

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 demonstrate the prudence of major supply-side
23 resource additions and the planned increases to generation related operation and

24 maintenance (O&M) expenses included in the this application. The new supply-
 25 side resources included in this case are described in the table below.

Resource Name	Location	In-Service Date	Capital Cost	O&M Included in GRC
Glenrock III	Converse County, Wyoming	December 31, 2008	\$87.2 Million	\$0.8 Million
Rolling Hills	Converse County, Wyoming	December 31, 2008	\$206.5 Million	\$1.9 Million
Seven Mile Hill II	Carbon County, Wyoming	December 31, 2008	\$45.7 Million	\$0.4 Million
High Plains	Albany County and Carbon County, Wyoming	June 1, 2009	\$245.5 Million	\$0.4 Million
Chehalis	Lewis County, Washington	September 15, 2008	*	*

26 *See Mr. Steven R. McDougal Testimony, Confidential Exhibit RMP___(SRM-
 27 3) for pertinent information.

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

30 A. I will start by describing the integrated resource plan (IRP) and how that strategic
 31 tool is utilized to assist the Company in identifying and quantifying the need and
 32 timing of new supply-side resources. I will also provide an overview of the
 33 relevant MidAmerican Energy Holdings Company (MEHC) transaction
 34 commitments. I will conclude with a description of each resource acquired by the
 35 Company and the decision-making process that led to the acquisitions.

36

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 to ensure the Company continues to provide reliable,
41 low-cost service with manageable and reasonable risk to its customers. The IRP
42 builds on the Company's prior resource planning efforts and reflects significant
43 advancements in portfolio modeling and risk analysis.

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

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

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

60 The emphasis of the IRP is to determine the most robust resource plan for
61 a reasonably wide range of potential outcomes, as opposed to the optimal plan for
62 some expected view of the future. The modeling is intended to inform and support
63 the expert judgment of the Company's decision-makers. The preferred portfolio is
64 not intended to be static, but rather is expected to evolve as part of the ongoing
65 planning process as new information becomes available and new circumstances
66 evolve. As a multi-objective planning effort, the IRP must balance several
67 priorities and account for diverse and sometimes conflicting stakeholder views.
68 However, the IRP cannot be all things to all people. As the owner of the IRP, the
69 Company is uniquely positioned to determine the resource plan that best
70 accomplishes IRP objectives on a system-wide basis, and meets customer,
71 community and investor obligations collectively.

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

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

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

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

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

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

84 A. Action item one of the 2007 IRP is to acquire 2,000 MW of renewable resources
85 by 2013 and, in addition, to seek to add transmission infrastructure and flexible
86 generating resources, such as natural gas, to integrate new wind resources.

87 **Q. Please describe the Company's other activities to implement item 1 of the**
88 **2007 IRP action plan.**

89 A. The Company is currently implementing two renewable resource requests for
90 proposals (RFPs). These RFPs are designated 2008R and 2008R-1. On
91 January 31, 2008, the Company issued an RFP 2008R for long-term renewable
92 resources less than 100 MW in generating capability, or alternatively, for a term
93 less than five years if greater than 100 MW in generating capability to be in
94 operation prior to December 31, 2009. The deadline for submission of bids under
95 RFP 2008R was March 31, 2008. Developers submitted proposals in the form of a
96 power purchase agreement or build-own-transfer agreement. The Company will
97 not have a benchmark or other Company-owned alternative in this process. The
98 Company has completed the evaluations for the 2008R RFP and is currently in
99 negotiations with the final shortlist of bidders. The Company expects to finalize
100 the agreements with project developers by September 30, 2008.

101 In addition, the Company filed the draft 2008R-1 RFP in Oregon and
102 Washington on April 28, 2008. The 2008R-1 RFP is for system wide renewable
103 resources which are limited in size to no more than 300 MW, which is the upper
104 project size limit permitted by Utah Senate Bill 202.¹ The Oregon Commission

¹ Utah Senate Bill 202 requires the Company to issue a public solicitation of bids for a renewable energy source up to 300 MW in size each year in which it reasonably anticipates that it will need to acquire or

105 selected Boston Pacific as the independent evaluator for the 2008R-1 RFP and the
106 Utah Commission has selected Merrimack Energy as its consultant. As a part of
107 this RFP, the Company is proposing a process that will allow the Company to re-
108 issue the solicitation in subsequent time periods to call for new bidders or updated
109 bids on an as-needed basis. This ability to periodically re-issue solicitations will
110 provide needed flexibility in the procurement of renewable resources. The
111 Company anticipates that it will re-issue the renewable RFP annually as long as it
112 requires additional renewable resources.

113 **Q. How did the 2007 IRP address other resources?**

114 A. The system resource needs assessment conducted for the 2007 IRP showed the
115 Company's incremental peak capacity need as over 2,400 MW by 2012. The
116 2007 IRP identified a need for a west-side combined cycle combustion turbine in
117 2011, high-capacity-factor resources in the east in 2012 and 2014 and east-side
118 combined cycle combustion turbines in 2012 and 2016.

119 **Q. Please describe the Company's current activity with respect to other
120 resource RFPs.**

121 A. In July 2006, the Company filed a proposal seeking approval of a proposed
122 solicitation for an RFP for the 2012 – 2014 period (2012 RFP) which solicited up
123 to 1,700 MW. The Company recently disclosed that the maximum resource
124 outcome of the 2012 RFP will be well short of the intended target and a large
125 system-wide shortfall will remain. As a result, the Company continues to pursue
126 cost-effective resources through the ongoing RFP process and with opportunity

commence construction of a renewable energy resource. (Utah Code 54-17-502(2)(a)(i))

127 purchases such as the Chehalis plant.

128 **MEHC Transaction Commitments**

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

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

- 133 • Bring at least 100 MW of cost-effective wind resources in service within one
134 year of the close of the transaction;
- 135 • Have 400 MW of cost-effective new renewable resources in the Company's
136 generation portfolio by December 31, 2007, and
- 137 • Reaffirm the Company's commitment to acquire 1,400 MW of cost-effective
138 new renewable generation resources.

139 The resources described below have been acquired consistent with these
140 commitments.

141 **Supply-Side Resources**

142 **Q. Please describe the benefits of these renewable resources to Utah customers.**

143 A. Utah customers benefit from these renewable resources because it is more
144 economical for the Company to generate electricity with these resources than to
145 purchase it in the open market. The 2004 and 2007 IRPs specify that renewable
146 resources (using wind resources as a proxy) are steadily added to the system with
147 the target of reaching 1,400 MWs or more of renewable resources.

148 **Q. How else will these renewable resources benefit Utah customers?**

149 A. These renewable resources further benefit Utah customers by providing the
150 Company with (i) a zero incremental cost fuel source (thus reducing commodity
151 risk exposure), (ii) multi-shafted generation resources (thus diversifying the

152 impact of individual generator failures), and (iii) additional valuable ownership
153 and operational experience with utility scale wind projects. These projects utilize
154 General Electric Company wind turbines, thus giving the Company the
155 opportunity to use valuable experience from other General Electric based projects
156 and spare parts optimization. Further, as a result of long-term planning and the
157 reasonable expectation that additional state and/or federal renewable portfolio
158 standards will be established, the Company is expecting to have a robust need for
159 renewable resources in the coming years.

160 **Q. What factors does the Company consider before acquiring new generation**
161 **resources?**

162 A. Upon reviewing a detailed overview of the project including the contract support
163 and counterparty guarantees, the risks, the need as established by the IRP, the
164 financial assessment, and the justification of the project, Company executives
165 make a decision as to whether it is in the best interests of our customers to
166 proceed with the acquisition of a resource. The Company followed this process in
167 determining that the resources discussed in the following paragraphs are prudent
168 and in the public interest to pursue.

169 **Glenrock III**

170 **Q. Please describe the size and location of the Glenrock III resource.**

171 A. The Glenrock III wind project is a 39 MW wind energy generation facility
172 comprised of 26 ~ 1.5 MW GE wind turbines. The project is currently being
173 constructed on the Company's Glenrock wind site (portions of which were
174 previously utilized for coal mining for the Dave Johnston power plant) located

175 approximately 25 miles east of Casper in Converse County, Wyoming. Exhibit
176 RMP___(ARL-1) shows a map of the plant location. The Glenrock III wind
177 project is will reside adjacent to the Glenrock wind site and interconnect to the
178 collector substations being constructed for the Glenrock and Rolling Hills wind
179 projects.

180 **Q. What investment related to the Glenrock III project is included in the**
181 **revenue requirement?**

182 A. The Company has included \$87.2 million for the Glenrock III plant in this
183 application. The O&M costs included in this case associated with Glenrock III are
184 approximately \$1.5 million to cover wind turbine-generator maintenance
185 agreement, permitting obligations, local levy tax and land royalties and
186 easements.

187 The Glenrock III plant is scheduled to begin operating on
188 December 31, 2008. As discussed in Mr. Gregory N. Duvall's testimony, the
189 Company's net power cost calculation reflects the inclusion of Glenrock III. Mr.
190 McDougal's testimony includes the revenue requirement calculations associated
191 with the inclusion of this resource.

192 **Rolling Hills**

193 **Q. Please describe the size and location of the Rolling Hills resource.**

194 A. The Rolling Hills wind project is a 99 MW wind energy generation facility
195 comprised of 66 ~ 1.5 MW GE wind turbines. The project is being constructed on
196 Company land adjacent to the Glenrock wind site. Exhibit RMP___(ARL-2)
197 shows a map of the plant location. The Rolling Hills wind project resides within

198 the boundaries of the land owned by the Company and interconnect to the
199 collector substations being constructed for the Glenrock and Rolling Hills wind
200 projects.

201 **Q. What investment related to the Rolling Hills project is included in the**
202 **revenue requirement?**

203 A. The Company has included \$206.5 million for the Rolling Hills project in this
204 application. The O&M costs included in the case associated with the Rolling Hills
205 resource are approximately \$3.9 million to cover wind turbine-generator
206 maintenance agreement, permitting obligations, and local levy tax.

207 The Rolling Hills project is expected to begin operating by
208 December 31, 2008. As discussed in Mr. Duvall's testimony, the Company's net
209 power cost calculation reflects the inclusion of Rolling Hills. Mr. McDougal's
210 testimony includes the revenue requirement calculations associated with the
211 inclusion of this resource.

212 **Seven Mile Hill II**

213 **Q. Please describe the size and location of the Seven Mile Hill II resource.**

214 A. The Seven Mile Hill II wind project is a 19.5 MW wind energy generation
215 facility, comprised of 13 ~1.5 MW GE wind turbines, constructed on leased land
216 located approximately three miles northwest of Medicine Bow in Carbon County,
217 Wyoming. The Seven Mile Hill II wind project will reside adjacent to the Seven
218 Mile Hill wind project site and will interconnect to the collector substation being
219 constructed for the Seven Mile Hill wind project. Exhibit RMP___(ARL-3) shows
220 a map of the plant location.

221 **Q. What investment related to the Seven Mile Hill II project is included in the**
222 **revenue requirement?**

223 A. The Company has included \$45.7 million for the Seven Mile Hill II project in this
224 application. The O&M costs included in this case associated with the Seven Mile
225 Hill II resource are approximately \$0.8 million to cover the wind turbine-
226 generator maintenance agreement, permitting obligations, local levy tax, and
227 landowner payments.

228 The Seven Mile Hill II project is expected to begin operating by
229 December 31, 2008. As discussed in Mr. Duvall's testimony, the Company's net
230 power cost calculation reflects the inclusion of Seven Mile Hill II. Mr.
231 McDougal's testimony includes the revenue requirement calculations associated
232 with the inclusion of this resource.

233 **High Plains**

234 **Q. Please describe the size and location of the High Plains resource.**

235 A. The High Plains wind project is a proposed 99 MW wind energy generation
236 facility, comprised of 66 ~1.5 MW GE wind turbines, located on leased land
237 approximately five miles south of Rock River in Albany County and Carbon
238 County in Wyoming. Exhibit RMP___(ARL-4) shows a map of the plant location.

239 **Q. What investment related to the High Plains project is included in the revenue**
240 **requirement?**

241 A. The Company has included \$245.5 million for the High Plains project in this
242 application. The O&M costs included in this case associated with the High Plains
243 resource are approximately \$2.9million to cover the wind turbine-generator

244 maintenance agreement, permitting obligations, local levy tax, and landowner
245 payments.

246 The High Plains project is expected to begin operating by June 1, 2009. As
247 discussed in Mr. Duvall's testimony, the Company's net power cost calculation
248 reflects the inclusion of High Plains. Mr. McDougal's testimony includes the
249 revenue requirement calculations associated with the inclusion of this resource.

250 **Other Supply-Side Resources**

251 **Q. Are there other Supply-Side Resources that the Company has acquired since**
252 **the last rate case?**

253 A. Yes. The Company is currently seeking approval with the Public Service
254 Commission of Utah, in Docket No. 08-035-35, of the Company's purchase of the
255 Chehalis combined cycle plant located in Chehalis, Lewis County, Washington.
256 Exhibit RMP___(ARL-5) shows a map of the plant location. Generally,
257 Chehalis is an approximately 500 MW natural gas-fueled electric generation
258 facility.

259 The Commission has not yet issued its order in Docket No. 08-035-35
260 approving the acquisition of Chehalis and the motion for an accounting order filed
261 in that docket regarding the \$8.7 million payment the Company was required to
262 make for the exclusive right, for a period of time, to negotiate for and acquire
263 Chehalis. The Company desires to incorporate in this case the evidence presented
264 by the Company in Docket No. 08-035-35. For purposes of this case, the
265 Company believes the Commission will approve the Company's purchase of
266 Chehalis. In the event the Commission does not approve the Company's purchase

267 of Chehalis in Docket No. 08-035-35, the Company requests that the Commission
268 take notice of the evidence presented in that docket in order to approve recovery
269 in rates of the \$8.7 million exclusivity payment in this case which will be paid by
270 the Company to the seller should the transaction not close. Recovery in that event
271 should be allowed because the payment was necessarily incurred in an effort to
272 attempt to acquire a favorably-priced generation asset for the benefit of
273 customers.

274 **Q. Please describe the benefits of this resource to the Company's Customers.**

275 A. The Chehalis combined cycle plant will add additional flexibility to the overall
276 system and represents a low-cost resource when compared to other gas-fueled
277 resources and the current cost to construct, own, and operate a similar resource.

278 **Q. What investment related to the Chehalis combined cycle plant is included in
279 the revenue requirement?**

280 A. The Company has included the revenue requirement, including O&M costs, for
281 the Chehalis combined cycle plant in Mr. McDougal's Testimony, Confidential
282 Exhibit RMP___(SRM-3). The O&M costs will be incurred as a result of labor
283 required to operate the plant, chemical cost, maintenance materials and contracts,
284 and other miscellaneous operating expenses (e.g. utilities, rents, leases, insurance
285 premiums, etc.

286 As discussed in Mr. Duvall's testimony, the Company's net power cost
287 calculation reflects the inclusion of the Chehalis combined cycle plant.

288

289 **Conclusion**

290 **Q. Please summarize your conclusions.**

291 A. The Company has included supply-side resources, including the investment,
292 modeling of net power cost impacts, and associated expenses, with in-service
293 dates prior to December 31, 2009, in its application. These projects represent
294 significant investments the Company is making on behalf of its customers to meet
295 their energy needs on a prudent and cost-effective basis. Customers will receive
296 the output of these facilities during the rate-effective period and, therefore, should
297 pay for the costs associated with the facilities. The Company has been prudent in
298 securing these facilities for the benefit of its Utah customers and should be
299 granted full cost recovery.

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

301 A. Yes.