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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 Exhibit Nos. 1.0-1.2
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**REBUTTAL TESTIMONY AND EXHIBITS OF
BRIAN DICKMAN**

Stadion LLC (“Stadion”) hereby submits the attached Rebuttal Testimony of Brian Dickman on behalf of Stadion.

Respectfully submitted this 5th day of October, 2020.

Sanger Law, PC

/s/ Irion Sanger

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Counsel for Stadion LLC

CERTIFICATE OF SERVICE

Docket No. 20-035-04

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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

Exhibit No. 1.0

REBUTTAL TESTIMONY OF

BRIAN DICKMAN

On Behalf of

Stadion LLC

October 5, 2020

1

1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 **A.** My name is Brian Dickman. My business address is 225 Union Boulevard,
4 Suite 305, Lakewood, Colorado 80228.

5 **Q. Please describe your background and experience.**

6 **A.** I am an Executive Consultant at the consulting firm NewGen Strategies and
7 Solutions LLC. Exhibit 1.1 (Resume) and Exhibit 1.2 (Record of Testimony),
8 which are both attached to this testimony, summarize my experience and
9 qualifications. I have over 18 years of experience in the utility industry with
10 extensive experience preparing and evaluating utility revenue requirements and
11 cost allocation studies, developing utility avoided costs, and evaluating the
12 impact of utility transactions on its customers. I began my career working for
13 PacifiCorp and transitioned to consulting on energy matters in 2017. I have
14 filed expert testimony before the public utility commissions of California,
15 Idaho, Indiana, Oregon, Utah, Washington, and Wyoming.

16 **Q. On whose behalf are you testifying in this proceeding?**

17 **A.** My testimony is provided on behalf of Stadion LLC (“Stadion”), a subsidiary
18 of Facebook, Inc. (“Facebook”).

19 **Q. Have you previously filed testimony in this case?**

20 **A.** No.

21 **Q. What is the purpose of this rebuttal testimony?**

22 **A.** My rebuttal testimony responds to issues raised by Dr. Joni Zenger, on behalf
23 of the Division of Public Utilities (“Division”), related to the contract between
24 PacifiCorp and Vitesse LLC (“Vitesse”), a Facebook subsidiary in Oregon,
25 pursuant to Oregon Schedule 272 (“Schedule 272 Agreement”) to purchase the
26 renewable energy attributes of the Pryor Mountain Wind Project (or the
27 “Project”). Specifically, I will respond to the concerns raised by the Division
28 related to PacifiCorp’s Oregon Schedule 272 tariff, which has been the subject
29 of some discussion in PacifiCorp’s general rate case (“Oregon GRC”) in front
30 of the Oregon Public Utility Commission (“Oregon Commission” or
31 “OPUC”).¹

32 **Q. Are you familiar with the referenced Oregon GRC?**

33 **A.** Yes. I am a consultant for Vitesse in the Oregon GRC. I did not submit
34 testimony, but I reviewed others’ testimony and pleadings contemporaneous to
35 when they were filed. I am still providing consulting services to Vitesse in that
36 case.

37 **Q. Please summarize your rebuttal testimony.**

38 **A.** Schedule 272 (the Renewable Energy Rider Optional Bulk Purchase Option) is
39 an Oregon rate schedule that is part of PacifiCorp’s Oregon Blue Sky
40 renewable energy program. The Schedule 272 question currently before the
41 Oregon Commission is unrelated to the issues raised by the Division in this

¹ *In re PacifiCorp, dba Pacific Power, Request for a General Rate Revision, Docket No. UE 374, Initial Utility Filing (Feb. 14, 2020).*

42 proceeding, as the question is addressing Oregon’s unique energy policies
43 related to customer choice and renewable energy. My testimony will not
44 address the prudence or reasonableness of the Project. It will only explain the
45 issues surrounding Oregon Schedule 272 in further detail to clarify any
46 confusion regarding the Oregon proceeding.

47 An important issue pending in the Oregon GRC is whether to adopt the
48 OPUC Staff² recommendation to open a new investigation into the future of
49 Schedule 272. Staff recommends the Oregon Commission investigate whether
50 Schedule 272 should be treated as a Voluntary Renewable Energy Tariff
51 (“VRET”) or “green tariff” under Oregon law. VRETs are subject to specific
52 criteria and regulatory guidelines set by Oregon legislation and previous
53 Commission decisions. The VRET guidelines are in place to address potential
54 impacts on 1) non-participating cost-of-service customers and 2) the
55 competitive retail market for nonresidential customers in Oregon. Staff raised
56 the question of whether Schedule 272 is essentially acting as a VRET without
57 OPUC approval, and at this time, it is recommending that the Oregon
58 Commission investigate the matter and halt future Schedule 272 transactions
59 utilizing utility-owned resources until the investigation is complete.

² In Oregon, the public utility commission has a Utility Program Staff (“Staff”) provides independent, expert testimony and recommendations in contested case proceedings. Staff considers the positions of other parties to the proceeding, balances the facts and policy considerations, and makes recommendations that protect the public interest. OPUC, *Internal Operating Guidelines* at 20, available at <https://www.oregon.gov/puc/forms/Forms%20and%20Reports/Internal-Operating-Guidelines.pdf> (last visited Oct. 5, 2020).

60 No party to the Oregon GRC has proposed to alter or unwind the
61 Schedule 272 Agreement, and further Oregon proceedings related to renewable
62 energy tariffs and Schedule 272 will have no impact on Pryor Mountain or the
63 Schedule 272 Agreement as included in this case. Therefore, the impact of any
64 investigatory outcome in Oregon (if it occurs) will not affect the Schedule 272
65 Agreement as included in the current Utah rate case.

66 **II. Summary of the Division’s Concerns Regarding Schedule 272**

67 **Q. Please summarize the Division’s testimony related to the Schedule 272**
68 **Agreement.**

69 **A.** As part of the Division’s review of Pryor Mountain Wind, Dr. Zenger explains
70 that PacifiCorp’s acquisition of the Project is accompanied by the Schedule 272
71 Agreement, a 25-year contract between PacifiCorp and Vitesse, a Facebook
72 subsidiary encompassing its Oregon data center operations.³ Vitesse is a
73 PacifiCorp customer located in Oregon, taking bundled service under Oregon
74 Schedule 48 (large general service 1,000 kW and over). Under the Schedule
75 272 Agreement, Vitesse will purchase all of the renewable energy credits
76 (“RECs”) generated by the Project over the first 25 years of the project life
77 according to the terms of Oregon Schedule 272, and PacifiCorp will retire the
78 RECs on Vitesse’s behalf.⁴ REC revenue received under the Schedule 272
79 Agreement will be passed back to PacifiCorp’s customers in all states.

³ DPU Exhibit 8.0 DIR at 2:34-39.

⁴ *Id.* at 8:146-153.

80 Dr. Zenger points out that when she prepared her testimony, the
81 Schedule 272 Agreement was also under review in PacifiCorp’s Oregon GRC,
82 and she cited to comments made by the Oregon Commission Staff in its rebuttal
83 testimony filed July 24, 2020, in that case (Docket No. UE 374).⁵ On
84 September 2, 2020, shortly before the Division filed its testimony in this Utah
85 proceeding, Staff (and other parties) submitted its “Prehearing brief” in the
86 Oregon GRC, which more clearly outlines Staff’s position.⁶ Dr. Zenger did not
87 refer to this Prehearing Brief in her testimony.

88 **Q. What are the issues identified by the Division?**

89 **A.** The Division questions whether the benefit to one large Oregon commercial
90 customer for a small attribute (RECs) of a project of this magnitude is a benefit
91 to the rest of the Company’s cost of service customers who: 1) pay for the
92 Project through retail rates for 30 years of the Project’s depreciable life; 2)
93 assume the risk to construct the Project; and 3) pay the ongoing operating and
94 maintenance costs through the life of the Project.

95 **Q. What does the Division recommend regarding the Schedule 272**
96 **Agreement?**

97 **A.** The Division recommends that, until a review of the issues raised in Oregon
98 regarding Schedule 272 is completed, Rocky Mountain Power should calculate

⁵ *Id.* at 3:43-45.

⁶ In an Oregon general rate case, the parties file legal prehearing briefs summarizing the positions prior to the evidentiary hearing. After the evidentiary hearing, the parties file posthearing briefs and make oral arguments before the Commissioners and administrative law judges. The full Oregon schedule can be found here: <https://www.oregon.gov/puc/edockets/Pages/default.aspx>

99 the Project benefits by excluding the revenue from the sale of RECs to Vitesse.⁷

100 Dr. Zenger states that the Division will continue to monitor the review of the

101 Schedule 272 Agreement in Oregon.⁸

102 **III. Oregon Green Tariff Policy Background**

103 **Q. Could you briefly summarize what a VRET is?**

104 **A.** A VRET is Oregon’s name for a “green tariff,” which is an optional program
105 that utilities may offer with approval from their respective state public utility
106 commissions. VRETs allow end-use customers to purchase the bundled output
107 (i.e., both RECs and renewable energy) directly from a specific renewable
108 project. Participants still receive electric service from the utility, but their bills
109 are adjusted to ensure the cost of the VRET resource(s) is recovered only from
110 participants without affecting non-participating customers.

111 The Oregon legislature passed House Bill (“HB”) 4126 in 2014, which
112 directed the Oregon Commission to study and determine the potential impacts a
113 utility VRET program might have, and whether a VRET tariff for
114 nonresidential customers in Oregon would be reasonable and in the public
115 interest.⁹ The legislature also authorized the Oregon Commission to approve a
116 utility’s filing if it determined that a utility VRET would serve the public
117 interest, based on various factors set out in the legislation.¹⁰ After lengthy

⁷ DPU Exhibit 8.0 DIR at 10:178-181.

⁸ *Id.* at 19:384-386.

⁹ H.B. 4126, 77th Leg. Assemb. Reg. Sess. (Or. 2014), available at <https://olis.leg.state.or.us/liz/2014R1/Downloads/MeasureDocument/HB4126/Enrolled>.

¹⁰ *Id.* at § 3 (3)(a)-(e) (“(a) Whether allowing electric companies to provide voluntary renewable energy tariffs to nonresidential customers promotes the

118 proceedings to determine a framework for potential utility VRET filings in
119 Oregon, at this time, only Portland General Electric Company (“PGE”) has
120 gone through the process with the Oregon Commission to have a VRET
121 approved.

122 **Q. You mentioned that the issues raised in the Oregon GRC stem specifically**
123 **from Oregon energy law and policy that is not applicable in Utah. Please**
124 **explain.**

125 **A.** Without a VRET, Oregon large nonresidential customers that remain cost-of-
126 service customers, purchasing electricity from their interconnected utility,
127 cannot purchase both RECs and renewable energy directly from the same
128 source. Oregon has two other options for customers to purchase bundled
129 renewable energy associated with a specific renewable resource: Direct Access
130 or Community Solar, both of which are complex and have been subject to
131 extensive litigation and protracted administrative proceedings.

132 In 1999, the Oregon legislature passed Senate Bill 1149, which provided
133 Oregon industrial and commercial ratepayers (in other words, nonresidential
134 customers) a right to “direct access,” which means they can purchase electricity

further development of significant renewable energy resources; (b) The effect of allowing electric companies to offer voluntary renewable energy tariffs on the development of a competitive retail market; (c) Any direct or indirect impact, including any potential cost-shifting, on other customers of any electric company offering a voluntary renewable energy tariff; (d) Whether the voluntary renewable energy tariffs provided by electric companies to nonresidential customers rely on electricity supplied through a competitive procurement process; and (e) Any other reasonable consideration related to allowing electric companies to offer voluntary renewable energy tariffs to their nonresidential customers.”).

135 from a third-party electricity service supplier (“ESS”) rather than their
136 regulated utility. Under Oregon’s direct access program, a large nonresidential
137 customer can purchase energy from a specified renewable resource.

138 The Oregon legislature passed Senate Bill 1547 in 2016 to create a
139 Community Solar Program. The program expands access to solar energy for
140 Oregon utility customers who are unable or unwilling to invest in their own
141 rooftop system. It allows these customers to purchase energy from a
142 community solar project and receive a credit on their monthly utility bill for the
143 electricity from their portion of the project.¹¹

144 **Q. Are there any options available for large nonresidential cost-of-service**
145 **customers in Oregon to purchase RECs and meet their goals to facilitate**
146 **renewable energy development?**

147 **A.** Yes. PacifiCorp offers Oregon customers a Schedule 272–Renewable Energy
148 Rider Optional Bulk Purchase Option, where a cost-of-service customer can
149 purchase RECs at a cost over-and-above their regular electric bill. Customers
150 purchasing RECs under Schedule 272 continue to receive their energy through
151 PacifiCorp’s other standard commercial rate schedules.

152 **Q. Can you explain the unique issues related to implementing a VRET in**
153 **Oregon?**

¹¹ Oregon Community Solar Program, *Program Implementation Manual*, available at <https://www.oregoncsp.org/p/ProgramDevelopmentProcess> (last visited Sept. 24, 2020).

154 A. In response to HB 4126, the Oregon Commission opened a docket to explore
155 whether it should adopt a VRET for Oregon electric companies.¹² As part of
156 that docket, the OPUC Staff performed a study on the potential impacts of a
157 VRET program, and the Oregon Commission ultimately determined that it
158 would wait for one or more of the state’s regulated electric utilities to actually
159 make a filing for a VRET program before determining whether it would be in
160 the public interest.¹³ However, the Oregon Commission outlined nine
161 conditions a utility must consider while drafting a VRET proposal.¹⁴ These
162 conditions were designed to protect non-participating cost-of-service customers
163 and Oregon’s Direct Access program. For example, the VRET terms and
164 conditions must “mirror those for direct access.”¹⁵

¹² *In re Pub. Util. Comm’n of Or. Voluntary Renewable Energy Tariffs for Non-Residential Customers*, Docket No. UM 1690, Order No. 15-258 (Aug. 26, 2015).

¹³ *Id.* at Order No. 15-405 (Dec. 15, 2015).

¹⁴ *Id.* (“1) Certain Renewable Portfolio Standards definitions (resource type, location, and bundled renewable energy certificates) must apply to VRET products; 2) Any RECs associated with serving participants must be retired by or on behalf of the participants, unless they give consent to do otherwise; 3) VRET-eligible projects must not have been operational earlier than 2015; 4) The VRET program size is limited to 300 aMW for PGE; 5) VRET program design should be sufficiently differentiated from the existing direct access programs; 6) VRET product offering terms and conditions, including the timing and frequency of offerings, as well as transition costs (i.e. the costs assignable to participants to avoid stranded costs at the utility), must mirror those for direct access; 7) The utility may own a VRET resource, but may not include it in its general rate base; 8) All direct and indirect costs and risks are borne by the participating VRET customers, shareholders of the utility or third-party developers; and 9) All VRET offerings must be made publicly available and subject to review by the Commission to ensure they are fair, just, and reasonable.”)

¹⁵ *Id.* at 2.

165 Initially, the Oregon utilities determined that they would not file for
166 VRETs, explaining that customers were not interested in a program that met the
167 conditions laid out by the Oregon Commission.¹⁶ Two years later, however,
168 PGE asked the Oregon Commission to approve its proposed VRET, which is
169 called the “Green Energy Affinity Rider” (“GEAR”).¹⁷

170 **Q. Does PacifiCorp have a VRET?**

171 **A.** No, PacifiCorp does not have a VRET in Oregon. Currently, PacifiCorp
172 customers’ only options to purchase bundled renewable energy in Oregon from
173 a specified resource are Direct Access or Community Solar.

174 **Q. How is purchasing RECs under Schedule 272 different from a VRET?**

175 **A.** PacifiCorp has explained that Schedule 272 is different from a VRET because
176 any energy from renewable projects acquired by PacifiCorp for the program is
177 supplied to all customers, while the RECs are separated from the energy and
178 sold to participating customers.¹⁸ The Schedule 272 Agreement between
179 PacifiCorp and Vitesse is structured in this manner. Under Vitesse’s Schedule
180 272 Agreement with PacifiCorp, Vitesse will purchase all RECs generated by
181 Pryor Mountain for 25 years. Meanwhile, Vitesse will continue to purchase
182 undifferentiated cost-based electric service from PacifiCorp under its Schedule
183 48 tariff.

¹⁶ PGE Letter of April 14, 2016, filed in Docket No. UM 1690.

¹⁷ *In re PGE Investigation into Proposed Green Tariff*, Docket No. 1953, Order No. 19-075 (Mar. 5, 2019).

¹⁸ Docket No. UE 374, PAC/2000, Wilding/25:17-20.

184 PacifiCorp has consistently stated that it will sell the RECs from Pryor
185 Mountain separate from the Project’s energy, which would serve PacifiCorp’s
186 general pool of customers. For example, when PacifiCorp filed its Notice of
187 Exception in Oregon¹⁹ it described the Schedule 272 Agreement as a unique
188 opportunity to leverage a customer’s “desire to purchase RECs from a specified
189 resource while providing a cost-effective energy resource to serve the
190 company’s customers.”²⁰

191 **Q. Why has the Oregon Commission Staff raised the similarities between the**
192 **Schedule 272 tariff and the VRET program as an issue in the Oregon**
193 **GRC?**

194 **A.** Staff recommends the Oregon Commission investigate whether Schedule 272
195 should be treated as a VRET under Oregon law. VRETs are subject to specific
196 criteria and regulatory guidelines set by Oregon legislation and Commission
197 decisions. The VRET guidelines are in place to address potential impacts on 1)
198 non-participating cost-of-service customers and 2) the competitive retail market
199 for nonresidential customers in Oregon. Staff raised the question of whether
200 Schedule 272 is essentially acting as a VRET without OPUC approval, and at
201 this time, it is recommending that the Oregon Commission investigate the
202 matter and halt future Schedule 272 transactions utilizing utility-owned
203 resources until the investigation is complete. One issue in that investigation

¹⁹ Notice of Exceptions are filed to inform the Oregon Commission when a utility acquires a resource outside of the Oregon competitive bidding guidelines.

²⁰ *PacifiCorp 2019 Integrated Resource Plan (IRP)*, Docket No. LC 70, Notice of Exception at 6 (Sept. 27, 2019).

204 would be whether the RECs from utility-owned resources sold under Schedule
205 272 are bundled or unbundled RECs under Oregon's VRET policies. If the
206 Oregon Commission opens an investigation related to Schedule 272, then there
207 could be changes to the tariff offering in the future.

208 **Q. Is Staff challenging the existing Schedule 272 contract between Vitesse and**
209 **PacifiCorp?**

210 **A.** No. Neither OPUC Staff nor any other party to the Oregon GRC recommends
211 any restrictions on Vitesse's existing Schedule 272 Agreement. Therefore, the
212 impact of any investigatory outcome in Oregon (if it occurs) will not affect the
213 Schedule 272 Agreement as included in the current Utah rate case.

214 **IV. Schedule 272 Issues in the Oregon GRC Are Not Relevant to Utah**

215 **Q. Are the concerns regarding Schedule 272 expressed by Staff relevant to the**
216 **Division's review of Pryor Mountain in this case?**

217 **A.** No. The issue before the Utah Public Service Commission is whether
218 PacifiCorp's acquisition of the Pryor Mountain Wind Project was prudent. On
219 the contrary, the issues left to be resolved in the Oregon GRC are related to a
220 jurisdiction-specific tariff issue and the state's VRET legislation.

221 In the Oregon GRC, Staff is simply trying to ensure that the guidelines
222 put in place under the state's VRET program are followed. In short, Staff
223 wants to make sure that Schedule 272 transactions are not essentially VRETs
224 operating without the VRET guidelines and procedures. In fact, with the
225 exception of transactions selling RECs from utility-owned resources (which
226 Staff recommends the Oregon Commission should postpone until it has had

227 time to investigate and make a ruling on the issue), Staff has recommended that
228 Schedule 272 transactions should continue while any potential investigations
229 are pending.²¹

230 Aside from Staff's recommendation to not allow new utility-owned
231 Schedule 272 transactions until an investigation has concluded, no other party
232 has recommended changes to Schedule 272 generally or to Vitesse's existing
233 Schedule 272 Agreement. Additionally, Staff concluded that it believes the
234 Pryor Mountain Wind Project was a prudent investment,²² and its remaining
235 recommendations are not directly related to the Project. The ongoing Schedule
236 272 discussions in Oregon are simply different and irrelevant to the discussions
237 happening here in Utah.

238 **V. CONCLUSION**

239 **Q. Does this conclude your testimony?**

240 **A.** Yes.

²¹ Docket No. UE 374, Staff's Prehearing Brief at 48-49 (Sept. 2, 2019).

²² *Id.* at 53.

Mr. Brian Dickman is an Executive Consultant in NewGen's energy practice with over 18 years of experience in the utility industry, with a focus on regulatory analytics. He has extensive experience preparing and evaluating utility revenue requirement and cost allocation studies, developing utility avoided costs, and evaluating the impact of new initiatives and transactions on a utility and its customers. Mr. Dickman's work has also included regulatory and financial modeling support for potential mergers and acquisitions, variable production cost simulations, valuations of potential asset acquisitions and other commercial opportunities, and pricing for Qualifying Facilities under the Public Utility Regulatory Policies Act. In addition to his extensive technical experience, Mr. Dickman understands the regulatory governance process and he has personally testified as an expert witness before the public utility commissions of California, Idaho, Indiana, Oregon, Utah, Washington, and Wyoming. Mr. Dickman has led utility regulatory teams in the development of cost recovery filings in multiple state jurisdictions and the Federal Energy Regulatory Commission.

EDUCATION

- Master of Business Administration, Finance Emphasis, University of Utah
- Bachelor of Science, Accounting, Utah State University

KEY EXPERTISE

- Revenue Requirement
- Cost of Service
- Regulatory Environment
- Financial Analysis and Modeling

RELEVANT EXPERIENCE

Electric Cost of Service, Rate Design, and Regulatory Analysis

Mr. Dickman leads project teams in the establishment of utility revenue requirements, evaluation of cost of service studies and retail and wholesale rates, and other regulatory analyses for numerous electric utilities. Previously, Mr. Dickman led departments at a multi-billion-dollar utility responsible for interfacing with six state regulatory agencies in support of revenue requirements, cost recovery mechanisms, avoided costs, and financial impacts of utility initiatives. He now works with clients and stakeholders to prepare and evaluate cost of service studies and rate design proposals, and to help clients understand the regulatory environment impacting policy objectives. Mr. Dickman's experience also includes evaluating the rate impact of proposed mergers and acquisitions, acquisition and divestiture of utility assets, negotiated retail service contracts, changing business models, and stranded costs due to exiting load.

A sample of Mr. Dickman's regulatory analysis clients includes the following:

- Abu Dhabi Distribution Company, UAE
- Austin Energy, Texas
- East Bay Community Energy, California
- Los Angeles Department of Water and Power, California
- Lubbock Power and Light, Texas
- Monterey Bay Community Power, California
- New York Power Authority, New York
- Blackstone Group, New York
- Duke Energy, North Carolina
- East Bay Community Energy, California
- Facebook, Inc., California
- Hemlock Semiconductor, Michigan
- Hydro One, Ontario CA
- Liberty Utilities, California
- Minnesota Power, Minnesota

Brian Dickman

Executive Consultant

- New York State Energy Research & Development, New York
- Transmission Agency of Northern California, California
- Tri-County Metropolitan Transportation District, Oregon
- Newmont Mining, Nevada
- Portland General Electric, Oregon
- SABIC Innovative Plastics Mt. Vernon, LLC
- Vermont Gas Systems, Vermont
- Vistra Energy, Texas

Expert Witness and Litigation Support

Mr. Dickman offers expert testimony regarding cost of service, rate design, and ratemaking issues before state and local regulatory bodies. He has experience providing litigation support regarding ratemaking matters at wholesale and retail levels in California, Idaho, Indiana, Oregon, Washington, Wyoming, Utah, the Federal Energy Regulatory Commission, and Ontario Energy Board.

Mr. Dickman has provided comprehensive expert testimony related to system revenue requirements, cost allocation, variable production costs, generation avoided costs, and resource valuation. Mr. Dickman's expert witness and litigation support includes:

Revenue Requirement/Cost Allocation

Mr. Dickman has prepared and evaluated revenue requirement, inter-jurisdictional cost allocation, and coincident peak allocation studies, supporting testimony for PacifiCorp and other clients in the following dockets:

- Wyoming Docket No. 20000-405-ER-11
- Wyoming Docket No. 20000-384-ER-10
- Wyoming Docket No. 20000-352-ER-09
- Wyoming Docket No. 20000-333-ER-08
- Utah Docket No. 10-035-89
- Idaho Case No. PAC-E-08-07
- Idaho Case No. PAC-E-06-10
- FERC Docket No. ER16-2320
- FERC Docket No. ER17-2154
- FERC Docket No. ER19-231-002
- FERC Docket No. ER20-270-000
- OEB Case No. EB-2018-0270
- Indiana Cause No. 43354 MCRA 21 S1

Power Supply Cost Modeling and Adjustment Mechanisms

Mr. Dickman has prepared and evaluated variable power supply cost forecasts, power supply cost balancing accounts and other rate mechanisms, stranded costs, and exit fees for departing load. These cases include the following:

- Oregon Docket UM 1662
- Oregon Docket UE 287
- Oregon Docket UE 296
- Oregon Docket UE 307
- Oregon Docket UE 375
- Wyoming Docket No. 20000-389-EP-11
- Wyoming Docket No. 20000-447-EA-14
- Wyoming Docket No. 20000-469-ER-15
- Utah Docket No. 12-035-67
- Utah Docket No. 13-035-32
- Utah Docket No. 14-035-31
- Utah Docket No. 15-035-03
- Idaho Case No. PAC-E-13-03
- Idaho Case No. PAC-E-14-01
- California Docket A.12-08-003
- California Docket A.13-08-001
- California Docket A.14-08-002
- California Docket A.19-06-001
- California Docket A.18-06-001
- California Docket A.20-02-009

Brian Dickman
Executive Consultant

Avoided Costs/Resource Valuation

Mr. Dickman provided expert testimony for PacifiCorp on various components to be included in a proposed method for valuing solar generation resources, calculation of PURPA avoided costs for large resources, and support of modifications to the avoided cost calculation for small resources. These cases include the following:

- Oregon Docket UM 1610
- Oregon Docket UM 1716
- Wyoming Docket No. 20000-481-EA-15
- Utah Docket No. 15-035-T06
- Washington Docket UE-144160
- Idaho Case No. GNR-E-11-03
- Idaho Case No. PAC-E-15-03

WORKSHOPS AND PRESENTATIONS

Host organizations and the topics Mr. Dickman presented are displayed below.

Advanced Workshop in Regulation and Competition, Center for Research in Regulated Industries

- *Customer Choice at a Vertically Integrated Utility*

Record of Testimony Submitted by Brian Dickman

Client	Utility	Proceeding	Subject	Before	Year
1. Joint Community Choice Aggregators	Pacific Gas & Electric	A.20-07-002	Expert testimony evaluating the calculation of the Power Charge Indifference Amount charged to Community Choice Aggregators	California Public Utilities Commission	2020
2. Clean Power Alliance of Southern California	Southern California Edison	A.20-07-004	Expert testimony evaluating the calculation of the Power Charge Indifference Amount charged to Community Choice Aggregators	California Public Utilities Commission	2020
3. Facebook, Inc.	Pacific Power	Docket UE 375	Joint testimony supporting a settlement agreement resolving the annual variable power supply cost forecast and generation resource dispatch model	Public Utility Commission of Oregon	2020
4. Joint Community Choice Aggregators	Pacific Gas & Electric	A.20-02-009	Expert testimony evaluating the appropriateness of entries recorded to the Portfolio Allocation Balancing Account to true up the Power Charge Indifference Amount	California Public Utilities Commission	2020
5. SABIC Innovative Plastics Mt. Vernon, LLC	Vectren Energy Delivery of Indiana	Cause No. 43354 MCRA 21 S1	Expert testimony supporting a settlement agreement regarding the calculation and use of a 4CP load study to allocate tariff rider costs among customer classes	Indiana Utility Regulatory Commission	2020
6.	PacifiCorp	Docket UE 307	Expert testimony supporting the annual variable power supply cost forecast and generation resource dispatch model	Public Utility Commission of Oregon	2016
7.	PacifiCorp	Docket UM 1662	Joint testimony with Portland General Electric regarding the need for a renewable resource tracking mechanism to provide cost recovery related to the impacts of renewable resource generation	Public Utility Commission of Oregon	2015
8.	PacifiCorp	Docket UE 296	Expert testimony supporting the annual variable power supply cost forecast and generation resource dispatch model	Public Utility Commission of Oregon	2015
9.	PacifiCorp	Docket No. 20000-469-ER-15	Expert testimony regarding the annual variable power supply cost forecast and modifications to the Energy Cost Adjustment Mechanism	Public Service Commission of Wyoming	2015
10.	PacifiCorp	Docket No. 15-035-03	Provided expert testimony regarding the true up of variable power supply costs in the Energy Balancing Account mechanism	Public Service Commission of Utah	2015

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11.	PacifiCorp	Docket UM 1716	Expert testimony proposing changes to the calculation of PURPA avoided costs for large resources	Public Utility Commission of Oregon	2015
12.	PacifiCorp	Docket No. 20000-481-EA-15	Expert testimony proposing changes to the calculation of PURPA avoided costs for large resources	Public Service Commission of Wyoming	2015
13.	PacifiCorp	Docket No. 15-035-T06	Expert testimony updating standard PURPA avoided cost prices and supporting modifications to the avoided cost calculation for small resources	Public Service Commission of Utah	2015
14.	PacifiCorp	Case No. PAC-E-15-03	Expert testimony proposing changes to the calculation of PURPA avoided costs for large resource	Idaho Public Utilities Commission	2015
15.	PacifiCorp	Docket UE-144160	Declaration supporting updates to standard PURPA avoided cost prices and supporting modifications to the avoided cost calculation for small resources	Washington Utilities and Transportation Commission	2014
16.	PacifiCorp	Docket UE 287	Expert testimony supporting the annual variable power supply cost forecast and generation resource dispatch model	Public Utility Commission of Oregon	2014
17.	PacifiCorp	Case No. PAC-E-14-01	Expert testimony regarding the true up of variable power supply costs in the Energy Cost Adjustment Mechanism	Idaho Public Utilities Commission	2014
18.	PacifiCorp	Docket A.14-08-002	Expert testimony supporting the annual variable power supply cost forecast and the true up of costs in the Energy Cost Adjustment Clause mechanism	California Public Utilities Commission	2014
19.	PacifiCorp	Docket No. 20000-447-EA-14	Expert testimony regarding the true up of annual variable power supply cost in the Energy Cost Adjustment Mechanism	Public Service Commission of Wyoming	2014
20.	PacifiCorp	Docket No. 14-035-31	Expert testimony regarding the true up of variable power supply costs in the Energy Balancing Account mechanism	Public Service Commission of Utah	2014
21.	PacifiCorp	Case No. PAC-E-13-03	Expert testimony regarding the true up of variable power supply costs in the Energy Cost Adjustment Mechanism	Idaho Public Utilities Commission	2013
22.	PacifiCorp	Docket A.13-08-001	Expert testimony supporting the annual variable power supply cost forecast and the true up of costs in the Energy Cost Adjustment Clause mechanism	California Public Utilities Commission	2013

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23.	PacifiCorp	Docket No. 13-035-32	Expert testimony regarding the true up of variable power supply costs in the Energy Balancing Account mechanism	Public Service Commission of Utah	2013
24.	PacifiCorp	Docket UM 1610	Expert testimony proposing changes to the calculation of PURPA avoided costs for large and small generation resources	Public Utility Commission of Oregon	2012
25.	PacifiCorp	Docket A.12-08-003	Expert testimony supporting the annual variable power supply cost forecast and the true up of costs in the Energy Cost Adjustment Clause mechanism	California Public Utilities Commission	2012
26.	PacifiCorp	Docket No. 12-035-67	Expert testimony regarding the true up of variable power supply costs in the Energy Balancing Account mechanism	Public Service Commission of Utah	2012
27.	PacifiCorp	Docket No. 20000-389-EP-11	Expert testimony regarding the collection of deferred balances accrued through previous Power Cost Adjustment Mechanisms	Public Service Commission of Wyoming	2011
28.	PacifiCorp	Docket No. 20000-405-ER-11	Inter-jurisdictional cost allocation and revenue requirement and sponsored expert testimony in corresponding general rate case	Public Service Commission of Wyoming	2011
29.	PacifiCorp	Case No. GNR-E-11-03	Expert testimony proposing changes to the calculation of PURPA avoided costs for large and small generation resources	Idaho Public Utilities Commission	2011
30.	PacifiCorp	Case No. PAC-E-06-10	Expert testimony regarding low income customer weatherization rebates	Idaho Public Utilities Commission	2010
31.	PacifiCorp	Docket No. 20000-405-ER-10	Inter-jurisdictional cost allocation and revenue requirement and sponsored expert testimony in corresponding general rate case	Public Service Commission of Wyoming	2010
32.	PacifiCorp	Docket No. 10-035-89	Inter-jurisdictional cost allocation and revenue requirement and sponsored expert testimony in corresponding general rate case	Public Service Commission of Utah	2010
33.	PacifiCorp	Docket No. 20000-352-ER-09	Inter-jurisdictional cost allocation and revenue requirement and sponsored expert testimony in corresponding general rate case	Public Service Commission of Wyoming	2009

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34.	PacifiCorp	Case No. PAC-E-08-07	Inter-jurisdictional cost allocation and revenue requirement and sponsored expert testimony in corresponding general rate case	Idaho Public Utilities Commission	2008
35.	PacifiCorp	Docket No. 20000-333-ER-08	Inter-jurisdictional cost allocation and revenue requirement and sponsored expert testimony in corresponding general rate case	Public Service Commission of Wyoming	2008