

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 professional background.**

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 public utility commissions
16 in California, Idaho, Oregon, Utah, and Wyoming.

17 **Purpose of Testimony**

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

19 A. My testimony presents the Company’s calculation of the Energy Balancing
20 Account (“EBA”) deferral amount for the 12-month period from January 1, 2012,
21 through December 31, 2012 (“Deferral Period”). More specifically, I provide the
22 following:

- 23
- Details supporting the calculation of the Company’s request to recover

24 \$17.4 million for the Deferral Period; and,
25 • A discussion of the main drivers of the difference between adjusted actual
26 net power costs (“Actual NPC”) and net power costs in rates (“Base
27 NPC”).

28 Throughout my testimony I describe how the Company has complied with
29 settlement stipulations and Commission orders from previous cases, including the
30 outcome of Docket No. 12-035-67 (“2012 EBA”).

31 **EBA Deferral Calculation**

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

34 A. The Company’s application requests recovery of \$17.4 million for the Deferral
35 Period, comprised of \$17.0 million deferral of excess EBA-related costs plus \$0.4
36 million of interest accrued during the Deferral Period. Exhibit RMP___(BSD-1)
37 presents the detailed calculation of the EBA deferral on a monthly basis during
38 the Deferral Period. Table 1 below provides a breakdown of the total requested
39 EBA recovery.

Table 1
Summary of EBA Deferral Account Balance

<u>Calendar Year 2012 EBA Deferral</u>	
Actual EBAC (\$/MWh)	\$ 24.39
Base EBAC (\$/MWh)	\$ 23.40
\$/MWh Differential	<u>\$ 0.99</u>
Utah Load (MWh)	25,157,542
Total Deferrable*	\$ 24,300,033
EBA Deferral at 70% Sharing	\$ 17,010,023
Interest Accrued through December 31, 2012	384,940
Requested EBA Recovery	<u><u>\$ 17,394,963</u></u>
<i>* Calculated monthly</i>	

40 **Q. What revenue requirement components are included in the EBA deferral**
41 **calculation?**

42 A. The EBA deferral calculation consists of two revenue requirement components:
43 NPC and wheeling revenue. NPC are defined as the sum of fuel expenses,
44 wholesale purchase power expenses and wheeling expenses, less wholesale sales
45 revenue. Wheeling revenue includes amounts booked to the Federal Energy
46 Regulatory Commission (“FERC”) account 456.1, revenues from transmission of
47 electricity of others. Collectively these two components are known in the
48 Company’s EBA tariff as Energy Balancing Account Costs (“EBAC”).

49 During 2012 several new SAP accounts were used in the Company’s
50 accounting system to track components of net power costs and wheeling revenue.
51 These new accounts fall within the main FERC accounts that make up EBAC, but
52 the specific SAP accounts are not identified in the current Schedule 94.

53 Exhibit RMP___(BSD-2) identifies the new accounts used in 2012. The new
54 accounts are also included in the revised tariff sheets provided in the testimony of
55 Ms. Joelle R. Steward.

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

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

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

63 The calculation of the Actual EBAC, Base EBAC, and the resulting EBA
64 Deferral in this application is according to the stipulated Scalar Method. The
65 Scalar Method was originally developed as part of the settlement agreement
66 reached in Docket No. 10-035-124 (“2011 GRC”) and the same approach was
67 again adopted in the settlement resolving Docket No. 11-035-200 (“2012 GRC”).
68 In the 2012 GRC settlement the Scalar Method was detailed in Exhibit A1: “Utah
69 Allocation Based on Scalar Method from Docket 10-035-124”.

70 **Q. Have you included carrying charges in the calculation of the EBA Deferral?**

71 A. Yes. Consistent with the Commission’s March 2, 2011, Order in

72 Docket No. 09-035-15, carrying charges accrue on the monthly EBA deferral at
73 an annual rate of six percent. Pursuant to the 2012 GRC stipulation the 2012 EBA
74 Deferral includes carrying charges only through December 31, 2012.

75 **Q. Please describe the Base EBAC the Company used to calculate the amount to**
76 **be deferred during the Deferral Period.**

77 A. For the 2012 Deferral Period, the Base EBAC consists of EBAC determined in
78 two separate general rate cases: Base EBAC from the 2011 GRC were effective in
79 rates from January 1, 2012, through October 11, 2012, and Base EBAC from the
80 2012 GRC were effective in rates from October 12, 2012, through December 31,
81 2012. In the 2011 GRC, total Company Base NPC were set at \$1.475 billion,
82 which included an unspecified reduction of \$33.4 million for purposes of
83 settlement. Consistent with the Commission's 2012 EBA order, the \$33.4 million
84 adjustment is split between the system generation ("SG") and system energy
85 ("SE") factors for purposes of allocation to Utah. In the 2012 GRC, total
86 Company Base NPC were set at \$1.479 billion, which was the level included in
87 the Company's updated NPC filed in May 11, 2012. The combined Base NPC for
88 the Deferral Period is \$1.479 billion on a total Company basis.

89 **Q. What was the difference between Actual NPC and Base NPC for the Deferral**
90 **Period?**

91 A. On a total Company basis, Actual NPC for the Deferral Period was approximately
92 \$1.497 billion, or approximately \$18.1 million higher than the \$1.479 billion Base
93 NPC. Table 2 below summarizes the differences between Actual NPC and Base
94 NPC.

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

	<u>EBA Deferral Period</u>
1 Base NPC	1,479
2 Reverse Settlement Adjustment	27
3 Increase/(Decrease) to NPC:	
4 Wholesale Sales Revenue	214
5 Purchased Power Expense	(147)
6 Coal Fuel Expense	(19)
7 Natural Gas Expense	(55)
8 Wheeling, Hydro and Other Expenses	(1)
9 Total Increase/(Decrease)	<u>(8)</u>
10 Adjusted Actual NPC 2012	<u><u>1,497</u></u>
11 Total Increase / (Decrease)	18

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

97 A. Line one of Table 2 displays the settled level of NPC, or the combined approved
98 Base NPC, for the 12 month Deferral Period. Line two of Table 2 displays the
99 settlement adjustment of approximately \$26.5 million that was in effect during the
100 Deferral Period - the portion of the 2011 GRC settlement adjustment from
101 January through October 11, 2012. The remainder of Table 2 is a breakout of the
102 difference between Actual NPC and Base NPC, by cost category, on a total
103 Company basis. Because the settlement adjustment in the 2011 Stipulation was
104 not identified by category, an item by item comparison of Actual NPC to Base
105 NPC is not possible. The differences by category in Table 2 result from
106 comparing Actual NPC to the combined Base NPC which was effective during
107 the Deferral Period.

108 **Q. How did the settlement adjustment impact the difference between Base NPC**
 109 **and Actual NPC?**

110 A. As can be seen in Table 2, if the settlement adjustment from the 2011 GRC is
 111 excluded, the difference between Actual NPC and Base NPC would be \$8.4
 112 million on a total Company basis.

113 **Q. Why is the EBA deferral \$24.3 million if the difference in total Company**
 114 **NPC is only \$18.1 million?**

115 A. In addition to the difference between Actual NPC and Base NPC, the EBA
 116 deferral calculation is impacted by other items such as wheeling revenue, inter-
 117 jurisdictional allocation factors, and changes in retail sales volumes which impact
 118 the collection of Base NPC in rates. Table 3 provides an accounting of the EBA
 119 deferral with the various components separated.

Table 3
Summary of EBA Deferral by Category

Utah Allocated Actual NPC	646,618,468
Utah Allocated Base NPC	631,887,909
NPC Variance	\$ 14,730,560
Utah Allocated Actual Wheeling Revenue	(32,995,864)
Utah Allocated Base Wheeling Revenue	(30,848,870)
Wheeling Revenue Variance	\$ (2,146,994)
Actual Utah Load/Sales	25,157,542
Base Utah Load/Sales	25,688,602
Load Variance	(531,060)
Base EBAC Collection Variance	\$ 11,716,468
Combined Impact on Total Deferrable EBAC	\$ 24,300,033
EBA Deferral at 70% Sharing	17,010,023
Interest Accrued through December 31, 2012	384,940
Requested EBA Recovery	\$ 17,394,963

120 **Q. Please explain the \$11.7 million collection variance shown in Table 3 above.**

121 A. The EBA calculation is designed to compare Base EBAC collected to the Actual
122 EBAC incurred over a period of time. The level of Base EBAC collected through
123 customer rates depends on the retail sales volumes that are realized over the
124 Deferral Period. During 2012, Utah load¹ was approximately 531 GWh lower
125 than the level used to determine the Base EBAC causing a lower amount of Base
126 EBAC to be included in customers' bills. The accrual in the deferred account is
127 determined by comparing the realized Base EBAC to Actual EBAC for the
128 period. When realized sales volumes are lower than those used in the test period
129 used to establish Base EBAC the deferral for the period will be larger than a
130 simple comparison of projected Base EBAC to Actual EBAC. If realized sales
131 volumes were greater than those used in the test period just the opposite would
132 occur and the deferral would be smaller.

133 **Drivers of NPC Variance**

134 **Q. What is the difference between Actual NPC and Base NPC?**

135 A. As shown in Table 2 above, when the settlement adjustment in effect during the
136 base period is excluded from the total, the overall difference between Actual NPC
137 and Base NPC is reduced to \$8.4 million on a total Company basis. The various
138 categories making up NPC have larger individual variances but are mostly
139 offsetting. The largest variances were a reduction in wholesale sales revenue
140 (which has the effect of increasing NPC) and a reduction in purchased power
141 expense.

¹ A combination of load and sales was used to compute the EBA deferral, consistent with the Commission's Order in the 2011 GRC.

142 **Q. Were there other factors that complicate the comparison of Base NPC and**
143 **Actual NPC?**

144 A. Yes. To compare Base NPC to Actual NPC, and to calculate the monthly EBA
145 deferral, the projected costs in a given calendar month are matched up to actual
146 costs for the same month. However, the test periods in the 2011 GRC and 2012
147 GRC were not aligned with the periods when rates from each case were in effect,
148 nor were they aligned with the Deferral Period. As a result, the test period from
149 the 2011 GRC – July 2011 through June 2012 – was out of synch for
150 approximately 3 ½ months during the Deferral Period. Since Base NPC from the
151 2012 GRC did not become effective until October 12, 2012, there are 3 months
152 and 11 days where Base NPC from months in 2011 are compared against 2012
153 Actual NPC. For example, July 2012 Actual NPC is compared against July 2011
154 Base NPC to calculate the deferrable amount for July.

155 The mismatch between Base NPC test periods and the Deferral Period
156 creates three distinct divisions during 2012: 1) January 2012 through June 2012,
157 when Base NPC from the 2011 GRC aligns with the corresponding months in the
158 Actual NPC, 2) July 2012 through October 11, 2012, when Base NPC from the
159 2011 GRC is still effective but the monthly comparison is one year out of synch,
160 and 3) October 12, 2012, through December 31, 2012, when Base NPC from the
161 2012 GRC was in effect and aligned with the corresponding months in Actual
162 NPC.

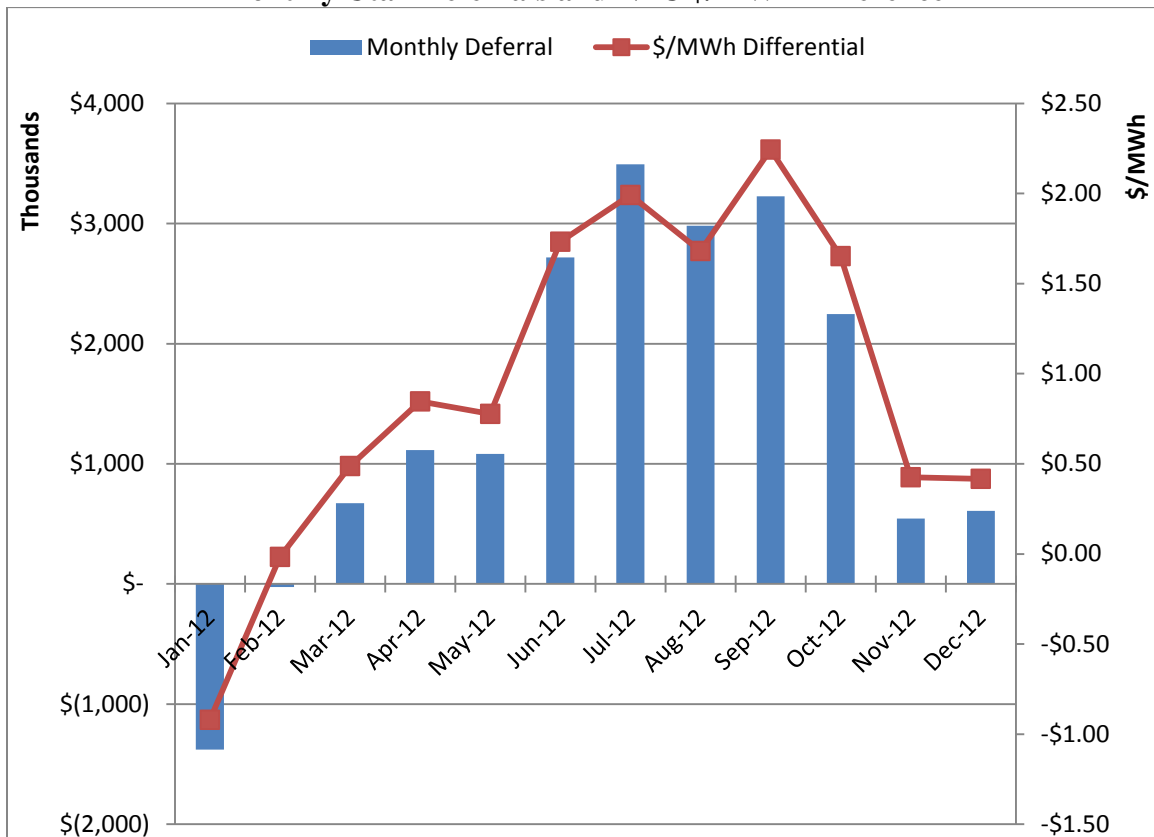
163 **Q. What is the impact of the mismatched periods?**

164 A. First, comparing actual costs during months in 2012 to a stale forecast of costs for

165 the same months in 2011 is difficult at best and is not an ‘apples-to-apples’
 166 comparison. Second, the out-of-date forecast of NPC during the summer months
 167 understated the Base NPC and caused a large variance with Actual NPC from July
 168 through October 2012.

169 Figure 1, below, illustrates the difference between Actual NPC and Base
 170 NPC on a dollar-per-megawatt-hour basis and the dollars deferred each month
 171 during the Deferral Period. The chart demonstrates that the majority of the
 172 deferral occurred during the July through October time period when the mismatch
 173 in test year occurred. During those four months, over \$12.0 million
 174 (or 71 percent) accrued to the EBA deferral, out of the total \$17.0 million total
 175 deferral for 2012.

Figure 1
Monthly Utah Deferrals and NPC \$/MWh Difference



176 **Q. Notwithstanding the mismatched months, what factors caused the variance**
177 **in the various NPC components?**

178 A. Two main issues impacted the operation of the Company's system compared to
179 the Base NPC: 1) a decrease in net system load, and 2) a drop in wholesale market
180 prices for electricity and natural gas.

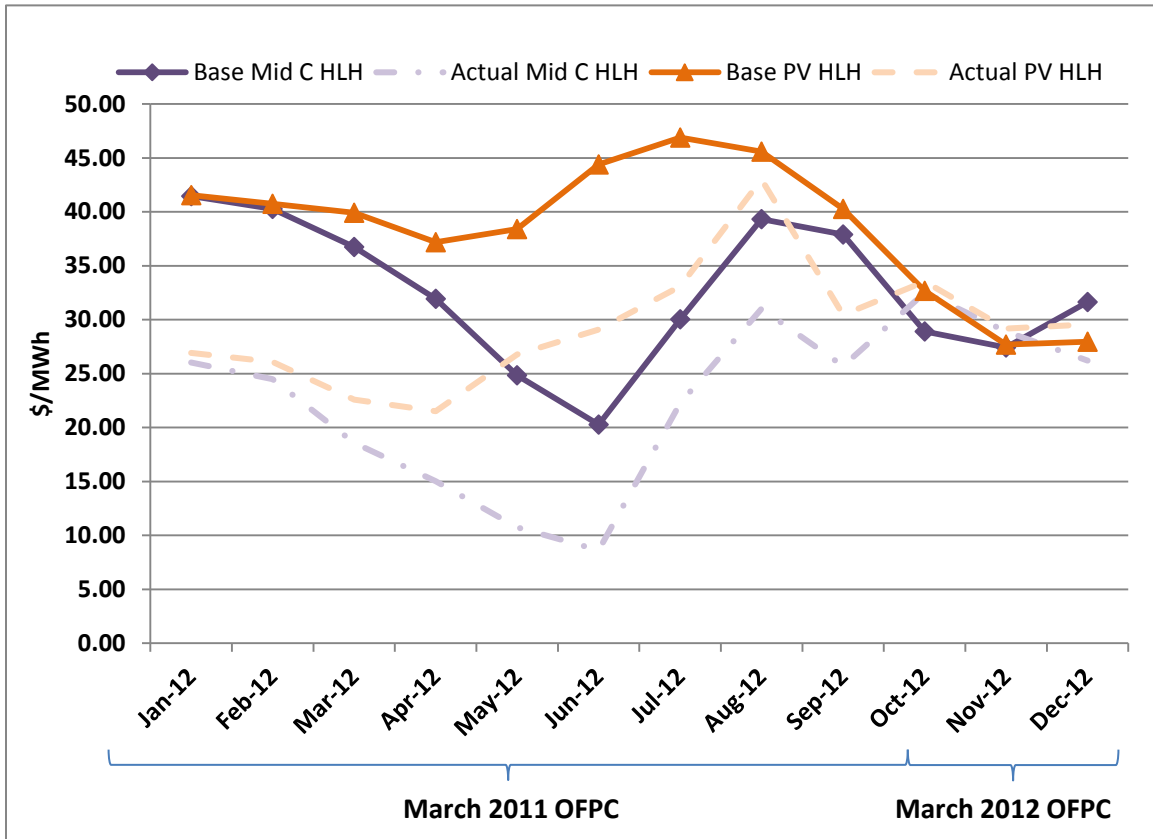
181 **Q. How did actual net system load compare to the load forecasts included in**
182 **Base NPC for the Deferral Period?**

183 A. Compared to the load used to determine the combined Base NPC from the 2011
184 GRC and the 2012 GRC, actual net system load was 1,737 GWh (3 percent) lower
185 than forecast. Generally speaking, lower system load enables the Company to
186 increase the net sales made to the wholesale market. Lower Utah loads also results
187 in lower retail revenues as I addressed earlier in my testimony.

188 **Q. Given the reduction in load, why did revenue from wholesale sales decrease?**

189 A. Revenue from wholesale market sales was impacted by a reduction in market
190 prices compared to the Official Forward Price Curve ("OFPC") reflected in Base
191 NPC. On average, prices at the Mid-Columbia ("Mid-C") and Palo Verde ("PV")
192 market hubs were lower by 35 percent and 22 percent, respectively. Figure 2,
193 below, demonstrates the magnitude of the change in the average heavy load hour
194 price at Mid-C and PV for the Deferral Period.

**Figure 2
Wholesale Electricity Market Prices
Forecast vs Actual**



195 For the Deferral Period, actual wholesale sales revenue declined approximately
 196 \$213.6 million when compared to wholesale sales revenues included in Base NPC
 197 as shown in Table 2. The reduction in wholesale sales revenue was largely offset
 198 by a reduction in purchased power expense, also attributable to the reduction in
 199 market prices.

200 **Q. Did the volume of net short term market sales change?**

201 A. Yes. As expected with a decrease in system load, the actual volume of net short
 202 term market sales (total short term sales less total short term purchases) was
 203 higher than the level included in Base NPC. However, the reduction in market
 204 prices overwhelmed the impact of additional net sales.

205 **Q. Do lower wholesale electricity market prices also impact generation from the**
206 **Company's owned resources?**

207 A. Yes. All else held equal, lower wholesale electricity market prices impact the
208 economics of the Company's generating units, such that if market prices are less
209 than the cost of generating electricity at Company facilities, the Company will not
210 operate those facilities during those hours. In this circumstance, the Company will
211 purchase lower cost power to serve customers, or if customer load has already
212 been served, the Company will back down the uneconomic facility as it cannot
213 make an economic sale of excess generation. During the Deferral Period, lower
214 wholesale market prices contributed to a decrease of 1,152 GWh (3 percent) in
215 coal fired generation compared to Base NPC.

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

218 A. As shown in Table 2, coal fuel expense fell approximately \$19 million compared
219 to Base NPC, due to the 1,152 GWh overall decrease in generation volume.
220 Figure 3, below, compares the average cost of coal during the Deferral Period to
221 the forecasted and actual Mid-C market prices during light load hours. Figure 4
222 makes the same comparison using the PV market.

Figure 3
Average Monthly Coal Generation Costs to Mid-C LLH Market

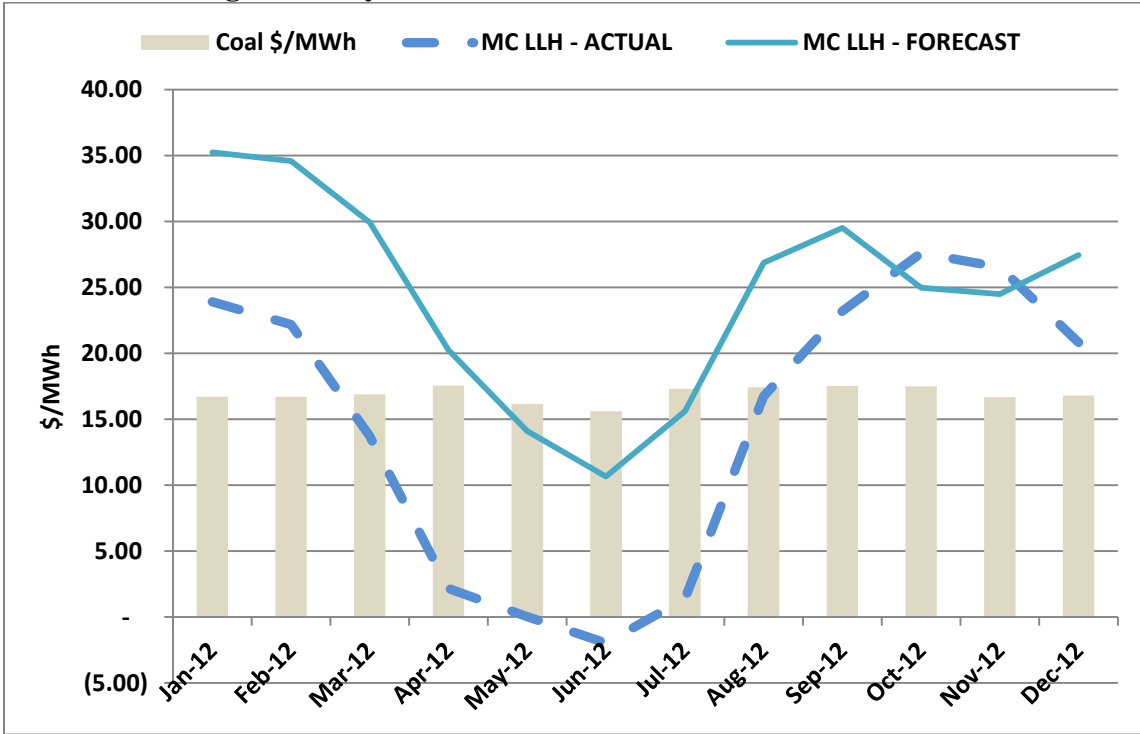
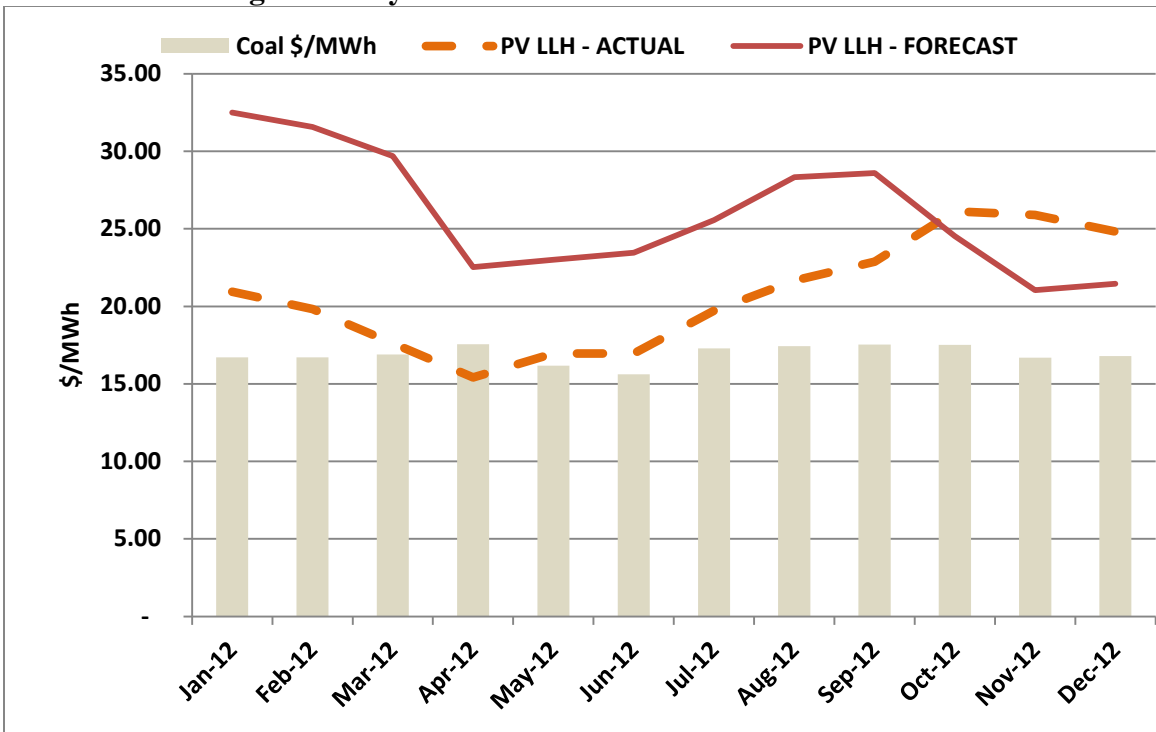


Figure 4
Average Monthly Coal Generation Costs to PV LLH Market

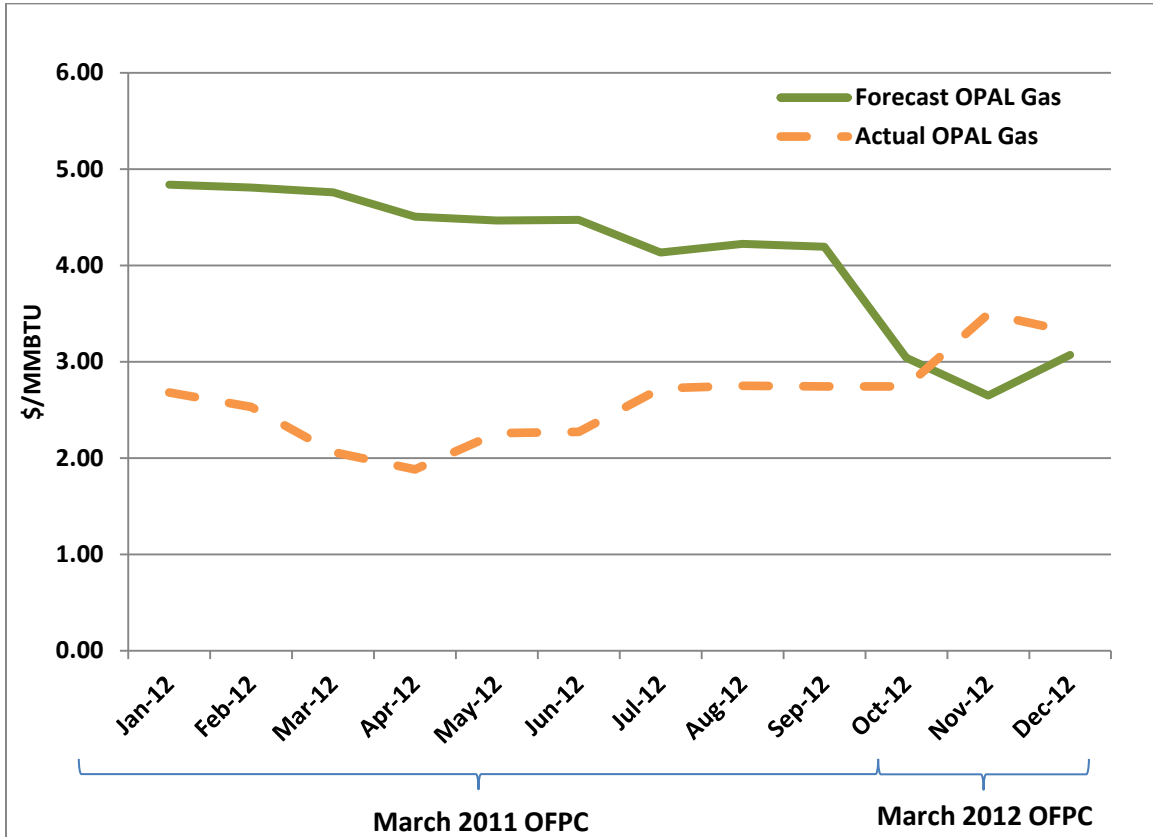


223 Figures 3 and 4 demonstrate that there were more hours during the Deferral
224 Period than previously forecasted, where market prices were lower than the
225 average cost of coal generation, contributing to the overall reduction in output
226 from coal facilities.

227 **Q. Please describe the changes in natural gas fuel expense.**

228 A. The total natural gas fuel expense in Actual NPC decreased by \$54.9 million
229 compared to Base NPC. The decrease in natural gas fuel expense was due to a net
230 decrease in generation from the Company's natural gas facilities of 540 GWh,
231 compounded by the decrease in actual natural gas market price forecast. On
232 average, the market price of natural gas fell approximately 36 percent when
233 compared to the forecast in Base NPC. Figure 5 illustrates the change in the price
234 of natural gas at the Opal market.

Figure 5
Natural Gas Market Prices
Forecast vs. Actual



235 **Q. Does the reduction in natural gas expense include the impact of hedging?**

236 **A.** Yes. Consistent with the Commission order approving the 2011 Stipulation, the

237 Company has included all settled gains and losses of its natural gas hedges

238 (i.e. swaps) in the EBA deferral calculation. Company witnesses Mr. Stefan A.

239 Bird and Mr. Frank C. Graves provide testimony supporting the Company’s

240 hedging program and the impact of swaps during the Deferral Period.

241 **Compliance with Previous Orders**

242 **Q. Has the Company prepared this EBA filing in conformance with**
243 **Commission orders in Docket No. 09-035-15 as well as the outcome of the**
244 **2012 EBA?**

245 A. Yes. In particular, the settlement in the 2012 EBA adopted a list of filing
246 requirements augmenting the filing requirements approved by the Commission in
247 Docket No. 09-035-15. The Company has also provided illustrative calculations
248 of the EBA Deferral under the various methods called for in the 2012 EBA
249 stipulation and the Commission's orders in Docket Nos. 12-035-67 and 09-035-
250 15. Details of the illustrative EBA calculations are provided in the testimony of
251 Mr. Steven R. McDougal.

252 **Q. Has the information provided in the filing requirements improved as a result**
253 **of the 2012 EBA proceeding?**

254 A. Yes. In particular, the Company improved the 'Trade Data' provided under the
255 original filing requirement 6b. In the 2012 EBA, significant effort was expended
256 to reconcile the detailed transactional information to the summary level NPC
257 accounting. The augmented filing requirements call for such a reconciliation to be
258 performed in advance. That reconciliation, and the additional information
259 provided with the other filing requirements, will enhance parties' ability to review
260 the 2012 EBA data.

261 **Q. Have you provided a detailed breakdown of all hedging and system**
262 **balancing transactions that settled during the Deferral Period?**

263 A. Yes. Exhibit RMP___(BSD-3) includes a summary of the hedging and balancing

264 transactions included in the Deferral Period, along with the supporting
265 transactional details. The transactional data is also provided as part of the filing
266 requirements in this case. Company witness Mr. Stefan A. Bird provides
267 testimony demonstrating the prudence of the natural gas and electricity hedging
268 transactions and balancing transactions that settled in 2012.

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

270 A. Yes.