

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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	)	DOCKET NO. 10-035-124
	)	
In the Matter of the Application of Rocky	)	Exhibit No. DPU 15.0-SR RR
Mountain Power for Authority to	)	
Increase Its Retail Electric Utility Service	)	
Rates in Utah and for Approval of Its	)	Surrebuttal Testimony and
Proposed Electric Service Schedules and	)	Exhibits
Electric Service Regulations.	)	Richard S. Hahn
	)	
	)	

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FOR THE DIVISION OF PUBLIC UTILITIES  
DEPARTMENT OF COMMERCE  
STATE OF UTAH

Surrebuttal Testimony of

Richard S. Hahn

July 19, 2011

PUBLIC REDACTED VERSION

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**Testimony of Richard S. Hahn**

**I. INTRODUCTION**

**Q: Please state your name, business address and title.**

A: My name is Richard S. Hahn. I am employed by La Capra Associates, Inc. (“La Capra Associates”) as a Principal Consultant. My business address is One Washington Mall, Boston, Massachusetts, 02108.

**Q: On whose behalf are you testifying?**

A: The Division of Public Utilities of the State of Utah (the “Division” or the “DPU”).

**Q: Have you previously filed testimony during this proceeding?**

A: Yes. On May 26, 2011, I filed direct testimony in this docket. That testimony was marked as Exhibit 15.0 D-RR.

**Q: Have you previously testified in other dockets before the Public Service Commission of Utah?**

A: Yes. In Docket No. 10-035-126, which pertained to the decision of Rocky Mountain Power (the “Company”) to pursue the Lake Side 2 plant, I filed direct, supplemental, and surrebuttal testimony.

23 **Q: What is the purpose of your testimony?**

24 A: On or about June 30, 2011, Mr. Duvall filed rebuttal testimony on behalf of the  
25 Company. In that rebuttal testimony, Mr. Duvall attempted to respond to some of the  
26 issues that I raised in by direct testimony in this docket. The purpose of my surrebuttal  
27 testimony is to respond to the rebuttal testimony of Mr. Duvall.

28

29 **Q: Does the Company's rebuttal testimony cause you to change any of the conclusions**  
30 **and recommendations contained in your direct testimony?**

31 A: No, it does not. I stand by the conclusions and recommendations contained in my direct  
32 testimony. I continue to believe that the Company prematurely terminated negotiations  
33 with LSPower over the acquisition of the Apex plant. This inappropriate action caused  
34 harm to Utah ratepayers by denying them the benefits of a needed and economic resource  
35 made available through a Commission-approved RFP.

36

## 37 **II. THE DUVALL REBUTTAL TESTIMONY**

38

39 **Q: What issues does Mr. Duvall raise in his rebuttal testimony to which you wish to**  
40 **respond?**

41 A: In his rebuttal testimony, Mr. Duvall attempts to defend the Company's decision to  
42 terminate negotiations with LSPower over the acquisition of the Apex plant on December  
43 12, 2010 and to rebut my direct testimony in this proceeding and in Docket No. 10-035-  
44 126. In formulating this defense, Mr. Duvall attempts to make five arguments related to  
45 (1) the methodology used to evaluate Apex, (2) the cost of unmet energy, (3)

46 transmission costs, (4) the appropriate imprudence remedy, and (5) regulatory examples  
47 from other jurisdictions. I disagree with the arguments made in the Company's rebuttal  
48 testimony. I will respond to each of these assertions in the remainder of this surrebuttal  
49 testimony. A lack of response to any issue raised in the Company's rebuttal testimony  
50 should not be construed as concurrence.

51

### 52 **III. RESPONSE TO ISSUE #1 - STUDY METHODOLOGY**

53

54 **Q: In his rebuttal testimony, Mr. Duvall states that "the decision to terminate**  
55 **negotiations for the Apex facility was made after a comprehensive and thorough**  
56 **evaluation and due diligence process". Do you agree?**

57 **A:** No. In fact, the exact opposite occurred. The comprehensive and thorough evaluation  
58 and due diligence process that was used to assess project bids received via the RFP began  
59 on or about mid-2010. It resulted in the selection of the Lake Side 2 unit proposed by  
60 CH2M Hill. On Thursday, December 9, 2010, after several months of evaluation, the  
61 Company wrote a memorandum recommending that the Apex plant also be acquired by  
62 the Company. This recommendation was discussed with the IE on Friday December 10,  
63 2010. The comprehensive and thorough due diligence cited by the Company actually led  
64 to the recommendation to acquire the Apex plant. Suddenly, and without warning or  
65 discussion with the DPU or the IE, the Company wrote another memorandum dated  
66 Sunday December 12, 2010 recommending termination of the Apex negotiations. Thus,  
67 the decision to terminate the Apex negotiations was made over a two-day weekend, and  
68 not by the comprehensive and thorough process cited by the Company.

69

70 **Q: How do you respond to Mr. Duvall statement that the methodology used by the**  
71 **Company to evaluate the Apex plant was approved?**

72 A: Again, I disagree. The evaluation methodology established and approved by the  
73 Commission called for the Company to issue an RFP for new generation resources to be  
74 available between 2014 and 2016. The Company also stated in a cover letter  
75 accompanying the RFP dated November 16, 2009 that it would consider proposals  
76 commencing prior to 2014.<sup>1</sup> If the Company wished to have its own resources  
77 considered as part of the RFP and evaluated against other bid projects, it was required to  
78 submit a proposal for its own resources in the form of a benchmark bid. The Lake Side 2  
79 unit was the only benchmark bid submitted by the Company. And yet, later in the  
80 evaluation process after the Apex plant was included on the short list, the Company  
81 moved the in-service date of the Currant Creek 2 unit to 2016 from 2018 in the evaluation  
82 of the RFP bids. Thus, the Company is using its own proposed project for a second unit  
83 at the Currant Creek site as an unauthorized benchmark bid. This is a flagrant violation  
84 of the approved evaluation process, one that is unfair to other bidders.

85

86 **Q: Has the Commission already determined that comparing Apex to the Currant**  
87 **Creek 2 unit is not in compliance with the approved evaluation process?**

---

<sup>1</sup> Final Report of the Utah Independent Evaluator: PacifiCorp All Source Request for Proposals (January 25, 2011) at 37.

88 A: Yes. In the Report and Order for Docket No. 10-035-126 issued on April 20, 2011, the  
89 Commission found that it was inappropriate for the Company to compare the Currant  
90 Creek 2 unit to Apex. Specifically, Finding #6 on page 25 states as follows:

91  
92 *“The Company's supplemental analysis comparing the costs of a "hypothetical"*  
93 *Currant Creek 2 plant, which was not vetted or reviewed by the IE, to the Apex plant,*  
94 *with actual costs, did not comply with the approved evaluation process.”*  
95

96 **Q: But doesn't the Company claim that allowing resources to “float” after 2016 as you**  
97 **suggest is inconsistent with the approved methodology?**

98 A: The Company does make that claim, and it is true that the “approved methodology” did  
99 call for timing and amount of post-2016 resources to be fixed per the latest RFP.  
100 However, it is important to note that the Company does not argue that it is incorrect to  
101 allow the timing and amount of post-2016 resources to float so that they can be optimized  
102 to reflect resource acquisitions made for the 2011 to 2016 time period. Indeed, the  
103 Company cannot make that argument. Any decision made to add significant resources in  
104 the 2011 to 2016 time period will definitely affect the amount, timing, and type of  
105 resources after 2016 that are part of a least cost resource plan. Allowing these resources  
106 to float or be optimized is necessary to arrive at the best long-range plan for Utah  
107 ratepayers. The Company should not be allowed to hide behind the “approved  
108 methodology” to avoid doing what is right for Utah.

109  
110 **Q: Does the Company also claim that the Apex plant was uneconomic at the time the**  
111 **decision was made?**

112 A: The Company does make that claim as well. On page 107 of the Duvall Rebuttal  
113 testimony at lines 2327 to 2330, Mr. Duvall states:

114  
115 *“First, I will show that consistent with the Commission’s Approved Evaluation*  
116 *Methodology for this RFP, which was approved by the Commission in Docket No.*  
117 *10-035-126, the economic evaluation of Apex results in a \$12 million present*  
118 *value revenue requirement (PVRR) customer harm on a Utah basis<sup>2</sup>.”*  
119

120 As noted in the footnote from the Company’s rebuttal testimony, the basis of this  
121 statement in the response to DPU Data Request 2.7 in Docket 10-035-126. According to  
122 Mr. Duvall, the response to DPU Data Request 2.7 shows that Apex would increase the  
123 Company’s costs by \$28 million, of which Utah’s share is \$12 million.

124

125 **Q: Do you agree with this interpretation of that response?**

126 A: No. The response to DPU Data Request 2.7 clearly shows that Apex will save the  
127 Company \$[REDACTED] million on a PVRR basis. In order to derive a loss of \$28 million due to  
128 Apex from this response, it is necessary to exclude unmet energy costs of \$[REDACTED] million  
129 and the risk adjustment of \$[REDACTED] million. By removing unmet energy costs, the Company  
130 is implicitly assuming that the portion of the energy supply that not met by actual  
131 generation is provided at a zero cost. Clearly, this is not correct. Furthermore, the  
132 Company included a risk adjustment in its evaluation of all other resources. It should not  
133 exclude these costs simply to arrive at a result they like. Bottom line – the confidential  
134 response to DPU Data Request 2.7 shows that Apex will produce savings for Utah.

135

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<sup>2</sup> The study requested by the Independent Evaluator in data request DPU 2.7 in Docket No. 10-035-126, which is most closely aligned with the Approved Evaluation Methodology was \$28m unfavorable to Apex, which is \$12m unfavorable on a Utah allocated basis.



136 A brief review of the results of the economic evaluation of Apex as they evolved over  
137 time provides useful insights. The following results occurred on a PVRR basis.

- 138 • Final Short List (10/7/2010): Apex saves \$[REDACTED] million.
- 139 • Original Due Diligence (12/9/2010): Apex saves \$[REDACTED] million
- 140 • Revised Due Diligence (12/12/2010): Apex saves (\$[REDACTED] million)
- 141 • Errata Filing (1/13/2011): Apex saves \$[REDACTED] million
- 142 • DPU Data Request 2.7 (1/27/2011): Apex saves \$[REDACTED] million
- 143 • DPU Data Request 4.23 (2/16/2011): Apex saves \$133 million

144  
145 Five of the six economic evaluations listed above showed savings for the Apex plant.  
146 The December 12, 2010 analysis showed negative savings, but this analysis contained  
147 errors. The errors in the Company’s December 12, 2010 analysis were discovered shortly  
148 after the Apex negotiations were terminated prematurely. Had the negotiations for the  
149 Apex plant continued as they should have, the Company would have corrected these  
150 errors and realized that the Apex plant yielded savings to Utah ratepayers.

151  
152 **Q: The Company claims that the acquisition of the Apex plant would have exposed**  
153 **Utah ratepayers to significant and certain near-term fixed costs on the gamble that**  
154 **long-term net variable cost savings would be realized. How do you respond?**

155 A: There are two possible bases for this statement. The first reason is that the annual cost of  
156 the Apex plant in the early years exceeded the estimated cost of Front Office  
157 Transactions (“FOTs”) and spot market balancing transactions. I believe that this is true

158 for all of the projects bid in the RFP, including the Lake Side 2 unit. In the step I  
159 evaluations, all projects including Lake Side 2 had bid prices above the forward curves  
160 used by the Company for the nearest price point. The Company believes that this risk is  
161 acceptable for Lake Side II, because it chose the Lake Side 2 unit, but does not believe it  
162 to be acceptable for Apex, a contradiction that the Commission should not accept.

163  
164 It is also possible that the basis of the Company's statement is the difference between the  
165 cost of two portfolios; one with Apex and Lake Side 2 and one with Lake Side 2 but  
166 without Apex. This comparison is inappropriate because the portfolio without Apex has  
167 the Currant Creek 2 unit added in 2016, which as stated previously is not appropriate  
168 because the Currant Creek 2 unit is not an approved benchmark project. The RFP  
169 requires that all Company-proposed resources be submitted and approved as benchmark  
170 projects, where the costs and operating parameters are vetted by the same process as  
171 other bids. This is important because it places Company projects on an equal footing  
172 with non-Company projects and reduces any bias or implications of self-dealing.  
173 Allowing a non-benchmark project to replace a project bid in the RFP removes that  
174 protection for ratepayers.

175  
176 Regardless of the source of the Company's statement, the Commission should not rely  
177 upon it.

178

## 179 IV. RESPONSE TO ISSUE #2 – RELIANCE ON UNMET ENERGY

## 180 COSTS

181

182 **Q:** The Company’s rebuttal testimony states that the analysis requested by the DPU is  
183 flawed because it forces the Company to rely excessively on unmet energy costs.

184 **Please respond.**

185 **A:** The Company’s testimony on this issue contradicts itself. In the Duvall rebuttal testimony  
186 at 2332 to 2336, he states that the studies relied upon by the DPU “force the Company to  
187 substitute high-cost unmet energy for Apex, without any ability to satisfy that energy  
188 demand with any other resource”. And yet, at 2459 through 2467, the same Duvall  
189 rebuttal testimony states as follows:

190 *“The Company will supply any required energy identified in the 2011 Integrated*  
191 *Resource Plan (IRP) from either market purchases or purchases from merchant*  
192 *resources on the east side of the system at a cost to ratepayers that is*  
193 *substantially lower than the Apex project. These resources will be procured*  
194 *through market purchases at Mona and the Nevada/Utah border as well as from*  
195 *existing generation inside of Utah at a lower cost and lower risk to customers*  
196 *than Apex. Simply stated, Apex is not the Company’s only alternative to providing*  
197 *power, but the DPU continues to base its position on modeling that assumes that*  
198 *it is.”*

199  
200 If there are resources available besides the Apex plant and besides the Currant Creek 2  
201 unit, then the Company should perform the analysis requested by the DPU in data request  
202 46.7 and 46.8. If there are no other resources available, then it would make economic  
203 sense to acquire the Apex plant. The Company cannot have it both ways.

204

205 Furthermore, it is not the DPU that is forcing the Company to place excessive reliance on  
206 high-cost unmet energy. The approved RFP process did not allow an unqualified  
207 benchmark project such as the Currant Creek 2 unit to be substituted for a qualified bid  
208 project such as the Apex plant. If the Company truly believes that it needs additional  
209 resources and it does not believe that the Apex plant is economic, it should consider other  
210 projects bid in the RFP. This action should have been discussed in advance with the IE  
211 and the DPU. The Company's testimony on this issue should be rejected.

212

## 213 V. RESPONSE TO ISSUE #3 – TRANSMISSION COSTS

214

215 **Q: What issues does the Company's rebuttal testimony raise regarding transmission**  
216 **costs?**

217 A: The Company appears to try and make two points; (1) that the acquisition of the Apex  
218 plant would require new transmission upgrades to be built and (2) that the cost of those  
219 upgrades is uncertain.

220

221 **Q: How do you respond?**

222 A: It is not unusual for new generating plants to require transmission upgrades in order to  
223 successfully integrate into the existing bulk power supply system. Most new plants  
224 require some transmission upgrades. This is why FERC requires all transmission owners  
225 to have an Open Access Transmission Tariff ("OATT") that contain a process for  
226 requesting estimates of the cost of any needed upgrades and having needed transmission  
227 facilities constructed. If the Company rejected all new resources that required new

228 transmission facilities, it would have a difficult time in meeting its service obligations.  
229 The Company did include approximately \$█ million in transmission upgrades for the  
230 Apex plant. The Company assumes that \$█ million in transmission upgrades are  
231 required for the Lake Side 2 project.<sup>3</sup>

232  
233 The uncertainty about the final cost of transmission upgrades for Apex appears to be  
234 based upon a study of sub-synchronous resonance. When the purchase transaction was  
235 expected to close in December 2011, the study was originally expected in the second  
236 quarter of 2011. If sub-synchronous resonance were truly the issue, during its hasty  
237 analysis over that December weekend, then the Company should have completed the  
238 study that would resolve this matter as soon as possible. To my knowledge, the study has  
239 not yet been completed as of the writing of this testimony. The Company has not  
240 provided any reason or explanation regarding why it had to terminate these negotiations  
241 over a weekend. The Company cannot continue to cite this uncertainty over sub-  
242 synchronous resonance and then have done nothing to resolve it. The Commission  
243 should ignore the Company's testimony on this issue.

244

245 **VI. RESPONSE TO ISSUE #4 – IMPRUDENCE REMEDY**

246

247 **Q: How do you respond to the Company's rebuttal testimony on the DPU's proposed**  
248 **imprudence remedy?**

---

<sup>3</sup>Confidential Attachment DPU 4.6(2) in Docket 10-035-126

249 A: The Company's rebuttal testimony states that the DPU's proposed remedy is an  
250 "attempted use of unprecedented ratemaking to penalize the Company solely because the  
251 DPU disapproves of the process by which the Company terminated the negotiations".  
252 This criticism seems more directed to the testimony of Mr. Peterson. However, it has  
253 been my experience in other jurisdictions that the type of remedy proposed by the DPU  
254 as a remedy for the Company's imprudence is not unprecedented at all. There are  
255 numerous instances where a state regulatory commission has reduced a utility's revenues  
256 during a rate case or other adjudicatory process because it found that the utility did not  
257 act in the best interest of ratepayers. For example, prior to electric industry restructuring  
258 in Massachusetts, NSTAR owned the Pilgrim Nuclear Power Station. On several  
259 occasions, the Massachusetts Department of Public Utilities ("MDPU") found that this  
260 unit experienced outages that the MDPU found should have been avoided. As a remedy,  
261 certain replacement power costs were denied and excluded from rates. In another  
262 proceeding, the MDPU issued an order in an NSTAR rate case with a zero percent return  
263 on equity in the determination of the approved revenue requirement. This is perhaps the  
264 harshest disallowance I can recall. These examples indicate that the remedy proposed by  
265 the DPU in this proceeding is not unprecedented at all.

266

## 267 VII. RESPONSE TO ISSUE #5 – REGULATORY EXAMPLES

268

269 Q: The Company's rebuttal testimony is critical of the regulatory examples that you  
270 provide for the Maine and Massachusetts commissions. How do you respond?

271 A: The Company does not appear to maintain that these examples are irrelevant or  
272 unresponsive to the Commission's request. Rather, the Company's rebuttal testimony  
273 seems to be a legal argument that Utah law renders these examples moot. I am not an  
274 attorney, and will leave the legal debate on the merits and applicability of these examples  
275 to the briefs. I was simply responding as best as I could to a question from the  
276 Commission.

277  
278 The question from the Commission seemed to draw a distinction between penalizing the  
279 Company for something it did versus penalizing the Company for something it should  
280 have done. As I stated in my direct testimony in this proceeding, I did not criticize the  
281 Company's decision not to act to acquire the Apex plant. My testimony stated that the  
282 Company erred by prematurely terminating the negotiations for the acquisition of Apex.  
283 This view is shared by the IE. One of the findings of the IE was that the Company  
284 prematurely terminated these negotiations. Specifically, on page 3 of the Final Report of  
285 the Utah Independent Evaluator dated January 25, 2011, the IE states the following:

286 *"However, the IE is of the opinion that PacifiCorp did not follow its procedures*  
287 *in later terminating negotiations and due diligence on the Apex project*  
288 *prematurely and rejecting the Apex project even though the resource was*  
289 *included in the lowest cost portfolio from a Risk Adjusted PVRR basis, which*  
290 *PacifiCorp proposed as the key criteria underlying resource selection."*  
291

292 It is clear from this report that the IE found that the Company prematurely terminated the  
293 Apex negotiations, and that the IE also found that the Apex plant was part of the lowest  
294 cost portfolio. So, I do not think that the Commission is precluded from examining the  
295 prudence of the Company's actions regarding the Apex negotiations.

296

297 **VIII. THE ECONOMIC IMPACT OF THE APEX TERMINATION**

298

299 **Q: What is the status of the economic analysis of the Apex plant?**

300 A: In Docket No. 10-035-126, the DPU had requested that the Company perform an  
301 economic analysis of the Apex plant. The results of that analysis showed that the  
302 acquisition of Apex would save the Company \$133 million on a PVRB basis. The Utah  
303 portion of this amount is the \$56.7 million figure used in Mr. Peterson's testimony. The  
304 Company was critical of that analysis, so the DPU requested that the Company perform  
305 an updated assessment. The 38<sup>th</sup> set of discovery from the Division to the Company  
306 contained six questions that are pertinent to this issue. These questions are intended to  
307 address some of the Company concerns expressed in its rebuttal testimony in Docket No.  
308 10-035-126 regarding the \$133 million figure. The Company did not provide the  
309 requested analysis. In the 46<sup>th</sup> set of discovery from the Division to the Company, the  
310 DPU again requested that the Company perform such an updated analysis. Again the  
311 purpose of these questions was to arrive at an undisputed level of savings that the Apex  
312 plant would have provided. As before, the Company has refused to provide the updated  
313 analysis, which forced the Division to file a yet unresolved motion to compel.

314

315 Despite the Company's outright refusal to perform the requested analyses, it continues to  
316 be critical of the savings estimate from Docket No. 10-035-126. It is inappropriate for  
317 the Company to criticize the results of a study that it did perform while refusing to  
318 perform a requested study intended to address those criticisms.



319

320 **Q: What then is the status of the estimate of the harm to Utah ratepayers from the**  
321 **premature termination of the Apex negotiations?**

322 A: The most recent estimate of the savings from the Apex plant is the \$133 million figure  
323 from Docket No. 10-035-126, with the Utah portion being \$56.7 million.

324

325 **IX. CONCLUSION**

326

327 **Q: Does this conclude your testimony?**

328 A: At this time, yes, it does. Should additional or new information become available, I will  
329 supplement this testimony as appropriate.

## CERTIFICATE OF SERVICE

I Hereby certify that on this 30<sup>th</sup> Day of June, 2011, I caused to be transmitted electronically (email) a true and correct copy of the Prefiled RFP-APEX Surrebuttal Testimony of Richard S. Hahn for the Utah Division of Public Utilities in Docket 10-035-124: In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations:

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