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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)
OF IDAHO POWER COMPANY FOR)
AUTHORITY TO IMPLEMENT POWER COST) CASE NO. IPC-E-13-10
COST ADJUSTMENT ("PCA") RATES)
FOR ELECTRIC SERVICE FROM JUNE 1,)
2013, THROUGH MAY 31, 2014.)
_____)

IDAHO POWER COMPANY

DIRECT TESTIMONY

OF

SCOTT WRIGHT

1 Q. Please state your name, business address, and
2 present position with Idaho Power Company ("Idaho Power" or
3 "Company").

4 A. My name is Scott Wright. My business address
5 is 1221 West Idaho Street, Boise, Idaho 83702. I am
6 employed by Idaho Power as a Regulatory Analyst II in the
7 Regulatory Affairs Department.

8 Q. Please describe your educational background.

9 A. I received a Bachelor of Science degree in
10 Business Economics from Eastern Oregon University. I have
11 also attended the Center for Public Utilities "Practical
12 Skills for a Changing Electric Industry" course at New
13 Mexico State University in Albuquerque, New Mexico, the
14 Edison Electric Institute's "Electric Rate Advanced Course"
15 in Madison, Wisconsin, and the NERA "Marginal Costing for
16 Electric Utilities", in Los Angeles, California.

17 Q. Please describe your work experience.

18 A. In May 1998, I accepted a position as Research
19 Assistant with Idaho Power in the Regulatory Affairs
20 Department. In March 2007, I was promoted to a Regulatory
21 Analyst. In March 2010, I was promoted to a Regulatory
22 Analyst II. As a Regulatory Analyst II, I am responsible
23 for running the AURORA model to calculate net power supply
24 expenses for ratemaking purposes, preparing the Power Cost
25 Adjustment ("PCA") filings in both Idaho and Oregon, as

1 well as the marginal cost of energy used in the Company's
2 marginal cost analysis. I also provide analytical support
3 for other regulatory activities within the Regulatory
4 Affairs Department, as well as providing testimony in other
5 Company filings.

6 Q. What is the purpose of your testimony?

7 A. The purpose of my testimony is to quantify the
8 2013-2014 PCA rates. I have provided this quantification
9 to Mr. Timothy E. Tatum, who will present the Company's
10 recommendation in his testimony.

11 Q. Please provide a summary of the sections
12 presented in your testimony.

13 A. My testimony is divided into several sections.
14 The first section of my testimony provides an overview of
15 the PCA components. The second section includes a
16 discussion of the quantification of the PCA forecast rate
17 using the PCA base components that were approved in Order
18 No. 31042 in Case No. IPC-E-10-01, Order No. 32426 in Case
19 No. IPC-E-11-08, and Order No. 32585 in Case No. IPC-E-12-
20 14. The third section details the quantification of the
21 True-up and the True-up of the True-up. The fourth section
22 addresses the PCA treatment of the revenue sharing amount
23 that is presented by Ms. Kelley K. Noe in her testimony in
24 this proceeding. The final section of my testimony details
25 the summation of all PCA components, which when combined

1 with the revenue sharing, provides a final PCA rate for
2 each rate class.

3 **I. OVERVIEW OF PCA COMPONENTS**

4 Q. Please describe the components of the PCA
5 base.

6 A. The PCA base level expenses are reflective of
7 the following Federal Energy Regulatory Commission ("FERC")
8 Accounts: FERC Account 501, fuel (coal); FERC Account 536,
9 water for power; FERC Account 547, fuel (gas); FERC Account
10 555, purchased power; FERC Account 565, transmission of
11 electricity by others; FERC Account 442, Hoku Materials,
12 Inc. ("Hoku") first block energy; and FERC Account 447,
13 sales for resale (typically referred to as surplus sales).

14 The PCA base expense component for FERC Account 555
15 includes both power purchases resulting from the Public
16 Utility Regulatory Policies Act of 1978 ("PURPA") and non-
17 PURPA (market) purchases. As per Order No. 32426, the
18 Company adjusts FERC Account 555 to include demand response
19 incentive payments that the Company provides to customers
20 for participating in any of its three demand response
21 programs.

22 **II. QUANTIFICATION OF PCA FORECAST**

23 Q. Please quantify the PCA component amounts
24 described previously that are included in the PCA base from
25

1 which deviations are to be tracked based on customers
2 receiving a 95 percent share ("95 percent accounts").

3 A. Order Nos. 31042, 32426, and 32585 approved
4 the Company's base level PCA component amounts from which
5 deviations are to be tracked at 95 percent for customer
6 responsibility as follows:

7	Account 501, coal	\$167,192,744
8	Account 536, water for power	\$1,828,640
9	Account 547, gas	\$51,934,201
10	Account 555, non-PURPA	\$45,510,093
11	Account 565, transmission	\$8,262,000
12	Account 442, Hoku first block	(\$23,921,466)
13	<u>Account 447, surplus sales</u>	<u>(\$124,916,153)</u>
14	Net of 95 percent accounts	\$125,890,059

15 Q. Please quantify the PCA component amounts
16 included in the PCA base from which deviations are to be
17 tracked with a 100 percent customer responsibility.

18 A. Order No. 31042 approved the PCA base
19 component amounts from which deviations are to be tracked
20 with 100 percent customer responsibility as follows:

21	Account 555, PURPA	\$62,851,454
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22 Q. Please quantify the PCA component amounts
23 included in the PCA base from which deviations are tracked
24 differently than described above.

25 A. The base level recovery of demand response
26 incentives in the amount of \$11,252,265 was approved per
27 Order No. 32426. The \$11,252,265 represents the Idaho

1 jurisdictional share of the incentive costs. Because the
 2 demand response incentive payments are jurisdictionalized
 3 prior to inclusion in the PCA, this cost category is
 4 calculated separately from the net 95 percent accounts.
 5 Under this separate treatment, an Idaho jurisdictional
 6 sales denominator is used rather than the normalized system
 7 firm sales denominator used for 95 percent accounts in the
 8 PCA rate development process.

9 Q. Please detail the amounts included in the PCA
 10 forecast for which deviations from base are to be tracked
 11 based upon a 95 percent customer sharing percentage.

12 A. Based upon the Company's March 28, 2013,
 13 Operating Plan ("Operating Plan"), the forecast of amounts
 14 for which deviations from base are to be tracked at 95
 15 percent for customer responsibility is as follows:

16	Account 501, coal	\$165,951,392
17	Account 536, water for power	\$2,354,374
18	Account 547, gas	\$66,536,064
19	Account 555, non-PURPA	\$40,080,534
20	Account 565, transmission	\$6,692,385
21	Account 442, Hoku first block	-
22	<u>Account 447, surplus sales</u>	<u>(\$98,510,169)</u>
23	Net of 95 percent accounts	\$183,104,580

24 Q. What is the difference between the net of the
 25 95 percent accounts of the forecast amount of \$183,104,580
 26 and the \$125,890,059 PCA base amount approved in Order Nos.
 27 31042, 32426, and 32585?

1 A. The PCA forecast amount of \$183,104,580 is
2 higher than the base amount of \$125,890,059, a difference
3 of \$57,214,521.

4 Q. What is the Operating Plan quantification of
5 PURPA expenses anticipated from April 2013 through March
6 2014?

7 A. The Operating Plan anticipates \$131,731,526 of
8 PURPA expenses during the April 2013 through March 2014
9 time period.

10 Q. How does this amount compare to the base level
11 of PURPA expenses approved in Order No. 31042?

12 A. The Operating Plan quantification of PURPA
13 expense is \$68,880,072 greater than the base level amount
14 of \$62,851,454 (approved in Order No. 31042) in the
15 Company's update of power supply expenses.

16 Q. What is the Operating Plan quantification of
17 the demand response incentive payments anticipated from
18 April 2013 through March 2014?

19 A. The Operating Plan anticipates \$4,668,960 of
20 Idaho jurisdictional demand response incentive payments
21 during the April 2013 through March 2014 time period.

22 Q. How does this amount compare to the base level
23 of Idaho jurisdictional demand response incentive payments
24 quantified in Order No. 32426?

25

1 A. In Order No. 32776, the Commission recently
2 approved a Settlement Stipulation under which the Company
3 will suspend the operation of two of its three demand
4 response programs in 2013. As a result of this approved
5 program suspension, the Operating Plan quantification of
6 demand response incentive payments is \$6,583,305 less than
7 the \$11,252,265 quantified in the Company's update of power
8 supply expenses approved per Order No. 32426.

9 Q. What is the rate for the forecast portion of
10 the PCA for April 2013 through March 2014?

11 A. The rate for the forecast portion of the PCA
12 is equal to the sum of: (1) 95 percent of the difference
13 between the non-PURPA expenses quantified in the Operating
14 Plan and those quantified in the Company's last approved
15 update of power supply expenses, divided by the Company's
16 normalized system firm sales, (2) 100 percent of the
17 difference between PURPA-related expenses quantified in the
18 Operating Plan and those quantified in the Company's last
19 approved update of power supply expenses, divided by the
20 Company's normalized system firm sales, and (3) 100 percent
21 of the difference between the Idaho jurisdictional demand
22 response incentive payments quantified in the Operating
23 Plan and those quantified in the Company's last approved
24 update of power supply expenses, divided by the Idaho
25 jurisdictional sales.

1 The rate for non-PURPA expenses is 0.3858 cents per
2 kilowatt-hour ("kWh"), which is calculated by multiplying
3 \$57,214,521 by 95 percent and then dividing it by the
4 normalized system firm sales of 14,088,933 megawatt-hours
5 ("MWh") ($(\$57,214,521 * 0.95) / 14,088,933$) = \$3.86/MWh =
6 0.3858 cents/kWh). The rate for PURPA expenses is 0.4889
7 cents per kWh, which is calculated by dividing \$68,880,072
8 by the 14,088,933 MWh ($\$68,880,072 / 14,088,933$ MWh =
9 \$4.89/MWh = 0.4889 cents/kWh). The rate for the demand
10 response incentive payment is (0.0489) cents per kWh, which
11 is calculated by dividing (\$6,583,305) by the Idaho
12 jurisdictional firm sales of 13,459,100 MWh ($-\$6,583,305 /$
13 $13,459,100$ MWh = $-\$0.49/\text{MWh}$ = -0.0489 cents/kWh). The
14 forecast portion of the PCA rate is 0.8258 cents per kWh,
15 which is calculated by adding the non-PURPA expense of
16 0.3858 cents per kWh to the PURPA expense of 0.4889 cents
17 per kWh to the demand response incentive payment of
18 (0.0489) cents per kWh ($0.3858 + 0.4889 + -0.0489 = 0.8258$
19 cents/kWh).

20 Q. What is the recoverable deviation of forecast
21 power supply expenses from base level power supply expenses
22 for the 2013-2014 PCA forecast from Idaho customers?

23 A. The recoverable portion of power supply
24 expenses is \$116,650,562 ($\$57,214,521 * 0.95$) + \$68,880,072
25 + $-\$6,583,305 = \$116,650,562$).

1 on row 108 of the deferral expense report. The True-up of
2 the True-up rate is calculated by dividing (\$7,719,349) by
3 the projected Idaho jurisdictional sales of 13,459,100 MWh,
4 which results in a rate of (0.0574) cents per kWh
5 ($-\$7,719,349 / 13,459,100 = -\$0.57/\text{MWh} = -0.0574$
6 cents/kWh). Unlike the True-up calculated earlier, this
7 year's True-up of the True-up is a benefit to customers.

8 Q. Please explain the combined effect of the
9 True-up and the True-up of the True-up in this year's PCA.

10 A. The sum of the \$62.2 million associated with
11 the True-up and the (\$7.7) million associated with the
12 True-up of the True-up represents \$54.5 million of
13 additional collection from customers. This additional cost
14 in large part reflects that actual net power supply
15 expenses for the 2012-2013 PCA year were greater than the
16 forecast.

17 Q. Does the quantified True-up rate include the
18 sales of Renewable Energy Certificates ("RECs") and Sulfur
19 Dioxide emission allowance proceeds?

20 A. Yes. The RECs and sulfur dioxide emission
21 allowance proceeds are included in the Company's deferral
22 expense report, included as Exhibit No. 3 on lines 37 and
23 38. In Order No. 32002 issued on June 11, 2010, the
24 Commission accepted for filing the Company's REC Management
25 Plan, which passes the customers' share of REC benefits

1 back to customers through the PCA. Order No. 32434 issued
2 on January 12, 2012, directed the Company to pass sulfur
3 dioxide emission allowance proceeds from 2011 through the
4 PCA to help offset the Company's PCA deferral balance.

5 **IV. PCA TREATMENT OF REVENUE SHARING**

6 Q. Based upon the quantification presented by Ms.
7 Noe filed in this year's PCA filing, what is the amount of
8 revenue sharing benefits that the Company proposes to pass
9 on to customers through this year's PCA?

10 A. As set forth in Ms. Noe's testimony, the
11 Company proposes to pass along revenue sharing benefits of
12 \$7,151,221 to customers through this year's PCA.

13 Q. How has the Company incorporated this offset
14 into the PCA rate?

15 A. As detailed in the "Rate Design" section of
16 Ms. Noe's testimony, the Company plans to apportion the
17 revenue sharing benefits based on each class's proportion
18 of test year base revenues. All classes of customers will
19 receive revenue sharing benefits in the form of a
20 volumetric rate, with the exception of the Company's
21 special contract customers. The Company's special contract
22 customers will receive revenue sharing benefits in the form
23 of a monthly credit on their bill during the 2013-2014 PCA
24 year. Exhibit No. 4, column A, shows the annual benefits
25 for all customers, while column B shows the cents per kWh

1 rate for the class's that will receive revenue sharing
2 amounts in the form of a volumetric rate.

3 **V. PCA RATE DETERMINATION**

4 Q. What is the resulting PCA rate when all of the
5 PCA components described previously are combined?

6 A. The Company's PCA rate for the 2013-2014 PCA
7 year is detailed in Exhibit No. 4, column C. The uniform
8 PCA rate is comprised of (1) the 0.8258 cents per kWh
9 adjustment for the 2013-2014 projected power cost of
10 serving firm loads, under the current PCA methodology and
11 95 percent sharing, (2) the 0.4622 cents per kWh for the
12 2012-2013 True-up portion of the PCA, and (3) the (0.0574)
13 cents per kWh for the True-up of the True-up. The sum of
14 these three components results in a 1.2306 cents per kWh
15 charge for all rate classes.

16 In addition to the uniform PCA rate, each rate class
17 is assigned a portion of the \$7.2 million of revenue
18 sharing. When this amount is combined with the uniform PCA
19 rate, each class will receive a different PCA rate. The
20 final PCA rate, including revenue sharing, is listed by
21 rate schedule in Exhibit No. 4, column D.

22 Q. Have you calculated the expected PCA revenue
23 using the PCA rates described above?

24 A. Yes. The Company expects to collect \$165.6
25 million through the uniform PCA rate using the base power

1 supply expenses approved in Order Nos. 31042, 32426, and
2 32585. This represents \$121.2 million of incremental
3 revenue above the \$44.4 million that the Company expected
4 to collect through the current uniform PCA rate approved in
5 Order No. 32552. When the uniform PCA rate is combined
6 with the additional \$7.2 million in revenue sharing, the
7 Company expects to collect an incremental amount of \$158.5
8 million, through the final combined PCA rates.

9 Q. What is the revenue impact of the requested
10 PCA rate combined with the revenue sharing rates and the
11 demand side management rates when compared to the PCA rate
12 currently in effect?

13 A. Attachment No. 3 to the Application provides a
14 detailed description of the overall revenue impact of this
15 filing on each customer class. As shown on Attachment No.
16 3, applying the requested PCA rates to expected customer
17 loads for June 2013 through May 2014 test year results in a
18 PCA increase of \$140.4 million.

19 Q. Do the calculations of this year's PCA rates
20 comply with the approved methodology?

21 A. Yes. The calculation of the PCA rates follows
22 the methodology that was approved in Order Nos. 30715,
23 30978, 31042, 32424, 32426, and 32585.

24
25

1 Q. Has the Company prepared a revised Schedule 55
2 that presents the PCA rates that would result from applying
3 the Company's PCA calculations?

4 A. Yes. Attachment No. 1 to the Application is a
5 revised Schedule 55, in both clean and legislative formats,
6 specifying the proposed PCA rates and changes for providing
7 electric service to customers in the state of Idaho with
8 \$140.4 million to be collected during the 2013-2014 PCA
9 year.

10 Q. Does this conclude your testimony?

11 A. Yes.

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**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. IPC-E-13-10

IDAHO POWER COMPANY

**WRIGHT, DI
TESTIMONY**

EXHIBIT NO. 3

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	
92																
93	True-Up of True-Up	\$	(5,165,169.03)	(22,517,074.09)	(49,414,325.94)	(47,943,577.50)	(42,441,530.29)	(36,760,395.05)	(31,698,860.14)	(27,806,694.83)	(24,256,823.45)	(20,469,132.25)	(16,033,152.96)	(11,485,507.89)	(5,165,169.03)	
94	Adjustments:															
95	Revenue Sharing Order No. 32558	\$	(17,646,658.22)	(37,200,635.53)	-	-	-	-	-	-	-	-	-	-	(37,200,635.53)	
96	2011-12 PCA Trmfr per PUC Ord No.	\$													(17,646,658.22)	
97		\$														
98	True-Up of True-Up Balance	\$	(22,811,827.25)	(49,717,709.62)	(49,414,325.94)	(47,943,577.50)	(42,441,530.29)	(36,760,395.05)	(31,698,860.14)	(27,806,694.83)	(24,256,823.45)	(20,469,132.25)	(16,033,152.96)	(11,485,507.89)	(5,017,462.78)	
99																
100	Monthly Interest Rate		1.0%	1.0%	1.0%	1.0%	1.0%	1.0%	1.0%	1.0%	1.0%	1.0%	1.0%	1.0%	1.0%	
101																
102	Monthly Interest	\$	(19,009,896)	(41,431,429)	(41,178,607)	(39,869,655)	(35,367,944)	(30,633,665)	(26,415,727)	(23,172,251)	(20,214,029)	(17,057,611)	(13,360,996)	(9,571,265)	(317,292,952)	
103																
104	True-Up of True-Up Including Interest	\$	(22,830,837.11)	(49,759,141,041)	(49,655,504,444)	(47,883,447,115)	(42,476,898,233)	(36,791,028,771)	(31,725,275,966)	(27,829,867,099)	(24,277,037,477)	(20,486,189,865)	(16,046,513,322)	(11,485,079,115)	(50,329,745,733)	
105	Monthly Collection Applied To Balance	\$	(313,769,023)	(344,815,200)	(1,611,926,341)	(5,441,916,866)	(5,716,503,181)	(5,092,198,577)	(3,918,581,003)	(3,573,043,653)	(3,807,805,227)	(4,453,036,901)	(4,581,006,033)	(3,775,230,161)	(42,610,396,741)	
106																
107	Ending True-Up of the True-Up Balance	\$	(22,517,074.03)	(49,414,325.94)	(47,943,577.50)	(42,441,530.29)	(36,760,395.05)	(31,698,860.14)	(27,806,694.83)	(24,256,823.45)	(20,469,132.25)	(16,033,152.96)	(11,485,507.89)	(7,719,348,999)	(7,719,348,999)	
108																
109																
110	* Negative amounts indicate benefit to the customer.															
111	** Interest rate changed per PUC Order No. 32453 (Jan 2012)															

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. IPC-E-13-10

IDAHO POWER COMPANY

**WRIGHT, DI
TESTIMONY**

EXHIBIT NO. 4

**Idaho Power Company
Combined Revenue Sharing and PCA**

Line No	Tariff Description	Rate Schedule No.	(A) Allocated Revenue Sharing Benefit	(B) Sharing (Cents per kWh)	(C) PCA (Cents per kWh)	(D) PCA + Revenue Sharing (Cents per kWh)
1	Residential Service	1	(\$3,244,707)	(0.0674)	1.2306	1.1632
2	Master Metered Mobile Home Park	3	(\$3,126)	(0.0639)	1.2306	1.1667
3	Residential Service Energy Watch	4	\$0	0.0000	1.2306	1.2306
4	Residential Service Time-of-Day	5	(\$16,619)	(0.0646)	1.2306	1.1660
5	Small General Service	7	(\$123,495)	(0.0861)	1.2306	1.1445
6	Large General Service - Secondary	9S	(\$1,531,678)	(0.0489)	1.2306	1.1817
7	Large General Service - Primary	9P	(\$187,329)	(0.0419)	1.2306	1.1887
8	Large General Service - Transmission	9T	(\$1,018)	(0.0416)	1.2306	1.1890
9	Dusk to Dawn Lighting	15	(\$9,965)	(0.1550)	1.2306	1.0756
10	Large Power Service - Secondary	19S	(\$2,689)	(0.0414)	1.2306	1.1892
11	Large Power Service - Primary	19P	(\$754,041)	(0.0365)	1.2306	1.1941
12	Large Power Service - Transmission	19T	(\$14,710)	(0.0350)	1.2306	1.1956
13	Agricultural Irrigation Service	24	(\$920,537)	(0.0539)	1.2306	1.1767
14	Unmetered General Service	40	(\$7,272)	(0.0598)	1.2306	1.1708
15	Street Lighting	41	(\$25,672)	(0.0963)	1.2306	1.1343
16	Traffic Control Lighting	42	(\$1,140)	(0.0406)	1.2306	1.1900
17	Total Uniform Tariffs		(\$6,843,999)			
18						
19	<u>Special Contracts</u>					
20	Micron	26	(\$180,702)	NA	1.2306	1.2306
21	J R Simplot	29	(\$55,194)	NA	1.2306	1.2306
22	DOE	30	(\$71,326)	NA	1.2306	1.2306
23	Hoku	32	\$0	NA	1.2306	1.2306
24	Total Special Contracts		(\$307,222)			
25						
26	Total Idaho Retail Sales		(\$7,151,221)			

Note:

June 1, 2013 - May 31, 2014, Forecast

