

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)
OF IDAHO POWER COMPANY FOR)
AUTHORITY TO INCREASE ITS RATES) CASE NO. IPC-E-08-10
AND CHARGES FOR ELECTRIC SERVICE.)
_____)

IDAHO POWER COMPANY

DIRECT TESTIMONY

OF

JEANNETTE BOWMAN

1 Q. Please state your name and business address.

2 A. My name is Jeannette Bowman. My business
3 address is 1221 West Idaho Street, Boise, Idaho.

4 Q. By whom are you employed and in what
5 capacity?

6 A. I am employed by Idaho Power Company as a
7 Senior Pricing Analyst.

8 Q. Please describe your educational background
9 and work experience.

10 A. In 1973, I graduated from the College of
11 Idaho earning a Bachelor of Arts degree in Social Studies
12 and Mathematics. I have also done graduate work at Boise
13 State University. In addition, I have attended electric
14 utility ratemaking courses offered through New Mexico State
15 University's Center for Public Utilities as well as various
16 advanced rate courses presented by the Edison Electric
17 Institute. From 1973 to 1981, I taught secondary school
18 mathematics and social studies courses. In 1981, I joined
19 Accounting Systems in Boise where my duties primarily
20 involved implementing accounting software systems. In
21 August 1982, I accepted a position at Idaho Power as a Rate
22 Analyst. In July 1986, I was promoted to Senior Rate
23 Analyst, now designated as Senior Pricing Analyst. My
24 duties as a Senior Pricing Analyst include gathering,

1 analyzing, and coordinating data from various departments
2 throughout the Company required for development of
3 jurisdictional separation studies, class cost-of-service
4 studies, and rate design as well as other analyses as may
5 be required. In addition, I assist in the development of
6 the Company's tariffs.

7 Q. What is the scope of your testimony in this
8 proceeding?

9 A. Under the direction of Mr. Gale, Vice
10 President of Regulatory Affairs, my testimony addresses
11 proposed changes to the Company's Idaho Schedule 24 -
12 Agricultural Irrigation Service, as well as all Idaho
13 lighting and non-metered retail tariff schedules. I will
14 also address the proposed changes to Schedule 89 - Unit
15 Avoided Energy Cost for Cogeneration and Small Power
16 Production.

17 Q. Have you prepared or supervised the
18 preparation of certain exhibits relating to your rate
19 design testimony?

20 A. Yes, I have prepared or supervised the
21 preparation of the following exhibits relating to rate
22 design:

1 present rate structure are the rates filed in Case No. IPC-
2 E-08-01 related to the Danskin Combustion Turbine. The
3 actual rates approved by the Commission in Case No. IPC-E-
4 08-01 (Order No. 30559) vary slightly from those originally
5 filed. In Order No. 30559, the Commission excluded a
6 relatively small part of the investment from inclusion in
7 rates (\$422,000). The Company has not included this small
8 impact in the General Rate Case filing because of the time
9 impact associated with reprocessing all the analyses and
10 studies. Since the impact of not making the change is to
11 slightly overstate revenues, any disadvantage accrues to
12 the Company's case.

13 **SCHEDULE 24 - AGRICULTURAL IRRIGATION SERVICE**

14 Q. What is the current rate structure for
15 Schedule 24?

16 A. Service under Schedule 24 is classified as
17 being either "in-season" or "out-of-season." The in-season
18 for each customer begins with the customer's meter reading
19 for the May billing period and ends with the customer's
20 meter reading for the September billing period. The out-
21 of-season encompasses all other billing periods.

22 Within the in-season, customers pay both an Energy
23 Charge and a Demand Charge for the metered usage. During
24 the out-of-season, customers pay an Energy Charge only.

1 For the in-season, customers pay a monthly Service Charge
2 of \$15.00. The monthly Service Charge during the out-of-
3 season is only \$3.00 to encourage customers to continue
4 service throughout the out-of-season period.

5 Both Secondary Service and Transmission Service
6 levels are available under Schedule 24, although no
7 customers are currently taking Transmission Service.

8 Q. Please describe the rate design proposal for
9 Schedule 24.

10 A. Consistent with my overall objectives, I
11 propose to move the individual rate components closer to
12 the costs indicated by Mr. Tatum's 3CP/12CP Class Cost-of-
13 Service study as shown on page six of Exhibit No. 67. My
14 rate design proposal on page two of Exhibit No. 76 also
15 targets the capped 15 percent average revenue increase
16 indicated on page four of Mr. Tatum's Exhibit No. 70.

17 In addition, I am proposing a load-factor pricing
18 mechanism for in-season energy sales to irrigation
19 customers. Out-of-season energy sales will not be impacted
20 by the proposed load-factor energy rate design.

21 Q. Please explain what is meant by "load
22 factor."

23 A. A load factor is the ratio of the kilowatt-
24 hours supplied during a designated period to the peak or

1 maximum load in kilowatts ("kW") occurring in that same
2 period. It is computed by dividing the number of the
3 monthly billed kilowatt-hours by the product of the billed
4 kW and the number of hours in the billing month. To attain
5 efficiency goals, it is beneficial to maximize the
6 kilowatt-hour usage for each kW of billed demand. The
7 higher the load factor, the higher the energy efficiency.

8 Q. Can you provide various examples of how load
9 factors are established?

10 A. Yes. If a customer has 1 kW of billed
11 demand and utilizes 720 kilowatt-hours of energy in a
12 typical 30-day month, the resulting load factor is 100
13 percent: $720 \text{ kilowatt-hours} / 720 (1 \text{ kW} \times 24 \text{ hours} \times 30$
14 $\text{days})$. If another customer has the same 1 kW billed demand
15 but only uses 360 kilowatt-hours during the 30-day month,
16 the customer would have a 50 percent $(360/720)$ load factor.

17 Q. Why is a customer's load factor meaningful
18 or important?

19 A. A customer's load factor is a measure of how
20 fully electric facilities are being utilized. For example,
21 assume one customer has the infrastructure required to
22 provide service to a 100-horsepower pump that is utilized
23 only 30 percent of the time. A second customer has a 50-
24 horsepower pump that is utilized 60 percent of the time.

1 Even though each customer may have the same kilowatt-hours
2 energy charges over a month's time, the demand charges for
3 the smaller pump will be proportionally less. In addition,
4 the smaller pump will have a load factor sufficient to
5 benefit from reduced energy rates.

6 Furthermore, right-sized equipment also assists in
7 minimizing the Company's peak demand if the device is being
8 utilized during the Company's highest demand periods.

9 Q. Why would an energy rate design which is
10 conditional on a customer's load factor be preferable to a
11 uniform energy rate?

12 A. Currently, a uniform energy rate is applied
13 to all in-season energy sales. Efficiency is neither
14 rewarded nor discouraged by such an energy pricing
15 mechanism. Unrecognized efficiencies of the higher load-
16 factor customers result in the subsidization of the lesser
17 efficient lower load-factor customers. Implementation of
18 the proposed load-factor pricing mechanism will ameliorate
19 the cross-subsidization between these two types of
20 customers.

21 Q. How is the load-factor pricing rate
22 mechanism structured?

23 A. Instead of applying a single uniform energy
24 rate to all in-season energy sales, the load-factor pricing

1 mechanism divides the energy sales into two groups: one
2 energy rate for all kilowatt-hours up to a certain load-
3 factor threshold and a second energy rate for all kilowatt-
4 hours above that level.

5 Q. What is the typical load factor of the
6 Company's Idaho irrigation customers?

7 A. Using 2007 data for Idaho irrigation
8 customers taking service during the in-season months (June
9 - September), the "average" and "median" in-season load
10 factors were 45.4 percent and 45.6 percent, respectively.
11 The "average" and "median" out-of-season load factors were
12 19.3 percent and 18.6 percent, respectively.

13 Q. For the proposed load-factor pricing rate
14 structure, what load factor served as your benchmark for
15 determining the kilowatt-hour tiers in your rate design?

16 A. My proposed rate design targets bill
17 neutrality for customers attaining the "median" load factor
18 of 45.6 percent (328 kilowatt-hours per kW) in an in-season
19 month. Those with a monthly load factor greater than that
20 level will benefit from lower bill charges than if all
21 kilowatt-hours are charged a single, uniform energy rate.
22 Conversely, customers with a load factor below 45.6 percent
23 in an in-season month will experience increased bill
24 charges compared to a single uniform energy rate. Again,

1 load-factor pricing is not being recommended for out-of-
2 season kilowatt-hour usage.

3 Q. In order to accomplish your expressed goal
4 of revenue neutrality at 328 kilowatt-hours, how large is
5 the first tier of your proposed energy rate design?

6 A. The first energy tier in the energy rate
7 design will be for the first 164 kilowatt-hours per kW.
8 The second tier will be for all additional kilowatt-hours
9 per kW. My workpapers include a sheet illustrating the
10 billing comparisons between single-rate energy pricing and
11 a load factor pricing rate design for customers with
12 monthly load factors between 0-100 percent.

13 Q. How large is the proposed price differential
14 between the first energy rate tier (first 164 kilowatt-
15 hours per kW) and the second tier (all other kilowatt-hours
16 per kW)?

17 A. I am proposing to make only a three percent
18 price differential between the two energy tiers. This
19 small differential will minimize any sizable economic
20 impacts of the proposed rate design while customers are
21 becoming more knowledgeable about the pricing structure.

22 Q. Does a load-factor energy pricing rate
23 design interfere with, or become counter-productive to, the
24 goals of either the Company's Irrigation Efficiency Rewards

1 Program or the Irrigation Peak Rewards Program?

2 A. No. Participants in the Irrigation
3 Efficiency Rewards Program receive rewards to improve the
4 energy efficiency of their existing irrigation systems or
5 their installation choices for new systems. The right-
6 sizing of equipment encouraged by this Program should
7 enhance the customer's load factor. Therefore, load-factor
8 energy pricing has the potential to provide a second set of
9 benefits to the participants in the Irrigation Efficiency
10 Rewards Program.

11 The Irrigation Peak Rewards Program provides
12 economic credits to customers who allow the Company to turn
13 off specific irrigation equipment on a regular, pre-
14 scheduled basis. Compared to the Irrigation Efficiency
15 Rewards Program, energy efficiency goals are not as
16 directly related to this Company Program. However,
17 whenever participating customers maintain a monthly in-
18 season load factor above the 45.6 percent threshold, they
19 will also receive a second additional benefit of lower
20 energy billings resulting from load-factor energy pricing.
21 Participants in the Program generally shift their usage to
22 another time period. Therefore load-factor energy pricing
23 should not make any significant changes to their monthly
24 load factor. As a result, participation levels in the

1 Program should not be negatively affected by the proposed
2 load-factor pricing rate design.

3 Q. What goals are addressed with the
4 introduction of load-factor energy pricing for in-season
5 usage?

6 A. As mentioned, the Company has the goals of
7 establishing prices which reflect the costs of the services
8 provided and establishing rate designs which encourage the
9 wise and efficient use of energy. Load-factor energy
10 pricing supports both of these goals because it incents
11 customers to right-size their equipment and utilize service
12 in an efficient manner.

13 Q. Will all irrigation customers be able to
14 immediately make adjustments that will allow them to
15 benefit from load-factor energy pricing?

16 A. Perhaps not. The right-sizing of irrigation
17 equipment and/or changes in operations would probably occur
18 gradually over time. However, load-factor energy pricing
19 will encourage efficient choices when equipment and
20 operational decisions are being made.

21 Q. Have you had an opportunity to discuss your
22 proposed load-factor energy rate design with any irrigation
23 customers or their representatives?

1 A. Yes. Idaho Power has discussed the load-
2 factor energy pricing mechanism with representatives of the
3 Idaho Irrigation Pumpers Association and sought their
4 input. In addition, at an irrigation forum on June 11,
5 2008, the load-factor energy pricing proposal was presented
6 to various irrigation customers, an Idaho Commission Staff
7 member, and, once again, representatives of the Idaho
8 Irrigation Pumpers Association.

9 Q. Please describe the rate design proposal for
10 Schedule 24.

11 A. The Unit Cost results detailed on page six
12 of Mr. Tatum's Exhibit No. 67 indicate the current Service
13 Charge, Demand Charge, and Energy Charge rate components
14 are not in alignment with costs. I propose to move the
15 individual rate components closer to the costs indicated by
16 the cost-of-service study.

17 Q. What approach did you take in determining
18 the amount of increase for each rate component?

19 A. I first considered the percentage of overall
20 revenue requirement identified by demand, energy, and
21 customer component for irrigation service resulting from
22 the 3CP/12CP Class Cost-of-Service study discussed in Mr.
23 Tatum's testimony. These percentages established the
24 target for each component. Second, I determined the

1 percentage of overall revenue by component currently
2 provided by the existing base rates. The difference, or
3 gap, between the target and the actual percentage was then
4 determined for each component. I then adjusted the current
5 percentage of overall revenue by component by approximately
6 seven percent of the gap to establish my targets for this
7 proceeding. Customer-, demand-, and energy-related charges
8 were then established to achieve these new targets. I have
9 included details of these calculations in my workpapers.

10 Q. How were the rates for Transmission Service
11 determined?

12 A. Once the component rates for Secondary
13 Service were determined, the charges for Transmission
14 Service were established to maintain the same relationship
15 between service levels as currently exists.

16 Q. What is the revenue requirement to be
17 recovered from Schedule 24?

18 A. The total annual revenue to be recovered
19 from customers taking service under Schedule 24, as shown
20 on page four of Mr. Tatum's Exhibit No. 70, is \$88,602,410.

21 Q. What is the proposed Service Charge for
22 Schedule 24?

23 A. The proposed Service Charge for Secondary
24 Service during the in-season increases from \$15.00 to

1 \$20.00 per month. The proposed Service Charge for
2 Transmission Service during the in-season is \$250 per
3 month. This amount is the same charge proposed for
4 Schedule 9 and Schedule 19 Transmission Service. For both
5 Secondary and Transmission Service, the Service Charge
6 during the out-of-season remains at \$3.00 per month.

7 Q. What is the proposed Demand Charge for
8 Schedule 24?

9 A. The proposed Demand Charge for Secondary
10 Service increases from \$4.67 to \$5.67 per kW per month.
11 The proposed Demand Charge for Transmission Service
12 increases from \$4.39 to \$5.33 per kW per month. The Demand
13 Charge is billed to Schedule 24 customers during the in-
14 season only.

15 Q. What are the proposed Energy Charges for
16 Schedule 24?

17 A. The proposed in-season Energy Charges for
18 Secondary Service increase from 3.6409¢ per kilowatt-hour
19 to 4.1430¢ per kilowatt-hour for the first 164 kilowatt-
20 hours per kilowatt, and to 4.0206¢ per kilowatt-hour for
21 all other energy usage. The proposed out-of-season Energy
22 Charges increase from 4.6347¢ per kilowatt-hour to 5.4654¢
23 per kilowatt-hour.

1 The proposed in-season Energy Charges for
2 Transmission Service increase from 3.4635¢ per kilowatt-
3 hour to 3.9411¢ per kilowatt-hour for the first 164
4 kilowatt-hours per kilowatt, and to 3.8247¢ per kilowatt-
5 hour for all other energy usage. The proposed out-of-
6 season Energy Charges increase from 4.4088¢ per kilowatt-
7 hour to 5.1990¢ per kilowatt-hour.

8 Q. What is the impact of the rate design on
9 Schedule 24 irrigation service customers?

10 A. Exhibit No. 77 shows the impact on
11 customers' bills of the proposed rate designs for Schedule
12 24. Approximately 33 percent of the customers taking
13 service under Schedule 24 receive an increase in their
14 annual bills of less than 15 percent, the total overall
15 capped percentage increase proposed for the class as a
16 whole. Another 44 percent of the customers receive an
17 increase of just 2 percent above the overall class proposed
18 increase of 15 percent.

19 Q. What are the usage characteristics of the
20 Schedule 24 customers receiving increases less than and
21 greater than 15 percent?

22 A. Because the rate design increases the Demand
23 Charge by a greater percentage than it increases the Energy
24 Charges, the higher a customer's load factor, the more

1 beneficial the rate structure tends to be in terms of the
2 overall impact to the annual billing. The proposed load-
3 factor energy pricing mechanism has a similar affect. As
4 can be seen from Exhibit No. 77, customers with the highest
5 percentage increase in annual bills have the lowest average
6 load factors.

7 LIGHTING & NON-METERED SCHEDULES

8 Q. What are the Company's lighting and non-
9 metered service schedules?

10 A. The Company's lighting and non-metered
11 schedules are Dusk-to-Dawn Customer Lighting, Street
12 Lighting Service Supplemental Seasonal or Variable Energy,
13 Unmetered General Service, Street Lighting Service, and
14 Traffic Control Signal Lighting Service, Schedules 15, 39,
15 40, 41, and 42, respectively.

16 Q. What is the present rate structure for Dusk-
17 to-Dawn Customer Lighting on Schedule 15?

18 A. Customers taking service under Schedule 15
19 are charged on a per lamp basis. Lamps currently served
20 under Schedule 15 include 100-, 200-, and 400-watt high
21 pressure sodium vapor area lighting, 200- and 400-watt high
22 pressure sodium vapor flood lighting, and 400- and 1,000-
23 watt metal halide flood lighting.

1 Q. What is the revenue requirement to be
2 recovered from customers taking service under Schedule 15?

3 A. The annual revenue requirement for Schedule
4 15 customers as shown on page four of Mr. Tatum's Exhibit
5 No. 70 is \$1,029,764.

6 Q. Please describe the rate design proposal for
7 Schedule 15.

8 A. The rate design proposal for Schedule 15 is
9 included on page one of Exhibit No. 76. It includes the
10 total energy usage and proposed effective rate for each
11 lamp size option. The proposed class revenue increase of
12 2.51 percent shown on page four of Mr. Tatum's Exhibit No.
13 70 is applied uniformly.

14 Q. Are you proposing any other changes to
15 Schedule 15?

16 A. No rate design changes are being proposed.
17 However, the Company is seeking to properly track energy
18 usage by correcting the designated energy usage per
19 lighting unit. Currently, the energy portion of service
20 under Schedule 15 is being tracked solely on the lamp
21 usage. To properly determine energy usage, it requires
22 basing it on the combined usage of both the lamp and its
23 ballast since both are integral to the lighting service.
24 One of my workpapers illustrates the combined energy usages

1 of each lamp and ballast option.

2 Q. Will the requested monthly base rate charges
3 per lighting unit be impacted in this filing if both the
4 lamp and ballast energy usages are combined?

5 A. No. The monthly per unit base rate lamp
6 charges proposed in this filing are being computed solely
7 on a uniform increase of 2.51 percent. Requested
8 recognition of combined lamp/ballast monthly energy usage
9 per lighting unit will have no impact to the proposed base
10 rates. However, if adopted, any other charge based on
11 kilowatt-hour usage (e.g. the Power Cost Adjustment) will
12 result in minor billing changes.

13 Q. Does the Company currently have any lighting
14 services where the energy charges are based on both the
15 lamp and ballast usages?

16 A. Yes. The energy portion of all the
17 Company's Schedule 41, Street Lighting options currently
18 includes charges for the combined energy usage of both the
19 lamp and ballast.

20 Q. Are you proposing any other changes to
21 Schedule 15?

22 A. No, I am not.

23 Q. What is the present rate structure for
24 Unmetered General Service under Schedule 40?

1 A. Customers taking service under Schedule 40
2 are unmetered but have energy loads and periods of
3 operation which are fixed. The customer's computed usage
4 is charged a flat Energy Charge. Demand- and customer-
5 related costs are also recovered through the Energy Charge.
6 The minimum bill for service under Schedule 40 is \$1.50 per
7 month.

8 Q. What is the revenue requirement to be
9 recovered from customers taking service under Schedule 40?

10 A. The annual revenue requirement for Schedule
11 40 customers as shown on page four of Mr. Tatum's Exhibit
12 No. 70 is \$990,791.

13 Q. Please describe the rate design proposal for
14 Schedule 40.

15 A. The rate design proposal for Schedule 40 is
16 included on page five of Exhibit No. 76. It targets the
17 proposed class revenue increase of 2.51 percent as shown on
18 page four of Mr. Tatum's Exhibit No. 70. The Energy Charge
19 remains flat and increases from 5.764¢ per kilowatt-hour to
20 5.909¢ per kilowatt-hour.

21 Q. Are any other changes being proposed to
22 Schedule 40?

23 A. No.

1 Q. What is the present rate structure for
2 Street Lighting Service, Schedule 41?

3 A. Charges for Street Lighting Service are
4 based on a per-lamp (including ballast) or per-pole basis.
5 Street Lighting is divided into two types: (1) Company-
6 Owned and (2) Customer-Owned. Both metered and non-metered
7 service is provided for Customer-Owned lighting; only non-
8 metered service is provided for Company-Owned lighting.
9 Schedule 41 does not allow new service for incandescent,
10 mercury vapor, or fluorescent fixtures.

11 Q. Are you proposing any changes to the rate
12 structure for Schedule 41?

13 A. No. However, I am proposing clarification
14 of the "Accelerated Replacement of Existing Services" text
15 for Company-Owned systems. In order to exercise the
16 accelerated replacement option, the Customer must make
17 payments prior to the work being performed. Because
18 prepayment is required, it is inconsistent to base the
19 charges on "actual labor, time, and mileage costs."
20 Therefore the proposed tariff text has been modified to
21 state the charges will be based on the Company's "designed
22 cost estimate" which includes labor, time, and mileage.

23 Q. What is the revenue requirement to be
24 recovered from customers taking service under Schedule 41?

1 A. The annual revenue requirement for Schedule
2 41 customers as shown on page four of Mr. Tatum's Exhibit
3 No. 70 is \$2,372,448.

4 Q. Please describe the rate design proposal for
5 Schedule 41.

6 A. The rate design proposal for Schedule 41 is
7 included on pages six through nine of Exhibit No. 76. Each
8 per-lamp charge for both non-metered and metered service
9 increases by the overall 2.51 percent increment proposed on
10 page four of Mr. Tatum's Exhibit No. 70 for Schedule 41.
11 In addition, the per-kilowatt-hour charge for metered
12 service also increases by 2.51 percent. The monthly meter
13 charge of \$8.45 remains unchanged. To encourage the
14 retention of metered lighting systems, I propose to keep
15 this charge at its current level.

16 Q. What is the present rate structure for
17 Schedule 39, Street Lighting Service Supplemental Seasonal
18 or Variable Energy?

19 A. Customers taking service under Schedule 39
20 pay a flat Energy Charge based on estimated variable or
21 seasonal usage until the street lighting service is
22 converted to a metered service or the potential for
23 variable usage has been removed. The current Energy Charge
24 is the same as the current Energy Charge for Schedule 40,

1 Unmetered General Service.

2 Q. Please describe the rate design proposal for
3 Schedule 39.

4 A. The rate design proposal for Schedule 39 is
5 included on page four of Exhibit No. 76. The Energy Charge
6 increases from 5.764¢ to 5.909¢ per kilowatt-hour in order
7 to match the Energy Charge proposed for Schedule 40,
8 Unmetered General Service.

9 Q. What is the present rate structure for
10 Traffic Control Signal Lighting Service, Schedule 42?

11 A. Customers taking service under Schedule 42
12 pay a flat Energy Charge for each kilowatt-hour of
13 estimated energy use for non-metered systems and for each
14 kilowatt-hour of actual usage for metered systems. For
15 non-metered systems, usage is estimated based on the number
16 and size of lamps burning simultaneously in each signal and
17 the average number of hours per day the signal is operated.
18 There is no minimum charge under Schedule 42.

19 Q. What is the revenue requirement to be
20 recovered from customers taking service under Schedule 42?

21 A. The annual revenue requirement for Schedule
22 42 customers as shown on page four of Mr. Tatum's Exhibit
23 No. 70 is \$178,483.

1 Q. Please describe the rate design proposal for
2 Schedule 42.

3 A. The rate design proposal for Schedule 42 is
4 included on page ten of Exhibit No. 76. It targets the
5 proposed capped class revenue increase of 15 percent shown
6 on page four of Mr. Tatum's Exhibit No. 70. The Energy
7 Charge increases from 3.6889¢ per kilowatt-hour to 4.2422¢
8 per kilowatt-hour.

9 Q. Is the Company proposing any other changes
10 to Schedule 42?

11 A. No.

12 MISCELLANEOUS

13 Q. Are you proposing any changes not directly
14 related to the Company's retail rate design?

15 A. Yes. I am proposing a change to Schedule
16 89, Unit Avoided Cost for Cogeneration and Small Power
17 Production, to comply with previous Commission Orders.

18 Q. Please describe the proposed change to
19 Schedule 89.

20 A. Based on previous Commission Orders, the
21 pricing under Schedule 89 is to be adjusted during the
22 course of every Idaho Power general rate proceeding. Using
23 the methodology previously ordered by the Commission, I
24 have adjusted the unit-avoided energy cost utilizing

1 updated variable operation and maintenance costs and
2 variable fuel costs for the Valmy plant. The proposed
3 monthly rate payments increase from 2.727¢ to 2.976¢ per
4 kWh for all kWh. I have included details of this
5 adjustment in my workpapers.

6 Q. Are you sponsoring any other Exhibits not
7 already mentioned in your testimony?

8 A. Yes. Exhibit No. 78 is a summary of the
9 revenue impacts of this filing on all the Company's retail
10 rate classes. It illustrates the current and proposed
11 effective revenues of each customer class as well as the
12 requested percentage revenue increases. This Exhibit is a
13 summary of the information provided by Mr. Tatum, Ms.
14 Waites, Ms. Nemnich, and myself.

15 Exhibit No. 79 contains all the proposed
16 additions/deletions/modifications to the Company's current
17 tariff sheets illustrated in legislative format.

18 Exhibit No. 80 contains the Company's proposed
19 revised tariff sheets in final form.

20 Q. Does this conclude your testimony?

21 A. Yes, it does.