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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Rocky Mountain Power Proposed Schedule 94, Energy Balancing Account (EBA) Pilot Program	Docket No. 11-035-T10
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PREFILED SUPPLEMENTAL REBUTTAL TESTIMONY OF KEVIN C. HIGGINS

The Utah Association of Energy Users (“UAE”) hereby submits the Prefiled
Supplemental Rebuttal Testimony of Kevin C. Higgins in this docket.

DATED this 16th day of March, 2012.

/s/ _____
Gary A. Dodge,
Attorneys for UAE

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 16th day of March, 2012, on the following:

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BEFORE
THE PUBLIC SERVICE COMMISSION OF UTAH

Supplemental Rebuttal Testimony of Kevin C. Higgins

on behalf of

UAE

Docket No. 11-035-T10

March 16, 2012

1 **SUPPLEMENTAL REBUTTAL TESTIMONY OF KEVIN C. HIGGINS**

2

3 **Q. Please state your name and business address.**

4 A. My name is Kevin C. Higgins. My business address is 215 South State
5 Street, Suite 200, Salt Lake City, Utah, 84111.

6 **Q. By whom are you employed and in what capacity?**

7 A. I am a Principal in the firm of Energy Strategies, LLC. Energy Strategies
8 is a private consulting firm specializing in economic and policy analysis
9 applicable to energy production, transportation, and consumption.

10 **Q. Are you the same Kevin C. Higgins who pre-filed direct and rebuttal**
11 **testimony in this docket on behalf of UAE?**

12 A. Yes, I am.

13 **Q. What is the purpose of your supplemental rebuttal testimony?**

14 A. The purpose of my supplemental rebuttal testimony is to clarify my
15 comments regarding the Composite NPC Allocator proposed by OCS witness
16 Daniel Gimble and the need to reflect voltage differentiation in Schedule 94 rates.

17 **Q. What clarification do you wish to offer?**

18 A. In my rebuttal testimony I stated that Mr. Gimble ignores the proposal by
19 Rocky Mountain Power (“RMP”) in its initial EBA filing to reflect voltage
20 differentiation in recovering EBA costs. Although Mr. Gimble does not
21 explicitly address this issue, after further review of the mechanics of his proposal,
22 I have concluded that the voltage differentiation is properly reflected in the

23 allocation he derives, in that the loads measured at input have been adjusted for
24 line losses. Therefore, the proper treatment of voltage differentiation in Schedule
25 94 rates is not absent from his proposal.

26 **Q. Does this conclude your supplemental rebuttal testimony?**

27 A. Yes, it does.