

1 **Q. Please state your name, business address and present position with PacifiCorp**  
2 **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 since  
11 2003 including positions in revenue requirement and regulatory affairs, and I  
12 assumed my current role managing the Company’s net power cost group in March  
13 2012.

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

15 A. Yes. I have filed testimony in proceedings before the public utility commissions in  
16 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 for the 12-month period from January 1, 2013, through  
21 December 31, 2013 (“Deferral Period”). More specifically, I provide the following:

- 22 • Details supporting the calculation of the Company’s request to recover  
23 \$28.3 million for the Deferral Period; and,

24                   • A discussion of the main differences between adjusted actual net power  
25                   costs (“Actual NPC”) and net power costs in rates (“Base NPC”).

26           Throughout my testimony I describe how the Company has complied with  
27           settlement stipulations and Commission orders from previous cases, including the  
28           outcome of Docket No. 13-035-32 (“2013 EBA”).

29   **EBA Deferral Calculation**

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

32   A.   The Company’s application requests recovery of \$28.3 million for the Deferral  
33   Period, comprised of \$27.6 million deferral of excess EBA-related costs, a credit  
34   of \$1.1 million to true-up incremental wheeling revenue due to the recently  
35   completed Federal Energy Regulatory Commission (“FERC”) rate case (Docket  
36   No. ER11-3643-000), and \$1.8 million of interest. Exhibit RMP\_\_\_(BSD-1)  
37   presents the detailed calculation of the EBA deferral on a monthly basis during the  
38   Deferral Period. Table 1 below provides a breakdown of the total requested EBA  
39   recovery.

**Table 1**  
**Summary of EBA Deferral Account Balance**

<b><u>Calendar Year 2013 EBA Deferral</u></b>	
Actual EBAC (\$/MWh)	\$ 27.04
Base EBAC (\$/MWh)	\$ 25.44
\$/MWh Differential	<u>\$ 1.61</u>
Utah Load (MWh)	24,456,528
Total Deferrable*	\$ 39,454,809
EBA Deferral at 70% Sharing	\$ 27,618,366
Additional FERC ER11-3643 Revenues	(\$1,128,262)
Interest through Dec. 31, 2013	\$ 470,671
Interest Jan. 1, 2014 through Oct. 31, 2014	\$ 1,378,778
<b>Requested EBA Recovery</b>	<b><u>\$ 28,339,553</u></b>
<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 FERC account 456.1,  
46 revenues from transmission of electricity of others. Collectively these two  
47 components are known in the Company’s EBA tariff as Energy Balancing Account  
48 Costs (“EBAC”).

49 During 2013 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 accounts fall within the main FERC accounts that make up EBAC, but the

52 specific SAP accounts are not identified in the current Schedule 94. Exhibit  
53 RMP\_\_\_(BSD-2) identifies the new accounts used in 2013. The new accounts are  
54 also included in the revised tariff sheets provided in the testimony of Ms. Joelle R.  
55 Steward.

56 **Q. What adjustments are made to Actual NPC and why are these adjustments**  
57 **needed?**

58 A. The Company adjusts Actual NPC to reflect the ratemaking treatment of several  
59 items, including buy-through of economic curtailment by interruptible industrial  
60 customers, situs assignment of the generation from Oregon solar resources  
61 procured to satisfy ORS 757.370 solar capacity standard, and legal fees included in  
62 the cost of coal related to fines and citations. The Company also adjusts Actual  
63 NPC to remove accounting entries booked in the Deferral Period that related to  
64 operations prior to implementation of the EBA in October 2011.

65 **Q. Were there any new adjustments made to Actual NPC in the Deferral Period?**

66 A. Yes. The Company received a small amount of revenue associated with the  
67 Company's Leaning Juniper facility due to a contract unique to that wind project.  
68 As a result of the contract, output at Leaning Juniper is now forecast at a slightly  
69 reduced level. This adjustment to the output of the Leaning Juniper wind project is  
70 consistent with the terms of stipulation, and a similar adjustment was made to the  
71 forecast NPC included in the Company's recently filed general rate case.

72 **Q. What methodology did the Company use to calculate the EBA deferral**

73 **account balance?**

74 A. The calculation of the Actual EBAC, Base EBAC, and the resulting EBA Deferral  
75 in this application is according to the stipulated Scalar Method. The Scalar Method  
76 was originally developed as part of the settlement agreement reached in Docket No.  
77 10-035-124 (“2011 GRC”) and the same approach was again adopted in the  
78 settlement resolving Docket No. 11-035-200 (“2012 GRC”). In the 2012 GRC  
79 settlement the Scalar Method was detailed in Exhibit A1: “Utah Allocation Based  
80 on Scalar Method from Docket 10-035-124”.

81 Generally, the EBA calculation is a comparison of actual NPC and wheeling  
82 revenue to the levels in rates as established in a general rate case, with 70 percent  
83 of the difference being deferred for later recovery or refund to customers. The  
84 calculation of the monthly amount debited or credited into the EBA Deferral  
85 Account using the Scalar Method is based on the following formula:

86 
$$EBA\ Deferral_{Utah,month} =$$

87 
$$\left[ \left( Actual\ EBAC_{\frac{month}{MWh}} - Base\ EBAC_{\frac{month}{MWh}} \right) \times Actual\ MWh_{Utah,month} \right] \times 70\%$$

88 **Q. Has the Company calculated the EBA deferral using other methods?**

89 A. Yes. The Company calculated the EBA deferral under the various methods called  
90 for in the Commission’s orders in Docket Nos. 12-035-67 and 09-035-15 as well  
91 as the 2012 GRC settlement. Company witness Mr. Steven R. McDougal provides  
92 the details of the illustrative EBA calculations in Exhibit RMP\_\_\_\_(SRM-2) through  
93 Exhibit RMP\_\_\_\_(SRM-4).

94 **Q. Does the calculation of the EBA deferral include carrying charges?**

95 A. Yes. Consistent with the Commission’s March 2, 2011, Order in Docket No. 09-

96 035-15, carrying charges accrue on the monthly EBA deferral at an annual rate of  
97 six percent. Carrying charges accrue monthly during the Deferral Period, and  
98 continue to accumulate until rates are set to recover the approved EBA amount.  
99 Consistent with the Commission's order issued August 30, 2012, in Docket No. 12-  
100 035-67, et.al., the Company anticipates new rates will take effect November 1,  
101 2014.

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

104 A. Base EBAC during the Deferral Period were determined in the 2012 GRC, which  
105 used a test period of the 12 months from June 2012 through May 2013. Total  
106 Company Base NPC were set at \$1.479 billion, which was the level included in the  
107 Company's updated NPC filed in May 11, 2012. Total Company wheeling revenue  
108 was set at \$74.7 million.

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

111 A. On a total Company basis, Actual NPC for the Deferral Period were approximately  
112 \$1.620 billion, or approximately \$140 million higher than the \$1.479 billion Base  
113 NPC. Table 2 below summarizes the differences between Actual NPC and Base  
114 NPC.

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

	<b>EBA Deferral Period</b>
1 <b>Base NPC</b>	<b>\$ 1,479</b>
2 Increase/(Decrease) to NPC:	
3 Wholesale Sales Revenue	161
4 Purchased Power Expense	(21)
5 Coal Fuel Expense	46
6 Natural Gas Expense	(44)
7 Wheeling, Hydro and Other Expenses	(1)
8 <b>Total Increase/(Decrease)</b>	<b>140</b>
9 <b>Adjusted Actual NPC 2013</b>	<b>\$ 1,620</b>

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

117 A. Line one of Table 2 displays the approved Base NPC for the Deferral Period. The  
 118 remainder of Table 2 is a breakout of the difference between Actual NPC and Base  
 119 NPC, by cost category, on a total Company basis. The differences by category in  
 120 Table 2 result from comparing Actual NPC to the Base NPC effective during the  
 121 Deferral Period.

122 **Q. Is the Deferral Period fully aligned with the test period used in the 2012 GRC**  
 123 **to determine the Base EBAC?**

124 A. No. The 2012 GRC test period (June 2012 through May 2013) used to set the Base  
 125 EBAC is not fully aligned with the Deferral Period (January 2013 through  
 126 December 2013). To calculate the EBA deferral, individual months are compared  
 127 one with another. For example, July 2013 Actual NPC is compared against July  
 128 2012 Base NPC to calculate the deferrable amount.

129 The mismatch between the Base NPC test period and the Deferral Period

130 creates a distinct division during 2013: 1) January 2013 through May 2013, when  
 131 Base NPC from the 2012 GRC aligns with the corresponding months in the Actual  
 132 NPC, and 2) June 2013 through December 2013, when the monthly comparison  
 133 differs by one year.

134 **Q. How does the misalignment of the two periods impact the deferral?**

135 A. Table 3, below, illustrates the difference between Actual NPC and Base NPC for  
 136 the two distinct periods during the Deferral Period. The table shows that the  
 137 majority of the deferral occurred during the June through December time period  
 138 when the mismatch in test year occurred. In fact, over 90 percent of excess net  
 139 power costs in 2013 occurred during these seven months.

**Table 3**  
**Total Company Net Power Cost Reconciliation (\$millions)**  
**Mismatched Test Period**

	<u>Jan-May</u>	<u>Jun-Dec</u>	<u>Total</u>
<b>UT 2012 GRC Settlement</b>	<b>\$ 590</b>	<b>\$ 889</b>	<b>\$ 1,479</b>
Increase/(Decrease) to NPC:			
Wholesale Sales	23	138	161
Purchased Power	(18)	(3)	(21)
Coal Generation	5	41	46
Gas Generation	5	(49)	(44)
Wheeling Hydro and Other	(2)	1	(1)
<b>Total Increase/(Decrease)</b>	<b>12</b>	<b>128</b>	<b>140</b>
<b>Adjusted Actual NPC 2013</b>	<b>\$ 602</b>	<b>\$ 1,017</b>	<b>\$ 1,620</b>

140 **Q. Why is the EBA deferral \$28.3 million or about 20 percent of the difference in**  
 141 **total Company NPC of \$140 million?**

142 A. In addition to the difference between Actual NPC and Base NPC, the EBA deferral  
 143 calculation is impacted by other items such as wheeling revenue, inter-



144 jurisdictional allocation factors, sharing bands, and changes in retail sales volumes  
 145 which impact the collection of Base NPC in rates. Table 4 provides an accounting  
 146 of the EBA deferral separated into the net power cost and wheeling revenue  
 147 components.

**Table 4**  
**Summary of EBA Deferral by Category**

1	Utah Allocated Base NPC - Docket No. 11-035-200	\$ 636,001,721
2	Projected Utah Sales	23,734,643
3	NPC \$/MWh (Line 1 / Line 2)	<u>\$ 26.80</u>
4	Actual Utah Sales (MWh)	24,456,528
5	Sales Adjusted Base NPC (Line 3 x Line 4)	\$ 655,125,999
6	Utah Allocated Actual NPC	<u>\$ 697,427,372</u>
7	<b>NPC Variance (Line 6 - Line 5)</b>	<b><u>\$ 42,301,372</u></b>
8	Utah Allocated Base Wheeling Revenue - Docket No. 11-035-200	\$ (32,217,891)
9	Projected Utah Sales	23,734,643
10	Wheeling Revenue \$/MWH (Line 8 / Line 9)	<u>\$ (1.36)</u>
11	Actual Utah Sales	24,456,528
12	Sales Adjusted Base Wheeling Revenue (Line 10 x Line 11)	\$ (33,177,057)
13	Utah Allocated Actual Wheeling Revenue	<u>\$ (36,023,620)</u>
14	<b>Wheeling Revenue Variance (Line 13 - Line 12)</b>	<b><u>\$ (2,846,563)</u></b>
15	<b>Total Deferrable EBAC (Line 7 + Line 14)</b>	<b>\$ 39,454,809</b>
16	EBA Deferral at 70% Sharing (Line 15 x 0.7%)	\$ 27,618,366
17	Additional FERC ER11-3643 Revenues	\$ (1,128,262)
18	Interest through Dec. 31, 2013	\$ 470,671
19	Interest Jan. 1, 2014 through Oct. 31, 2014	\$ 1,378,778
20	<b>Requested EBA Recovery (Sum Lines 16 - 19)</b>	<b><u>\$ 28,339,553</u></b>

148 Table 4 shows that Utah sales in the Deferral Period were approximately 727 GWh  
 149 higher than sales used to set the Base EBAC included in customers rates during  
 150 2013. Because actual sales were higher than forecast, the Company collected more  
 151 to cover its costs during the Deferral Period, partially offsetting the increase in  
 152 Utah-allocated Actual NPC. On Line 5 of Table 4, Base NPC is adjusted to account

153 for the higher collections due to increased Utah sales. The increased sales help to  
154 offset the amount deferred in the EBA, resulting in a lower balance to be collected  
155 from customers later and preventing over- or under-collection of the variance in  
156 EBA costs.

157 **Differences in NPC**

158 **Q. Notwithstanding the issues of test period timing, please describe the primary**  
159 **differences between Actual NPC and Base NPC?**

160 A. Actual NPC were higher than Base NPC due, in part, to an increase in system load  
161 and a reduction in zero-fuel-cost generation from the Company's owned hydro and  
162 wind resources. From an accounting perspective, Actual NPC were higher than  
163 Base NPC due to a \$161 million reduction in wholesale sales and \$46 million  
164 increase in coal fuel expense. These increases in NPC were partially offset by a \$21  
165 million reduction in purchase power expenses and \$44 million reduction in natural  
166 gas expense.

167 **Q. Please explain the changes in load and resources that caused an increase in**  
168 **NPC.**

169 A. Net system load was over 1,500 GWh higher than forecasted load used in the 2012  
170 GRC. Furthermore, actual generation from Company owned hydro and wind  
171 resources was 784 GWh and 127 GWh lower than projected in Base NPC,  
172 respectively. Higher load increases net power costs because the Company must  
173 purchase or generate electricity to serve the load, and may be unable to sell  
174 economic generation into wholesale markets. Generation from hydro and wind  
175 facilities is a zero cost resource and must be replaced with additional generation

176 from the Company's thermal resources or a net increase in power procured from  
177 the wholesale market, also increasing net power costs. Consequently, variances in  
178 load and hydro and wind generation impact each of the cost categories shown in  
179 Table 1.

180 **Q. Please explain what contributed to the reduction in wholesale sales revenue.**

181 A. The primary contributor to the decline in wholesale sales revenues relative to the  
182 forecast base period was a reduction in the wholesale sales volumes, with much of  
183 the reduction related to short term sales made to balance the Company's system.  
184 Actual sales were 4,482 Gigawatt-hours (GWh), or 32 percent, lower than forecast  
185 sales of 13,875 GWh. Base NPC included 1,934 GWh of short term firm sales  
186 transactions (actual transactions included in the GRID model and executed in  
187 advance of the GRC filing) with deliveries between June 2012 and December 2012  
188 which would not be relevant to the Deferral Period.

189 **Q. Were there also specific long-term contract changes that caused a decrease in  
190 wholesale sales revenues?**

191 A. Yes. Three long-term sales contracts with Nevada Energy, Pacific Gas & Electric,  
192 and Southern California Edison expired prior to the Deferral Period. The expiration  
193 of these contracts decreased wholesale sales by 986 GWh, or approximately \$23  
194 million.

195 **Q. Please explain the decrease in purchased power expenses.**

196 A. Similar to wholesale sales, actual purchased power volumes were lower than the  
197 level included in Base NPC, mainly related to short term purchases made to balance  
198 the Company's system. Overall, purchased power volume decreased by 3,382

199 GWh, or 22 percent, while the total purchased power expense decreased by \$21  
200 million, or three percent. Base NPC included 1,965 GWh of short term firm  
201 purchase transactions (actual transactions included in the GRID model and  
202 executed in advance of the GRC filing) with deliveries between June 2012 and  
203 December 2012 which would not be relevant to the Deferral Period. The reduction  
204 in total purchased power expenses due to lower volumes was muted due to an  
205 increase in the average market prices.

206 **Q. Were there specific contract changes that impacted purchase power expense?**

207 A. Yes. The long term power purchase contract with Grant County expired August  
208 2012 and the Pioneer Wind Park II Qualify Facility (“QF”) that was included in  
209 Base NPC never reached commercial operation. Removing these two contracts  
210 results in a decrease in NPC of \$7 million compared to Base NPC. In addition, US  
211 Magnesium used its QF generation to serve its own load and the Company did not  
212 enter into a generation incentive agreement for 2013 with Kennecott Utah Copper  
213 LLC, resulting in a \$5 million decrease in purchase power expense. A new seasonal  
214 purchase power contract was entered into with Constellation, increasing expenses  
215 \$6 million compared to Base NPC.

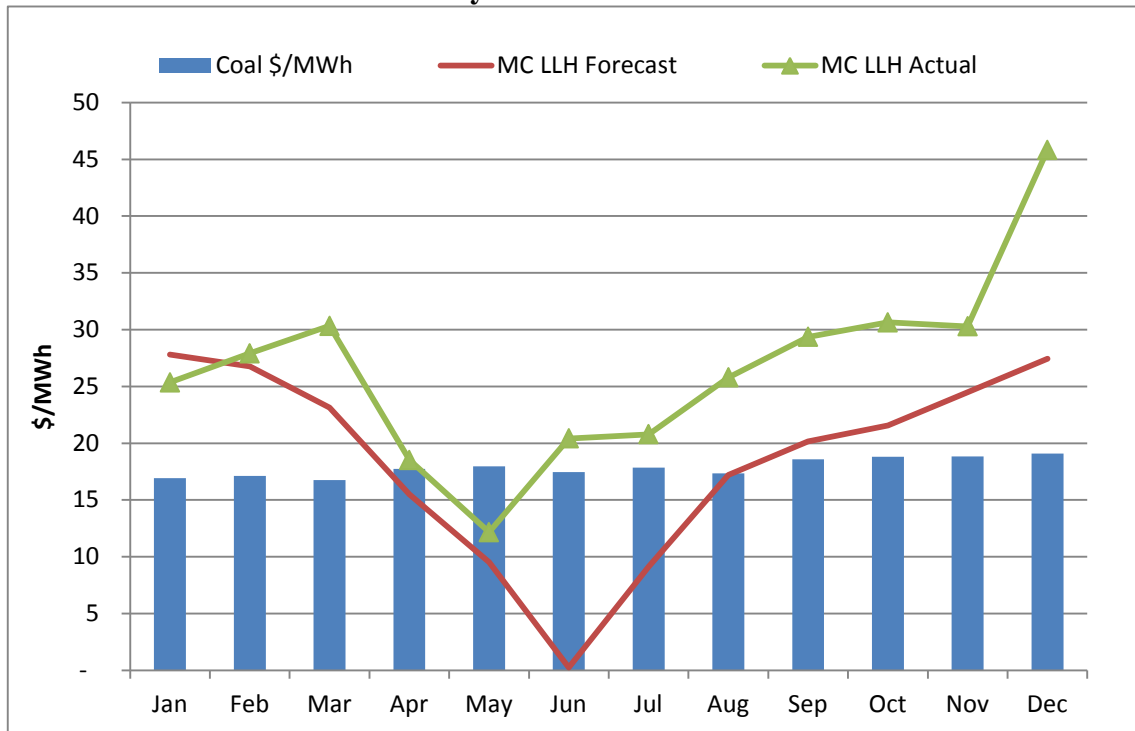
216 **Q. Please discuss the changes in coal fuel expense.**

217 A. Coal fuel expense was \$46 million higher than the forecast included in Base NPC,  
218 due to increased coal generation in actual operations. The volume of coal generation  
219 increased 2,515 GWh (six percent) while actual prices were within \$0.02/MWh  
220 (0.13 percent).

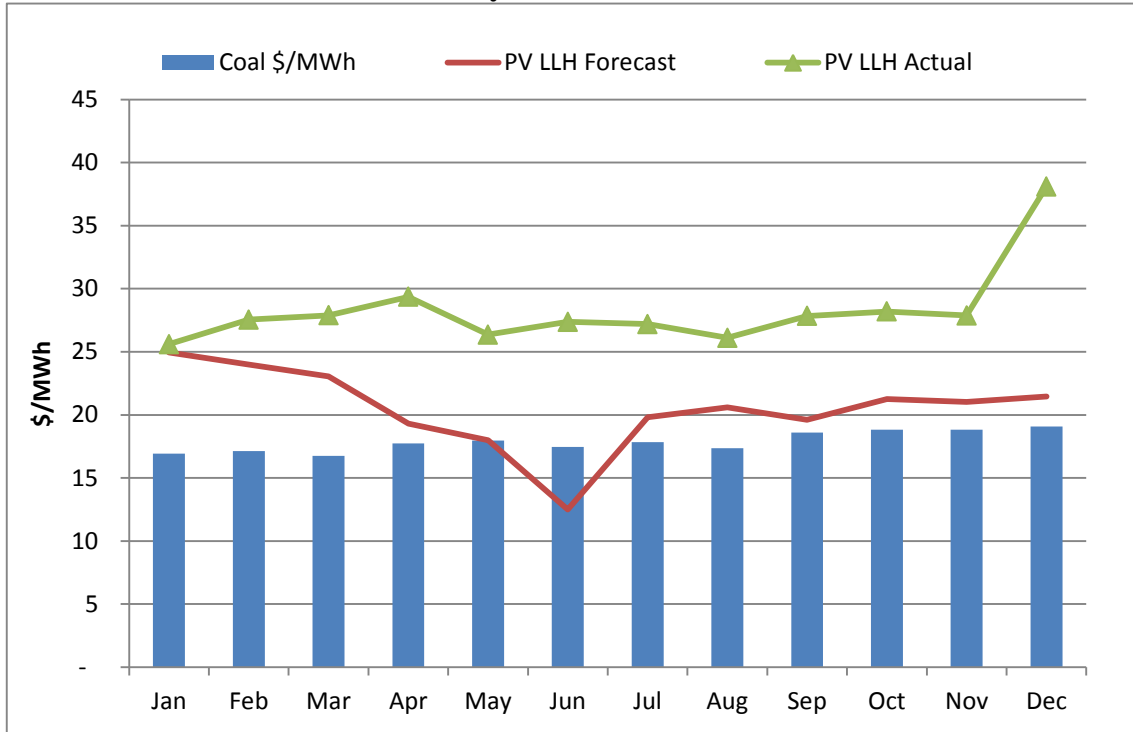
221 Q. Do the higher wholesale market prices for electricity mentioned earlier impact  
222 the volume of coal generation?

223 A. Yes. All else held equal, wholesale electricity market prices impact the economics  
224 of the Company's generating units, such that if market prices are higher than the  
225 cost of generating electricity, the Company will operate those facilities during those  
226 hours. Figures 1 and 2 below show the change in average wholesale electricity  
227 prices during light load hours at the Mid Columbia and Palo Verde trading hubs,  
228 respectively, for the Deferral Period compared to the average price for coal  
229 generation. The lower market prices for electricity included in Base NPC caused  
230 reduced generation from the Company's coal fleet in the GRID model.

**Figure 1**  
**Coal vs. Electricity Market Prices – Mid Columbia**



**Figure 2  
Coal vs. Electricity Market Prices – Palo Verde**



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

232 A. The total natural gas fuel expense in Actual NPC decreased by \$44 million  
 233 compared to Base NPC. The decrease in natural gas fuel expense was due to a  
 234 decrease in volume of 1,162 GWh in gas generation. Overall, the average price of  
 235 natural gas fuel during the Deferral Period was one percent higher than the average  
 236 price included in Base NPC.

237 **Q. Did the Company utilize a “must-run” setting in the GRID model for specific  
 238 gas units in the Base NPC?**

239 A. Yes. Currant Creek and Gadsby CT were modeled as “must run” units to compute  
 240 Base NPC in the 2012 GRC, setting them to operate at minimum capacity or higher  
 241 during all hours of the test period. These two units accounted for over fifty percent  
 242 of the decreased generation volume when comparing Base NPC versus Actual

243 NPC.

244 **Compliance with Previous Orders**

245 **Q. Has the Company prepared this EBA filing in conformance with Commission**  
246 **orders in Docket No. 09-035-15 as well as the outcome of previous EBAs and**  
247 **general rate cases?**

248 A. Yes. The Company's filing is in compliance with the Commission's order in Docket  
249 No. 09-035-15, and is consistent with applicable provisions of settlements reached  
250 in past EBA filings as well as the 2011 and 2012 GRCs. The Company's filing is  
251 accompanied by data as outlined in the filing requirements approved by the  
252 Commission in Docket No. 09-035-15 and augmented in Docket No. 12-035-67.  
253 Furthermore, the Company has continued to provide quarterly update filings to the  
254 Commission and the Division of Public Utilities reporting on the preliminary EBA  
255 balance and providing transactional data for electric and natural gas trades for each  
256 period.

257 **Q. Did the Company participate in the technical conference to discuss dynamic**  
258 **allocation as called for in the stipulation resolving the 2013 EBA?**

259 A. Yes. On February 26, 2014, the Company participated in the technical conference  
260 agreed to in Docket No. 13-035-32 to discuss the use of dynamic allocation factors  
261 in the EBA calculation. As described earlier in my testimony, Mr. McDougal's  
262 Exhibit RMP\_\_\_\_(SRM-2) through Exhibit RMP\_\_\_\_(SRM-4) provide illustrative  
263 examples of the EBA calculation under the various methods developed in past  
264 dockets in order for interested parties to consistently track the Company's annual  
265 filings and to view the impact of the various methods on the EBA deferral.

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

267 A. Yes.