

Rocky Mountain Power  
Docket No. 21-035-01  
Witness: Jack Painter

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF UTAH

ROCKY MOUNTAIN POWER

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Surrebuttal Testimony of Jack Painter

January 2022

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 Jack Painter and my business address is 825 NE Multnomah Street, Suite  
4 600, Portland, Oregon 97232. My title is Net Power Cost Specialist.

5 **Q. Are you the same Jack Painter who submitted direct, supplemental and response**  
6 **testimony on behalf of the Company in this proceeding?**

7 A. Yes.

8 **PURPOSE OF TESTIMONY**

9 **Q. What is the purpose of your surrebuttal testimony?**

10 A. My surrebuttal testimony responds to the rebuttal testimony of Mr. Philip DiDomenico  
11 and Mr. Dan F. Koehler of Daymark Energy Advisors, Inc. (“Daymark”) and their  
12 calculation of replacement power costs for a generation outage in the Energy Balancing  
13 Account (“EBA”) on behalf of the Utah Division of Public Utilities (“DPU”).  
14 Specifically, I address an input used by Daymark in its replacement power cost  
15 calculation for the proposed adjustment related to the generating plant outage at Gadsby  
16 Unit 2.

17 **Q. Are any other Company witnesses filing testimony in response to rebuttal**  
18 **testimony by Daymark on behalf of DPU?**

19 A. Yes. Company witness Mr. Brad Richards provides testimony responding to the  
20 proposed adjustments related to the two generating plant outages. Mr. Richards  
21 explains that the Company was prudent in its operations and management of its thermal  
22 generation plants.

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**REPLACEMENT POWER COSTS INPUTS**

24 **Q. Please describe the proposed input adjustment for the Gadsby Unit 2 outage**  
25 **replacement power cost calculation proposed by Daymark.**

26 A. While Daymark accepts the changes to the replacement power calculation provided in  
27 the Company's response testimony, they recommend using a heat rate curve specific to  
28 Gadsby Unit 2 from the Company's Generation and Regulation Initiative Decision Tool  
29 ("GRID") used in modeling Base NPC rather than the average July 2014 heat rate for  
30 Gadsby in Base NPC from the 2014 GRC.

31 **Q. Does the Company agree this input adjustment to the replacement power cost**  
32 **calculation for Gadsby Unit 2 is appropriate?**

33 A. Yes. The Company agrees that the use of the heat rate from GRID used in modeling  
34 Base NPC for Gadsby Unit 2 is a more granular and appropriate input in the  
35 replacement power cost calculation.

36 **Q. Did the Company review Daymark's updated calculation for the replacement**  
37 **power costs associated with the Gadsby Unit 2 outage?**

38 A. Yes. The Company agrees with the updated calculation and replacement power costs  
39 for Gadsby Unit 2 provided by Daymark.

40 **Q. Does this conclude your surrebuttal testimony?**

41 A. Yes.