

PUBLIC SERVICE COMMISSION OF UTAH

Docket No. 20-035-04

PUBLIC HEARING

November 18, 2020

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Public Hearing
November 18, 2020

1 BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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3 Application of Rocky Mountain)
4 Power for Authority to)
5 Increase its Retail Electric)
6 Utility Service Rates in Utah)
7 and for Approval of its)
8 Proposed Electric Service)
9 Schedules and Electric Service)
10 Regulations)
11 _____)

9 DOCKET 20-035-04

11 PUBLIC HEARING PROCEEDINGS

12 TAKEN VIA GOOGLE MEET

13 THROUGH ADVANCED REPORTING SOLUTIONS

15 Taken on Wednesday, November 18, 2020

16 9:01 a.m. to 9:39 p.m.

22 Advanced Reporting Solutions
23 159 West Broadway
24 Suite 100
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25 Reported by: Kimberly A. Harmon, RPR, CSR

A P P E A R A N C E S

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Commissioner Ron Allen

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I N D E X

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1 P R O C E E D I N G S

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3 COMMISSIONER LEVAR: Thank you. We'll be on
4 the record.

5 It is Wednesday, November 18th, 2020, and
6 we're here for the second day of the Cost of Service
7 Phase 2 hearing in Utah Public Service Commission
8 Docket 20-35-04, Rocky Mountain Power's general rate
9 case.

10 I'm Thad LeVar, and Commissioners Ron Allen
11 and David Clark are also here.

12 Before we move on to our next witness, I'll
13 just mention that we received a request for
14 clarification regarding our notice on closing
15 statements and -- or legal briefing and closing
16 arguments. There was, of course, a typographical
17 error in our notice. We did not intend to require
18 witnesses to be present at the closing arguments.
19 And we will issue an errata this week, although we do
20 appreciate Rocky Mountain Power educating us on how
21 closing statements work.

22 And with that, I'll go to Ms. Hayes, if
23 you'd like to call your first witness.

24 MS. HAYES: Thank you. Quickly, before I do
25 that, could I follow up with another question about

1 what you just clarified?

2 COMMISSIONER LEVAR: Certainly.

3 MS. HAYES: Is it your intention that all
4 parties provide closing statements or just parties
5 that are filing briefs?

6 COMMISSIONER LEVAR: The intention for both
7 was to allow but not mandate --

8 MS. HAYES: Okay.

9 COMMISSIONER LEVAR: -- for both briefs and
10 closing statements. If that was unclear in our
11 notice, we will also clarify that in our errata. But
12 both were intended to be optional.

13 MS. HAYES: Okay.

14 COMMISSIONER LEVAR: Although, I think -- I
15 think we probably would only allow closing statements
16 if someone also filed a brief. I don't know that --
17 I don't know that we were intending to allow closing
18 statements without a brief. If anyone feels
19 differently, please let us know by the conclusion of
20 today's hearing so we can be sure to address that in
21 our errata clarification.

22 And with that, you can go ahead with your
23 first witness.

24 MS. HAYES: Thank you. Thank you for
25 clarifying that, and thank you for accommodating

1 Western Resource Advocate's scheduling -- pardon
2 me -- constraints.

3 I would like to call Mr. Aaron Kressig to be
4 sworn.

5 COMMISSIONER LEVAR: Good morning,
6 Mr. Kressig. Are you with us?

7 MR. KRESSIG: Good morning, Commissioner.
8 Yes, I am.

9 COMMISSIONER LEVAR: Okay. Thank you. Do
10 you swear to tell the truth?

11 MR. KRESSIG: Yes, I do.

12 COMMISSIONER LEVAR: Okay. Thank you. Go
13 ahead, Ms. Hayes.

14 MS. HAYES: Thank you.

15

16 DIRECT EXAMINATION

17 BY MS. HAYES:

18 Q. Good morning, Mr. Kressig. Just a note up
19 front, if you can really try and speak into your
20 microphone. I know that, you know, concentrating on
21 that amidst everything else is difficult, but I'll
22 let you know if we have trouble hearing you.

23 A. Yes. Thank you.

24 Q. Thank you. Would you please state your name
25 and business address for the record.

1 A. Yes. My name is Aaron Kressig, spelled
2 A-A-R-O-N, Kressig, K-R-E-S-S-I-G, and my business
3 address is 2260 Baseline Road, Boulder, Colorado
4 80302.

5 **Q. Thank you. What is your position with**
6 **Western Resource Advocates?**

7 A. I am the transportation electrification
8 manager working on electric vehicle policy across our
9 six states.

10 **Q. Did you prepare and file direct testimony**
11 **along with two exhibits marked as AJK-1 and AJK-2 and**
12 **a work paper on September 15th, 2020?**

13 A. Yes, I did.

14 **Q. Did you prepare and file surrebuttal**
15 **testimony on November 6th, 2020?**

16 A. Yes, I did.

17 **Q. Do you have any corrections to make to your**
18 **testimony?**

19 A. No, I do not.

20 **Q. If I asked you the same questions today as**
21 **were set forth in your direct and surrebuttal**
22 **testimony, would your answers be the same?**

23 A. Yes, they would.

24 **Q. Thank you.**

25 MS. HAYES: I would now move the admission

1 of Aaron Kressig's prefiled testimony and exhibits.

2 COMMISSIONER LEVAR: If anyone objects to
3 that motion, please indicate your objection.

4 I'm not seeing or hearing any, so the motion
5 is granted. Thank you.

6 (Testimony and exhibits admitted.)

7 BY MS. HAYES:

8 **Q. Have you prepared a summary of your**
9 **testimony for the Commission?**

10 A. Yes, I have.

11 **Q. Please proceed.**

12 A. Thank you.

13 In my direct testimony, I describe the
14 environmental and economic benefits which can result
15 from widespread electric vehicle adoption and
16 highlight the demonstrative interests of the Utah
17 legislature in supporting the robust rollout of
18 public charging stations to support EV adoption.

19 My direct testimony highlights the
20 importance of commercial EV rate design in supporting
21 the proliferation of public and fleet charging
22 stations. The challenge is traditional commercial
23 rate design composed of these customers and the
24 importance of low-load-factor charging stations in
25 supporting higher levels of EV adoption.

1 With these issues in mind, I looked at the
2 impact of the current and proposed optional
3 Schedule 6A rates in the context of their suitability
4 for electric -- commercial electric vehicle charging
5 stations. I recommend the Commission approve the
6 redesigned 6A, but also keep the existing 6A option
7 open for customers.

8 I also discussed the benefits and best
9 practices of dedicated commercial electric vehicle
10 rates and recommend the Commission require PacifiCorp
11 to bring forth a specific commercial EV rate design
12 by no later than January 1st, 2023.

13 In my surrebuttal testimony, I maintain my
14 recommendation to keep both 6A rate options open,
15 but, in recognition of potential revenue risks
16 highlighted by the Company in the rebuttal testimony
17 of Mr. Robert Meredith, I suggest that the new 6A
18 could be implemented as a pilot while the Company
19 gathers data about customer response to this new rate
20 design.

21 Ultimately, however, my core recommendation
22 in this proceeding is for the Commission to create --
23 I'm sorry -- for the Company to create a dedicated
24 commercial EV charging rate specific for electric
25 charging stations. Rates specifically dedicated to

1 electric vehicle charging service have been
2 demonstrated across the country to reduce barriers to
3 electric vehicle adoption while still being
4 cost-based and ensuring that these users are being
5 charged for the price of energy that they are
6 consuming.

7 While allowing for the proposed 6A and the
8 existing 6A to exist together would provide
9 optionality in the short term and offer some cost
10 savings compared to Schedule 6, neither of these rate
11 designs shifts sufficiently away from demand charges
12 or meet the best practices of commercial EV rate
13 design, which I lay out in my direct testimony. This
14 leads to rates which penalize low-usage customers
15 while not necessarily ensuring that the flexibility
16 inherent in this technology is being utilized to
17 ensure that load is managed to avoid Company system
18 peaks or periods of system stress. Therefore, I
19 maintain my recommendation that the Company develops
20 an EV charging specific rate by January 1st, 2023.
21 And I believe that the rate design working group
22 proposed by Mr. Robert Meredith, in his rebuttal
23 testimony, would be an excellent form for
24 facilitating this effort.

25 Thank you.

1 MS. HAYES: Thank you.

2 Mr. Kressig is now available for
3 cross-examination.

4 COMMISSIONER LEVAR: Thank you, Ms. Hayes.
5 I think I'll start with Mr. Sanger.

6 Do you have any questions for Mr. Kressig?

7 MR. SANGER: No, Your Honor, I do not.

8 COMMISSIONER LEVAR: Okay. Thank you.

9 Mr. Boehm, do you have any questions?

10 MR. BOEHM: No questions, Your Honor. Thank
11 you.

12 COMMISSIONER LEVAR: Okay. Thank you.

13 Ms. Baldwin?

14 MS. BALDWIN: No questions. Thank you.

15 COMMISSIONER LEVAR: Thank you.

16 Mr. Russell, do you have any questions?

17 MR. RUSSELL: No questions. Thank you.

18 COMMISSIONER LEVAR: Thank you.

19 Mr. Holman?

20 MR. HOLMAN: No questions. Thank you,
21 Chair.

22 COMMISSIONER LEVAR: Mr. Snarr?

23 MR. SNARR: No questions on behalf of the
24 Office. Thank you.

25 COMMISSIONER LEVAR: Thank you.

1 Mr. Jetter?

2 MR. JETTER: No questions from the Division.
3 Thank you.

4 COMMISSIONER LEVAR: Okay. Thank you.

5 Ms. Wegener or Mr. Kumar?

6 MS. WEGENER: No questions from the Company.
7 Thank you.

8 COMMISSIONER LEVAR: I missed the beginning,
9 but I assume that was a "no questions"; right?

10 MS. WEGENER: Yes, no questions.

11 COMMISSIONER LEVAR: Okay. Thank you.

12 Commissioner Allen, do you have any
13 questions for Mr. Kressig?

14 COMMISSIONER ALLEN: I think you were
15 talking to me. You were breaking up a little bit.
16 But I have no questions. Thank you.

17 COMMISSIONER LEVAR: Okay. Thank you.

18 We are having a little bit of interference.
19 Hopefully that will improve in a moment. I'll ask
20 anyone who is not participating to mute yourself.

21 Commissioner Clark, do you have any
22 questions for Mr. Kressig?

23 COMMISSIONER CLARK: No questions. Thank
24 you, Chair LeVar.

25 COMMISSIONER LEVAR: Okay. Thank you.

1 And I don't have any questions either, so
2 thank you for your testimony this morning,
3 Mr. Kressig.

4 MR. KRESSIG: Thank you for having me.

5 COMMISSIONER LEVAR: Ms. Hayes, we had
6 talked about going to Kroger's witness next, but I
7 think with our -- with the schedule we're working on,
8 I think we'll go ahead and go to your next witness at
9 this point.

10 MS. HAYES: Wonderful. And then may I also
11 request that Mr. Kressig be excused so that he may
12 testify in Colorado under their revised schedule?

13 COMMISSIONER LEVAR: If anyone participating
14 in this hearing has any objection to that, please
15 indicate your objection.

16 I'm not seeing anyone who might have
17 follow-up questions for him, so thank you for your
18 testimony this morning.

19 MR. KRESSIG: Thank you.

20 MS. HAYES: WRA's next witness is
21 Dr. Doug Howe.

22 COMMISSIONER LEVAR: Good morning, Dr. Howe.
23 Are you with us?

24 DR. HOWE: Good morning. Yes, I am.

25 COMMISSIONER LEVAR: Thank you. Do you

1 swear to tell the truth?

2 DR. HOWE: I do.

3 COMMISSIONER LEVAR: Okay. Thank you.

4 Go ahead, Ms. Hayes.

5

6 DIRECT EXAMINATION

7 BY MS. HAYES:

8 Q. Dr. Howe, would you please state your name
9 and business address for the record.

10 A. Douglas Howe, D-O-U-G-L-A-S, H-O-W-E. And
11 my address is 624 East Alameda Street, Unit 16,
12 Santa Fe, New Mexico.

13 Q. And on whose behalf are you participating in
14 this proceeding?

15 A. For Western Resource associates.

16 Q. Advocates?

17 Did you prepare and file direct testimony
18 along with one exhibit marked as DJH-1 and work
19 papers on September 15th, 2020?

20 A. Yes. Yes, I did.

21 Q. And was there another exhibit to your direct
22 testimony, DJH-2, that was filed with the Commission
23 on November 12th, which the Commission then accepted
24 for prefiling yesterday?

25 A. Yes, there was.

1 Q. Did you prepare and file surrebuttal [sic]
2 testimony on October 16th, 2020?

3 A. Yes, I did.

4 Q. Did you prepare and file surrebuttal
5 testimony, including one exhibit, on November 6th,
6 2020?

7 A. Yes, I did.

8 Q. Do you have any corrections to your
9 testimony?

10 A. Yes. I have a typographical correction to
11 the rebuttal testimony. The heading block in the
12 upper right of each page indicates that it is the
13 direct testimony when it should indicate that it is
14 the rebuttal testimony.

15 Q. Thank you. So with that correction, if I
16 asked you the same questions today, would your
17 answers be the same?

18 A. Yes, they would.

19 MS. HAYES: I would now -- pardon me -- move
20 the admission of Dr. Howe's exhibits -- testimony and
21 exhibits.

22 COMMISSIONER LEVAR: Thank you. If anyone
23 objects to that motion, please indicate your
24 objection.

25 I'm not seeing or hearing any, so the motion

1 is granted.

2 (Testimony and exhibits admitted.)

3 BY MS. HAYES:

4 **Q. Dr. Howe, have you prepared a summary of**
5 **your testimony to provide the Commission today?**

6 A. Yes, I have.

7 **Q. Go ahead.**

8 A. Good morning, Chairman LeVar,
9 Commissioner Allen, and Commissioner Clark.

10 In my direct testimony, I supported the
11 Company's proposal to eliminate the third tier of the
12 inclining block rate as a step in the direction
13 toward deploying time-of-use rates. My primary
14 recommendation was that the Commission required the
15 Company to develop and propose a time-of-use rate as
16 the default rate for residential customers and
17 establish a flat seasonal rate as an opt-in rate at
18 the time of its next general rate case.

19 However, in recognition of the fact that the
20 AMI project and the customer service system may not
21 be able to accommodate time-of-use rates by the time
22 of the next rate case, I recommend that the Company
23 have a plan in place by the next rate case for
24 implementing a default time-of-use rate for
25 residential customers.

1 In my direct testimony, I also outlined
2 considerations and best practices for designing
3 time-of-use rates.

4 In my rebuttal testimony, I generally
5 supported the goals of the Company's Utah AMI
6 project, but agreed with Mr. Nelson of the Office
7 that they have not yet shown a cost benefit analysis
8 favorable to customers. I recommended that the
9 Company expand its consideration of benefits
10 associated with the project by, for example,
11 quantifying the benefits of advanced rate designs. I
12 supported OCS's recommendation to create an advanced
13 rate design road map.

14 And in my surrebuttal testimony, I supported
15 the Company's recommendation to create a rate design
16 working group to accomplish the objectives of OCS's
17 proposed advanced metering rate design road map. I
18 recommended that the Commission include additional
19 specific topics into the mission and purview of that
20 working group, including developing a timeline and
21 implementation strategy, developing advanced rates
22 and programs, considerations for low-income
23 participation, developing open-data access standards,
24 and integrating AMI advancements into distribution
25 planning processes.

1 That concludes my summary.

2 MS. HAYES: Thank you, Dr. Howe.

3 Dr. Howe is now available for
4 cross-examination.

5 COMMISSIONER LEVAR: Thank you, Ms. Hayes.

6 Mr. Sanger, do you have any questions for
7 Dr. Howe?

8 MR. SANGER: I do not. Thank you.

9 COMMISSIONER LEVAR: Thank you.

10 Mr. Boehm, do you have any questions?

11 MR. BOEHM: No questions. Thank you.

12 COMMISSIONER LEVAR: Ms. Baldwin?

13 MS. BALDWIN: No questions. Thank you.

14 COMMISSIONER LEVAR: Thank you, Ms. Baldwin.

15 Mr. Russell, do you have any questions?

16 MR. RUSSELL: No questions. Thank you.

17 COMMISSIONER LEVAR: Thank you.

18 Mr. Holman?

19 MR. HOLMAN: No questions. Thank you.

20 COMMISSIONER LEVAR: Mr. Snarr?

21 MR. SNARR: No questions on behalf of the
22 Office. Thank you.

23 COMMISSIONER LEVAR: Thank you.

24 Mr. Jetter?

25 MR. JETTER: And also no questions from the

1 Division. Thank you.

2 COMMISSIONER LEVAR: Thank you.

3 Ms. Wegener or Mr. Kumar?

4 I'm sorry. We didn't hear what you said.

5 MS. WEGENER: Thank you.

6 COMMISSIONER LEVAR: Okay. We're have -- we
7 are having an audio problem, but I'm assuming that
8 your answer was "No questions." Please let me know
9 if I'm wrong about that.

10 MS. WEGENER: Yes, my answer was "No
11 questions." Can you hear it better when it's from
12 the phone instead of my AirPods?

13 COMMISSIONER LEVAR: Much better. Yeah,
14 there was a delay --

15 MS. WEGENER: Okay.

16 COMMISSIONER LEVAR: -- and we were just
17 catching the last part of your statement, not the
18 beginning. So --

19 MS. WEGENER: Perfect. Thank you.

20 COMMISSIONER LEVAR: But this is much
21 better. Thank you.

22 Okay. Commissioner Allen, do you have any
23 questions for Dr. Howe?

24 COMMISSIONER ALLEN: Thank you. No
25 questions.

1 COMMISSIONER LEVAR: Thank you.

2 Commissioner Clark?

3 COMMISSIONER CLARK: I have no questions.

4 COMMISSIONER LEVAR: I don't either, so
5 thank you for your testimony this morning, Dr. Howe.

6 DR. HOWE: Thank you.

7 COMMISSIONER LEVAR: Ms. Hayes, anything
8 further from Western Resource Advocates?

9 MS. HAYES: Nothing further from Western
10 Resource Advocates. Thank you.

11 COMMISSIONER LEVAR: Thank you. We'll go to
12 Mr. Boehm next, then.

13 And you are muted right now, Mr. Boehm.

14 MR. BOEHM: Thank you. Sorry about that.
15 And thank you for accommodating our scheduling issue.

16 Kroger calls Richard Baudino to the stand.

17 COMMISSIONER LEVAR: Good morning,
18 Mr. Baudino. Can you hear me?

19 MR. BAUDINO: Yes, I can. Thank you. I
20 hope you can all hear me.

21 COMMISSIONER LEVAR: Yes, we're hearing you
22 great. Do you swear to tell the truth?

23 MR. BAUDINO: Yes, I do.

24 COMMISSIONER LEVAR: Okay. Thank you.
25 Go ahead, Mr. Boehm.

1 MR. BOEHM: Thank you.

2

3 DIRECT EXAMINATION

4 BY MR. BOEHM:

5 Q. Good morning, Mr. Baudino.

6 A. Good morning.

7 Q. Can you please state your name and business
8 address for the record.

9 A. Yes. My name is Richard A. Baudino, and my
10 business address is Baudino Regulatory Consulting,
11 Inc., 1347 Frye Road, Westfield, North Carolina.

12 Q. Did you submit testimony on behalf of the
13 Kroger Company, direct testimony and exhibits, on
14 September 15th, 2020?

15 A. I did.

16 MR. BOEHM: And I would just note for the
17 record that Kroger submitted a corrected version of
18 this testimony yesterday in which the only change
19 that we made was to add a page -- or a line numbering
20 to Mr. Baudino's direct testimony, as we overlooked
21 doing that in the original filing.

22 BY MR. BOEHM:

23 Q. Mr. Baudino, did you also submit rebuttal
24 testimony on October 16th, 2020?

25 A. Yes. Excuse me. Yes, I did.

1 **Q. And did you submit surrebuttal testimony on**
2 **November 6th, 2020?**

3 A. Yes, I did.

4 **Q. Do you have any corrections to any of the**
5 **testimony that you filed?**

6 A. I do not.

7 **Q. And if I asked you the same questions today,**
8 **would your answers be the same?**

9 A. Yes.

10 MR. BOEHM: Kroger moves for the admission
11 of Mr. Baudino's prefiled testimony and exhibits.

12 COMMISSIONER LEVAR: Thank you.

13 If anyone objects to that motion, please
14 state your objection.

15 I'm not seeing or hearing any objection, so
16 the motion is granted.

17 (Testimony and exhibits admitted.)

18 BY MR. BOEHM:

19 **Q. Mr. Baudino, have you prepared a summary of**
20 **your testimony?**

21 A. Yes, I have.

22 **Q. Please proceed.**

23 A. Okay. Thank you. And thanks, everyone.

24 I'm here today testifying on behalf of the
25 Kroger Company. And Kroger is one of the largest

1 grocery retailers in the United States and operates
2 42 grocery stores in Rocky Mountain Power's service
3 territory under the Smith's banner. Kroger also
4 operates dairy and dough manufacturing facilities in
5 Utah. All together, these facilities purchase more
6 than 146 million kilowatt hours of electricity from
7 Rocky Mountain Power annually, and the retail
8 facilities primarily purchasing under Rate 6 -- Rate
9 Schedule 6, and the manufacturing facilities under
10 Rate Schedule 9.

11 And the purpose of my testimony in this case
12 is to present revenue allocation and Schedule 6 rate
13 design recommendations to the Commission. And in so
14 doing, as part of that, I evaluated the file
15 testimony of Mr. Robert Meredith, witness for the
16 Company.

17 To summarize, my recommendations, in
18 general, are as follows: I recommend the Commission
19 move to address the long-standing problem of
20 subsidies being paid by Schedule 6 customers. The
21 subsidy being paid by Schedule 6 customers is over
22 \$38 million a year at the Company's present rates.
23 In the interest of gradualism, however, and reducing
24 the impact on the residential customers, Kroger does
25 not oppose the Company's proposed revenue allocation

1 in this case even though the Schedule 6 composite
2 customers -- and these are the customers who are
3 going to be remaining on Schedule 6 after the 6A rate
4 redesign -- those customers will be receiving a
5 higher than average increase under the Company's
6 original proposal, although that's been modified
7 somewhat in its rebuttal testimony.

8 So in condition -- in connection with this
9 recommendation, I recommend the Commission utilize
10 any authorized reductions in the Company's overall
11 revenue increase request to address the subsidy
12 problem for Schedule 6 composite customers. And this
13 could be accomplished by reducing the Schedule 6
14 composite percentage revenue increase below the lower
15 authorized overall percentage revenue increase that
16 the Commission may authorize in this case.

17 I presented an example of how this could
18 work, in my direct testimony, with the Commission
19 applying a 50 percent reduction in its overall
20 allowed percentage base revenue increase to
21 Schedule 6 composite customers remaining on
22 Schedule 6. So, for example, if the Commission
23 allowed an overall increase of 2.4 percent to
24 Rocky Mountain Power in this case, these Schedule 6
25 customers remaining on Schedule 6 would receive an

1 increase of 1.2 percent.

2 Now, in terms of rate design, any revenue
3 increase allocated to Schedule 6 composite customers
4 should be assigned to the demand and other fixed
5 charges, the customer charge. The energy charge
6 revenue or the rates should not be increased. And I
7 do agree with the Company's proposed differential for
8 the energy charges, the summer/winter energy charges
9 of 1.13. I do agree with that, but I do recommend
10 the current differential between summer and winter
11 demand charges remains the same.

12 Also, in my direct testimony, I recommend
13 the Commission require Rocky Mountain to file a
14 multisite commercial rate for eligible Schedule 6
15 customers in its next rate case. This rate would be
16 applicable to Schedule 6 customers who can aggregate
17 the loads of multiple facilities for purposes of
18 receiving a lower cost base fixed generation charge.
19 I show and discussed in my testimony that such a rate
20 has been approved in Arizona, Michigan, and
21 Washington.

22 I further recommend that a collaborative be
23 implemented between Rocky Mountain Power and its
24 Schedule 6 customers. I believe that in his
25 testimony, Mr. Meredith also recommended that a

1 collaborative be -- collaborative working group be
2 implemented after this case, and I would support
3 that.

4 I also submitted in my rebuttal testimony in
5 this proceeding testimony that was responsive to the
6 recommendations of other parties regarding cost of
7 service allocation methodologies. For purposes of
8 this case, however, I've accepted the Company's class
9 cost of service study as a guide to cost and revenue
10 allocation.

11 And in my surrebuttal testimony, I responded
12 to Mr. Meredith's rebuttal testimony regarding the
13 revenue allocation to Schedule 6 customers and, in
14 particular, to Schedule 6 composite customers who
15 remain on Schedule 6.

16 I note that Mr. Meredith's revised revenue
17 allocation, while more favorable to Schedule 6, still
18 did not adequately address the impacts on Schedule 6
19 composite customers. And I offered an alternative
20 revenue allocation method for the Commission to
21 consider, which would make greater progress towards
22 eliminating these significant subsidies being paid by
23 Schedule 6.

24 And that concludes my summary.

25 MR. BOEHM: Thank you, Mr. Baudino.

1 Mr. Baudino is available for
2 cross-examination.

3 COMMISSIONER LEVAR: Thank you, Mr. Boehm.
4 I'll go to Ms. Baldwin first.

5 Do you have any questions for Mr. Baudino?

6 MS. BALDWIN: No. Walmart has no questions.
7 Thank you.

8 COMMISSIONER LEVAR: Thank you. I'll go to
9 Mr. Russell.

10 Mr. Russell, do you have any questions?

11 MR. RUSSELL: No questions. Thank you.

12 COMMISSIONER LEVAR: Thank you.

13 Mr. Sanger, any questions?

14 MR. SANGER: No questions. Thank you.

15 COMMISSIONER LEVAR: Thank you.

16 Mr. Holman?

17 MR. HOLMAN: No questions. Thank you.

18 COMMISSIONER LEVAR: Ms. Hayes, do you have
19 any questions for this witness?

20 MS. HAYES: I do not. Thank you.

21 COMMISSIONER LEVAR: Thank you.

22 Mr. Snarr?

23 MR. SNARR: Yes, just a few questions, if I
24 might.

25 COMMISSIONER LEVAR: Okay. Go ahead.

CROSS-EXAMINATION

BY MR. SNARR:

Q. Good morning, Mr. Baudino.

A. Good morning.

Q. I have just a few questions. You did indicate that you undertook a review of the cost of service study that the Company had submitted; is that correct?

A. Yes, that's correct.

Q. And you indicated that for purposes of your testimony, you were relying upon that study; is that right?

A. That's right.

Q. You understand some questions have been raised about that study by other parties in this proceeding? To what extent did you look at some of the issues underlying the cost of service study?

A. Well, I did review the Company's cost of service study in detail as it was filed in Mr. Meredith's direct testimony, and it seemed to follow the, you know, general procedures the Company has followed in the past with respect to -- especially with respect to allocating generation costs. After really looking at that study, I felt it was -- even though I don't endorse it, necessarily, I

1 think it was close enough to pass Commission practice
2 and pass Company practice that I was willing to
3 accept it.

4 And I also did review some of the other
5 comments that -- that the other witnesses for the
6 other parties made. And I also looked at
7 Mr. Meredith's rebuttal and surrebuttal testimony
8 where he discussed those as well. And I think for
9 purposes of this case, I still would accept the
10 Company's -- or not challenge the Company's cost of
11 service method.

12 **Q. All right. Just a couple of follow-on**
13 **questions there.**

14 **Could you confirm that functionalization,**
15 **including subfunctionalization, is traditionally**
16 **carried out as the first step of a cost of service**
17 **study?**

18 A. Yes.

19 **Q. And that following that, classification is**
20 **traditionally the second step?**

21 A. Yes.

22 **Q. And allocation, the third step?**

23 A. That's right.

24 **Q. All right. You also looked at**
25 **Mr. Meredith's testimony. Do you recall him making a**

1 statement that he was making one change to the
2 Company's cost of service study, that being
3 unbundling?

4 A. Yes, I recall that.

5 Q. And did you review his testimony to
6 determine to what extent that effort of unbundling
7 had altered the cost of service study?

8 A. I didn't see that it significantly altered
9 the results. It was more just sort of functional
10 unbundling and moving towards more unbundling for
11 rate purposes. Anyway, that's how I understood it.

12 Q. All right. Let me move to one other thing.
13 You've indicated in your testimony,
14 particularly page 7, that you say that Schedule 6 is
15 paying the largest dollar subsidy compared to any
16 other class; is that correct?

17 A. Which page is this?

18 Q. Page 7, I believe, in your table.

19 A. Well, yes, that's true.

20 Q. And at page 11 of your direct testimony, you
21 proposed Schedule 6 customers should pay a lower
22 percentage increase than other classes; right?

23 A. That's right.

24 Q. And that would be even lower than
25 Schedule 23 and lighting, who've shown better results

1 in covering their costs than previously assigned to
2 those classes; is that right?

3 A. Well, now, could you sort of show me where
4 that is?

5 Q. I believe it's on page 11. Let me just
6 rephrase the question.

7 Would you accept, subject to check, that
8 Schedule 23 and lighting have shown better results in
9 covering the costs that have previously been assigned
10 to those classes?

11 A. Well, I -- I'm not sure I agree with that.
12 I'd like you to point me towards the numbers there
13 that you're referring to because I -- I do have --
14 excuse me -- I do have work papers here, and I can
15 refer to the numbers.

16 Q. Let me look at that. Just a minute, please.
17 I'd like to thank the Commission's
18 indulgence for just a minute, please.

19 Let me just refer you back to your Table 1
20 on page 7.

21 A. Okay.

22 Q. Looking at the classes of street and aerial
23 lighting on that table, and -- and also -- well, the
24 outdoor lighting, would you agree that those
25 particular schedules are covering a lot of the

1 **costs -- are being subsidized to a great extent?**

2 A. Well, now, you're talking about street and
3 aerial lighting. This would be Schedules 7, 11, and
4 12?

5 **Q. Yes.**

6 A. Well, they're an even higher -- certainly
7 their relative rate of return is even higher under
8 the Company's study than Schedule 6 is. So, you
9 know, they're paying significant subsidies as well.

10 **Q. All right. I just wanted to let you look at**
11 **that and opine on those schedules with us.**

12 MR. SNARR: I have no other questions.

13 COMMISSIONER LEVAR: Thank you, Mr. Snarr.

14 Mr. Jetter, do you have any questions for
15 Mr. Baudino?

16 MR. JETTER: No questions from the Division.
17 Thank you.

18 COMMISSIONER LEVAR: Thank you.

19 Ms. Wegener or Mr. Kumar?

20 MR. KUMAR: No questions, Your Honor. Thank
21 you.

22 COMMISSIONER LEVAR: Thank you.

23 Mr. Boehm, do you have any redirect?

24 MR. BOEHM: No redirect, Your Honor. Thank
25 you.

1 COMMISSIONER LEVAR: Okay. Thank you.

2 Commissioner Clark, do you have any
3 questions for Mr. Baudino?

4 COMMISSIONER CLARK: No questions. Thank
5 you.

6 COMMISSIONER LEVAR: Commissioner Allen, do
7 you?

8 COMMISSIONER ALLEN: Also no questions.
9 Thank you.

10 COMMISSIONER LEVAR: Thank you.

11 And I don't have anything else, so thank you
12 for your testimony this morning.

13 MR. BAUDINO: You're welcome. Thank you.

14 COMMISSIONER LEVAR: Mr. Boehm, anything
15 else from Kroger?

16 MR. BOEHM: No. That concludes our
17 witnesses -- witness.

18 COMMISSIONER LEVAR: Okay. Thank you. I'll
19 go to Ms. Baldwin, then.

20 MS. BALDWIN: Thank you. Walmart calls
21 Mr. Steve Chriss and asks that he be sworn.

22 COMMISSIONER LEVAR: Thank you.

23 Good morning, Mr. Chriss. Can you hear us?

24 MR. CHRISS: I can.

25 COMMISSIONER LEVAR: Thank you. Do you

1 swear to tell the truth?

2 MR. CHRISS: I do.

3 COMMISSIONER LEVAR: Okay. Thank you.

4 Go ahead, Ms. Baldwin.

5

6 DIRECT EXAMINATION

7 BY MS. BALDWIN:

8 Q. Mr. Chriss, could you please state your name
9 and spell your last name for the record.

10 A. My name is Steve W. Chriss, C-H-R-I-S-S.

11 Q. And what is your position?

12 A. I am director, energy services, for
13 Walmart, Inc.

14 Q. And Mr. Chriss, did you file direct
15 testimony and associated exhibits in this cost of
16 service phase of this docket on September 15th, 2020?

17 A. Yes.

18 Q. Do you have any corrections to your
19 testimony?

20 A. No.

21 Q. If I were to ask you the same questions
22 contained within your testimony, today, would your
23 answers be the same?

24 A. Yes.

25 MS. BALDWIN: I would like to move at this

1 time to have Mr. Chriss' prefiled direct testimony
2 and associated exhibits admitted to the record.

3 COMMISSIONER LEVAR: Thank you.

4 If anyone objects to that motion, please
5 state your objection.

6 I'm not seeing or hearing any, so the motion
7 is granted.

8 (Testimony and exhibits admitted.)

9 MS. BALDWIN: Thank you.

10 BY MS. BALDWIN:

11 **Q. Mr. Chriss, do you have a summary of your**
12 **testimony that you are ready to present?**

13 A. I do.

14 **Q. Please proceed.**

15 A. Good morning, Chairman LeVar and
16 Commissioners. My name is Steve Chriss, and I'm
17 director, energy services, for Walmart, Inc.

18 Walmart makes the following recommendations
19 for the cost of service phase of this docket:

20 First, Walmart does not take a position on
21 the Company's proposed cost of service study model at
22 this time. However, to the extent that alternative
23 cost of service methodologies or modifications to the
24 Company's methodology are proposed by other parties,
25 Walmart reserves the right to address any such

1 changes in accordance with the Commission's
2 procedures in this docket.

3 Second, for the purposes of this docket, at
4 the Company's proposed revenue requirement, Walmart
5 does not oppose the Company's proposed revenue
6 allocation methodology.

7 Third, if the Commission determines that the
8 appropriate level of revenue requirement is lower
9 than that proposed by the Company, the Commission
10 should take larger steps to address the significant
11 interclass subsidies in Rocky Mountain Power's rates.
12 Specifically, Walmart recommends that the Commission
13 should, A, start with the revenue allocation proposed
14 by the Company at its proposed revenue requirement
15 increase; B, allocate on a revenue basis 50 percent
16 of the reduction in revenue requirement from the
17 Company's proposed revenue increase of 95.7 million
18 to Schedules 6, 8, 23, and 15, traffic and other
19 signal systems. Those schedules are currently paying
20 a subsidy per the Company's cost of service study
21 results, subject to a limit such that no class
22 becomes subsidized as a result. And, finally,
23 allocate the remaining 50 percent of the reduction on
24 an equal percentage basis to all classes.

25 Finally, our fourth recommendation is that

1 Walmart supports the Company's proposal to
2 functionally unbundle rates.

3 This concludes my summary.

4 MS. BALDWIN: Thank you.

5 Mr. Chriss is available for
6 cross-examination.

7 COMMISSIONER LEVAR: Thank you. I'll go to
8 Mr. Boehm first.

9 Do you have any questions for Mr. Chriss?

10 MR. BOEHM: No questions, Your Honor. Thank
11 you.

12 COMMISSIONER LEVAR: Okay. Thank you.

13 Mr. Russell, do you have any questions for
14 Mr. Chriss?

15 MR. RUSSELL: Sorry. I do not. Thank you.

16 COMMISSIONER LEVAR: Okay. Thank you.

17 Mr. Sanger, do you have any questions for
18 this witness?

19 MR. SANGER: I do not have any questions.
20 Thanks.

21 COMMISSIONER LEVAR: Okay. Thank you.

22 Ms. Hayes, do you have any questions for
23 Mr. Chriss?

24 MS. HAYES: I do not. Thank you.

25 COMMISSIONER LEVAR: Thank you.

1 Mr. Holman, do you have any questions for
2 this witness?

3 MR. HOLMAN: No questions. Thanks.

4 COMMISSIONER LEVAR: Mr. Snarr?

5 MR. SNARR: No questions from the Office.
6 Thank you.

7 COMMISSIONER LEVAR: Thank you.

8 Mr. Jetter?

9 MR. JETTER: And no questions from the
10 Division. Thank you.

11 COMMISSIONER LEVAR: Okay. Thank you.

12 Ms. Wegener or Mr. Kumar?

13 MR. KUMAR: No questions, Your Honor. Thank
14 you.

15 COMMISSIONER LEVAR: Thank you.

16 Commissioner Allen, do you have any
17 questions for Mr. Chriss?

18 COMMISSIONER ALLEN: No questions. Thank
19 you.

20 COMMISSIONER LEVAR: Commissioner Clark?

21 COMMISSIONER CLARK: Also no questions.
22 Thank you.

23 COMMISSIONER LEVAR: Thank you.

24 I do not have any either, so thank you for
25 your testimony this morning, Mr. Chriss.

1 MR. CHRISS: Thank you.

2 COMMISSIONER LEVAR: Ms. Baldwin, anything
3 further from Walmart?

4 MS. BALDWIN: No. That concludes Walmart's
5 case.

6 COMMISSIONER LEVAR: Anything further from
7 anyone?

8 Well, with that, I'll just repeat that we
9 intend to issue an errata notice with respect to
10 legal briefing and closing arguments, as we discussed
11 this morning. And as Ms. Hayes requested, we'll
12 clarify that neither are required. Both legal briefs
13 and closing statements are being allowed, but not
14 required of any party because I recognize we have a
15 lot of parties in this docket.

16 I think we will, though, allow closing
17 arguments only from those who file legal briefs. And
18 we'll clarify that point. If someone feels
19 differently about that, please file something with us
20 to that effect. Otherwise, we'll get that
21 clarification out this week, and then we will start
22 doing our part of this docket.

23 Thank you. We are adjourned.

24 (Proceedings were adjourned at
25 9:39 a.m.)

REPORTER'S CERTIFICATE

STATE OF UTAH)
)
COUNTY OF UTAH)

I, KIMBERLY A. HARMON, a Certified Shorthand Reporter and Registered Professional Reporter, hereby certify:

THAT the foregoing proceedings were taken before me at the time and place set forth in the caption hereof; that the witnesses were placed under oath to tell the truth; that the proceedings were taken down by me in shorthand and thereafter my notes were transcribed through computer-aided transcription; and the foregoing transcript constitutes a full, true, and accurate record of such testimony adduced and oral proceedings had, and of the whole thereof.

I further certify that I am not a relative or employee of any attorney of the parties, nor do I have a financial interest in the action.

I have subscribed my name on this 18th day of November, 2020.



Kimberly A. Harmon, RPR, CSR

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