Company's Application, the confidential direct testimonies
26 of Company witnesses Paul H. Clements and Steven R. McDougal, the
27 confidential exhibits provided with each of these respective testimonies,
28 and the confidential workpapers provide by the Company. I also
29 discussed the models provided in the confidential workpapers with
30 Company witness Steven McDougal and RMP employees familiar with the
31 models to gain greater familiarity with the models and to be able to use the
32 models to perform alternative scenarios from those provided by the
33 Company in its confidential workpapers.

34 **Q. UNDER THE COMPANY'S PROPOSED REGULATORY TREATMENT**
35 **OF THE CONTRACT, HOW DOES THE POTENTIAL FACEBOOK LOAD**
36 **IMPACT THE JURISDICTIONAL ALLOCATION FACTORS?**

37 A. The Company's proposal for including the impacts of the Facebook load
38 on the calculation of the jurisdictional cost allocation factors is presented
39 in the Confidential Direct Testimony of Steven R. McDougal. As explained
40 by Mr. McDougal, at pages 3 – 4 of his Confidential testimony, *****BEGIN**

41 **CONFIDENTIAL ***** [REDACTED]
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43 [REDACTED]
44 [REDACTED]
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52 [REDACTED] ***END CONFIDENTIAL***

53 Q. HAS THE COMPANY PROVIDED ANY ESTIMATES OF THE
54 POTENTIAL IMPACT ON THE REVENUE REQUIREMENTS
55 ASSOCIATED WITH CHANGES TO THE JURISDICTIONAL
56 ALLOCATION FACTORS UNDER ITS PROPOSED TREATMENT OF
57 THE FACEBOOK LOAD?

58 A. ***BEGIN CONFIDENTIAL*** [REDACTED]
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114 Q. [REDACTED]

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129 A. [REDACTED]

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- 156 A. [REDACTED]
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[REDACTED] *****END CONFIDENTIAL*****

167

Q. DOES THIS COMPLETE YOUR PREFILED DIRECT TESTIMONY?

168

A. Yes.

REDACTED