

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 Erich D. Wilson. My business address is 825 N.E. Multnomah, Suite  
4 1800, Portland, Oregon 97232. My present position is Director, Human  
5 Resources.

6 **Qualifications**

7 **Q. Please briefly describe your education and business experience.**

8 A. I have been employed as the Director of Human Resources since March 2006.  
9 From March 2001 to March 2006, I was the Director of Compensation for the  
10 Company. Prior to coming to the Company, I held various positions within the  
11 area of human resources (operations, benefits and staffing), but for the majority of  
12 my career I have directed the design and administration of compensation  
13 programs. I received a Bachelor's degree in Economics (Business) from the  
14 University of California at San Diego in 1992. In addition, I achieved the  
15 Certified Compensation Professional status from the American Compensation  
16 Association (ACA) in 1999 and have kept this certification current through  
17 attending various educational programs and seminars.

18 **Q. Please describe your present duties.**

19 A. My primary responsibilities include managing the Company's human resource  
20 function, including compensation, benefits, compliance, staffing, training and  
21 development, employee and labor relations, and payroll. I focus on assisting the  
22 Company in attracting, retaining, and motivating qualified employees along with  
23 the administration of all associated human resource programs and employee

24 experiences.

25 **Purpose of Testimony**

26 **Q. What is the purpose of your testimony?**

27 A. The purpose of my testimony is to provide a general overview of the  
28 compensation and benefit plans provided to employees at the Company and  
29 support the costs related to these areas included in the test period. This overview  
30 focuses on our base pay, annual incentive and retirement plans. These plans are  
31 designed to allow the Company to attract and retain the employee talent necessary  
32 to deliver safe and reliable service at a reasonable cost.

33 **Background**

34 **Q. As background, please briefly describe the Company's compensation  
35 philosophy and note any changes that have been made since the last filing.**

36 A. There have been no changes to the Company's compensation philosophy or  
37 programs since the last filing. The Company's primary objective in establishing  
38 employee compensation is to provide pay at the market average. Compensation at  
39 the market average (competitive level) is critical to attracting and retaining  
40 qualified employees to support the business and our customers. Thus, the  
41 Company endeavors to provide the same general pay levels and components in its  
42 total remuneration package as are included in the packages provided by its  
43 competitors for labor. Second, the Company believes that, in order to encourage  
44 superior performance, a certain percentage of each employee's market  
45 compensation must be "at risk." Accordingly, under the Company's Annual  
46 Incentive Plan, each employee has the opportunity to receive total compensation

47 at the market average, so long as the employee performs at an acceptable level.  
48 However, employees will earn less than the average remuneration when  
49 performance is less than acceptable and, conversely, will earn higher than the  
50 average remuneration when performance is exceptional.

51 **Total Compensation**

52 **Q. How does the Company determine the total cash compensation package for**  
53 **each position?**

54 A. At least annually, the Company collects market data for comparable jobs and  
55 calculates the average data point for total cash compensation for each position. To  
56 do so, we use a variety of compensation studies put out by various  
57 experts/organizations, including Hewitt Associates, Towers Perrin, and Mercer. In  
58 addition, in 2008 the Company acquired access to an on-line tool called  
59 MarketPay.com. MarketPay.com provides electronic access to all of the  
60 compensation studies we have traditionally used and some additional surveys,  
61 allowing us to more efficiently perform information searches and job and pay  
62 comparisons.

63 After we determine the appropriate level of total cash compensation for a  
64 position, we then determine the portion of that compensation that will constitute  
65 the “at-risk” portion – that is, the “target” incentive pay. The Company sets the  
66 “at-risk” portion by reviewing market compensation using the various  
67 compensation studies described above. The “at-risk” portion is typically in the 10-  
68 25 percent range; however, incentive pay for a few employees is set as high as 75  
69 percent. Generally speaking, the higher the position is within the Company, the

70 higher the percentage of target incentive pay. The remaining percentage of total  
71 compensation is referred to as "base compensation."

72 **Retirement Plans**

73 **Q. What retirement plan changes were implemented in 2008 and are being**  
74 **implemented in 2009?**

75 A. At the beginning of 2008, the pension plan benefits were frozen for all members  
76 of IBEW local 659. All their future retirement benefits will be derived from the  
77 401(k) plan. The same approach went into effect on October 1, 2008 for members  
78 of IBEW local 125 who were not yet age 53. Local 125 members age 53 or older  
79 will continue to receive final average pay accruals from the pension plan.  
80 Effective January 1, 2009, this approach also went into effect for nonunion  
81 employees who elected such. Nonunion employees made an election in the fall of  
82 2008 to either continue receiving benefit accruals through the pension plan or  
83 receive all their future retirement benefits from the 401(k) plan. The pension  
84 accruals for nonunion employees are provided through a cash balance formula.  
85 Those opting out received contributions into their 401(k) account using the same  
86 formula. The results of the "choice" was that 41 percent of the nonunion  
87 employees elected to freeze their pension benefits and have all future retirement  
88 benefits derived from the 401(k) plan. During 2009, the Company will be  
89 involved in collective bargaining negotiations with three of its unions. At this  
90 time, it is not known what, if any, changes will occur to their pension and/or  
91 401(k) benefits.

92 Following is an updated table which shows that the retirement plan

changes create nearly identical expense amounts:

<b>PacifiCorp</b>				
<b>Effect of Retirement Plan Changes</b>				
	\$ millions			
	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>
<u>Actual/Budget</u>				
PRP*	51.5	26.2	23.3	27.6
401(k)	<u>18.5</u>	<u>23.4</u>	<u>35.8</u>	<u>35.8</u>
	70.0	49.6	59.1	63.4
<u>Without "Mgt actions"</u>				
PRP*	51.5	30.1	38.2	42.0
401(k)	<u>18.5</u>	<u>19.9</u>	<u>20.5</u>	<u>21.5</u>
	70.0	50.0	58.7	63.5
Savings	0.0	0.4	(0.4)	0.1
* PRP includes Electric, Mines, and Non-regulated groups				

94 **Q. What are the key aspects of the change in focus to a 401(k) only approach**  
 95 **rather than through a defined benefit (pension) approach?**

96 A. First, for those employees who have shifted to the enhanced 401(k) plan, the  
 97 fundamental impact of the transition from the old defined benefit pension plan to  
 98 the new 401(k) plan is that the investment risk for future retirement benefits is  
 99 borne by the employee, not by the Company and ultimately our customers.  
 100 Whereas the defined benefit plan for nonunion employees provided a pay credit  
 101 percentage with a guaranteed level of interest, that same pay credit percentage is  
 102 now provided to the nonunion employee in the 401(k) plan, with the employee  
 103 deciding how it should be invested. This shift reduces the ongoing defined benefit  
 104 expense while increasing the 401(k) expense.

105 Second, an analysis of the details underlying the changes in the pension  
 106 and 401(k) expense supports the Company's view that the transition will be a  
 107 benefit in the near-term for our customers. Beginning in January 2008, all new  
 108 hires, with the exception of those under certain collective bargaining units, are

109 only eligible to participate in the 401(k) plan. Also, during 2008 and effective  
110 January 1, 2009, all the retirement plan changes set forth above focused on  
111 freezing the defined benefit plan accruals and deriving all future retirement  
112 benefits from the 401(k) plan.

113 **Q. If the table demonstrates that the Company's expense for 2009 and 2010**  
114 **would have been the same had the Company made no changes, why do you**  
115 **say that the new plan results in a benefit to customers?**

116 A. In a declining economy, the Company's pension plan expenses rapidly increase  
117 because the plan's assets typically decrease with the overall decline in the  
118 financial markets and the plan's obligations typically increase due to lower  
119 interest rates. In a robust economy, the opposite is likely the case. So, in the  
120 current environment, customers are the beneficiaries of this transition to the new  
121 retirement plan. With the elimination of the guaranteed return associated with the  
122 defined benefit plan, employees bear the risk of market volatility and future  
123 economic turmoil with regard to their ongoing retirement benefit accruals. While  
124 the Company and our customers forgo this risk, favorable economics which could  
125 decrease costs of these retirement benefit accruals is also foregone. Thus, the  
126 determination of net savings over time is dependent on future economic  
127 circumstances.

## 128 **Medical Expenses**

129 **Q. Do any other benefit categories in the filing show significant increases over**  
130 **the base period?**

131 A. Medical Benefits increased from \$49.7 million to \$55.2 million, an 11.1 percent

132 increase over 18 months, or 7.38 percent annually. This is in line with other  
 133 companies in our industry. In support of this level of increase, shown below is a  
 134 chart of Hewitt's health care trend expectations for 2009 and 2010. These trend  
 135 numbers are developed based on a series of nationally available data (national  
 136 health expenditures, CPI-W, HHVI, Milliman Health Cost Index, and pharmacy  
 137 benefit manager trend reports) and Hewitt internal surveys.

<b>PacifiCorp</b>						
<b>Annual Trend of Medical Expenses (Including Prescription Drugs)</b>						
Year	Active/Pre-65 Retiree				Post-65 Retiree	
	Ind	PPO	POS	HMO	Ind	HMO
2008-2009	8.5%	7.5%	7.5%	9.5%	6.5%	6.5%
2009-2010	8.0%	7.0%	7.0%	9.5%	6.5%	6.5%

138 **Other Issues**

139 **Q. There was a communication sent out to all employees on June 16, 2009**  
 140 **stating there would be a reduction in the calendar year 2010 merit increase**  
 141 **and an increase in the employee's share of the cost of medical insurance. Has**  
 142 **this been incorporated into the case?**

143 A. Yes. On page 4.19.4 of Exhibit RMP\_\_\_(SRM-2) there is a reduction in the 2010  
 144 Non-Power Cost Operation and Maintenance Target of \$3.3 million which  
 145 reduces the revenue requirement in the filing. Please refer to that page for  
 146 additional detail.

147 **Q. Does this conclude your direct testimony?**

148 A. Yes.