

REDACTED

Rocky Mountain Power

Docket No. 22-035-01

Witness: Craig M. Eller

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF UTAH

ROCKY MOUNTAIN POWER

REDACTED
Surrebuttal Testimony of Craig M. Eller

December 2022

1 **Q. Are you the same Craig M. Eller who previously filed response and rebuttal**
2 **testimony in this proceeding on behalf of PacifiCorp, d.b.a. Rocky Mountain**
3 **Power (“the Company”)?**

4 A. Yes.

5 **PURPOSE OF TESTIMONY**

6 **Q. What is the purpose of your testimony in this case?**

7 A. My testimony responds to the rebuttal testimony of Mr. DiDomenico and Mr. Koehler
8 (“Daymark”) who jointly submitted testimony on behalf of the Division of Public
9 Utilities (“DPU”). I respond to their concerns that insufficient information has been
10 provided regarding the TB Flats and Aeolus substation outage and that litigation may
11 delay the availability of that information.¹

12 **RESPONSE TO DPU**

13 **Q. Can you please summarize the efforts that the Company has taken to provide**
14 **Energy Balancing Account (“EBA”) parties with more information in this**
15 **proceeding about the Aeolus Substation outage?**

16 A. Yes, it is my understanding that, as this issue was raised with Rocky Mountain Power
17 through discovery in this proceeding, the Company scheduled a meeting with parties
18 on October 7, 2022. While I did not attend that meeting, [REDACTED]
19 [REDACTED]
20 [REDACTED] The
21 Company followed up on this meeting by providing additional explanation in my
22 response testimony, and then provided the report from the investigation with additional






¹ Exhibit DPU 2.0R, Confidential Rebuttal Testimony of Philip DiDomenico and Dan F. Koehler at 11-12:187-204 (Nov. 18, 2022).

23 detailed analysis on the cause of the outage in my rebuttal testimony. At this point,
24 Rocky Mountain Power has provided significant information about the cause of the
25 outage.

26 **Q. The DPU contends that “the Company still has not demonstrated prudence” with**
27 **regards to this outage.² Do you agree?**

28 A. No. While the DPU did not have a chance to review the latest round of testimony and
29 the investigation report filed by the Company on November 18, 2022, prior to filing its
30 rebuttal testimony on the same date, Rocky Mountain Power has repeatedly provided
31 information regarding the cause of the outage and demonstrated that the Company
32 acted prudently in retaining third-party contractors to design and construct the
33 substation, and to verify that the work was performed according to design. The
34 Company also demonstrated that it acted prudently in operating the substation.
35 PacifiCorp has provided significantly more testimony and information on this outage
36 than in any of the Company’s other jurisdictions.

37 **Q. The DPU also contends that the Company “**
38  **³ How do you respond?**

39 A. First, I would like to clarify that the Company is 
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41  As noted in my response testimony, Rocky Mountain Power
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² Exhibit DPU 2.0R at 12:197.

³ Exhibit DPU 2.0R at 12:197-198.

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[REDACTED]

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[REDACTED]

As I noted above, the

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Company has provided significant information, including a thorough investigation

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report on this event, which is similar to the level of detail that is typically provided for

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other generation outages. That report demonstrates that the Company did not act

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imprudently. Therefore, there is substantial information in the record to resolve this

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issue now before the Commission.

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[REDACTED]

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55 **Q. What is your recommendation to the Commission?**

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A. I recommend that the Commission reject the DPU's adjustments regarding the Aeolus

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substation fire, and allow for recovery of the replacement power costs associated with

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this event. Considering the on-going nature of the discussions with Hitachi and Burns

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& McDonnell, the Company has diligently shared information with parties through the

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course of this proceeding that demonstrates that the Company was prudent in its

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actions.

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Q. Does this conclude your surrebuttal testimony?

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A. Yes.

⁴ Confidential Exhibit RMP __ (CME-1R), Response Testimony of Craig M. Eller at 4:79-81 (Oct. 21, 2022).