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**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE APPLICATION ) CASE NO. AVU-E-10-01  
OF AVISTA CORPORATION FOR THE )  
AUTHORITY TO INCREASE ITS RATES )  
AND CHARGES FOR ELECTRIC AND )  
NATURAL GAS SERVICE TO ELECTRIC ) DIRECT TESTIMONY  
AND NATURAL GAS CUSTOMERS IN THE ) OF  
STATE OF IDAHO ) CLINT G. KALICH  
)

FOR AVISTA CORPORATION

(ELECTRIC ONLY)

1 I. INTRODUCTION

2 Q. Please state your name, the name of your  
3 employer, and your business address.

4 A. My name is Clint Kalich. I am employed by Avista  
5 Corporation at 1411 East Mission Avenue, Spokane,  
6 Washington.

7 Q. In what capacity are you employed?

8 A. I am the Manager of Resource Planning & Power  
9 Supply Analyses, in the Energy Resources Department of  
10 Avista Utilities.

11 Q. Please state your educational background and  
12 professional experience.

13 A. I graduated from Central Washington University in  
14 1991 with a Bachelor of Science Degree in Business  
15 Economics. Shortly after graduation, I accepted an analyst  
16 position with Economic and Engineering Services, Inc. (now  
17 EES Consulting, Inc.), a Northwest management-consulting  
18 firm located in Bellevue, Washington. While employed by  
19 EES, I worked primarily for municipalities, public utility  
20 districts, and cooperatives in the area of electric utility  
21 management. My specific areas of focus were economic  
22 analyses of new resource development, rate case proceedings  
23 involving the Bonneville Power Administration, integrated  
24 (least-cost) resource planning, and demand-side management  
25 program development.

Kalich, Di 1  
Avista Corporation

1           In late 1995, I left Economic and Engineering  
2 Services, Inc. to join Tacoma Power in Tacoma, Washington.  
3 I provided key analytical and policy support in the areas  
4 of resource development, procurement, and optimization,  
5 hydroelectric operations and re-licensing, unbundled power  
6 supply rate-making, contract negotiations, and system  
7 operations. I helped develop, and ultimately managed,  
8 Tacoma Power's industrial market access program serving  
9 one-quarter of the company's retail load.

10           In mid-2000 I joined the Company and accepted my  
11 current position assisting in resource analysis, dispatch  
12 modeling, resource procurement, integrated resource  
13 planning, and rate case proceedings. Much of my career has  
14 involved resource dispatch modeling of the nature described  
15 in this testimony.

16           **Q. What is the scope of your testimony in this**  
17 **proceeding?**

18           A. My testimony will describe the Company's use of  
19 the AURORA<sub>xmp</sub> dispatch model, or "Dispatch Model." I will  
20 explain the key assumptions driving the Dispatch Model's  
21 market forecast of electricity prices. The discussion  
22 includes the variables of natural gas, Western Interconnect  
23 loads and resources, and hydroelectric conditions. I will  
24 describe how the model dispatches our resources and

1 contracts in a manner that maximizes benefits to customers  
2 and tracks their values for use in pro forma calculations.  
3 I will then present the modeling results provided to  
4 Company witness Mr. Johnson for his power supply pro forma  
5 adjustment calculations. Additionally, in support of  
6 Company witness Ms. Knox, I detail the Company's demand  
7 classification calculations.

8 **Q. Are you sponsoring any exhibits in this**  
9 **proceeding?**

10 A. Yes. I am sponsoring Exhibit 5, Schedules 1 and  
11 2, as well Confidential Schedule 3. Schedule 1 provides a  
12 forecast of Company load and resource positions from 2011  
13 through 2020. Schedule 2 is the spreadsheet used to  
14 calculate the demand classification. Confidential Schedule  
15 3 provides summary output from the Dispatch Model. All  
16 information contained in the exhibit was prepared by me or  
17 prepared under my direction.

18 **II. THE DISPATCH MODEL**

19 **Q. What model is the Company using to dispatch its**  
20 **portfolio of resources and obligations?**

21 A. The Company uses EPIS, Inc.'s Dispatch Model for  
22 determining power supply costs. The model optimizes  
23 dispatch of Company-owned resources and contracts in each  
24 hour of the pro forma year. The pro forma period is  
25 October 1, 2010 through September 30, 2011. It reflects

1 true system operations by evaluating future resource  
2 decisions on an hourly basis.

3 **Q. What AURORA version and database is the Company**  
4 **using for this case?**

5 A. The Company is using AURORA<sub>XMP</sub> version 9.6.1033,  
6 and its associated database (North\_American\_DB\_2009-02).

7 **Q. Please briefly describe the Dispatch Model.**

8 A. The Dispatch Model was developed by EPIS, Inc. of  
9 Sandpoint, Idaho. It is a fundamentals-based tool  
10 containing demand and resource data for the entire Western  
11 Interconnect. It employs multi-area, transmission-  
12 constrained dispatch logic to simulate real market  
13 conditions. Its true economic dispatch captures the  
14 dynamics and economics of electricity markets—both short-  
15 term (hourly, daily, monthly) and long-term. On an hourly  
16 basis, the Dispatch Model develops an available resource  
17 stack, sorting resources from lowest to highest cost. It  
18 then compares this resource stack with load obligations in  
19 the same hour to arrive at the least-cost market-clearing  
20 price for the hour. Once resources are dispatched and  
21 market prices are determined, the Dispatch Model singles  
22 out Avista resources and loads and values them against the  
23 marketplace.

1           **Q.   What experience does the Company have using**  
2 **AURORA<sub>XMP</sub>?**

3           A.   The Company purchased a license to use the  
4 Dispatch Model in April 2002.  AURORA<sub>XMP</sub> has been used for  
5 numerous studies, including all of our integrated resource  
6 plans and rate filings after 2001.  The tool is also used  
7 for various resource evaluations, market forecasting, and  
8 requests-for-proposal evaluations.

9           **Q.   Who else uses AURORA<sub>XMP</sub>?**

10          A.   AURORA<sub>XMP</sub> is used all across North America and in  
11 Europe.  In the Northwest specifically, AURORA<sub>XMP</sub> is used by  
12 the Bonneville Power Administration, the Northwest Power  
13 and Conservation Council, Puget Sound Energy, Idaho Power,  
14 Portland General Electric, Seattle City Light, Grant County  
15 PUD, Snohomish County PUD, and Tacoma Power.

16          **Q.   What benefits does the Dispatch Model offer for**  
17 **this type of analysis?**

18          A.   The Dispatch Model generates hourly electricity  
19 prices across the Western Interconnect, accounting for its  
20 specific mix of resources and loads.  The Dispatch Model  
21 reflects the impact of regions outside the Northwest on  
22 Northwest market prices, limited by known transfer  
23 (transmission) capabilities.  Ultimately, the Dispatch  
24 Model allows the Company to generate price forecasts in-  
25 house instead of relying on exogenous forecasts.

1           The Company owns a number of resources, including  
2 hydroelectric plants and natural gas-fired peaking units,  
3 which serve customer loads during more valuable on-peak  
4 hours. By optimizing resource operation on an hourly  
5 basis, the Dispatch Model is able to appropriately value  
6 the capabilities of these assets. For example, actual 2008  
7 and 2009 on-peak prices were 23 percent higher than off-  
8 peak prices. 2007 on-peak prices were 25 percent higher.  
9 Forward on-peak prices for 2011 were 27 percent higher than  
10 off-peak prices at the time this case was prepared. For  
11 comparison, Dispatch Model on-peak prices for the pro forma  
12 period average 29 percent higher than off-peak prices. In  
13 summary, the Dispatch Model appropriately values the energy  
14 from Avista's resources during on-peak periods in a manner  
15 similar to that recently experienced in the Northwest  
16 region.

17           **Q. On a broader scale, what calculations are being**  
18 **performed by the Dispatch Model?**

19           A. The Dispatch Model's goal is to minimize overall  
20 system operating costs across the Western Interconnect,  
21 including Avista's portfolio of loads and resources. The  
22 dispatch model generates a wholesale electric market price  
23 forecast by evaluating all Western Interconnect resources  
24 simultaneously in a least-cost equation to meet regional  
25 loads. As the Dispatch Model progresses from hour to hour,

1 it "operates" those least-cost resources necessary to meet  
2 load. With respect to the Company's portfolio, the  
3 Dispatch Model tracks the hourly output and fuel costs  
4 associated with portfolio generation. It also calculates  
5 hourly energy quantities and values for the Company's  
6 contractual rights and obligations. In every hour the  
7 Company's loads and obligations are compared to available  
8 resources to determine a net position. This position is  
9 balanced using the simulated wholesale electricity market.  
10 The cost of energy purchased from or sold into the market  
11 is determined based on the electric market-clearing price  
12 for the specified hour and the amount of energy necessary  
13 to balance loads and resources.

14 **Q. How does the Dispatch Model determine electric**  
15 **market prices?**

16 A. The Dispatch Model calculates electricity prices  
17 for the entire Western Interconnect, separated into various  
18 geographical areas such as the Northwest and Northern and  
19 Southern California. The load in each area is compared to  
20 available resources, including resources available from  
21 other areas that are linked by transmission corridors, to  
22 determine the electricity price in each hour. Ultimately,  
23 the market price for an hour is set based on the last  
24 resource in the stack to be dispatched. This resource is  
25 referred to as the "marginal resource." Given the



1 prominence of natural gas-fired resources on the margin,  
2 this fuel is a key variable in the determination of  
3 wholesale electricity prices.

4 **Q. How does the Dispatch Model operate regional**  
5 **hydroelectric projects?**

6 A. The model begins by "peak shaving" loads using  
7 system hydro resources. When peak shaving, the Dispatch  
8 Model determines which hours contain the highest loads and  
9 allocates to them as much hydroelectric energy as possible.  
10 Remaining loads are then met with other available  
11 resources.

12 **Q. Has the Company made any modifications to the**  
13 **database for this case?**

14 A. Yes. Avista's portfolio of resources is modified  
15 to reflect actual operating characteristics, natural gas  
16 prices are modified to match projected forward prices over  
17 the pro-forma period, regional resources are modified where  
18 better information is known, and Northwest hydro data is  
19 replaced with Northwest Power Pool data.

20

21 **III. HYDRO MODELING ASSUMPTIONS**

22 **Q. How has the Company modeled hydroelectric**  
23 **generation for this case?**

24 A. As in the past, Avista uses historical stream flow  
25 data from the Northwest Power Pool (NWPP) to determine

1 hydroelectric generation for its Clark Fork and Spokane  
2 River systems. Certain adjustments to the NWPP data are  
3 necessary to yield a proper estimate of generation from the  
4 model. These adjustments include changes to address the  
5 NWPP's tendency to overstate generation in high-flow  
6 periods, to account for recent upgrades at our  
7 hydroelectric projects, to maintain year-to-year  
8 consistency in project operations, to account for  
9 encroachment on our Mid-Columbia project shares, and to  
10 allow for 2000 irrigation depletion levels.

11 **Q. Why does the NWPP overstate generation on the**  
12 **Company's hydroelectric facilities?**

13 A. The NWPP's regional hydroelectric model is in many  
14 ways simplified and therefore does not account for various  
15 project operating characteristics. The NWPP model is not  
16 granular enough to account for intra-month flow changes.  
17 This impact is most significant during the spring months.  
18 For example, the Noxon Rapids project has a maximum turbine  
19 flow capability of approximately 50,000 cubic feet per  
20 second (cfs). The NWPP model will use all water up to  
21 50,000 cfs in a given month to generate power. However, a  
22 50,000 cfs month is not comprised of 28, 29, 30 or 31 days  
23 of 50,000-cfs flows. Instead it is made up of flows that  
24 range below and above 50,000 cfs. For example, where flows  
25 are 20,000 cfs for the first half of the month and 80,000

1 cfs the second half, the average flow for the period is  
2 50,000 cfs. The NWPP would assume all of this water went  
3 through the generation turbines and made power. In fact,  
4 the project would in the first half of the month generate  
5 with 20,000 cfs and in the second half of the month it  
6 would generate with 50,000 cfs. The additional 30,000 cfs  
7 in the second half of the month ( $80,000 - 50,000 = 30,000$ ),  
8 or nearly 30 percent of the monthly total, would be spilled  
9 in the actual operation of the project.

10 **Q. Does Noxon Rapids have storage capability to**  
11 **account for such variations in flows?**

12 A. Noxon does have some storage, but not near enough  
13 to convert all of the intra-month variability of flows into  
14 electric energy. A study completed by BorisMetrics  
15 explained that on average our hydroelectric dams on the  
16 Spokane and Clark Fork Rivers generate 3.7 aMW less than  
17 the NWPP estimates. This study was reviewed and accepted  
18 in previous cases before this Commission.

19 **Q. Is the Company now experiencing an even greater**  
20 **difference between actual hydroelectric generation and**  
21 **generation from the NWPP model, than that quantified by**  
22 **BorisMetrics?**

23 A. Yes. Relative to the NWPP data used in previous  
24 cases, hydro generation on the Clark Fork projects has been  
25 overstated by a significant amount on average. Over the

1 past 20 years actual hydroelectric generation has been  
2 319.72 aMW, 3.2 percent (10 aMW) below the NWPP model  
3 results for the 50-year period used in rate modeling. Over  
4 the past 10 years generation has been 299.08 aMW, or 10.3  
5 percent (31 aMW) below the NWPP modeled results. Lower  
6 results in the past 10 years have been driven primarily by  
7 lower-than-average stream flows; however, not all of the  
8 reduction is driven by lower stream flows. A portion of  
9 the overstatement is caused by the design limitations of  
10 the model itself.

11 **Q. Please provide additional detail as to why the 10-**  
12 **and 20-year averages were below the 50-year NWPP study**  
13 **period average?**

14 A. There are a number of reasons. Flows in the 1990s  
15 were high relative to history, whereas flows in the most  
16 recent 10 years have been low relative to average. Also,  
17 half of the 20-year average is affected by the use of  
18 operating assumptions from our old Clark Fork operating  
19 license. New licensing requirements implemented in 2001  
20 have negatively affected power production on the Clark Fork  
21 projects. Poor hydroelectric conditions also have played a  
22 role in a number of recent years. Additionally, the  
23 Company continues to shift reserve obligations to the Clark  
24 Fork as we lose Mid-Columbia generation capacity, and as we  
25 respond to a marketplace greatly affected by new variable

1 generation resources (i.e., wind). Upgrades at Cabinet  
2 Gorge and Noxon Rapids have helped to offset these losses,  
3 but the statistics explain that generation levels continue  
4 to fall over time.

5 **Q. How is hydro generation calculated in this**  
6 **proceeding?**

7 A. For our Mid-Columbia shares, and for the Spokane  
8 River, there is no change from previous filings.  
9 Generation data are taken from the NWPP Headwater Benefits  
10 Study, adjusted downward by the results of the BorisMetrics  
11 study for the Spokane River and Encroachment for the Mid-  
12 Columbia projects. For the Clark Fork River projects we  
13 continue to use NWPP data for the historical record (1929-  
14 1978). However, instead of using energy levels calculated  
15 by their model, and adjusted by the BorisMetrics study for  
16 overstated generation, the NWPP flow data is used as an  
17 input in a new model: the Clark Fork Optimization Package.

18 **Q. Please describe the Clark Fork Optimization**  
19 **Package.**

20 A. The Clark Fork Optimization Package is a mixed-  
21 integer linear programming-based system emulating the  
22 operation of the Company's Clark Fork projects. It was  
23 developed in support of the Company's system operations,  
24 financial forecasting, and hydro upgrade efforts.  
25 Operating on an hourly time-step, it accurately represents

1 individual turbine and reservoir operations. License  
2 constraints (e.g., minimum flows, elevation limits) are  
3 honored in all periods. The Clark Fork Optimization  
4 Package is comprised of four components which are described  
5 below.

6 **Q. In what programming language was the model**  
7 **developed?**

8 A. The Clark Fork Optimization Package is a suite of  
9 database (Microsoft Access) and spreadsheet (Microsoft  
10 Excel) programs. The Excel programs benefit from  
11 WhatsBEST!, an Excel Add-In for Linear, Nonlinear, and  
12 Integer Modeling and Optimization. WhatsBEST! was  
13 developed by Lindo Systems of Chicago, Illinois in 1979.

14 **Q. What is the first component of the Clark Fork**  
15 **Optimization Package?**

16 A. The first component is the Clark Fork Water Budget  
17 Model. It looks over the long-term record and optimizes  
18 water flow through the projects to maximize generation  
19 values. This step is necessary to recognize the storage  
20 capabilities inherent in a hydro project. The long-term  
21 optimization is simplified to provide present-day computers  
22 with the ability to efficiently solve the equations. Each  
23 project is represented by one power curve instead of  
24 multiple curves representing individual turbines. Model

1 granularity is daily instead of hourly. Project elevation  
2 and flow constraints are retained.

3       Outputs of the Clark Fork Water Budget Model are  
4 weekly beginning and ending project elevations for the  
5 Noxon Rapids and Cabinet Gorge projects. These elevations  
6 are exported to the second module of the Clark Fork  
7 Optimization Package—the Clark Fork Optimization Model  
8 Input Database. It is discussed below.

9       **Q. What is the source for hydroelectric flows in the**  
10 **Clark Fork Water Budget Model?**

11       A. The source is the 2007-08 NWPP Headwater Benefits  
12 Study. To shape the monthly NWPP data Avista used a daily  
13 study obtained from the Bonneville Power Administration  
14 (BPA). The BPA data were from the U.S. Army Corp of  
15 Engineers study re-creating daily historical flows on the  
16 Clark Fork River back to 1929 based on today's river  
17 system.

18       Because of the need for daily inflow values that  
19 the NWPP does not provide, and the fact that the BPA data  
20 is daily, Avista elected to shape the NWPP monthly data  
21 using the daily shapes of the BPA study in each month.

22       **Q. What data does the Clark Fork Optimization Model**  
23 **Input Database contain?**

24       A. The Clark Fork Optimization Model Input Database  
25 contains the daily inflows and side flows into the

1 Company's Clark Fork River projects described above. It  
2 also contains representative hourly market prices enabling  
3 the model to maximize generation levels in the higher-  
4 valued on-peak periods.

5 **Q. What is the third element of the Clark Fork**  
6 **Optimization Package?**

7 A. The third element is the Clark Fork Optimization  
8 Model itself. This hourly model uses a mixed-integer  
9 optimization routine to maximize the value of the Clark  
10 Fork projects over time. Each project is represented in  
11 detail, including individual turbine efficiency curves,  
12 physical and license-constrained reservoir elevations,  
13 tailrace elevations, and minimum and maximum flow  
14 constraints.

15 The Clark Fork Optimization Model shapes  
16 generation into the most economically beneficial time  
17 periods using the projects' storage reservoirs. It also  
18 maximizes the value of generation by flowing water through  
19 the turbines at their most economically efficient points on  
20 the power curves.

21 **Q. What is the fourth element of the Clark Fork**  
22 **Optimization Package?**

23 A. The fourth element is the Clark Fork Optimization  
24 Model Output Database. This database contains results from  
25 the Clark Fork Optimization Model, including hourly turbine



1 discharge and spill flows, hourly generation levels, hourly  
2 generation values, and hourly reservoir elevations.

3 **Q. How did the Company ensure the Clark Fork**  
4 **Optimization Package accurately reflects the operations and**  
5 **value of the Clark Fork projects?**

6 A. Once the Clark Fork Optimization Package models  
7 were completed, it was benchmarked against the Company's  
8 2000-2009 actual results at the Clark Fork projects to  
9 ensure its accuracy.

10 **Q. How did the results compare?**

11 A. The Clark Fork Optimization Package initially  
12 over-estimated generation relative to the 2000-2009 periods  
13 by approximately 6 percent. This result was expected, as  
14 Avista does not operate its projects in isolation. Instead  
15 the Company uses the Clark Fork projects to meet its load  
16 and reserve needs. There are also times where units are  
17 down for maintenance or forced outage. To reconcile the  
18 Clark Fork Optimization Package with actual operating  
19 history, the power curves for each project were therefore  
20 reduced by the 6 percent difference. After the  
21 benchmarking process, the model generated just over 100  
22 percent of actual generation levels during the 2000-2009  
23 period.

24 **Q. How is the generation then used for ratemaking**  
25 **purposes?**

1           A. The generation levels for each project (Mid-  
2 Columbia, Spokane River, and Clark Fork) are input into the  
3 dispatch model (AURORAxmp) where Avista's portfolio value  
4 is quantified for ratemaking purposes.

5           **Q. Are the models included in the Company's filing?**

6           A. Yes. All four components of the Clark Fork  
7 Optimization Package are included in my workpapers,  
8 including all input and output data.

9           **Q. Does the Clark Fork Optimization Package account**  
10 **for recent upgrades at the Noxon Rapids project?**

11          A. Yes. Once the original model was benchmarked  
12 against recent generation years that did not benefit from  
13 upgrades at Noxon, the three newly upgraded units (1, 2,  
14 and 3) were input into the model to reflect the higher  
15 anticipated generation levels. As Unit 2 will not enter  
16 service until April 1, 2011, all proforma periods prior to  
17 April 2011 include upgrades only to Units 1 and 3.

18          **Q. How much additional generation did the new units**  
19 **provide based on your modeling?**

20          A. The Company evaluated generation levels with the  
21 old Noxon units 1 through 3, and the newly upgraded units  
22 over the 50-year period for this case. Generation levels  
23 from the upgrades increased by a total of 35,778 MWh (4.08  
24 aMW) a year, or 1.3 percent.

1           **Q. How much additional generation does the new Unit 2**  
2 **provide?**

3           A. On an annual basis the new Unit 2 included in this  
4 case generates 10,326 MWh per year on average over the 50-  
5 year period, or 1.18 aMW.

6           **Q. Why did the Company not use similar models in this**  
7 **case for the Spokane River and Mid-Columbia projects?**

8           A. The Clark Fork Optimization Package is the product  
9 of several years of work by Avista. The Company has not  
10 yet attempted to build a model for the Mid-Columbia due to  
11 those projects' significant reliance on upstream (e.g.,  
12 Grand Coulee Dam) projects that greatly affect their  
13 output. A model for the Spokane River projects is under  
14 development but is not yet ready for use. The Company  
15 hopes to have a working version for the Spokane River  
16 system prior to its next rate proceeding. We will  
17 subsequently examine a model for the Mid-Columbia projects.

18           **Q. Please explain why the Company developed the Clark**  
19 **Fork Optimization Package.**

20           A. The Clark Fork Optimization Package is the  
21 culmination of nearly ten years of work by the Company to  
22 bring in-house a tool to enable true optimization of our  
23 hydro facilities. In 2002 the Company acquired the Vista  
24 suite from Synexus Global. This tool was used to evaluate  
25 system operations and support upgrades at our Noxon Rapids

1 and Cabinet Gorge projects. It also was used to evaluate  
2 various Spokane River project upgrades. Because of some  
3 problems inherent to the Vista model, and very slow  
4 solution times, it was retired in the middle of the last  
5 decade. We then evaluated other options in the  
6 marketplace, and the Company acquired Riverware from the  
7 University of Colorado at Boulder. After working with this  
8 tool over a number of years it became apparent that it  
9 cannot meet our need for efficient unit-level dispatch  
10 modeling.

11 Due to the apparent lack of a strong package for  
12 hydro modeling in the marketplace, the Company began  
13 developing the Clark Fork Optimization Package in the  
14 middle of 2009.

15 **Q. How is the Company using the new Clark Fork**  
16 **Optimization Package in its business operations, and how**  
17 **does it intend to use the tool into the future?**

18 A. The Clark Fork Optimization Package is an  
19 essential tool to assist the Company with optimizing hydro  
20 system operations, both in short- and long-term planning.  
21 Its results are also used for Company budgets, hydro  
22 project market valuation studies, and upgrade studies.  
23 Given its solution efficiency, it is possible to run large  
24 hydro-flow records through it, as is necessary for rate  
25 filings such this.

1           The Company anticipates using its new model to analyze  
2 opportunities to increase the value of the Clark Fork  
3 projects and lower overall system costs to customers. With  
4 this model there is now a potential to analyze a  
5 coordination agreement between Clark Fork River project  
6 operators that would be similar to the Pacific Northwest  
7 Coordination Agreement. Initiation of discussions on this  
8 a potential agreement between the various parties with  
9 projects on the river has been hampered to a large extent  
10 by the lack of a good means to model the values of  
11 coordination.

12           **Q. How does the AURORA<sub>xmp</sub> Dispatch Model operate**  
13 **Company-controlled hydroelectric generation resources?**

14           A. The Dispatch Model treats all hydroelectric  
15 generation plants within a load area as a single large  
16 plant. The Company's hydroelectric plants are on average,  
17 however, more flexible than the average plant used in each  
18 load area. To account for this additional flexibility, the  
19 Company algebraically extracts its plants from the region  
20 and develops individual hydro operations logic for them.  
21 Company-controlled hydroelectric resources are separated  
22 into three river systems: the Spokane River, the Clark  
23 Fork River, and individually separate the Mid-Columbia  
24 projects. This separation ensures that the flexibility

1 inherent in these resources is credited to customers in the  
2 pro forma exercise.

3 **Q. Please compare the operating statistics from the**  
4 **Dispatch Model to recent historical hydroelectric plant**  
5 **operations.**

6 A. Over the pro forma period the Dispatch Model  
7 generates 69 percent of Clark Fork hydro generation during  
8 on-peak hours (based on the average of the 50 year hydro  
9 record). Since on-peak hours represent only 57 percent of  
10 the year, this demonstrates a substantial shift of hydro  
11 resources to the more valuable on-peak hours. This is  
12 identical to the 5-year average of on-peak hydroelectric  
13 generation at the Clark Fork through 2009. Similar  
14 performance is achieved for the Spokane and Mid-Columbia  
15 projects.

16

17 **IV. OTHER KEY MODELING ASSUMPTIONS**

18 **Q. Please describe your update to pro forma period**  
19 **natural gas prices.**

20 A. Natural gas prices for this filing are based on a  
21 3-month average from October 1, 2009 to December 31, 2009  
22 of the rate period forward prices. Natural gas prices  
23 used in the Dispatch Model are presented below in Table No  
24 1.

25

1 **Table No. 1 - Pro Forma Natural Gas Prices**

Basin	\$/Mcf	Basin	\$/Mcf
AECO	5.957	PG&E CITY	6.709
CHICAGO	6.504	RATHDRUM	6.265
CIG	5.882	SJUAN BASIN	5.975
EL PASO	6.056	SOCAL	6.277
MALIN	6.345	STANFIELD	6.265
NECT	6.566	SUMAS	6.372
NWPC RM	5.904	Henry Hub	6.424

2

3 **Q. What is the Company's assumption for rate period**  
4 **loads?**

5 A. Rate period loads (October 2010 through September  
6 2011) used in this case are taken from the Company's load  
7 forecast completed in July 2009. As this load is generated  
8 using "normal weather," it eliminates the need for a  
9 weather-normalization adjustment. Removing the 2009 actual  
10 (test year) generation from the Clearwater (previously  
11 known as Potlatch) cogeneration facility, from the October  
12 2010 to September 2011 proforma period loads, results in  
13 system loads of 1,070.4 aMW as filed in this proceeding.

14 The Company's latest energy loads and resources  
15 tabulation (L&R) is attached in Exhibit No.5, Schedule 1.

16 **Q. Please discuss the availability assumptions for**  
17 **your thermal and gas generating facilities.**

18 A. For baseload generating facilities such as Coyote  
19 Springs 2, Kettle Falls Generating Station, and Colstrip,  
20 we use a 5-year average through 2009 to estimate long-run  
21 operating performance. The following table summarizes the

