

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

3 A. My name is Dana M. Ralston. My business address is 1407 West North Temple,  
4 Suite 320, Salt Lake City, Utah 84116. My present position is Vice President of  
5 Thermal Generation. I am responsible for the coal, gas, and geothermal resources  
6 owned by the Company.

7 **Qualifications**

8 **Q. Briefly describe your education and professional background.**

9 A. I have a Bachelor of Science degree in Electrical Engineering from South Dakota  
10 State University. I have been the Vice President of Thermal Generation for  
11 PacifiCorp Energy since January 2010. Before 2010, I held a number of positions  
12 of increasing responsibility with MidAmerican Energy Company for 28 years in  
13 the generation organization, including the plant manager position at the Neal  
14 Energy Center, a 1600 megawatt generating complex. In my current role, I am  
15 responsible for the operation and maintenance of the thermal generation fleet.

16 **Purpose and Overview of Testimony**

17 **Q. What is the purpose of your testimony?**

18 A. In the prior EBA docket, parties raised concerns on the Company’s plant  
19 availability due to certain outages. My testimony addresses these concerns by  
20 presenting PacifiCorp’s 4-year average Equivalent Availability performance year-  
21 on-year in 2012 and to compare the historical performance of PacifiCorp’s  
22 thermal units to the North American Electric Reliability Corporation (“NERC”)  
23 industry average. While the Company may experience certain extended outages

24 the overall management of the generation fleet results in performance that is  
25 superior to the industry, benefitting customers.

26 **Q. What steps or action has PacifiCorp undertaken to maintain or improve**  
27 **Equivalent Availability performance?**

28 A. PacifiCorp is very aggressive in minimizing planned outage duration through  
29 advanced planning, properly defined work scopes and critical path scheduling and  
30 project coordination. Additionally, programmatic efforts have been implemented  
31 to more effectively manage key areas of operation that impact availability with  
32 good success. Examples of these programmatic efforts include “Boiler Tube  
33 Failure Reduction / Cycle Chemistry Improvement” (“BTFR/CCI”), “Operational  
34 Excellence” initiative for improvement in the fundamental aspects of operation  
35 and maintenance, and “Significant Event Reporting” to expand awareness and  
36 introduce the opportunity among the remainder of the fleet to learn and address  
37 similar availability impacting events at other locations prior to actually impacting  
38 availability further.

39 **Q. Why is Equivalent Availability an important statistic when comparing plant**  
40 **performance?**

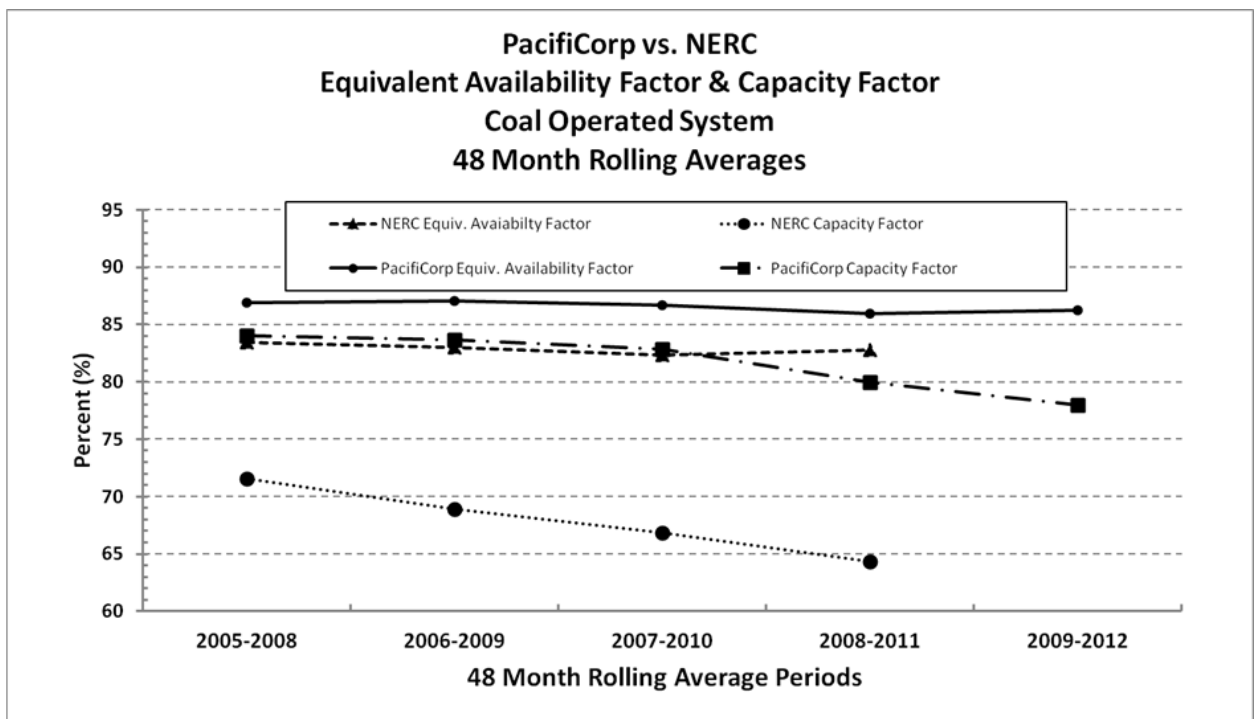
41 A. Equivalent Availability is a measure of the optimal energy that could have been  
42 generated during a given reporting period. It encompasses all of the  
43 approximately 1,175 NERC outage codes used by the industry. Equivalent  
44 Availability takes into account all the reasons a plant could be unavailable,  
45 including planned outages, planned derates, forced outages, maintenance outages,  
46 equivalent forced derates, and equivalent maintenance derates. This means that

47 the Equivalent Availability data removes the bias that can appear if a Company  
48 outage is placed in a different category than a comparable outage from the peer  
49 group. For example, it does not matter if an outage is classified as maintenance or  
50 forced; they are all treated equally in Equivalent Availability.

51 **Q. How does the availability of the Company's entire coal fleet compare to the**  
52 **NERC averages?**

53 A. Figure 1 below compares the Company's overall coal fleet performance to  
54 equivalent industry averages for both Equivalent Availability and Capacity  
55 Factor. It is evident that the Company's performance is better than industry  
56 averages. This data provides a comprehensive representation of the Company's  
57 overall performance taking all NERC codes into consideration.

**Figure 1**



58 **Q. What is the representative importance of Capacity Factor represented in**  
59 **Figure 1?**

60 A. Capacity Factor is the average percent of total capacity at which the represented  
61 group of units have actually operated. As illustrated, PacifiCorp's Capacity Factor  
62 for this category of units is approximately 13 percent higher than industry average  
63 for similar coal fired units. This shows that PacifiCorp has a higher utilization of  
64 the plants when compared to the industry. Units that operate at higher Capacity  
65 Factors experience increased wear and tear on systems and equipment and  
66 adversely impact efforts to maintain above average Equivalent Availability  
67 performance. As illustrated, even with a significantly higher than industry average  
68 Capacity Factor for this defined group of units, PacifiCorp's Equivalent  
69 Availability still outperforms the industry average.

70 **Q. Has the 4-year average Equivalent Availability improved for PacifiCorp's**  
71 **entire coal fleet in 2012 over 2011?**

72 A. Yes. For PacifiCorp's entire fleet of coal fleet, Equivalent Availability  
73 performance has improved by 0.35 percent and is over 3.0 percent better than the  
74 NERC average for the industry.

75 **Q. How does PacifiCorp's Equivalent Availability and Capacity Factor**  
76 **performance benefit customers?**

77 A. PacifiCorp's fleet provides low cost reliable power for our customers. As the data  
78 shows with the higher utilization of the assets PacifiCorp owns and the  
79 significantly better than average Equivalent Availability than the industry this  
80 provides a substantial benefit for our customers providing low cost power more

81 reliably that most others in the electric industry and minimizing market  
82 fluctuations our customers could experience.

83 **Q. In the prior EBA docket, certain parties challenged costs incurred as a result**  
84 **of forced outages. Why is Equivalent Availability pertinent to this issue?**

85 A. When evaluating the Company's plant performance, Equivalent Availability must  
86 be used and not just specific outage events. PacifiCorp has had outage events that  
87 have negatively impacted the availability of the plants but focusing in on just  
88 these events alone does not present a complete view of the Company's  
89 performance. As I stated above, Equivalent Availability is a measure of the  
90 optimal energy that could have been generated during a given reporting period. It  
91 encompasses all of the approximately 1,175 NERC outage codes used by the  
92 industry. Equivalent Availability takes into account all the reasons a plant could  
93 be unavailable. Equivalent Availability is a total view of availability performance  
94 and takes into consideration all the concerns other parties have previously raised  
95 and all other factors that can impact availability. When looking at the company's  
96 availability performance from a total view, Equivalent Availability, and not just  
97 focusing on specific outage events, one can see that the company's performance is  
98 significantly better than the industry average in both Equivalent Availability and  
99 Capacity Factor. The better than average performance in both Equivalent  
100 Availability and Capacity Factor have benefited and will continue to benefit  
101 customers.

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

103 A. Yes.