ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

1407 West North Temple
Salt Lake City, Utah 84116

January 17, 2020

VIA ELECTRONIC FILING

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Administrator

Re: Docket 20-035-04
Notice of Intent to File General Rate Case and Request for Approval of Test Period

Rocky Mountain Power, a division of PacifiCorp ("Rocky Mountain Power" or "Company"), pursuant to the Public Service Commission Administrative Procedures Act Rule, R746-700-1.B., hereby submits this notice to the Public Service Commission of Utah ("Commission") of its intent to file a general rate case on or about May 5, 2020.

In addition, pursuant to R746-700-10.B.1., Rocky Mountain Power respectfully requests that the Commission approve the test period the Company intends to use in its next general rate case, which is twelve months ending December 31, 2021, using a 13-month average rate base ("2021 Proposed Test Period"). Consistent with R746-700-10.B.1, the Company also files the testimony of Mr. Steven R. McDougal, providing information supporting the 2021 Proposed Test Period.

Informal inquiries may be directed to Jana Saba at (801) 220-2823 or me at (801) 220-4050.

Sincerely,

Yvonne R. Hogle

Yvonne Hogle
Assistant General Counsel

cc: Docket No. 13-035-184

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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of Its Proposed Electric Service Schedules and Electric Service Regulations.	Docket No. 20-035-04 **ROCKY MOUNTAIN POWER'S NOTICE OF INTENT TO FILE A GENERAL RATE CASE AND REQUEST FOR APPROVAL OF TEST PERIOD**

I. INTRODUCTION

Rocky Mountain Power, a division of PacifiCorp ("Rocky Mountain Power" or "Company"), pursuant to the Public Service Commission Administrative Procedures Act Rule, R746-700-1.B., hereby submits this notice to the Public Service Commission of Utah ("Commission") of its intent to file a general rate case on or about May 5, 2020. In addition, pursuant to R746-700-10.B.1., Rocky Mountain Power respectfully requests that the Commission approve the test period the Company intends to use in its next general rate case, which is twelve months ending December 31, 2021, using 13-month average rate base ("2021 Proposed Test Period"). Consistent with R746-700-10.B.1, the Company also files the testimony of Mr. Steven R. McDougal, providing information supporting the 2021 Proposed Test Period.

II. THE APPLICANT

In support of this request, Rocky Mountain Power states as follows:

1. The Company is an electrical corporation and public utility in the state of Utah. It provides electric service to retail customers in the state of Utah and is subject to the jurisdiction of the Commission with regard to its public utility operations. The Company also provides retail electric service in the states of Idaho and Wyoming under the name Rocky Mountain Power, and in the states of Oregon, Washington and California under the name Pacific Power.

2. The Company serves approximately 840,000 customers and has approximately 2,400 employees in Utah.

3. The Company requests that all notices, correspondence and pleadings with respect to this Request be sent to:

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III. EARLY DETERMINATION OF TEST PERIOD

The Company seeks approval of the test period before filing the general rate case application, which will include the proposed revenue requirement and rates. If the test period is not determined before the Company's filing, R746-700-10.A.2 requires the Company, in order to seek a future test period, to file an alternative test period, which in this case would be the 12 months ending June 30, 2020, in addition to an historical test period. Requiring the Company to prepare and the parties to review and audit all potential test periods increases the resources necessary to review the case and complicates the process. Determination of the test period early and separately from the other aspects of the general rate case will allow the Company, Commission and intervening parties the ability to focus their resources more efficiently on the relevant issues. Therefore, the Company requests the Commission approve the test period in advance of the May 5, 2020 filing.

IV. TEST PERIOD REQUEST

Utah Code Ann. § 54-4-4(3)(a) states that in determining just and reasonable rates, the Commission "shall select a test period that, on the basis of evidence, the commission finds best reflects the conditions that a public utility will encounter during the period when the rates determined by the commission will be in effect." In its October 20, 2004 Order in Docket No. 04-035-42, the Commission identified the following factors for consideration in test period selection, including:

- the general level of inflation;
- changes in the utility's investment, revenues, or expenses;
- changes in utility services;
- availability and accuracy of data to the parties;
- ability to synchronize the utility's investment, revenues, and expenses;
- whether the utility is in a cost increasing or cost declining status;
- incentives to efficient management and operation; and
- the length of time the new rates are expected to be in effect.[1]

The Company's general rate case filing on or around May 5, 2020 will request a rate-effective date of January 1, 2021. The 2021 Proposed Test Period most closely reflects the conditions the Company expects to experience during the rate-effective period and rates will be better aligned with the Company's expected cost of service. The Company selected the future test period in this case in consideration of the current regulatory environment, state statutes governing test period development and the business factors identified above by the Commission. The 2021 Proposed Test Period is explained and supported in the direct testimony of Mr. McDougal.

Utah Code Ann. § 54-4-4, requires that rates be just and reasonable. To be just and reasonable for both customers and utilities, rates must accurately reflect prudent costs expected to be incurred by a utility during the period when rates are in effect. Current economic conditions,

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[1] Order Approving Test Period Stipulation, Docket No. 04-035-42 (October 20, 2004)

the ability for the Company to obtain timely recovery of the costs related to the wind repowering and new wind and transmission projects ("EV2020 projects"), and increased depreciation expense, among other things, support the use of the 2021 Proposed Test Period. Under these circumstances, if the 2021 Proposed Test Period is not approved, the rates in effect for the rate-effective period will not be aligned with the Company's expected costs of service which would deprive the Company of a fair opportunity to recover its costs.

Utah Code Ann. § 54-4-4(3)(b) allows the use of a forward-looking test period, which may include data forecast up to 20 months beyond of the filing date of a rate case. In the 2011 general rate case, Docket No. 10-035-124 ("2011 GRC"), the Commission authorized the Company's use of a 17-month forecast test period, i.e., twelve months ended June 30, 2012, on the basis that the statutory rate case processing schedule and the rates to be implemented as part of the 2011 GRC could potentially be in effect during the latter half of 2012. The rates to be approved as part of this 2020 general rate case will likely be in effect not only during 2021 but after (although their full duration at this time is uncertain). In reviewing a previous Commission determination on test period, the Utah Supreme Court stated that "in future proceedings, the Commission will decide issues concerning test year … based on the then existing conditions of the utility and the economy in which it is operating." *See Mountain Fuel Supply Company v. Public Service Commission of Utah*, 861 P.2d 414 (Utah 1993). Current economic conditions, the costs related to the EV2020 projects, and increasing depreciation expense as a result of the new depreciation rates that are approved in Docket No. 18-035-36, among other things, and the likelihood that rates that will be approved in the next general rate case will be in effect not only during the first year of the rate-effective period but beyond support the use of the 2021 Proposed Test Period in order for rates to be just and reasonable for both customers and the Company.

Wherefore, the Company respectfully requests that the Commission approve the 2021 Proposed Test Period in this case, which is 12 months ending December 31, 2021, with 13-month average rate base. The Company proposes that the Commission hear evidence in support of this request and set a procedural schedule that allows for an order to be issued by March 17, 2020.

RESPECTFULLY SUBMITTED this 17th day of January, 2020.

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Rocky Mountain Power
Docket No. 20-035-04
Witness: Steven R. McDougal

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF UTAH

ROCKY MOUNTAIN POWER

Direct Testimony of Steven R. McDougal

January 2020

Q. Please state your name and business address with PacifiCorp dba Rocky Mountain Power ("Company").

A. My name is Steven R. McDougal, and my business address is 1407 W. North Temple, Suite 330, Salt Lake City, Utah 84116.

QUALIFICATIONS

Q. Please describe your education and professional background.

A. I received a Master of Accountancy from Brigham Young University with an emphasis in Management Advisory Services and a Bachelor of Science degree in Accounting from Brigham Young University. In addition to my formal education, I have also attended various educational, professional, and electric industry-related seminars. I have been employed with PacifiCorp and its predecessor, Utah Power and Light Company, since 1983. My experience includes various positions with regulation, finance, resource planning, and internal audit. My current position is the Director of Revenue Requirements.

Q. What are your current responsibilities with the Company?

A. My primary responsibilities include overseeing the calculation and reporting of the Company's regulated earnings and revenue requirement, assuring that the interjurisdictional cost allocation methodology is correctly applied, and explaining those calculations to regulators in the jurisdictions in which the Company operates.

Q. Have you testified in previous proceedings?

A. Yes. I have provided testimony in many dockets before the Public Service Commission of Utah ("Commission"). I have also provided testimony before the California, Idaho, Oregon, Washington, and Wyoming public utility commissions.

PURPOSE OF TESTIMONY

Q. What is the purpose of your direct testimony?

A. Rocky Mountain Power is preparing to file a general rate case on approximately May 5, 2020, for new rates to be effective January 1, 2021 ("2020 GRC"). My testimony identifies the three different test periods required for a General Rate Case under Utah Code Ann. R746-700-10.A. In addition, my testimony explains why, after evaluating a variety of different factors, using a test period that aligns with the rate-effective period is the only test period that produces rates that properly reflect the cost of providing service to our customers during the timeframe for which the rates are in effect. Therefore the Company proposes a test period for the 2020 GRC that uses the 12-months ending December 31, 2021 with 13-month average rate base ("2021 Proposed Test Period").

Q. Why is the Company seeking a test period determination prior to filing the general rate case application?

A. The Company is seeking a test period determination prior to filing the general rate case application, which will include the proposed revenue requirement and rates, to simplify the filing, which allows the parties to more efficiently focus their resources on the relevant aspects of the case. A timely test period determination also allows the Commission, the Company and other parties to consider if the proposed timing for the general rate case will allow timely recovery of prudently incurred costs associated with capital investments related to the repowering and new wind and transmission projects. The Company's 2021 Proposed Test Period is the only test period that allows the

Company timely recovery of the majority of these costs without the need for multiple general rate cases or extensive use of alternative mechanisms or accounting deferrals. Absent prior determination of a test period, the Company is required to file the three separate test periods in order to request a future test period, as described later in my testimony, requiring parties to audit and review all three test periods and propose, evaluate and respond to adjustments to all three test periods. Additionally, issues raised by parties related to test period selection require resources to be divided and constrains the 240-day statutory schedule.

TEST PERIODS

Q. What test period information is required under Utah Admin. Code R746-700-10(A) in a general rate case application?

A. In order to request a future test period, Utah Admin. Code R746-700-10(A) requires the Company to file three different test periods: (1) an historical test period for the 12-month period of actual, unadjusted operations; (2) an alternative test period for the 12-month period ending on the last day of June or December, whichever is closest, following the filing date of the application; and (3) the Company's proposed future test period.

Q. What test period does the Company propose to use in its 2020 GRC?

A. The Company plans to file its 2020 GRC on or about May 5, 2020 for rates effective January 1, 2021. The Company proposes a future test period using the 12 months ending December 31, 2021. The historical test period would be 12-months ended December 31, 2019 and the mid-test period closest to the filing date, as required under R746-700-10.A.2 would be 12-months ended June 30, 2020.

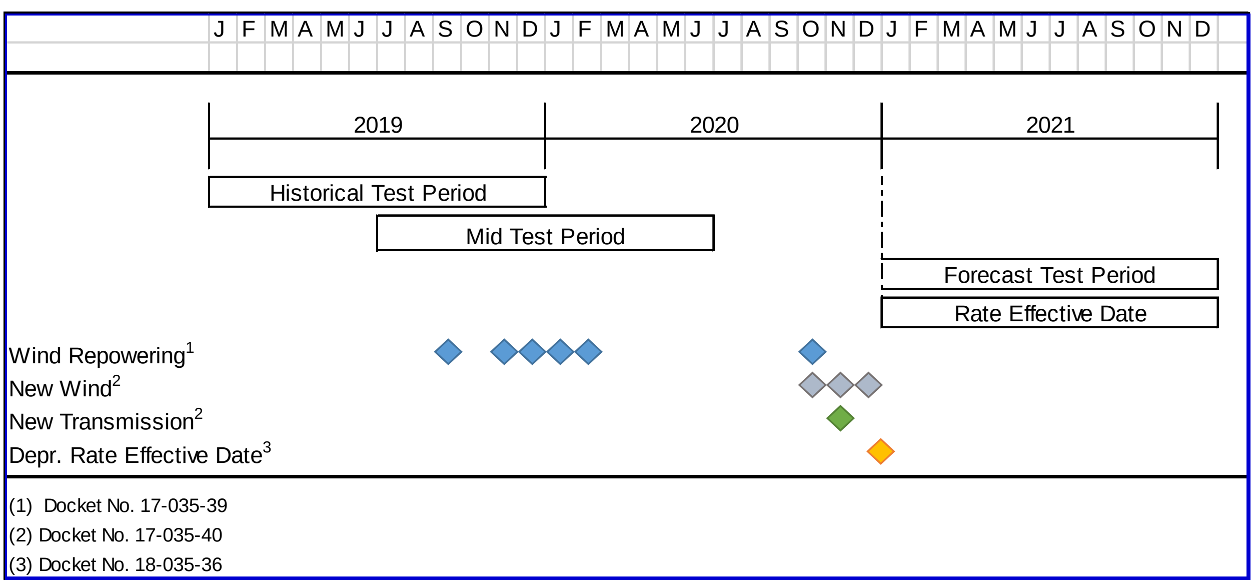
Q. What are the major drivers for the 2020 GRC?

A. The Company has identified the major drivers that necessitate its 2020 GRC as the major capital projects associated with wind repowering (Docket No. 17-035-39), new wind and transmission projects (Docket No. 17-035-40) and the implementation of new depreciation rates, which are likely to result in an increase to depreciation expense beginning January 1, 2021.

Q. Why is the Company recommending the 2021 Proposed Test Period?

A. The 2021 Proposed Test Period aligns with the rate-effective period and properly reflects the cost of providing service to our customers. Table 1 below illustrates the three test periods in relation to the January 1, 2021 rate-effective date, along with the dates associated with the previously mentioned major drivers of the 2020 GRC.

TABLE 1



As shown, utilizing a historical test period or the alternative period only partially captures the wind repowering projects and completely denies the Company recovery of the new wind and new transmission and increased depreciation expense. The 2021 Proposed Test Period is the only option that provides the Company the ability to recover its prudently incurred costs related to the wind repowering projects, the new wind and transmission investments, and the increased depreciation expense. Any risk of forecasting error from using a forecast test period is greatly overshadowed by the denial of the recovery of these items to the Company.

Q. Will the development of the 2021 Proposed Test Period be consistent with that of the Company's previous general rate cases in Utah?

A. Yes.

Q. Please explain how the Company plans to develop the revenue requirement for the 2021 Proposed Test Period.

A. To calculate the 2020 GRC revenue requirement, the Company will begin with historical accounting information; in this case, the 12 months ended December 31, 2019 as the base period. The revenue requirement components in the historical period are analyzed to determine if an adjustment is warranted to reflect normal operating conditions expected to occur during the 2021 Proposed Test Period. Parties will have the opportunity to review all historical information and evaluate all adjustments to the future test period to make recommendations on the reasonableness of the forecasts. Therefore, approving a future test period will not disadvantage any party or presume an outcome in the proceeding. Parties will be free to review and audit the supporting information provided through the application, testimony, exhibits, and filing requirements under R746-700(20) through (23) and propose adjustments to the costs included in the test period.

TEST PERIOD FACTORS

Q. Why does the Company support the use of the 2021 Proposed Test Period?

A. The Company's primary objective in determining a test period is to develop normalized results of operations based on a period of time that best reflects the conditions during which the new rates will be in effect. The Company considered the following eight factors previously identified by the Commission in Docket No. 04-035-42 in its selection of test period:

- the general level of inflation;
- changes in the utility's investment, revenues, or expenses;
- changes in utility services;
- availability and accuracy of data to the parties;
- ability to synchronize the utility's investment, revenues, and expenses;
- whether the utility is in a cost increasing or cost declining status;
- incentives to efficient management and operation; and
- the length of time the new rates are expected to be in effect.[1]

In its Order on Test Period in Docket No. 07-035-93,[2] the Commission also expressed its desire to balance Company and customer interest. The Company's 2021 Proposed Test Period is the best option when considering these factors.

- **Level of Inflation –** While the Company has striven to absorb cost increases as much as possible, inflationary pressures from items such as labor costs due to increases in

[1] Order Approving Test Period Stipulation, Docket No. 04-035-42 (October 20, 2004)
[2] Order on Test Period, Docket No. 07-035-93 (February 14, 2008)

many of its union labor contracts still exist. Capturing the correct level of wages during the rate-effective period is critical in allowing the Company a fair opportunity to adequately recover the cost associated with providing service to all customers.

- **Changes in Utility Investment, Revenues, and Expenses –** As described earlier, changes in utility investment and expenses are a major driver for the 2020 GRC. The Utah service territory continues to grow with increasing demand for renewable resources. The Company has made significant capital investment including the wind repowering and the new wind and transmission assets. Similarly, the rate pressures due to the planned economic retirement of existing coal units and recovery of prudent capital additions will increase overall depreciation expense as part of the 2018 depreciation study. Furthermore, because of past, current, and future load changes, the Company will have to acquire new generation and transmission resources, impacting not only the level of investment needed to be included in rate base, but also retail revenues, net power costs and operations and maintenance costs.
- **Changes in Utility Services –** No change in service levels is anticipated, however the Company continues to fund maintenance in providing safe and reliable electric service to our customers.
- **Availability and Accuracy of Data to Parties –** Adoption of the 2021 Proposed Test Period for the 2020 GRC will not compromise the parties' ability to obtain available and accurate data. Any risk of forecasting error associated with the 2021 Proposed Test Period should be weighed against the fact that if an earlier test period is adopted the Company would be denied cost recovery of the most significant cost drivers in the case.

- **Ability to Synchronize the Utility's Investment, Revenues and Expenses –** The synchronization or "matching" of a utility's revenues, expenses and investments in setting rates is a traditional rate making concept; however, it is one that cannot be viewed in isolation without taking into consideration the rate-effective period. The goal in setting rates should be to set rates that properly reflect the costs that will be incurred by a utility during the period in which the rate will be in effect. The idea that a purely historical test period may be properly synchronized between the revenues, expenses, and investment is correct, however, that may have very little to do with the costs that will be incurred when new rates go into effect. The important synchronization under the statute is aligning the revenue requirement determined for the test period and the prudent costs that will be incurred during the rate-effective period. This is important in the current regulatory environment where the Company has and continues to make significant capital investment in projects that lower net power costs and provide production tax credit benefits.
- **Whether the Utility is in a Cost Increasing or Cost Declining Status –** As discussed above, while the Company has controlled and mitigated many cost components of the revenue requirement, changes as a result of increased depreciation expense and capital investment result in an overall cost-increasing status.
- **Incentives to Efficient Management and Operation –** The Company management is continually looking for ways to increase the efficiency of the Company. The Company is adding investment to serve load. To use a test period that does not align with the rate-effective date would be a disincentive to the Company in these efforts.

- **Length of Time New Rates Are Expected To Be In Effect –** The Company has not made a decision on any length of time the new rates are expected to be in effect; however, the Company has not filed a general rate case since Docket No. 13-035-184. That rate case resulted in a two-step increase with the later step effective September 1, 2015, over four years ago. The 2021 Proposed Test Period balances the need for timely recovery of prudent costs with these other considerations.

CHANGES IN UTILITY INVESTMENT, REVENUES, AND EXPENSES

Q. Can you provide specific detail on the changes in utility investment, revenues, and expenses the Company is experiencing?

A. As I mentioned, the primary drivers of the 2020 GRC are the new capital investments and increased depreciation expense from new depreciation rates. The Company is in an environment of increasing capital costs related to new investments. Additionally, the Company has made significant capital investment since the last general rate case to improve reliability and support customer load growth. I will discuss each of these items in more detail.

Q. Please explain the impact of the different test periods in regards to the wind repowering project cost and benefits.

A. The Commission approved the Company's resource decision in Docket No. 17-035-39 to repower eleven existing wind projects for a cost of approximately $1.1 billion.[3] The wind repowering project will reduce operating costs, extend the useful lives of the wind facilities, provide for greater control of power quality and voltage as well as provide customers long-term net power cost benefits and tax credits. The wind repowering

[3] Report and Order, Docket No. 17-035-39 (May 25, 2018)

projects began to be placed into service in the latter part of 2019. When using a 13-month average rate base, both the expense, tax credits, and capital investment in these projects would only be partially recovered using any test period other than the 2021 Proposed Test Period.

Q. Please explain the impact of the different test periods in regards to the new wind and transmission project cost and benefits.

A. The Commission approved the Company's resource decision in Docket No.17-035-40 to construct or procure four new wind resources in Wyoming and to construct transmission facilities for a cost of approximately $2 billion.[4] These projects are anticipated to be placed into service in calendar year 2020 and would not be fully reflected in any test period other than the 2021 Proposed Test Period.

Q. Please explain the impact of the different test periods in regards to the 2018 depreciation study.

A. The Company's 2018 depreciation study is currently pending before the Commission in Docket No. 18-035-36. Although depreciation rates from that proceeding are not final, any change in depreciation expense that results from the new rates will only be fully reflected in rates if the Company's 2021 Proposed Test Period is used.

Q. If the Company were to use a different period other than calendar year 2021, what would be the impact?

A. Using a test period other than the 2021 Proposed Test Period would expose the Company to significant regulatory lag. "Regulatory lag" refers to the time difference between when costs are incurred and when they are included in rates. More than

[4] Order, Docket No. 17-035-40 (June 22, 2018)

anything else, regulatory lag is the result of the rate-making process, including selection of an improper test period. If new rates do not reflect the costs being incurred at the time the rates are in effect, regulatory lag is created.

Q. If the Company's proposed test period is not approved, what are the other options the Company has to recover its prudently incurred costs?

A. Given the current period of increased investment, using any test period other than the one that aligns with the rate-effective date, deprives the Company of timely cost recovery of prudently incurred costs that are necessary to serve customers. More importantly, using any other test period does not reflect the true cost to serve customers during the rate-effective period and gives poor price signals to customers. In response, the Company would need to file another rate case, possibly overlapping with the current rate case, or would need a deferral mechanism in order to recover costs in a manner that matches investment costs with the full net power cost benefits that will flow through the energy balancing account.

Q. Would the Company's 2021 Proposed Test Period allow the Company the opportunity to recover all of the prudently incurred costs associated with the wind repowering, new wind and new transmission projects?

A. No. The 2021 Proposed Test Period gives the Company the opportunity to recover its prudently incurred costs after January 1, 2021 if a calendar year 2021 test period is used. However, this would not give the Company the opportunity to recover its prudently incurred costs occurring prior to January 1, 2021. In order to have the opportunity to recover its prudently incurred costs prior to January 1, 2021, the Company would need a deferral mechanism. A deferral mechanism would allow the

Company to defer costs prior to January 1, 2021 and seek recovery as part of the general rate case. Even though the Company, absent a deferral mechanism, is not getting recovery of its costs, customers will receive the net power cost benefits through the energy balancing account. This inequity prior to the rate case and the ability to match the costs and benefits associated with the wind repowering project are addressed in Docket No. 19-035-45. Absent the ability to recover the costs of the new wind and transmission project and the increased depreciation expense through the 2021 Proposed Test Period from new depreciation rates, the Company would need to request similar deferrals.

SUMMARY OF RECOMMENDATIONS

Q. Please summarize your recommendations to the Commission.

A. I recommend that, based on the reasons above, the Commission approve the Company's 2021 Proposed Test Period. This affords the Company the reasonable opportunity to recover its prudently incurred costs required to provide service to customers and earn a reasonable return on investment during the period rates will be in effect. In addition, the Company's 2021 Proposed Test Period is the only test period that fully matches the cost and benefits of the wind repowering project, new wind and transmission projects and includes implementation of the new depreciation rates.

Q. Does this conclude your direct testimony?

A. Yes.

<u>**CERTIFICATE OF SERVICE**</u>

Docket No. 20-035-04, 13-035-184

I hereby certify that on January 17, 2020, a true and correct copy of the foregoing was served by electronic mail to the following:

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