

**Anderson OCS – 1SR**

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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**Rocky Mountain Power’s Application for Approval of the 2023 Energy Balancing Account** ) **Docket No. 23-035-01**  
)  
) **Surrebuttal Testimony**  
) **of Alyson Anderson**  
) **On behalf of the Utah**  
) **Office of Consumer Services**

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**January 22, 2024**

1 **Q. WHAT IS YOUR NAME, OCCUPATION AND BUSINESS ADDRESS?**

2 A. My name is Alyson Anderson. I am a utility analyst for the Utah Office of  
3 Consumer Services (“OCS”). My business address is 160 East 300 South,  
4 Salt Lake City, Utah.

5

6 **Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?**

7 A Yes, I filed Direct Testimony on December 7, 2023, in this proceeding on  
8 behalf of the Utah Office of Consumer Services (OCS).

9

10 **Q. WHAT IS THE PURPOSE OF THIS TESTIMONY?**

11 A. My testimony responds to certain issues discussed in the rebuttal testimony  
12 of Rocky Mountain Power Company (RMP) witness Jack Painter and Utah  
13 Division of Public Utilities (DPU) witness Gary Smith related to RMP’s  
14 request for approval of the 2023 energy balancing account (EBA).

15

16 **Q. IN REBUTTAL, RMP WITNESS JACK PAINTER STATES “...THE**  
17 **COMPANY HAS PROVIDED SIGNIFICANT EVIDENCE OF THE**  
18 **PRUDENCE OF OUR DISPATCH DECISIONS WHILE THE OCS HAS**  
19 **OFFERED NO EVIDENCE THAT THE COMPANY DID NOT**  
20 **APPROPRIATELY AND PRUDENTLY DISPATCH ITS COAL**  
21 **RESOURCES.<sup>1</sup>” HOW DO YOU RESPOND?**

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<sup>1</sup> 23-035-40 RMP Rebuttal Testimony Jack Painter, Lines 14-16.

22 A. Mr. Painter has mischaracterized both the OCS position and the larger  
23 context of this case. Originally, the DPU expressed a specific concern  
24 regarding whether the coal resources were economically dispatched,  
25 particularly in the context of the magnitude of RMP's Energy Balancing  
26 Account (EBA) request. Consequently, the DPU requested the ability to  
27 review as well as make out of period adjustments during the audit of the  
28 2024 EBA after reviewing a forthcoming RMP report requested by the Idaho  
29 Public Utilities Commission (Idaho Report). The DPU also requested that  
30 specific information regarding the coal modeling and plant dispatch be  
31 included in the 2024 EBA application to better understand RMP's coal  
32 generation and related issues. I supported the DPU's specific request to  
33 make out of period adjustments after reviewing the Idaho Report and  
34 referenced a prior Utah Public Service Commission (PSC) ruling that  
35 allowed RMP to make out of period adjustments to the EBA. In the above  
36 statement, Mr. Painter appears to shift RMP's burden of proof to the OCS  
37 and misconstrues my direct testimony as taking a position on the prudence  
38 of the company's dispatch decisions. I only took a position on the DPU's  
39 request and provided evidence (a relevant PSC order) supporting our  
40 position. The OCS did not propose any adjustments for which to provide  
41 evidence. It is disappointing to see RMP once again misunderstand or  
42 misconstrue the fundamental issue of burden of proof.

43

44 **Q. WAS IT APPROPRIATE FOR THE IDAHO REPORT TO BE**  
45 **CONSIDERED IN THIS UTAH DOCKET?**

46 A. Yes. Another commission with jurisdiction over this utility and this very same  
47 data articulated very similar concerns and ordered additional information  
48 and evidence to be provided. In fact, in my opinion, it would have been  
49 irresponsible for Utah not to have considered any additional evidence  
50 provided in the Idaho Report.

51

52 **Q. DOES THE DPU CONTINUE TO REQUEST ADDITIONAL TIME TO**  
53 **REVIEW AND MAKE OUT OF PERIOD ADJUSTMENTS TO THE EBA**  
54 **AFTER REVIEWING THE IDAHO REPORT?**

55 A. No. In rebuttal, DPU witness Gary Smith stated “[t]he Division relies on the  
56 information in the Report to conclude that there are likely plausible reasons  
57 for the Company’s large, requested deferral.<sup>2</sup>” As the DPU no longer  
58 requests additional time, the only issue on which I took a position is now  
59 resolved.

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61 **Q. PLEASE STATE THE OCS’S CURRENT POSITION.**

62 A. The OCS currently takes no position on the 2022 EBA.

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<sup>2</sup> 23-035-40 DPU Rebuttal Testimony Gary Smith, Lines 86-87.

65 **Q. DOES THIS COMPLETE YOUR TESTIMONY?**

66 **A. Yes, it does.**