

1 **Q. Please state your name.**

2 A. My name is William R. Griffith.

3 **Q. Are you the same William R. Griffith who has testified previously in this**
4 **case?**

5 A. Yes I am. I submitted Direct Testimony in Phase I of this case on March 16, 2009.

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

7 A. The purpose of my surrebuttal testimony in this proceeding is to address the
8 rebuttal testimony of the Utah Industrial Energy Consumers' (UIEC) witness Mr.
9 Maurice Brubaker filed September 15, 2010 in Phase II-2.

10 **ECAM Mechanism**

11 **Q. In Mr. Brubaker's rebuttal testimony, he states "RMP's tariff sheet which it**
12 **proposes for the ECAM mechanism is completely devoid of any information**
13 **necessary to understand how it would be implemented and applied."**
14 **(MEB_RT, Page 2, Lines 25 to 27.) Please respond.**

15 A. Mr. Brubaker's statement is not correct. Proposed Schedule 94 contains the
16 information necessary to implement the energy cost adjustment mechanism
17 (ECAM) on customer bills. As with all tariff rate schedules, the Company's
18 proposed tariff sheet Schedule 94 is designed to bill customers the rates approved
19 by the Public Service Commission of Utah. Schedule 94 contains the proposed
20 ECAM rates applicable to customers by rate schedule, and for Schedule 6A,
21 Schedule 8, Schedule 9, and Schedule 9A, for summer (May through September)
22 and winter (October through April) months and for on- and off-peak periods.

23 **Q. Mr. Brubaker indicates that the ECAM mechanism is not seasonal and that**
24 **it is “blind to deviations in costs on a seasonal basis and that it completely**
25 **ignores varying responsibility of customer classes for consumption in**
26 **individual months.” (MEB_RT, Page 3, Lines 2 to 4.) Do you agree with**
27 **Mr. Brubaker?**

28 A. No. I do not agree with Mr. Brubaker. First, as indicated in the Company’s
29 proposal in my direct testimony, the cents per kWh amounts for Schedules 6A, 8,
30 9, and 9A would be “shaped to mirror the structure of the time of day base energy
31 charges for these schedules” and there would be separate rates for the May
32 through September and the October through April periods. Clearly, the ECAM
33 rates would be seasonal for these customers.

34 Second, the ECAM charges are not fixed charges. Therefore, for
35 customers that have seasonal usage, the ECAM charges, which are volumetric
36 charges, would be applied proportionately to their usage. This means that
37 customers whose usage is predominantly in the summer months would pay
38 ECAM charges primarily in those months proportionate with their usage.

39 **Q. Has the Company prepared an example showing the shaping of seasonality in**
40 **the proposed ECAM rates?**

41 A. Yes. Exhibit RMP___(WRG-Phase II-2-1SR) contains an illustrative example of
42 the ECAM rate structure for Schedule 9. This example assumes after adjusting for
43 voltage level losses that Schedule 9 customers would pay an overall average
44 ECAM rate of 0.0489 cents per kWh. Once the rate is shaped by the Schedule 9
45 energy charge rate structure as proposed by the Company, the example shows that

46 May-September on-peak usage would be charged 0.0697 cents per kWh, or 43
47 percent higher than the average Schedule 9 ECAM rate; October – April on-peak
48 usage would be charged 0.0524 cents per kWh, or seven percent higher than the
49 average Schedule 9 ECAM rate; and off-peak usage year round would be charged
50 0.0438 cents per kWh, or 10 percent lower than the average Schedule 9 ECAM
51 rate. Clearly, ECAM rates would reflect the seasonal and time-differentiated rate
52 structure in the Company's rates, and they would reflect seasonal consumption
53 deviations of customers such that customers with disproportionately larger usage
54 levels during summer months would pay higher average ECAM rates and
55 customers with disproportionately higher usage levels during winter months and
56 off-peak periods would pay lower average ECAM rates.

57 **Q. Has the Company prepared an example showing rates across rate schedules**
58 **and how those would be differentiated by voltage level?**

59 A. Yes. Exhibit RMP____(WRG-Phase II-2-2SR), shows estimated Schedule 94 rates
60 across rate schedule classes assuming a \$10 million, or 0.7 percent change,
61 implemented through the ECAM. In addition to the rate design differences
62 discussed above, it shows that the ECAM cents per kWh rate would vary by about
63 5.1 percent between secondary voltage customers and transmission voltage
64 customers due to differences in voltage level losses.

65 **Q. Have other parties raised issues similar to Mr. Brubaker's issues concerning**
66 **rate design of the ECAM?**

67 A. No. In fact, UAE's witness Mr. Kevin C. Higgins agrees with the Company's
68 proposal stating, "I also concur with the rate design proposal presented by RMP

69 witness William R. Griffith that would differentiate any ECAM adjustor charge
70 by voltage and time-of-day, as applicable.” (UAE Exhibit 1D, Page 6, Lines 121
71 to 124.)

72 **Q. Does this conclude your rebuttal testimony?**

73 A. Yes, it does.

**Rocky Mountain Power - State of Utah
 ECAM Rate Design Example**

	Forecasted	Present	Present	Proposed	Proposed	Flat ECAM Rate		Revenue Diff	
	Units	Price	Price	ECAM	ECAM	Price	Revenues	\$	%
	(1)	(2)	Ratio	Price	Revenues	(6)	(7)	(8)	(9)
		(3)	(4)	(5)	(1)x(4)	(6)	(1)x(6)	(5)-(7)	(8)/(7)
Schedule No. 9									
On-Peak kWh (May-Sept)	384,941,621	3.4643 ¢	1.59	0.0697 ¢	\$268,304	0.0489 ¢	\$188,236	\$80,068	43%
On-Peak kWh (Oct-Apr)	1,013,941,762	2.6049 ¢	1.20	0.0524 ¢	\$531,305	0.0489 ¢	\$495,818	\$35,487	7%
Off-Peak kWh	2,278,864,469	2.1760 ¢	1.00	0.0438 ¢	\$998,143	0.0489 ¢	\$1,114,365	(\$116,222)	-10%
Total	3,677,747,852			0.0489 ¢	\$1,797,752		\$1,798,419	-\$667	0%
				\$1,798,419	¹				-\$667

¹ Equals the \$1.8 million increase shown on Line No. 11, Column 10, Exhibit WRG-2SR. Differences due to rounding.

Table A
 Rocky Mountain Power
 Estimated Effect of Proposed ECAM Changes
 on Revenues from Electric Sales to Ultimate Consumers in Utah
 Historical Test Period 12 Months Ending December, 2008
 Forecast Test Period 12 Months Ending June 2010

Line No.	Description (1)	Pre. Sch No. (2)	No. of Cust Forecast (3)	MWh Forecast (4)	Present Revenue (\$000) (5)	MWh by Voltage			Generation MWh ¹ (9)	ECAM Proposal Rate ¢/kWh			
						S (6)	P (7)	T (8)		Revenue (\$000) (10)	% (11)	S (12)	P (13)
Residential													
1	Residential	1,3	710,179	6,599,232	\$583,224	6,599,232	-	-	7,177,127	\$3,390	0.6%	0.0514	-
2	Residential-Optional TOD	2	306	2,740	\$237	2,740	-	-	2,980	\$1	0.6%	0.0514	-
3	Residential-Mobile Homes	25	11	12,009	\$870	12,009	-	-	13,060	\$6	0.7%	0.0514	-
4	AGA/Revenue Credit	--	--	--	\$29	--	--	--	--	--	--	--	--
5	Total Residential	--	710,496	6,613,981	\$584,359	6,613,981	-	-	7,193,167	\$3,397	0.6%	-	-
Commercial & Industrial & OSPA													
6	General Service-Distribution	6	13,339	5,561,682	\$392,416	5,428,202	133,480	-	6,044,722	\$2,855	0.7%	0.0514	0.0500
7	General Service-Distribution-Energy TOD	6A	2,095	253,189	\$23,926	244,327	8,862	-	275,095	\$130	0.5%	0.0514	0.0500
8	General Service-Distribution-Demand TOD	6B	29	6,439	\$511	6,439	-	-	7,003	\$3	0.6%	0.0514	0.0500
9	<i>Subtotal Schedule 6</i>	--	15,463	5,821,310	\$416,852	5,678,968	142,342	-	6,326,820	\$2,988	0.7%	-	-
10	General Service-Distribution > 1,000 kW	8	274	1,951,262	\$119,912	1,190,270	760,992	-	2,099,350	\$992	0.8%	0.0514	0.0500
11	General Service-High Voltage	9	149	3,677,748	\$162,840	-	-	-	3,677,748	\$1,800	1.1%	-	0.0489
12	General Service-High Voltage-Energy TOD	9A	9	42,034	\$2,469	-	-	-	42,034	\$21	0.8%	-	0.0489
13	<i>Subtotal Schedule 9</i>	--	158	3,719,782	\$165,309	-	-	-	3,719,782	\$1,820	1.1%	-	-
14	Irrigation	10	2,534	170,125	\$10,230	165,702	4,423	-	184,890	\$87	0.9%	0.0514	0.0500
15	Irrigation-Time of Day	10TOD	235	18,695	\$1,119	18,209	486	-	20,317	\$10	0.9%	0.0514	0.0500
16	<i>Subtotal Irrigation</i>	--	2,769	188,820	\$11,349	183,911	4,909	-	205,207	\$97	0.9%	-	-
17	Electric Furnace	21	5	3,369	\$298	-	-	-	3,500	\$2	0.6%	0.0514	0.0500
18	General Service-Distribution-Small	23	75,383	1,254,822	\$104,484	1,253,567	1,255	-	1,364,669	\$645	0.6%	0.0514	0.0500
19	Back-up, Maintenance, & Supplementary	31	2	13,622	\$854	-	-	-	14,407	\$7	0.8%	0.0514	0.0500
20	Special Contracts	--	4	2,419,273	\$84,999	-	-	-	2,419,273	\$7	0.8%	0.0514	0.0500
21	AGA/Revenue Credit	--	--	--	\$3,445	--	--	--	--	--	--	--	--
22	Total Commercial & Industrial & OSPA	--	94,058	15,372,259	\$907,502	8,306,716	923,591	-	16,374,321	\$6,550	0.7%	-	-
23	Total Commercial & Industrial (excluding special contracts, AGA)	--	94,054	12,952,986	\$819,058	8,306,716	923,591	-	13,867,834	\$6,550	0.8%	-	-
Public Street Lighting													
24	Security Area Lighting	7	8,479	13,125	\$3,120	13,125	-	-	14,274	\$7	0.2%	0.0514	-
25	Street Lighting - Company Owned	11	1,027	21,323	\$6,278	21,323	-	-	23,190	\$11	0.2%	0.0514	-
26	Street Lighting - Customer Owned	12	760	49,832	\$3,947	49,832	-	-	54,196	\$26	0.6%	0.0514	-
27	Metered Outdoor Lighting	15	380	12,757	\$933	12,757	-	-	13,875	\$7	0.7%	0.0514	-
28	Traffic Signal Systems	15	2,218	5,255	\$487	5,255	-	-	5,716	\$3	0.6%	0.0514	-
29	<i>Subtotal Public Street Lighting</i>	--	12,863	102,293	\$14,766	102,293	-	-	111,251	\$53	0.4%	-	-
30	Security Area Lighting-Contracts (PTL)	--	78	277	\$21	277	-	-	302	\$3	0.4%	-	-
31	Street Lighting-Contracts (66, 77)	--	2	127	\$17	127	-	-	138	\$5	0.4%	-	-
32	AGA/Revenue Credit	--	--	--	\$5	--	--	--	--	--	--	--	--
33	Total Public Street Lighting	--	12,943	102,698	\$14,809	102,698	-	-	111,691	\$53	0.4%	-	-
34	Total Sales to Ultimate Customers	--	817,497	22,088,938	\$1,506,670	15,023,395	923,591	-	23,679,179	\$10,000	0.7%	-	-
35	Total Sales to Ultimate Customers (excluding special contracts, AGA)	--	817,413	19,669,260	\$1,418,154	15,022,990	923,591	-	21,172,252	\$10,000	0.7%	-	-

¹ Loss Factors

² Total Proposed ECAM Revenue (\$000) and Rate by Voltage (cents/kWh)