

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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)	DOCKET NO. 11-035-T10
)	Exhibit No. DPU 1.0 SR
In the Matter of the Rocky Mountain)	
Power Proposed Schedule 94, Energy)	
Balancing Account (EBA) Pilot Program)	
Tariff)	Surrebuttal Testimony
)	Charles Peterson
)	
)	

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

**Surrebuttal Testimony of
Charles Peterson**

April 5, 2012

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24 I note that lack of comment on an issue in this surrebuttal testimony does not necessarily
25 imply agreement with any party in this proceeding.

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II. COMMENTS ON THE REBUTTAL TESTIMONIES

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29 **Q. What issues did Mr. Taylor raise in rebuttal testimony that you have concerns about?**

30 A. I do not have so much of a concern as a comment. Mr. Taylor explains why my second
31 recommended addition, i.e. to include an example billing calculation, would not be
32 particularly helpful in the tariff. The Division accepts his explanation and withdraws that
33 recommendation.

34

35 **Q. What comments do you have regarding Mr. McDougal's rebuttal testimony?**

36 A. Mr. McDougal criticizes Division witness Mr. Matthew Croft's recommendation that
37 additional account detail should be included in the tariff. I believe that Mr. Croft's
38 explanation of the need for additional detail in this matter should have been sufficient to
39 justify the inclusion of additional detail. However, Mr. Croft adds further response to Mr.
40 McDougal's concerns in his surrebuttal testimony.

41

42 **Q. Do you have comments on the rebuttal testimony of the Office's witness, Mr. Gimble?**

43 A. Just a brief comment. The Division agrees that the rate spread in the EBA should be done on
44 the same basis as net power costs in the general rate case.

45

46 **Q. What comments do you have on UAE witness Mr. Higgins' rebuttal testimony?**

47 A. Given Mr. Higgins' clarification of his critique of Mr. Gimble in his supplemental rebuttal
48 testimony, the Division has no additional comments.

49

50 **Q. Do you have concerns regarding UIEC witness Mr. Brubaker's rebuttal testimony?**

51 A. In my rebuttal testimony I responded to issues covered in Mr. Brubaker's critiques Division
52 positions. The Division continues to support its previously stated position regarding rate
53 spread. Regarding Mr. Brubaker's recommendations for monthly true-ups and billings of the
54 EBA, the Division believes the Commission has already rejected that notion. The Division
55 also believes that the best that can be said of Mr. Brubaker's 20-day lag for the
56 implementation of carrying charges is that it would, for practical purposes, be a one-time
57 event.

58

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

60 A. Yes.