

IPC-E-93-10

Nov. 28, 2003

**Updated Testimony of Gregory W. Said
for Idaho Power**

**Exhibit No. 6 = 126 pages of Current Applicable
Tariffs (see case file)**

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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IDAHO POWER COMPANY,)
)
 Petitioner,)
)
 vs.)
)
 THE NEW VILLAGER CONDOMINIUM)
 ASSOCIATION, INC., A NON-)
 PROFIT IDAHO CORPORATION)
 AND ITS MEMBERS, INDIVIDUALLY,)
)
 Respondents.)
 _____)

CASE NO. IPC-E-93-10

IDAHO POWER COMPANY

DIRECT TESTIMONY

OF

GREGORY W. SAID

1 Q. Please state your name and business address.

2 A. My name is Gregory W. Said and 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 the
7 Manager of Revenue Requirement in the Pricing and Regulatory
8 Services Department.

9 Q. Please describe your educational background.

10 A. In May of 1975, I received a Bachelor of
11 Science Degree with honors from Boise State University. In
12 1999, I attended the Public Utility Executives Course at the
13 University of Idaho.

14 Q. Please describe your work experience with
15 Idaho Power Company.

16 A. I became employed by Idaho Power Company in
17 1980 as an analyst in the Resource Planning Department. In
18 1985, the Company applied for a general revenue requirement
19 increase. I was the Company witness addressing power supply
20 expenses.

21 In August of 1989, after nine years in the
22 Resource Planning Department, I was offered and I accepted a
23 position in the Company's Rate Department. With the
24 Company's application for a temporary rate increase in 1992,
25 my responsibilities as a witness were expanded. While I

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Idaho Power Company
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1 continued to be the Company witness concerning power supply
2 expenses, I also sponsored the Company's rate computations
3 and proposed tariff schedules in that case.

4 In 1994, I was asked to become the Meridian
5 District Manager for a one year cross-training opportunity.
6 In 1995 I returned to my position in the Rate Department.
7 In October 1996, I was promoted to lead a team of analysts
8 in the newly reorganized Pricing & Regulatory Services
9 Department, formerly known as the Rate Department. In that
10 role, I became the Company contact for line installation
11 disputes concerning Company compliance with tariff
12 provisions.

13 As the Manager of Revenue Requirement, I
14 continue to be the Company contact for Idaho Public
15 Utilities Commission line installation disputes.

16 Q. Do the tariffs of Idaho Power Company address
17 the provision of easements?

18 A. Yes. Rule C, Service and Requirements, item
19 7 includes the following requirement: "The Customer shall,
20 without cost to the Company, grant the Company a right of
21 way for the Company's lines and apparatus across and upon
22 the property owned or controlled by the Customer, necessary
23 or incidental to the supplying of Electric Service and shall
24 permit access thereto by the Company's employees at all
25 reasonable hours."

1 Q. What is the rationale for having the customer
2 provide an easement or Right of Way at no cost to the
3 Company?

4 A. The cost of acquiring easements or Rights of
5 Way in order to provide service to customers of Idaho Power
6 Company would ultimately be included in the Company's
7 revenue requirement and would be subject to recovery through
8 the Company's rates. By requiring that the customer
9 receiving service provide at no cost the easement/Right of
10 Way necessary to provide that service, there is no upward
11 pressure on the Company's rates.

12 Q. Have you prepared an exhibit that
13 demonstrates that the provision of easements/Rights of Way
14 at no cost to the Company has been in existence for quite
15 some time?

16 A. Yes. Exhibit 5, consisting of 34 pages,
17 includes tariff provisions concerning Rights of Way dating
18 back to 1937. The provisions have always stated that Rights
19 of Way would be provided by the customer at no cost to the
20 Company.

21 Q. Does the current tariff provide for either
22 overhead or underground service to residential customers?

23 A. Yes, it does.

24 Q. Please describe the Company standard for
25 underground service.

1 A. Standard underground service on the Idaho
2 Power Company system consists of a pad mounted transformer
3 connected to underground service conductor which is
4 connected to an above ground meter.

5 Q. Have you prepared an exhibit that provides
6 the history of underground service provisions?

7 A. Yes. Exhibit 6, consisting of 126 pages,
8 contains tariff provisions for underground line
9 installations from 1960 until now. Exhibit No. 6 is divided
10 into 3 sections: The Company's current applicable tariffs
11 start on page 1, the applicable tariff revisions for 1960
12 through 1997 start on page 15, and the applicable tariff
13 revisions that occurred between 1997 through the
14 implementation of the current tariffs start on page 71.
15 Initially, the tariff language concentrated on the
16 difference in cost between distribution facilities placed
17 underground as opposed to facilities placed overhead.
18 Customers were responsible for paying the cost differential.
19 In March 1972 tariff language, "Underground Facilities" were
20 defined and included either submersible transformers or
21 surface-type transformers mounted on concrete pads. In
22 January 1976, tariff language no longer included submersible
23 transformers in the definition of Underground Facilities.

24 Q. Would the provision of new underground
25 service that includes placing the transformer underground be

1 desirable to the Company?

2 A. No. As Mr. Nielson has stated and the tariff
3 language affirms, the Company has made the transition from
4 having only overhead distribution facilities to the current
5 standards for underground distribution facilities with pad
6 mounted transformers. The Company did place transformers
7 underground for a period of time, but has discontinued doing
8 so.

9 Q. What relief is the Company requesting that
10 the Commission provide in this proceeding?

11 A. The Company believes that the Commission has
12 the authority to determine appropriate provisions for
13 service of residential customers. The Commission should
14 rule that for the New Villager Condominium Association, Inc.
15 to receive residential service from Idaho Power Company the
16 association must provide appropriate easements/Rights of Way
17 to allow for pad mounted transformers.

18 Q. If the Commission did not rule as you have
19 suggested, but rather required the Company to place
20 transformers underground, what would your recommendation be?

21 A. If the Commission were to rule that
22 underground service to the New Villager Condominium
23 Association, Inc. was to include transformers placed
24 underground, I would recommend that the Commission recognize
25 that this is a nonstandard underground service and as such

1 should be paid for by the customer.

2 Q. What would you recommend as the amount that
3 New Villager Condominium Association, Inc. would pay for
4 this nonstandard service?

5 A. Based upon Exhibit 4, the cost that the New
6 Villager Association should pay is \$58,995. At a later
7 point in time, should the company need to replace any of the
8 transformers, including the standby transformer, another
9 assessment would be appropriate.

10 Q. Would this be all that you would suggest
11 requiring of New Villager Condominium Association, Inc.?

12 A. No. I would also suggest that the Commission
13 require that New Villager Condominium Association, Inc.
14 grant a Right of Way that would allow temporary utilization
15 of above ground transformers during periods of time when
16 failures prevent the Company from being able to serve the
17 New Villager Condominiums from the nonstandard New Villager
18 system as a condition of providing electric service.

19 Q. Does this conclude your testimony.

20 A. Yes, it does.