

1 **Q. Please state your name, business address and present position with**
2 **PacifiCorp, dba Rocky Mountain Power (the “Company”).**

3 A. My name is Brian S. Dickman. My business address is 825 NE Multnomah Street,
4 Suite 600, Portland, Oregon 97232. My title is Manager, Net Power Costs.

5 **Qualifications**

6 **Q. Briefly describe your education and business experience.**

7 A. I received a Master of Business Administration from the University of Utah with
8 an emphasis in finance and a Bachelor of Science degree in accounting from Utah
9 State University. Prior to joining the Company, I was employed as an analyst for
10 Duke Energy Trading and Marketing. I have been employed by the Company
11 since 2003 including positions in revenue requirement and regulatory affairs, and
12 I assumed my current role managing the Company’s net power cost group in
13 March 2012.

14 **Q. Have you testified in previous regulatory proceedings?**

15 A. Yes. I have filed testimony in proceedings before the Idaho Public Utilities
16 Commission, the Wyoming Public Service Commission, and the Utah Public
17 Service Commission.

18 **Purpose of Testimony**

19 **Q. What is the purpose of your testimony in this proceeding?**

20 A. My testimony presents the Company’s calculation of the Energy Balancing
21 Account (“EBA”) deferral amount for the three month period from October 1,
22 2011, through December 31, 2011 (“Deferral Period”). More specifically, I
23 provide the following:

- 24 • Details of the calculation of the EBA deferral amount of \$9.1 million
25 using the all-party stipulated methodology (“Stipulated Scalar”) approved
26 by the Commission in its September 13, 2011, order resolving Docket No.
27 10-035-124, et al. (“2011 Stipulation”), and the additional costs making up
28 the \$29.3 million requested EBA recovery; and,
- 29 • An overall discussion and quantification of the main drivers of the
30 difference between actual net power costs (“Actual NPC”) and net power
31 costs in rates (“Base NPC”).

32 **Q. Are additional witnesses presenting testimony in this case?**

33 A. Yes. Mr. Steven R. McDougal, Director of Revenue Requirement, is sponsoring
34 testimony discussing the background of the EBA and supporting the allocation of
35 net power costs to Utah in the EBA. Mr. William R. Griffith, Vice President
36 Regulation, is sponsoring testimony regarding the rate spread and rate design of
37 the EBA surcharge.

38 **Summary of the EBA Deferral Calculation**

39 **Q. Please describe the Company’s calculation of the EBA deferral for the**
40 **Deferral Period.**

41 A. The Company calculated a total EBA deferral of \$9,003,977 over the Deferral
42 Period, plus \$53,320 of accrued interest for a total of \$9,057,297. Exhibit
43 RMP___(BSD-1) presents a detailed review of the Company’s monthly
44 calculation of the EBA deferral.

45 The Company’s request also includes two additional items: 1) interest in
46 the amount of \$228,708 that will accrue on the EBA Deferral Account Balance

47 prior to the EBA Rate Effective Date of June 1, 2012, and 2) an incremental \$20
 48 million surcharge agreed to in the 2011 Stipulation that represents the first year of
 49 a three-year amortization of NPC previously deferred on the Company's books
 50 prior to September 20, 2011. Table 1 below provides a detailed breakdown of the
 51 total requested EBA recovery.

Table 1
Summary of EBA Deferral Account Balance

<u>Incremental EBA Deferral</u>	
Actual EBA Rate (\$/MWh)	23.50
Base EBA Rate (\$/MWh)	21.39
\$/MWh Differential	\$ 2.11
Utah Load (MWh)	6,103,728
Total Deferrable	\$ 12,862,824
EBA Deferral at 70% Sharing	<u>\$ 9,003,977</u>
<u>EBA Deferral Account Balance</u>	
Beginning EBA Deferral Balance: Oct 1, 2011	-
Incremental EBA Deferral	9,003,977
Interest	53,320
EBA Revenues	-
Ending EBA Deferral Balance: Dec. 31, 2011	<u>\$ 9,057,297</u>
Accrued Interest through June 1, 2012	228,708
Stipulated Deferred Net Power Costs Amortization	20,000,000
Requested EBA Recovery	<u>\$ 29,286,005</u>

52 **Q. What revenue requirement components are included in the EBA deferral**
 53 **calculation?**

54 **A.** The EBA deferral calculation consists of two revenue requirement components:
 55 NPC and wheeling revenue. NPC are defined as the sum of fuel expenses,
 56 wholesale purchase power expenses and wheeling expenses, less wholesale sales

57 revenue. Wheeling revenue includes amounts booked to the Federal Energy
58 Regulatory Commission (“FERC”) account 456.1, Revenues from transmission of
59 electricity of others. Collectively these two components are known in the
60 Company’s proposed EBA tariff as Energy Balancing Account Costs (“EBAC”).

61 **Q. What methodology did the Company use to calculate the EBA Deferral**
62 **Account Balance?**

63 A. The EBA calculation is a comparison of actual NPC and wheeling revenue to the
64 levels in rates as established in a general rate case, with 70 percent of the
65 difference being deferred for later recovery or refund to customers. The
66 calculation of the monthly amount debited or credited into the EBA Deferral
67 Account is based on the following formula:

68
$$EBA\ Deferral_{Utah,month} =$$

69
$$\left[\left(Actual\ EBAC_{\frac{month}{MWh}} - Base\ EBAC_{\frac{month}{MWh}} \right) \times Actual\ MWh_{Utah,month} \right] \times 70\%$$

70 The calculation of the Actual EBAC, Base EBAC, and the resulting EBA Deferral
71 in this application is according to the Stipulated Scalar methodology developed
72 and approved in the 2011 Stipulation.

73 Consistent with the Commission’s order approving the 2011 Stipulation,
74 the Company has also calculated the amount that would have resulted from using
75 the EBA formula detailed in the Commission’s March 3, 2011, Corrected Report
76 and Order in Docket No. 09-035-15. This calculation is provided for
77 informational purposes in Exhibit RMP___(BSD-2). The testimony of Mr.
78 McDougal discusses the different approaches used in each method of computing
79 Utah-allocated NPC for the EBA.

80 **Q. On a total Company basis, what was the difference between Actual NPC and**
81 **Base NPC for the Deferral Period?**

82 A. On a total Company basis, Actual NPC for the Deferral Period were
83 approximately \$367 million, or approximately \$22 million higher than the \$345
84 million Base NPC from the 2011 Stipulation. Table 2 below summarizes the
85 differences between Actual NPC and Base NPC.

Table 2
Total Company Net Power Cost Reconciliation (\$millions)

		EBA Deferral Period
1	Base NPC (2011 Stipulation)	\$ 344.9
2	Settlement Adjustment	7.8
3	2011 GRC Rebuttal NPC	352.7
4	Increase/(Decrease) to NPC:	
5	Wholesale Sales Revenue	39.3
6	Purchased Power Expense	37.2
7	Coal Fuel Expense	(19.7)
8	Natural Gas Fuel Expense	(41.4)
9	Wheeling, Hydro and Other Expense	(1.0)
10	Actual NPC	<u>\$ 367.1</u>
11	Total Increase / (Decrease) to NPC	\$ 22.1

86 **Q. Please describe Table 2 and the line items making up the difference between**
87 **Actual NPC and Base NPC.**

88 A. Line one of Table 2 shows the settled level of NPC, or the approved Base NPC,
89 for the three months of the Deferral Period. Line two of Table 2 shows the
90 settlement adjustment of approximately \$7.8 million (out of the total \$33.4
91 million stipulated reduction to NPC included in the 2011 Stipulation) that was
92 applicable to the Deferral Period. The remainder of Table 2 is a breakout of the

93 difference between Actual NPC and Base NPC (after removing the settlement
94 adjustment) by cost category on a total Company basis. Because the settlement
95 adjustment in the 2011 Stipulation was not identified by category, an item by item
96 comparison of Actual NPC to the stipulated NPC is not possible. The differences
97 by category in Table 2 result from comparing Actual NPC to the rebuttal NPC in
98 the 2011 GRC.

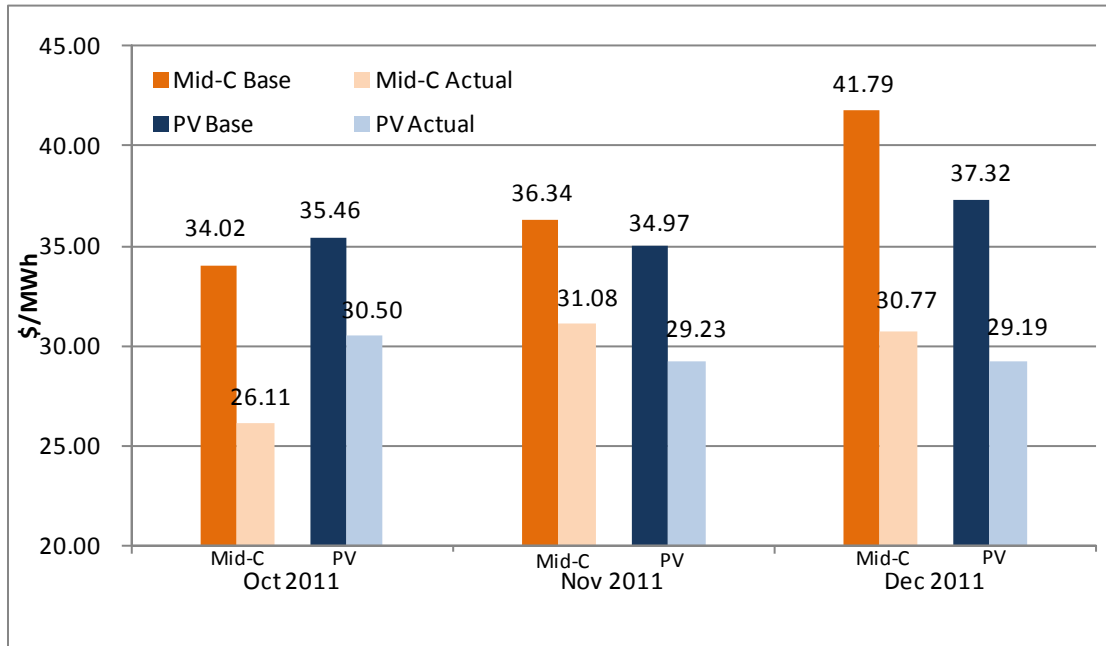
99 **Principle Drivers of NPC Variance**

100 **Q. What is the principle driver causing Actual NPC to be different from Base**
101 **NPC?**

102 A. The principle driver of the difference in NPC was the decline in wholesale
103 electricity and natural gas market prices as compared to the prices reflected in the
104 2011 Stipulation. The change to wholesale market prices resulted in a re-
105 optimization of the Company's supply portfolio to achieve the lowest NPC for
106 customers. The lower market prices resulted in reduced coal and natural gas
107 generation volumes, which in return resulted in reduced wholesale sales and
108 increased purchased power volumes.

109 Wholesale electricity market prices declined by approximately 20 percent
110 and natural gas prices fell by approximately 26 percent compared to the March
111 31, 2011, Official Forward Price Curve ("OFPC") reflected in Base NPC. Table 3
112 below demonstrates the magnitude of the change using the Mid-Columbia ("Mid-
113 C") and Palo Verde ("PV") average wholesale electricity market price reflected in
114 Base NPC versus actual average wholesale electricity market prices at the
115 respective trading hubs.

Table 3



116 **Q. How do lower wholesale electricity market prices change the volume of**
117 **wholesale sales the Company makes during the Deferral Period?**

118 A. In general, lower wholesale electricity market prices impact the economics of the
119 Company’s coal and natural gas units, such that, if wholesale electricity market
120 prices are less than the cost of generating electricity at Company facilities the
121 Company will not operate those facilities. In this circumstance, the Company will
122 purchase lower cost power to serve customers, or, if customer load has already
123 been served, the Company will back down the uneconomic facility as it cannot
124 make an economic sale of excess generation. For the Deferral Period the drop in
125 wholesale electricity market prices caused a reduction in wholesale sales revenues
126 of approximately \$39.3 million as shown in Table 2. Total wholesale sales
127 volume decreased 961 gigawatt-hours (“GWh”), or nearly 25 percent compared to
128 the volume included in Base NPC. On the other hand, lower market prices

129 allowed the Company to acquire more economic market purchases at a cost that
130 was lower than the cost to generate, which contributed to a corresponding
131 increase of \$37.2 million and 647 GWh in purchased power expense compared to
132 the amount in Base NPC. The loss in wholesale sales revenue and increase in
133 purchased power costs were offset, in part, by reduced coal and natural gas fuel
134 expense of \$19.7 million and \$41.4 million respectively.

135 **Q. Please further describe the changes in coal fuel expense and the decrease in**
136 **volume compared to Base NPC.**

137 A. The decrease in coal fuel expense of approximately \$19.7 million is due to the
138 decrease in volume of the Company's coal generation facilities of 1,266 GWh
139 compared to Base NPC. The average cost per MWh of coal fuel expense stayed
140 relatively flat, increasing by only \$0.14 per MWh or less than 1 percent.

141 **Q. Did any other factor, in addition to the change in wholesale electricity prices,**
142 **impact the volume of actual coal generation compared to the amount**
143 **included in Base NPC?**

144 A. Yes. The reduction in the volume of coal generation in this case is partly driven
145 by differences in normalized versus actual planned outages. To compute Base
146 NPC in a general rate case, the Company applies a four-year average outage rate
147 to its coal units to normalize output in a given test period. This approach produces
148 normalized coal generation consistent with the Company's practice of
149 overhauling units on a four-year cycle, but it will not match actual experience
150 during a short period of time. For example, during the Deferral Period both
151 Huntington 2 and Naughton 2 were on planned outage for more than a month. The

152 Company's normalized study included a shorter planned outage at Huntington 2
153 and no planned outage at Naughton 2 during the Deferral Period.

154 **Q. Please further describe the changes in natural gas fuel expense and the**
155 **decrease in volume compared to Base NPC.**

156 A. The total natural gas fuel expense in Actual NPC decreased by \$41 million
157 compared to Base NPC. The decrease in natural gas fuel expense was due to the
158 decrease in generation of the Company's natural gas facilities of 737 GWh.

159 **Q. Why did generation at the Company's natural gas facilities decrease when**
160 **the average market price for natural gas decreased at a faster rate than the**
161 **average market price for electricity?**

162 A. The comparison of average market prices for electricity and natural gas may seem
163 to indicate that generation at the Company's natural gas facilities would be more
164 economical. However, when viewed at a more granular level, i.e. hourly prices
165 and specific market hubs, there were still many times during the Deferral Period
166 when the market price of electricity was lower than the cost of generation at the
167 Company's natural gas plants. Consequently, generation volumes at many of the
168 Company's natural gas generating facilities were lower than the amount included
169 in Base NPC.

170 **Q. Did the Company include the settled value of its natural gas and power**
171 **hedges, both physical and financial, in its Actual NPC and EBA deferral**
172 **calculation?**

173 A. Yes. Consistent with the Commission order approving the 2011 Stipulation, the
174 Company included all settled gains and losses of its natural gas and power hedges

175 (i.e. swaps) in the EBA deferral calculation.¹

176 **Q. Have you provided detailed work papers supporting the tables and exhibits**
177 **in your testimony?**

178 A. Yes. Exhibit RMP___(BSD-3) contains an index to my work papers, which are
179 provided on a compact disc (“CD”) with the Company’s filing. These work
180 papers are generally consistent with the information provided to the Division of
181 Public Utilities (“DPU”) in response to data request DPU 1.1 in the EBA tariff
182 proceeding, Docket No. 11-035-T10. Additional information is also provided on
183 the CD accompanying the Company’s application that is consistent with the
184 filing requirements proposed in the DPU’s EBA Pilot Program Evaluation Plan
185 filed with the Commission in Docket No. 09-035-15.

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

187 A. Yes.

¹The Commission’s Corrected Report and Order dated March 3, 2011 in Docket No. 09-035-15 was later modified by the Report and Order approving the 2011 Stipulation, wherein the Commission vacated its prior position regarding swaps in the EBA calculation.