Idaho Public Utilities Commission
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Boise, Idaho

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF IDAHO POWER COMPANY FOR AUTHORITY TO REVISE THE ENERGY EFFICIENCY RIDER, TARIFF SCHEDULE 91	)	CASE NO. IPC-E-04-29

IDAHO POWER COMPANY

DIRECT TESTIMONY

OF

MAGGIE BRILZ

December 2004

1 Q. Please state your name, address, and present
2 occupation.
3 Q. Please state you name and business address.
4 A. My name is Maggie Brilz. My business address
5 is 1221 West Idaho Street, Boise, Idaho.
6 Q. By whom are you employed and in what
7 capacity?
8 A. I am employed by Idaho Power Company as
9 Director of Pricing.
10 Q. Please describe your educational background.
11 A. In May of 1980 I received Bachelor of Arts
12 Degrees in Economics and Psychology from Smith College in
13 Northampton, Massachusetts. In 1998 I completed the
14 University of Idaho's Public Utilities Executive Course in
15 Moscow, Idaho. I have also attended numerous seminars and
16 conferences on pricing issues related to the utility
17 industry and have attended seminars and courses involving
18 public utility regulation.
19 Q. Please describe your business experience with
20 Idaho Power Company.
21 A. I started employment with Idaho Power Company
22 in November of 1984 as a Financial Analyst in the Planning
23 Department. In 1986 I was promoted to the position of Rate
24 Analyst in the Rate Department. My duties as a Rate Analyst
25 included the development of alternative pricing structures,

1 the analysis of the impact on customers of rate design
2 changes, the preparation of cost-of-service studies, and the
3 administration of the Company's tariffs. In July of 1993 I
4 was promoted to Rate Design Supervisor. In that capacity I
5 also became responsible for the overall rate design
6 activities of the Rate Department. In October of 1996 I was
7 promoted to my current position of Director of Pricing in
8 the Pricing and Regulatory Services Department.
9 Q. What is the scope of your testimony in this
10 proceeding?
11 A. My testimony will address the Company's
12 proposal for increasing the Energy Efficiency Rider amount
13 from the current level of 0.5% to an amount sufficient to
14 fund the 2004 Integrated Resource Plan (IRP) identified
15 demand-side management (DSM) programs, other customer-
16 focused energy efficiency programs, the Company's continued
17 participation in the Northwest Energy Efficiency Alliance
18 (Alliance), DSM research and studies, and incremental DSM
19 administrative costs. My testimony will also address the
20 Schedule 19 conservation program developed in compliance
21 with Commission Order No. 29505 issued in the Company's
22 recent general rate case.
23 Q. Will your testimony describe each of these
24 proposed programs?
25 A. No. Mr. Tatum describes each of these

1 programs in his testimony and provides information on the
2 projected program costs and the program cost-effectiveness.
3 Q. Please explain how the current Energy
4 Efficiency Rider came into being.
5 A. In Order No. 28722 issued in Case Nos. IPC-E-
6 01-07 and IPC-E-01-11, the Company's 2001-2002 Power Cost
7 Adjustment (PCA) case, the Commission directed Idaho Power
8 to develop and file a comprehensive DSM program to provide
9 customers with the opportunity to reduce electric
10 consumption. The Company complied with the Commission's
11 directive through a filing made on July 31, 2001, which the
12 Commission docketed as Case No. IPC-E-01-13. In the
13 compliance filing the Company identified a number of
14 potential DSM programs that could be implemented to assist
15 customers in reducing their bills and proposed that the
16 expenditures for the analysis and implementation of energy
17 conservation programs be funded through a charge known as
18 the Energy Efficiency Rider (Rider). On November 21, 2001
19 the Commission issued Order No. 28894 directing the Company
20 to implement limited DSM programs for the 2001-2002 winter
21 heating season and to organize the Energy Efficiency
22 Advisory Group (EEAG) to advise the Company on the
23 implementation of long-term DSM programs. Through Order No.
24 28894 the Commission postponed the consideration of funding
25 of DSM programs until the Company's 2002-2003 PCA filing was

1 made in the spring of 2002. In April 2002 the Energy
2 Efficiency Advisory Group, comprised of members from the
3 Company's customer groups, from special interest groups,
4 from Commission Staff, and Company personnel, was formed.
5 On May 13, 2002, the Commission issued Order No. 29026
6 authorizing the implementation of the Energy Efficiency
7 Rider as a means to fund DSM programs. The Rider amount for
8 each customer class targeted a level approximately equal to
9 .5 percent of overall class revenue. For the residential
10 class, the Rider was set equal to $.30 per customer per
11 month. For all other customer classes the Rider was
12 established as a cent per kilowatt-hour (kWh) charge for all
13 billed kWh, except for the irrigation class; the Rider was
14 capped at $15.00 per meter for irrigation customers. On an
15 annual basis, approximately $2.6 million is currently
16 collected through the .5 percent Rider.
17 Q. Please describe some of the DSM programs that
18 have been funded with the Rider since 2002.
19 A. Since 2002, the Rider funds have supported
20 such programs as a Compact Fluorescent Light bulb (CFL)
21 lighting program for residential and small commercial
22 customers, the Industrial Efficiency Program for customers
23 with basic load capacity of 500 kW or greater, the
24 Irrigation Efficiency Program, the AC Cycling Pilot Program
25 for residential customers, the Irrigation Peak Clipping

1 Pilot Program, and numerous small projects, energy
2 efficiency training seminars, and education workshops and
3 scholarships. A complete description of the programs funded
4 by the Rider during 2002 and 2003 can be found in the
5 Demand-Side Management Annual Reports for 2002 and 2003
6 included in Exhibit No. 1 to my testimony.
7 Q. What is the amount of annual funding required
8 to support the 2004 Integrated Resource Plan identified
9 programs, other customer-focused programs, the Company's
10 participation in the Northwest Energy Efficiency Alliance
11 (Alliance), DSM research and studies, and administrative
12 costs as described by Mr. Tatum?
13 A. Mr. Tatum's Exhibit No. 5 details the
14 expected expenditures for DSM programs through 2009. As can
15 be seen from this exhibit, the expected program expenditure
16 for 2005 is $6,490,040 and the expenditures increase each
17 year reaching $12,815,547 to be spent in 2009. The total DSM
18 program cost for the five-year period is approximately $53
19 million.
20 Q. What is your proposal for increasing the
21 Rider in order to support the expected program expenditures?
22 A. I propose the Rider be increased from the
23 current .5 percent level to 1.5 percent beginning June 1,
24 2005 and to 2.4 percent beginning June 1, 2007. Exhibit No.
25 2, page 1, details the expected annual program costs, the

1 anticipated Rider funding at the recommended levels, and the
2 Rider fund balance remaining at the end of each year through
3 2009. As can be seen from this exhibit, it is anticipated
4 that the Rider account will have a balance at year-end 2004
5 of approximately $4.5 million. This anticipated balance has
6 been taken into consideration in the determination of the
7 proposed funding levels.
8 Q. Page 1 of Exhibit No. 2 identifies a small
9 deficit in the Rider fund balance for 2009. Please explain
10 why you are recommending a proposal that does not provide
11 funding to support the total cost for the identified DSM
12 programs over the five-year period.
13 A. One of the goals in establishing a new
14 funding level for the Rider is to minimize the variability
15 in the rate paid by customers from year to year while at the
16 same time minimizing any fund surplus or deficit that may
17 accumulate. The recommended proposal to increase the Rider
18 in 2005 and again in 2007 minimizes the number of rate
19 changes needed to fund the identified programs and, although
20 it results in a small projected deficit in 2009, minimizes
21 the fund surplus.
22 Q. Did you review a scenario that would
23 accommodate just one change to the Rider during the five-
24 year period?
25 A. Yes. I evaluated the scenario in which the

1 Rider amount would increase to 2 percent beginning June 1,
2 2005. A 2 percent Rider coupled with the $4.5 million year-
3 end 2004 balance would provide just slightly less than the
4 total amount of funding needed to support the targeted DSM
5 programs through 2009. The details of this scenario are
6 included on page 2 of Exhibit No. 2
7 Q. Why did you choose not to select this
8 alternative?
9 A. Although this scenario requires just one rate
10 change and provides a constant funding level over the
11 targeted five-year period, it results in a significant
12 funding surplus through 2008, with the surplus in 2006
13 exceeding $5,900,000. In addition, this scenario results in
14 a projected deficit in 2009 of about $450,000. Due to what
15 I consider to be an unacceptable level of surplus generated
16 by this scenario, along with the relatively high deficit in
17 2009, I chose not to recommend this alternative.
18 Q. Are you recommending that the proposed Rider
19 funding expire at the end of the five-year period, or on
20 December 31, 2009?
21 A. No. I am recommending that the 2.4 percent
22 Rider which I have proposed become effective on June 1, 2007
23 remain in place until it is determined that a different
24 funding level is appropriate as a result of a proceeding
25 before the Commission.

1 Q. Please explain why you are taking into
2 account only the first five years of projected program
3 expenditures, particularly when the IRP planning horizon
4 encompasses a ten-year time frame.
5 A. The IRP identified programs are targeted to
6 be in full operation at the end of 2009. After the five-
7 year period, the annual costs for the identified programs
8 stabilize. Establishing a Rider amount sufficient to support
9 the identified programs over the five-year implementation
10 period provides the funding certainty needed by the Company
11 to undertake the level of expenditures required to fully
12 launch the targeted programs.
13 Q. Since the IRP-related DSM programs as well as
14 the other customer focused programs are intended to be in
15 place for more than five years, what do you propose
16 regarding a review of the adequacy of Rider funding at the
17 end of the five-year period?
18 A. There are several issues that may affect the
19 adequacy of the proposed Rider funding by the end of the
20 five-year period. First, due to the nature of DSM programs
21 and the inherent risk that customers either will not choose
22 to participate at the target level or will choose to
23 participate at a level greater than the target, the
24 estimated program costs used to determine the required
25 funding level may be overstated or understated. Second, the

1 Company will file its next IRP in 2006. To the extent that
2 additional DSM programs are selected as part of the
3 preferred resource portfolio, an additional adjustment to
4 the Rider may be needed. And third, the Company's current
5 contract with the Alliance ends December 31, 2009. Although
6 the Company would likely continue its involvement with the
7 Alliance past this date, this timing will provide the
8 opportunity to once again evaluate the benefits of continued
9 participation. Given these various issues, the Company
10 plans to monitor the adequacy of Rider funds on a periodic
11 basis. If an adjustment to the funding level needs to be
12 made at the end of the five-year period, or sooner, the
13 Company will file a request with the Commission to balance
14 the account.
15 Q. How do you propose to collect the Rider funds
16 from the various customer classes?
17 A. I propose that each customer pay an amount
18 that is equal to 1.5 percent and then to 2.4 percent of base
19 revenue beginning June 1, 2005 and June 1, 2007,
20 respectively. This charge would be applied to all bills for
21 retail sales delivered to Idaho customers via the Company's
22 distribution system.
23 Q. Have you prepared an exhibit that details the
24 funding to be collected from each customer class under your
25 proposal?

1 A. Yes. Exhibit No. 3 details the annual
2 funding to be provided by each customer class. As can be
3 seen from Exhibit No. 3, the 1.5 percent Rider is expected
4 to provide $7,680,965 annually; the 2.4 percent Rider is
5 expected to provide $12,289,543 annually.
6 Q. Are you proposing any changes to the way in
7 which the Rider is applied to customer accounts?
8 A. Yes. Currently, the Rider is established as
9 a cents-per-kWh charge. I am recommending that it be
10 changed to a percentage of base revenue.
11 Q. Why are you proposing the Rider be changed
12 from a cents-per-kWh charge to a percentage of base revenue?
13 A. Each of the DSM programs selected as part of
14 the IRP portfolio has a component that at least in part, if
15 not in whole, targets a reduction in peak demand. Because of
16 the capacity component of these programs, and because the
17 IRP-related DSM programs comprise such a large percentage of
18 the total DSM programs targeted for implementation, I
19 believe it is appropriate to recover program costs based on
20 the customers' total base revenue rather than only on the
21 energy component of customers' bills. A Rider based on the
22 total base revenue recognizes both the capacity and energy
23 utilized by a customer and more equitably recovers the DSM
24 program costs.
25 Q. Are you proposing that all customer classes

1 be assessed the Rider based on the total monthly billing for
2 the base rate charges?
3 A. Yes. I am recommending that each customer,
4 regardless of the service schedule or special contract under
5 which service is taken, be charged a monthly Rider amount
6 equal to 1.5 percent of the total charges for the base rate
7 components beginning June 1, 2005 and increasing to 2.4
8 percent beginning June 1, 2007.
9 Q. Currently, each residential customer pays a
10 flat 30¢ charge per month regardless of the amount of energy
11 consumed. Are you proposing that all residential customers
12 continue to pay a fixed amount each month?
13 A. No, I am not. I am proposing that each
14 residential customer pay a monthly amount based on the total
15 billing for the base charges. For the average customer, the
16 monthly charge would be $.85 at the 1.5 percent level and
17 $1.36 at the 2.4 percent level.
18 Q. Why are you proposing that each residential
19 customer pay based on the total billing rather than continue
20 to pay a flat charge?
21 A. Approximately 83 percent of the expected DSM-
22 related expenditures through 2009 are for programs selected
23 through the IRP. These programs are designed as system
24 resources. As such it is appropriate for the cost of the
25 resources to be paid based on consumption, just as supply-

1 side resources such as power plants and fuel are recovered
2 from customers based on consumption. Applying the Rider
3 charge to the total base revenue rather than maintaining a
4 flat charge per customer will recover a larger portion of
5 the costs from those customers who use more energy,
6 mirroring the method in which supply-side resource costs are
7 recovered.
8 Q. Currently, the Energy Efficiency Charge for
9 any single irrigation service point or meter is capped at
10 $15 per month. Are you recommending that this cap continue?
11 A. No. I am recommending that each irrigation
12 customer pay a monthly charge based on the total billing for
13 the base charges.
14 Q. Why are you proposing that each irrigation
15 customer pay based on total energy consumption rather than
16 capping the charge at $15 per meter as is currently the
17 case?
18 A. My primary reason for recommending that
19 irrigation customers pay the Energy Efficiency Charge based
20 on total consumption is the same as the reason I expressed
21 earlier in support of my recommendation for the residential
22 customer class. That is, given that approximately 83
23 percent of the expected DSM-related expenditures through
24 2009 are for programs selected through the IRP, I believe it
25 is appropriate for the cost of the resources to be paid on

1 the basis of consumption, just as the costs associated with
2 supply-side resources are recovered from customers based on
3 consumption. In addition, two of the six IRP-related
4 programs are designed specifically for the irrigation class.
5 As such, irrigation customers have the opportunity to
6 benefit from participation in either of the two DSM
7 programs.
8 Q. What will be the impact of your proposed
9 Energy Efficiency Charge to irrigation customers?
10 A. To determine the potential impact to
11 irrigation customers of my recommendation to have the Energy
12 Efficiency Charge apply uniformly to each customer based on
13 total base revenue, I reviewed the bill frequency data for
14 2002 which was provided in response to a production request
15 in the Company's recent general rate case (Case No. IPC-E-
16 03-13; Response to Third Production Request of Commission
17 Staff, Request No. 79). On an annual basis, over 90 percent
18 of the Company's irrigation customers use less than 50,000
19 kWh per month, with almost 50 percent of irrigation
20 customers using 5,000 kWh a month or less. At the 50,000
21 kWh per month level, assuming a billing demand of 140 kW,
22 the total monthly Rider payment would be $33.09 beginning
23 June 1, 2005 and $52.94 beginning June 1, 2007. Exhibit No.
24 4 details the bill frequency data for the months of April
25 2002 through October 2002 as well as the annual total for

1 2002.

2 Q. If the Commission were to determine that a
3 continued cap in the monthly Rider payment were appropriate
4 for irrigation customers, do you have a recommendation as to
5 how any shortfall in funds should be recovered?

6 A. Yes. Should the Commission determine that a
7 cap is appropriate, I would recommend that any shortfall in
8 funds from the irrigation class be recovered on an equal
9 basis from all other customer classes so that the total
10 amount of funding necessary to support the identified level
11 of DSM programs can be achieved.

12 Q. Are you proposing any changes to the way in
13 which the Rider funds collected from Schedule 19 customers
14 are tracked and made available for program implementation?

15 A. Yes. In Order No. 29505 issued in Case No.
16 IPC-E-03-13, the Commission directed Idaho Power to work
17 with industrial customers and Commission Staff to develop a
18 conservation program targeted specifically to Schedule 19
19 customers. Order No. 29505 stated, "the Commission would
20 like to see a DSM program that allows Schedule 19 customers
21 to determine appropriate energy conservation improvements to
22 their own facilities and receive matching funds from their
23 contributions to Energy Efficiency Rider program to install
24 the improvements". (Order No. 29505, p. 63) In Order No.
25 29547 the Commission clarified its intent regarding the

1 development of a DSM program for Schedule 19 customers and
2 reaffirmed its directive that the Company develop a program
3 in conjunction with customers and Staff. Regarding the
4 application of Rider funds, the Commission also clarified
5 that it "intended the customer to pay one-half the cost and
6 receive matching funds for the other one-half cost, but not
7 in an amount greater than the customer's contributions to
8 the Energy Efficiency Rider program". (Order No. 29547, p.
9 7) As a result of working with Schedule 19 customers and
10 Staff, I am proposing that changes be made to the Industrial
11 Efficiency Program to modify the way in which funds are
12 tracked and made available for Schedule 19 customers and to
13 accommodate other changes identified through this process.
14 Q. Do the changes you are proposing to the
15 funding structure match the Commission's stated intent
16 regarding the application of Rider funds for the
17 installation of conservation improvements?
18 A. No. The parties have identified a funding
19 structure which they believe is preferable to the structure
20 specified by the Commission.
21 Q. Before you describe the changes you are
22 proposing, would you please briefly describe the process
23 undertaken to work with the Schedule 19 customers and
24 Commission Staff?
25 A. Yes. On September 13, 2004, a meeting was

1 held at Idaho Power's office to discuss the development of a
2 DSM program targeted specifically to Schedule 19 customers.
3 Members from the Energy Efficiency Advisory Group who
4 represent the Schedule 19 customer class, Commission Staff,
5 representatives for the Industrial Customers of Idaho Power
6 (ICIP), and Idaho Power personnel attended the meeting.
7 Overall, the parties agreed that the current design of the
8 existing Industrial Efficiency Program available to Schedule
9 19 customers allowed sufficient flexibility for customers to
10 customize projects to meet the specifics of their individual
11 operations. However, four issues related to the program
12 design were identified by the customer groups during this
13 meeting. First, the customer groups expressed their desire
14 to have Rider funds paid by Schedule 19 customers tracked by
15 customer, similar to a savings account structure, with 100
16 percent of the funds in the account made available to the
17 individual customer for DSM projects. In addition, the
18 customer groups requested the ability to combine Rider funds
19 from multiple sites to fund DSM projects. Second, the
20 customer groups requested that there be no minimum payback
21 period required in order for a DSM project to be approved
22 for funding. Third, the customer groups requested the audit
23 provision of the program be expanded. And finally, the
24 customer groups requested the mechanism for calculating the
25 available incentive amount for a project be simplified.

1 Following this meeting, Company personnel worked to address
2 these issues raised by the customer groups.
3 Q. Was a redesign of the existing Industrial
4 Efficiency Program that is satisfactory to the parties
5 involved in this process achieved?
6 A. Yes. The parties met again on November 8,
7 2004 to review a revised program design that addressed the
8 issues identified at the September 13 meeting. After
9 further discussion, the parties reached agreement on the
10 four issues.
11 Q. Would you please describe the agreement
12 reached on each of the four issues?
13 A. Yes. The parties agreed to restructure the
14 Industrial Efficiency Program to provide an option for
15 Schedule 19 customers to designate whether or not they want
16 to establish an individual account in which to track Rider
17 payments for direct use by the customer for DSM projects at
18 the customer's site (this option is defined as "self-
19 directed"). As part of this option, customers will be able
20 to combine funds from multiple sites to implement cost-
21 effective projects. In addition, the parties agreed to
22 eliminate any minimum payback requirement from the program
23 design with the intent to revisit this issue after one year
24 in order to determine its effect on the program. The parties
25 also agreed to expand the audit feature of the program and

1 to simplify the mechanism for calculating the incentive
2 amount.
3 Q. Would you please describe in more detail how
4 the individual, or self-directed, accounts are intended to
5 work?
6 A. Yes. Funds will be tracked individually for
7 each customer as of June 1, 2004 and made available to
8 customers for use in implementing DSM projects as of June 1,
9 2005. Customers will have until January 1, 2008 to utilize
10 the funds in the individual accounts for approved projects.
11 Any individually tracked funds not utilized for a specific
12 project by January 1, 2008, will be removed from the
13 individual account and pooled with the rest of the Rider
14 funds. Customers will have the flexibility to choose either
15 the new "self-directed" funding option or the existing
16 "cost-share" funding option at the time the customer commits
17 to implementing an approved DSM project. Once the customer
18 has made a funding selection, the customer will be required
19 to continue with that funding option until January 1, 2008.
20 In addition, beginning June 1, 2005, customers will be able
21 to utilize for project implementation the amount of funding
22 expected to be assessed as of January 1, 2008. This
23 provision allows for an incentive to be paid to the customer
24 prior to the customer actually paying into the individual
25 account. Customers who choose to establish individual

1 accounts will have the ability to use 100 percent of the
2 funds in the account towards the implementation of approved,
3 cost-effective DSM projects.
4 Q. How will the self-directed option be
5 structured after January 1, 2008?
6 A. The self-directed option will be structured
7 the same as I have just described, with the exception that
8 the funds will be tracked and made available on the basis of
9 each subsequent three-year timeframe.
10 Q. How will funds be available to Schedule 19
11 customers who choose not to use the self-directed option?
12 A. Customers who choose not to select the self-
13 directed option will be eligible to receive Rider funding
14 for approved, cost-effective DSM projects through the cost-
15 share option which will utilize funds from the overall pool
16 of Rider funds.
17 Q. Is the agreement among the parties regarding
18 the establishment of "self-directed" accounts contingent on
19 any action of the Commission?
20 A. Yes. Throughout the discussions held with
21 the parties it has been expressed that the revision to the
22 Industrial Efficiency Program to include a self-directed
23 option is contingent upon the Commission's approval of an
24 increase in the Rider from the current .5 percent amount and
25 approval of the self-directed funding structure.

1 Q. What changes have been agreed upon regarding
2 the audit provision of the program?
3 A. The parties agreed to revise the audit
4 provision to provide up to $3,000 in Rider funds per year
5 for a high level audit of the customer's facility with no
6 obligation on the part of the customer to implement any
7 measures identified as part of the audit. In addition, the
8 parties agreed to a cost-share provision in which Rider
9 funds will pay for 50 percent of the cost of a detailed
10 audit of a project identified in the high level audit,
11 provided the customer is likely to install the project. The
12 Rider funds available for a detailed audit will be limited
13 to $10,000 per customer site once every three years.
14 Q. Would you please describe the changes made to
15 the Industrial Efficiency Program to simplify the incentive
16 mechanism?
17 A. Yes. The mechanism has been simplified to
18 provide a cap for the incentive amount under the cost-share
19 option equal to $.12 per kWh reduced or 50 percent of the
20 project cost, up to $100,000. For the self-directed option
21 the incentive cap is equal to 100 percent of the funds
22 expected to be collected in the individual customer account
23 through January 1, 2008. Previously the program design
24 included an additional cap and limited the amount of funds
25 which could be combined from other sites to 25 percent of

1 the calculated incentive amount for qualified projects at
2 each site.
3 Q. What is the role of the EEAG regarding the
4 Industrial Efficiency Program and the changes you have just
5 described?
6 A. The changes to the Industrial Efficiency
7 Program will be reviewed with the EEAG at the group's
8 quarterly meeting in January. On an ongoing basis, the
9 Company will review with the EEAG any additional revisions
10 to the program which may be suggested in order to receive
11 input on the program design and implementation.
12 Q. Are you proposing that the changes made to
13 the Industrial Efficiency Program that you have just
14 described be available to the Company's three special
15 contract customers?
16 A. Yes. The Company's Industrial Efficiency
17 Program is currently available to the three special contract
18 customers. I recommend that each of the changes I just
19 described, including the self-directed option, also be made
20 available to the special contract customers.
21 Q. Are you aware of the level at which other
22 utilities in the region are funding DSM programs?
23 A. Yes. In its most recent general rate case
24 before this Commission, Avista received authorization to
25 establish the level for its DSM surcharge at 1.25 percent of

1 base revenues. Both Portland General Electric and Pacific
2 Power & Light in Oregon assess each customer a Public
3 Purposes Charge equal to 3 percent of the total revenue
4 billed. Of the total amount assessed, approximately 67
5 percent is earmarked for conservation.
6 Q. Have you included in the amount to be
7 collected through the Rider a component for the lost revenue
8 that will occur as a result of the implementation of the
9 energy efficiency programs?
10 A. No. There is no component for lost revenue
11 included in the proposed Rider funding.
12 Q. Does this conclude your testimony?
13 A. Yes, it does.