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IDAHO PUBLIC
UTILITIES COMMISSION

April 22, 2011

Ms. Jean Jewell
Commission Secretary
Idaho Public Utilities Commission
472 W. Washington
Boise, ID 83702

RE: Case No. GNR-E-11-01

Dear Ms. Jewell:

We are enclosing for filing in the above-referenced case nine (9) copies of the REBUTTAL TESTIMONY OF DON READING filed on behalf of THE NORTHWEST AND INTERMOUNTAIN POWER PRODUCERS COALITION IN OPPOSITION TO ROCKY MOUNTAIN POWER'S MOTION FOR CLARIFICATION AND MOTION FOR PROTECTIVE ORDER. An additional copy is enclosed for you to stamp for our records. I have also enclosed a CD-ROM containing the electronic copies of the testimony and exhibit for the court reporter.

Sincerely,

Greg Adams
Richardson & O'Leary PLLC

encl.

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Power Producers Coalition

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE
COMMISSION'S INVESTIGATION
INTO DISAGGREGATION AND AN
APPROPRIATE PUBLISHED
AVOIDED COST RATE ELIGIBILITY
CAP STRUCTURE

Case No. GNR-E-11-01

**REBUTTAL TESTIMONY AND EXHIBITS OF
DR. DON READING
ON BEHALF OF
NORTHWEST AND INTERMOUNTAIN POWER PRODUCERS COALITION**

APRIL 22, 2011

1 **Q. Please state your name, address, and affiliation.**

2 A. My name is Don Reading. I am Vice President and Consulting Economist for
3 Ben Johnson Associates, 6070 Hill Road, Boise Idaho. My resume is attached as Exhibit 401.

4 **Q. On whose behalf are you testifying?**

5 A. I am testifying on behalf of the Northwest and Intermountain Power Producers
6 Coalition (NIPPC) which is a party to this proceeding. NIPPC is an association of independent
7 power producers established to actively pursue informal and formal (i.e., laws, policies, rules and
8 regulations) avenues and forums to promote competitive electric power supply markets in the
9 Pacific Northwest and Intermountain West. NIPPC supports a fully competitive electric power
10 supply marketplace. Among NIPPC's 15 members and 11 associate members are some of the
11 major independent energy producers in the county. The member companies' energy projects that
12 are currently on-line have a capacity of more than 4,000 MW in the Northwest.

13 **Q. What is the purpose of your rebuttal testimony?**

14 A. I point out that some of the recommendations made by several parties go
15 beyond the scope of this proceeding. In addition, I address implementation and real world
16 problems associated with the recommendations of other parties.

17 **Q. Why did NIPPC not file direct testimony?**

18 A. NIPPC did not file direct testimony because NIPPC does not believe that the
19 current methodology used by the Commission needs to be changed. Therefore, it would not have
20 been productive for NIPPC to file testimony on how it should be changed.

21 **Q. Why do you believe the current system for eligibility for the published rates**
22 **does not need to be changed?**

1 A. The “problems” identified by the three investor-owned utilities is that projects
2 are actually employing the methodology set up by the Commission for determining eligibility for
3 published avoided cost rates. It is not a bad thing to comply with this Commission’s orders and
4 standards. The result is that a large number of projects have been able to utilize the current
5 system to successfully build wind projects.

6 **Q. Would you agree that the use of disaggregation is a problem?**

7 A. Not necessarily. Utilities and their ratepayers should be indifferent to a project
8 that is disaggregated or one that is aggregated – as long as the avoided cost rates are accurately
9 set. So I believe this entire case is focused on the wrong “problem.”

10 **Q. What is your understanding of the proper scope of this proceeding?**

11 A. Staff witness Sterling has done a good job in his description the proper scope of
12 this proceeding. On page 5 of his direct testimony he quotes from Order No. 32195 and
13 concludes that his testimony would be narrowly focused on the two questions raised by the
14 Commission. He also properly concluded on page 6 that “Issues related to the appropriateness or
15 accuracy of either the Surrogate Avoided Cost Resource methodology (SAR methodology) or the
16 Integrated Resources Plan Methodology (IRP methodology) will be addressed in subsequent
17 proceedings.” I do not necessarily agree with the premise that the question of disaggregation and
18 the validity of the avoided cost methodology are distinct such that they can be addressed
19 separately. Nevertheless, the Commission has, for purposes of this phase of its ongoing
20 investigation, strictly limited the parties to just the two questions of how to devise a methodology
21 that “(1) allows small wind and solar QFs to avail themselves of published rates for projects 10

1 aMW or less; and (2) prevents large QFs from disaggregating in order to obtain a published
2 avoided cost rate that exceeds a utility's avoided cost."

3 **Q. Have you reviewed the testimonies filed by the three investor-owned**
4 **utilities, Rocky Mountain Power, Idaho Power and Avista?**

5 **A.** Yes. All three recommend that the Commission adopt a permanent 100 kW size
6 threshold for wind and solar projects for entitlement to the published avoided cost rates. See Mr.
7 Griswold's testimony at page 2, Mr. Kalich's testimony at page 4 and Mr. Stokes' testimony at
8 page 3.

9 **Q. What is your opinion with respect to the recommendation by the three**
10 **investor-owned utilities that the Commission restrict the availability of published avoided**
11 **cost rates to projects no larger than 100 kW.**

12 **A.** Those recommendations simply ignore the Commission's directive in Order No.
13 32195 which clearly states that the parties are to provide testimony and propose a methodology
14 that "allows small wind and solar QFs to avail themselves of published rates for projects
15 producing 10 aMW or less." Ignoring the Commission's clear instructions, the investor-owned
16 utilities all recommend that small solar and wind QFs be restricted to only access published
17 avoided cost rates for projects 100 kW or less. They have disregarded the Commission's
18 instructions with respect to recommending a methodology that "allows" small wind and solar to
19 have access to published rates up to 10 aMW.

20 **Q. What is your response to the assertions by the investor-owned utilities that**
21 **it is not possible to devise a system that both allows access to avoided cost rates of up to 10**
22 **aMW and prevents disaggregation?**

1 I do not believe the investor-owned utilities are motivated to offer such a system for
2 the Commission's review. Certainly the other parties to this case were able to offer ideas on how
3 the Commission could accomplish its goals. I see no justification for why the investor-owned
4 utilities failed to do so by simply recommending a 100 kw eligibility cap.

5 **Q. Have you reviewed Staff Witness Sterling's direct testimony in this docket?**

6 **A.** Yes, and I have some concerns about his recommendations.

7 **Q. What are your concerns?**

8 **A.** His Single Project Criteria in Staff Exhibit 301 are overly broad and vague.

9 **Q. In what way are Staff's Single Project Criteria vague?**

10 **A.** Staff's Exhibit lists fifteen separate indicia of what makes for a Single Project.
11 That list is prefaced with the statement that the Commission will consider "all relevant factors,
12 including but not limited to" the fifteen listed on Exhibit 301. Therefore, a developer cannot
13 know, going forward what other "relevant factors" may be used to determine whether or not his
14 or her project will be aggregated for purposes of entitlement to published avoided cost rates.
15 That uncertainty is surely not going to engender a positive climate for developers investing
16 capital in QF projects. In addition, some of the specific items on the list are too vague to provide
17 clarity.

18 **Q. Why did Mr. Sterling include as one of his criteria the phrase, "all relevant**
19 **factors, including but not limited to" and leave it to the Commission to settle disputes over**
20 **non-listed factors?**

21 **A.** On page 9 of his direct testimony he states that "If a rigid set of criteria were to
22 be adopted, I believe that some project developers might devise ways to meet the criteria, yet

1 violate their clear intent.” I understand his concern. He also advocates the utilities make the
2 initial determination and go before the Commission only when there may be uncertainty or
3 disagreement between the project developer and the utility. My concern is that it can also be the
4 utility that can take advantage of the overly broad and vague criteria in order to stall or
5 discourage projects.

6 **Q. Do you have any examples of items on the list that are vague?**

7 **A.** Yes. Let’s start with a real world example of how Staff’s proposal will play out.
8 Assume there are two landowners with adjacent properties and they each build a wind project on
9 their land. Assume further that each project is owned, conceived, built, financed and managed
10 completely independently of the other. Under Staff’s proposal these two independent projects
11 would be subject to aggregation because they use the same motive force and they are in close
12 proximity to each other.

13 **Q. Do you have other examples of the vagueness of Staff’s list?**

14 **A.** Yes. An indicia of a Single Project for Staff is if two wind projects use the
15 same general contractor. That fact alone would be sufficient to classify them as a single project
16 regardless of how distant and how unrelated the two projects really are. Given the relative small
17 universe of contractors in the specialized business of designing and constructing wind and solar
18 projects, the chances that a single contractor would work on more than one project in the state
19 are quite high.

20 **Q. Do you have specific concerns with Staff’s Criteria?**

21 **A.** Yes. Only the terms “person” and “affiliated person” are defined, leaving us to
22 speculate as to the meaning and applicability of the other terms in the list of Criteria. In Criteria

1 “a” it is an indicia of common ownership if two projects use the “same motive force.” That
2 could be interpreted to be as broad as just “wind.” It would make no sense to define it that
3 broadly as there could be two wind projects hundreds of miles apart that are aggregated because
4 they both use wind to generate power. The same argument could be made for use of the “same
5 fuel source.” Two hydro projects on different streams both use hydro power as the fuel source.
6 Surely Staff doesn’t mean to be so broad in the application of its criteria, but without specifically
7 defining each term as to how it is to be used there is simply too much room for mischief in
8 Staff’s proposal. The same criticism is applicable to the criteria on sharing common control,
9 communications and operations facilities – how granular one gets or how broad a view one takes
10 of sharing common communications and operations facilities can be subject to great variability.
11 Criteria “g” provides that two facilities are a single project if they have a contract executed
12 within twelve months of each other and are located “in the same general vicinity.” It is
13 impossible to know what that means with any degree of certainty. The same criteria calls out a
14 “similar facility” that is in the same general vicinity. Exactly what a similar facility would be is
15 surely in the eye of the beholder. Are wind turbines of different sizes similar enough to be
16 ensnared in this definition / or are wind turbines manufactured by different companies similar
17 enough to be ensnared? Criteria “o” is particularly troubling. It provides for different projects to
18 be considered a Single Project if they are merely in close proximity to other similar facilities.
19 Staff’s proposal, as written is simply unworkable.

20 **Q. Do you have any comments on the Criteria on interconnections and**
21 **transmission?**

1 A. Yes. I believe that the Commission should be careful with recommendations
2 that allow investor-owned utilities to inquire as to the status of interconnection facility
3 agreements and transmission interconnection agreements as suggested by Staff's Criteria "d" and
4 "f." It is my understanding that utilities may be precluded from making such inquiries by
5 FERC's Standards of Conduct. But someone with a better understanding of that issue than I
6 have should probably be consulted on that topic.

7 **Q. Do you have any comments on the Criteria relative to financing and**
8 **revenue arrangements of QF developers?**

9 A. Again, the Commission should be careful with recommendations that allow
10 investor-owned utilities to inquire into the financial arrangements of QFs as I understand they are
11 exempt from those types of inquiries under PURPA. But, again someone with a better
12 understanding of that issue than I have probably should be consulted on this topic as well.

13 **Q. Do you have any comments on the applicability of Staff's Criteria to non-**
14 **wind and non-solar project?**

15 A. Yes. I was surprised to see that Staff recommends that its Criteria apply to all
16 projects not just wind and solar.

17 **Q. Why were you surprised?**

18 A. Because the Commission's order opening this docket was explicit in stating that
19 it only wanted testimony and comments on wind and solar. I was also surprise to read that Staff
20 wanted to extend the reach of its Criteria beyond wind and solar because in the opening pages of
21 his testimony Staff Witness Sterling cited to the Commission's order, stating that his "testimony
22 will be very narrowly focused." (Sterling Direct at p. 5.) One, I believe, unintended

1 consequence of expanding the coverage to all QFs and using Staff's Criteria would be that a
2 strong argument could be made that all dairy digesters in the Twin Falls area should be
3 aggregated as a Single Project. In addition, I think that non-wind and non-solar developers
4 would be surprised to see an order come out of this phase of the Commission's investigation that
5 subjects their projects to aggregation – given that the order opening this docket was limited to
6 just wind and solar.

7 **Q. Do you have any comments on ownership restrictions?**

8 **A.** I believe that such restrictions, if deemed appropriate by the Commission at the
9 time the power purchase agreement is in place, should be lifted at some point well before the end
10 of the contract term. This is important because such restrictions are nothing more than a restraint
11 on the owner's ability to sell his project should the need arise. Investors may want to consolidate
12 a number of smaller projects for the benefit of the landowners, financiers or even for ease of
13 administration for the power purchase agreements.

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

15 **A.** Yes it does.
16

BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION

CASE NO. GNR-11-01

NORTHWEST AND INTERMOUNTAIN POWER PRODUCERS
COALITION

READING, REB

TESTIMONY

EXHIBIT NO. 401

Dr. Don Reading's Curriculum Vitae

Don C. Reading

Present position Vice President and Consulting Economist

Education B.S., Economics — Utah State University
M.S., Economics — University of Oregon
Ph.D., Economics — Utah State University

Honors and awards Omicron Delta Epsilon, NSF Fellowship

Professional and business history Ben Johnson Associates, Inc.:
1989 --- Vice President
1986 ---- Consulting Economist

Idaho Public Utilities Commission:
1981-86 Economist/Director of Policy and Administration

Teaching:
1980-81 Associate Professor, University of Hawaii-Hilo
1970-80 Associate and Assistant Professor, Idaho State University
1968-70 Assistant Professor, Middle Tennessee State University

Experience Dr. Reading provides expert testimony concerning economic and regulatory issues. He has testified on more than 35 occasions before utility regulatory commissions in Alaska, California, Colorado, the District of Columbia, Hawaii, Idaho, Nevada, North Dakota, Texas, Utah, Wyoming, and Washington.

Dr. Reading has more than 30 years experience in the field of economics. He has participated in the development of indices reflecting economic trends, GNP growth rates, foreign exchange markets, the money supply, stock market levels, and inflation. He has analyzed such public policy issues as the minimum wage, federal spending and taxation, and import/export balances. Dr. Reading is one of four economists providing yearly forecasts of statewide personal income to the State of Idaho for purposes of establishing state personal income tax rates.

In the field of telecommunications, Dr. Reading has provided expert testimony on the issues of marginal cost, price elasticity, and measured service. Dr. Reading prepared a state-specific study of the price elasticity of demand for local telephone service in Idaho and recently conducted research for, and directed the preparation of, a report to the Idaho legislature regarding the status of telecommunications competition in that state.

Dr. Reading's areas of expertise in the field of electric power include demand forecasting, long-range planning, price elasticity, marginal and average cost pricing, production-simulation modeling, and econometric modeling. Among his recent cases was an electric rate design analysis for the Industrial Customers of Idaho Power. Dr. Reading is currently a consultant to the Idaho Legislature's Committee on Electric Restructuring.

Since 1999 Dr. Reading has been affiliated with the Climate Impact Group (CIG) at the University of Washington. His work with the CIG has involved an analysis of the impact of Global Warming on the hydro facilities on the Snake River. It also includes an investigation into water markets in the Northwest and Florida. In addition he has analyzed the economics of snowmaking for ski areas impacted by Global Warming.

Among Dr. Reading's recent projects are a FERC hydropower relicensing study (for the Skokomish Indian Tribe) and an analysis of Northern States Power's North Dakota rate design proposals affecting large industrial customers (for J.R. Simplot Company). Dr. Reading has also performed analysis for the Idaho Governor's Office of the impact on the Northwest Power Grid of various plans to increase salmon runs in the Columbia River Basin.

Dr. Reading has prepared econometric forecasts for the Southeast Idaho Council of Governments and the Revenue Projection Committee of the Idaho State Legislature. He has also been a member of several Northwest Power Planning Council Statistical Advisory Committees and was vice chairman of the Governor's Economic Research Council in Idaho.

While at Idaho State University, Dr. Reading performed demographic studies using a cohort/survival model and several economic impact studies using input/output analysis. He has also provided expert testimony in cases concerning loss of income resulting from wrongful death, injury, or employment discrimination. He is currently a adjunct professor of economics at Boise State University (Idaho economic history, urban/regional economics and labor economic.)

Dr. Reading has recently completed a public interest water rights transfer case. He is currently a member of the Boise City Public Works Commission.

- Publications* "Energizing Idaho", Idaho Issues Online, Boise State University, Fall 2006.
www.boisestate.edu/history/issuonline/fall2006_issues/index.html
- The Economic Impact of the 2001 Salmon Season In Idaho, Idaho Fish and Wildlife Foundation, April 2003.
- The Economic Impact of a Restored Salmon Fishery in Idaho, Idaho Fish and Wildlife Foundation, April, 1999.
- The Economic Impact of Steelhead Fishing and the Return of Salmon Fishing in Idaho, Idaho Fish and Wildlife Foundation, September, 1997.
- "Cost Savings from Nuclear Resources Reform: An Econometric Model" (with E. Ray Canterbury and Ben Johnson) *Southern Economic Journal*, Spring 1996.
- A Visitor Analysis for a Birds of Prey Public Attraction, Peregrine Fund, Inc., November, 1988.
- Investigation of a Capitalization Rate for Idaho Hydroelectric Projects, Idaho State Tax Commission, June, 1988.
- "Post-PURPA Views," In Proceedings of the NARUC Biennial Regulatory Conference, 1983.
- An Input-Output Analysis of the Impact from Proposed Mining in the Challis Area (with R. Davies). Public Policy Research Center, Idaho State University, February 1980.
- Phosphate and Southeast: A Socio Economic Analysis* (with J. Eyre, et al). Government Research Institute of Idaho State University and the Southeast Idaho Council of Governments, August 1975.
- Estimating General Fund Revenues of the State of Idaho* (with S. Ghazanfar and D. Holley). Center for Business and Economic Research, Boise State University, June 1975.
- "A Note on the Distribution of Federal Expenditures: An Interstate Comparison, 1933-1939 and 1961-1965." In *The American Economist*, Vol. XVIII, No. 2 (Fall 1974), pp. 125-128.
- "New Deal Activity and the States, 1933-1939." In *Journal of Economic History*, Vol. XXXIII, December 1973, pp. 792-810.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 22nd day of April, 2011, a true and correct copy of the within and foregoing **Rebuttal Testimony of Don Reading** was served as shown to the following parties:

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Signed 

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