

1 **Q. Please state your name, business address and present position with Rocky**
2 **Mountain Power ("the Company"), a division of PacifiCorp.**

3 A. My name is James Campbell and my business address is 1407 West North Temple,
4 Suite 310, Salt Lake City, Utah, 84116. I am currently employed as a Senior
5 Environmental Analyst for Rocky Mountain Power.

6 **QUALIFICATIONS**

7 **Q. Briefly describe your educational and professional background.**

8 A. I have a Bachelor of Science in Materials Science and Engineering, a Master of
9 Engineering in Environmental Engineering and a Master of Business
10 Administration all from the University of Utah. I have previously worked as an
11 engineer with Foster Wheeler, Boston Scientific, and the Utah Division of Air
12 Quality. In November 2007, I joined the Company as a Senior Environmental
13 Analyst.

14 **Q. What are your responsibilities as Senior Environmental Analyst?**

15 A. My primary responsibilities include reviewing proposed and final environmental
16 rules, regulations, and laws. Also, I participate on state and local environmental
17 stakeholder processes representing the Company. Further, I support the Company's
18 compliance activities for state and federal environmental regulations.

19 **PURPOSE OF TESTIMONY**

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

21 A. My testimony supports the Company's proposed Gadsby Emissions Curtailment
22 Program described in the Application, and attached as Exhibit E thereto. Through
23 this Application the Company seeks Commission authorization for this program

24 under U.C.A. § 54-20-105(1)(e).

25 **GADSBY EMISSIONS CURTAILMENT PROGRAM**

26 **Q. Please describe the Company's proposed Gadsby Emissions Curtailment**
27 **Program.**

28 A. This program would establish a process where the Gadsby Power Plant would
29 curtail operations during winter inversion air quality events, as defined by the Utah
30 Division of Air Quality (“UDAQ”), to reduce emissions and reimburse the system
31 for the curtailment. Full program details are included in the Gadsby Emissions
32 Curtailment Program document which I am sponsoring and which is included as
33 Exhibit E to the Application.

34 **Q. What benefits will the Gadsby Emissions Curtailment Program provide to**
35 **customers and the state of Utah?**

36 A. The DAQ issues action alerts when pollution is approaching unhealthy levels.
37 These alerts proactively notify residents and businesses before pollution build-up
38 so they can begin to reduce their emissions. When pollution levels reach 15 µg/m³
39 for PM_{2.5}, DAQ issues a ‘yellow’ or voluntary action day, urging Utah residents to
40 drive less and take other pollution reduction measures. At 25 µg/m³, 10 µg/m³
41 below the EPA health standard, DAQ issues a “red” or mandatory advisory
42 prohibiting burning of wood and coal stoves or fireplaces. It is at the 25 µg/m³ level
43 when the Company will take action to curtail the Gadsby Steam units.

44 **CONCLUSION**

45 **Q. Please summarize the proposal for the Gadsby Emissions Curtailment**
46 **Program contained in this Application.**

47 A. After receiving notification from the DAQ that an “air quality event” is in effect,
48 the Company will curtail the operations of the Gadsby Power Plant. The Company
49 will calculate the system impacts of not operating the system resource and request
50 funding available under U.C.A. § 54-7-12.8(6)(b)(ii)(B) to cover costs of the
51 curtailment during the five-year pilot program period. The curtailment program is
52 budgeted for a total \$500,000. Once the funds are exhausted the program will
53 terminate.

54 **Q. In your opinion, is the Company's emissions curtailment program consistent**
55 **with STEP and in the interest of Rocky Mountain Power's customers?**

56 A. Yes. Section 54-20-105-1(e) states “a program to curtail emissions from thermal
57 generation plant in the Salt Lake non-attainment area during a non-attainment event
58 as defined by the Division of Air Quality.” The Gadsby Emissions Curtailment
59 Program is consistent with this language. Further, since the Gadsby curtailment
60 program may reduce emissions in the Salt Lake non-attainment area (where
61 customers reside) and assist the state in complying with federal National Ambient
62 Air Quality Standards, the curtailment program is in customers’ interests.

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

64 A. Yes.