		Т	PacifiCorp Rebuttal Testimony ug 23, 2002	by In	Corrected PacifiCorp Surrebuttal ep 5, 2002	<u> </u>	Corrected and with Monsanto Adjustments
1	A. ECONOMIC CURTAILMENT		(1)		(2)		(3)
2	Avoided Reservation Fee						
3	Capacity Charge (\$/kW-mo)		\$3.08		\$3.08		\$3.08
4	Capacity - kW		46,000		67,000	_	67,000
5	Amount	\$	1,699,450	\$	2,475,286	\$	2,475,286
6	Avoided Energy Cost						
7	Curtailments per year (Hrs)		500		500		500
8 9	Times Capacity (MW) MWH Curtailed		46 23,000		67		67
9 10	Market Price - SuperPeak (\$ per MWH)		\$59.25		33,500 \$59.25		33,500 \$59.25
11	Amount	\$	1,362,750	\$	1,984,875	\$	1,984,875
12 13	Total Avoided Costs (In 5 + In 11)     Lost Retail Revenue	\$	3,062,200	\$	4,460,161	\$	4,460,161
14	MWH Curtailed		23,000		33,500		
15	Retail Cost		\$31.40		<u>\$16.31</u>		
16	Amount	\$	722,200	\$	546,385		
17	5. Economic Curtailment (In 12 - In 16)	\$	2,340,000 🗸	\$	3,913,776 ✓	\$	4,460,161 ✓
17	5. Economic Guitaliment (iii 12 - iii 10)	Ψ	2,340,000	Ψ	3,913,770 •	Ψ	4,400,101
18	B. OPERATING RESERVES CURTAILMENT						
19	Avoided Reservation Fee						
20	Reservation Fee (\$/kW-mo)		\$2.73		\$3.44		\$3.44
21	Capacity - kW	_	95,000		95,000	_	95,000
22	Amount	\$	3,112,200	\$	3,922,193	\$	3,922,193
23 24	Avoided Energy Cost     Curtailments per year (Hrs)		288		288		
24 25	Times Capacity (MW)		200 95		∠oo 95		
26	MWH Curtailed		27,360		27,360		
27	Retail Price		\$31.40		\$16.31		
28	Amount	\$	859,104	\$	446,242		
29	3. "Market Opportunity" (In 22 + In 28)		3,971,304		4,368,435		3,922,193
30	4. Lost Retail Revenue		-,,		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		-,,
31	MWH Curtailed		27,360		27,360		
32	Retail Cost		<u>\$31.40</u>		<u>\$16.31</u>		
33	Amount	\$	859,104	\$	446,242		
34	5. Operating Reserves (In 29 - In 33)	\$	3,112,200 ✓	\$	3,922,193 ✓	\$	3,922,193 ✓
35	C. SYSTEM INTEGRITY						
36	Capacity (MW)		162 12		162 12		162
37 38	System Interruption per year MWH Interrupted		1,944		12 1,944		12 1,944
39	FERC Cap (\$ per MWH)		\$250		\$250		\$1,000
40	System Integrity	\$	486,000 ✓	\$	486,000 ✓	\$	<u>\$1,000</u> 1,944,000 ✓
40	Gystem integrity	Ψ	400,000	Ψ	400,000	Ψ	1,544,000
41	TOTAL VALUATION						
42	A. Economic Curtailment	\$	2,340,000	\$	3,913,776	\$	4,460,161
43	B. Operating Reserves	\$	3,112,200	\$	3,922,193	\$	3,922,193
44	C. System Integrity	\$	486,000	\$	486,000	<u>\$</u>	1,944,000
45	Total	\$	5,938,200	\$	8,321,969	\$	10,326,354
46	Divided by 1,354,000 MWH usage		\$4.39		\$6.15		\$7.63
47	SUMMARY OF PRICING (\$ PER MWH)						
48	A. Firm Price		\$31.39		\$31.39		\$28.30
49	B. Interruptible Valuation (In 46)		\$4.39		\$6.15		\$7.63
50	C. Net Price	_	\$27.00		\$25.24		\$20.67
		=					

#### **Explanation of Calculations:**

#### Column (1): PacifiCorp Rebuttal Testimony August 23, 2002

PacifiCorp Rebuttal Testimony filed August 23, 2002, Exhibit Nos. 13, 14 and 15. Line 46 is the value of the interruptibility on a "per MWH" basis using Monsanto usage of 1,354,000 MWH as proposed by PacifiCorp in Exhibit No. 11.

#### Column (2): Corrected by PacifiCorp in Surrebuttal September 5, 2002

At the hearing, PacifiCorp updated its calculation by revising line 4 up to 67 MW, and revising the retail cost rate component for lost revenue from \$31.4 per MWH down to \$16.31 per MWH according to PacifiCorp's proposed rate design. PacifiCorp agreed that Monsanto would not need to sell 1,000 hours of interruptibility since the second 500 hours were shown to have a negative value.

#### Column (3): Corrected and With Monsanto Adjustments

Column (3) starts with the corrected Column (2) and represents three adjustments made by Monsanto to arrive at the net price of \$20.67 per MWH. These adjustments include eliminating lost revenues from the valuation, increasing the FERC Rate Cap to \$1,000 per MWH, and starting with a firm price of \$28.3 per MWH.

# Valuation Of Monsanto Interruptibility Based on the Avoided Peaker Resource

			OR WA Simple Cycle CT (1)		UTAH Simple Cycle CT (2)		OR WA CT 3 Furnaces 800 Hrs (3)
1	A. AVOIDED CAPACITY		( )		( )		( )
2	Total Fixed Cost (\$/kW-year)		\$73.48		\$86.63		\$73.48
3	kW Curtailed		116,500		116,500		162,500
4	kW Adjusted for Reserve Margin of 10%	_	128,150		128,150		178,750
5	Value of Avoided Capacity	\$	9,416,462	\$	11,101,635	\$	13,134,550
6	B. AVOIDED ENERGY						
7	Total Variable Costs (\$/MWH)		\$22.52		\$23.78		\$22.52
8	MWH Curtailed:						
9	500 hours/year of 67 MW		33,500		33,500		
10	300 hours/year of 116.5 MW		34,950		34,950		
11	800 hours/year of 162.5 MW		<u> </u>		<u> </u>		130,000
12	Total MWH per year		68,450		68,450		130,000
13	Value of Avoided Energy	\$	1,541,494	\$	1,627,741	\$	2,927,600
14	TOTAL AVOIDED PEAKER COSTS						
15	A. Avoided Capacity	\$	9,416,462	\$	11,101,635	\$	13,134,550
16	B. Avoided Energy	\$	1,541,494	\$	1,627,741	\$	2,927,600
17	Subtotal	\$	10,957,956	\$	12,729,376	\$	16,062,150
18	Adjusted for losses of 5.19%	\$	11,526,674 ✓	\$	13,390,030 ✓	\$	16,895,776 ✓
19	TOTAL VALUATION	\$	11,526,674	\$	13,390,030	\$	16,895,776
20	Divided by 1,354,000 MWH usage	Ψ	\$8.51	Ψ	\$9.89	Ψ	\$12.48
21	SUMMARY OF PRICING (\$ PER MWH)						
22	A. Firm Price		\$28.30		\$28.30		\$28.30
23	B. Interruptible Valuation (In 20)		\$8.51		\$9.89		\$12.48
24	C. Net Price		<b>\$19.79</b>		<b>\$18.41</b>		\$15.82

## Valuation Of Monsanto Interruptibility Based on the Avoided Peaker Resource

#### **Explanation of Calculations:**

#### Column (1): OR WA Simple Cycle CT

Avoided costs based on the resource cost of a simple cycle CT built in Oregon or Washington according to PacifiCorp's RAMPP-6 planning documents. Both Mr. Schunke and Dr. Rosenberg use the avoidance of this resource in their valuation of Monsanto's interruptibility. Curtailed capacity and energy amounts are from Monsanto's original proposal. The curtailed energy of 68,450 MWH was detailed by Mr. Schunke in his Exhibit 101. Line 20 is the value of the interruptibility on a "per MWH" basis using Monsanto usage of 1,354,000 MWH as proposed by PacifiCorp in Exhibit No. 11.

#### Column (2): UTAH Simple Cycle CT

The costs for a simple cycle CT built in Utah are also presented in the RAMPP-6 planning documents, and result in a higher valuation. This resource was used by Mr. Yankel in his testimony, and referenced by Dr. Rosenberg in his rebuttal. The curtailed capacity and energy amounts are the same as those shown in Column (1), and are based on Monsanto's original proposal.

#### Column (3): OR WA CT, 3 Furnances, 500 Hours Only

Column (3) uses the avoided costs of a CT built in Oregon or Washington, similar to that used in Column (1). The curtailed capacity and energy amounts reflect Monsanto's updated proposal for interrupting all three furnaces. The avoided capacity is 162.5 MW before reserves or losses. The energy curtailed is equal to 800 hours x 162.5 MW, or 130,000 MWH.

## **Summary of Economic Curtailment Valuations** From PacifiCorp Exhibit No. 36

Capacity Curtailed: 67 MW Strike Price: \$31.40 per MWH

<u>Ln</u>	Price Curve Date	First 500 Hours	Next 500 Hours	Total 1,000 Hours
		(1)	(2)	(3)
1	26-Sep-02	\$3,144,068	(\$704,097)	\$2,439,971
2	19-Sep-02	3,312,340	(676,646)	2,635,693
3	03-Sep-02	3,015,000	(390,948)	2,624,052
4	29-Aug-02	3,197,002	(695,000)	2,502,002
5	22-Aug-02	3,283,309	(483,309)	2,800,000
6	25-Jul-02	2,523,277	(724,237)	1,799,040
7	18-Jul-02	2,244,193	(713,592)	1,530,601
8	27-Jun-02	2,019,659	(740,194)	1,279,465
9	20-Jun-02	1,485,791	(761,161)	724,630
10	30-May-02	1,462,843	(772,429)	690,414
11	23-May-02	1,899,241	(757,271)	1,141,971
12	25-Apr-02	2,216,764	(752,967)	1,463,797
13	18-Apr-02	1,913,095	(750,668)	1,162,427
14	28-Mar-02	2,226,134	(782,676)	1,443,459
15	21-Mar-02	2,306,547	(768,874)	1,537,672
16	28-Feb-02	3,197,271	(807,574)	2,389,697
17	21-Feb-02	2,908,109	(817,119)	2,090,990
18	31-Jan-02	1,992,492	(853,143)	1,139,349
19	24-Jan-02	1,454,368	(870,279)	584,089
20	27-Dec-01	1,897,649	(845,942)	1,051,706
21	20-Dec-01	2,215,053	(842,411)	1,372,642
22	28-Nov-01	2,686,315	(736,100)	1,950,214
23	21-Nov-01	3,056,172	(720,337)	2,335,835
24	29-Oct-01	4,416,284	(692,890)	3,723,394
25	18-Oct-01	3,929,740	(740,542)	3,189,198
26	Minimum	\$1,454,368	(\$870,279)	\$584,089
27	Maximum	4,416,284	(390,948)	3,723,394
28	Average	2,560,109	(736,016)	1,824,092
29	Number of Times Va	lue is Negative	25	
30	% Reduction in going	84.3%		

Column (1): Econ. Curtail. from *even* pages of Exhibit No. 36 (500 hours). Column (2): Column (3) - Column (1)

Column (3): Econ. Curtail. from *odd* pages of Exhibit No. 36 (1,000 hours)

Note: This page uses the first box of each page of Exhibit No. 36.

## Summary of Economic Curtailment Valuations From PacifiCorp Exhibit No. 36

Capacity Curtailed: 46 MW Strike Price: \$31.40 per MWH

<u>Ln</u>	Price Curve Date	First 500 Hours	Next 500 Hours	Total 1,000 Hours	
		(1)	(2)	(3)	
1	26-Sep-02	\$2,205,529	(\$511,791)	\$1,693,737	
2	19-Sep-02	2,341,048	(495,174)	1,845,874	
3	03-Sep-02	1,875,000	243,967	2,118,967	
4	29-Aug-02	2,245,218	(506,293)	1,738,925	
5	22-Aug-02	2,340,000	210,000	2,550,000	
6	25-Jul-02	1,670,341	(524,020)	1,146,321	
7	18-Jul-02	1,419,108	(517,574)	901,534	
8	27-Jun-02	1,227,228	(533,672)	693,556	
9	20-Jun-02	765,485	(546,379)	219,106	
10	30-May-02	751,025	(553,191)	197,834	
11	23-May-02	1,122,584	(544,006)	578,578	
12	25-Apr-02	1,401,041	(541,397)	859,644	
13	18-Apr-02	1,139,081	(540,022)	599,059	
14	28-Mar-02	1,390,959	(559,398)	831,561	
15	21-Mar-02	1,459,515	(551,024)	908,491	
16	28-Feb-02	2,382,470	(574,483)	1,807,987	
17	21-Feb-02	2,135,167	(580,278)	1,554,889	
18	31-Jan-02	1,346,810	(602,101)	744,709	
19	24-Jan-02	881,736	(612,474)	269,262	
20	27-Dec-01	1,256,773	(597,726)	659,047	
21	20-Dec-01	1,526,593	(595,582)	931,011	
22	28-Nov-01	1,752,551	(531,199)	1,221,352	
23	21-Nov-01	2,071,191	(521,627)	1,549,564	
24	29-Oct-01	3,248,644	(504,979)	2,743,665	
25	18-Oct-01	2,855,316	(533,876)	2,321,439	
26	Minimum	\$751,025	(\$612,474)	\$197,834	
27	Maximum	3,248,644	243,967	2,743,665	
28	Average	1,712,416	(484,972)	1,227,444	
29		Number of Times Value is Negative 23			
30	% Reduction in going	92.8%			

Column (1): Econ. Curtail. from even pages of Exhibit No. 36 (500 hours).

Column (2): Column (3) - Column (1)

Column (3): Econ. Curtail. from *odd* pages of Exhibit No. 36 (1,000 hours) Note: This page uses the second box of each page of Exhibit No. 36.

## **Summary of Economic Curtailment Valuations** From PacifiCorp Exhibit No. 36

Capacity Curtailed: 67 MW Strike Price: \$16.31 per MWH

<u>Ln</u>	Price Curve Date	First 500 Hours	Next 500 Hours	Total 1,000 Hours
		(1)	(2)	(3)
1	26-Sep-02	\$3,988,831	\$89,678	\$4,078,509
2	19-Sep-02	4,160,393	123,491	4,283,884
3	03-Sep-02	4,025,469	618,481	4,643,950
4	29-Aug-02	4,039,832	95,772	4,135,604
5	22-Aug-02	4,006,187	375,699	4,381,886
6	25-Jul-02	3,352,638	50,735	3,403,373
7	18-Jul-02	3,074,840	63,612	3,138,452
8	27-Jun-02	2,845,120	25,234	2,870,354
9	20-Jun-02	2,306,666	(4,424)	2,302,243
10	30-May-02	2,278,160	(23,377)	2,254,783
11	23-May-02	2,719,428	(4,269)	2,715,159
12	25-Apr-02	3,033,652	(2,737)	3,030,915
13	18-Apr-02	2,726,336	(693)	2,725,643
14	28-Mar-02	3,045,955	(54,063)	2,991,892
15	21-Mar-02	3,126,240	(37,131)	3,089,109
16	28-Feb-02	4,013,202	(91,685)	3,921,516
17	21-Feb-02	3,720,278	(106,502)	3,613,776
18	31-Jan-02	2,793,957	(160,595)	2,633,362
19	24-Jan-02	2,250,605	(186,506)	2,064,100
20	27-Dec-01	2,697,497	(154,714)	2,542,783
21	20-Dec-01	3,018,358	(149,796)	2,868,562
22	28-Nov-01	3,506,751	(7,046)	3,499,705
23	21-Nov-01	3,877,966	13,304	3,891,270
24	29-Oct-01	5,242,137	46,283	5,288,419
25	18-Oct-01	4,743,467	(17,427)	4,726,040
26	Minimum	\$2,250,605	(\$186,506)	\$2,064,100
27	Maximum	5,242,137	618,481	5,288,419
28	Average	3,383,759	20,053	3,403,812
29	Number of Times Va	lue is Negative	15	
30	% Reduction in going	61.0%		

Column (1): Econ. Curtail. from *even* pages of Exhibit No. 36 (500 hours). Column (2): Column (3) - Column (1)

Column (3): Econ. Curtail. from *odd* pages of Exhibit No. 36 (1,000 hours) Note: This page uses the third box of each page of Exhibit No. 36.

## **Summary of Economic Curtailment Valuations** From PacifiCorp Exhibit No. 36

Capacity Curtailed: 46 MW Strike Price: \$16.31 per MWH

<u>Ln</u>	Price Curve Date	First 500 Hours	Next 500 Hours	Total 1,000 Hours
		(1)	(2)	(3)
1	26-Sep-02	\$2,757,667	\$10,022	\$2,767,690
2	19-Sep-02	2,895,165	30,517	2,925,681
3	03-Sep-02	3,312,000	104,441	3,416,441
4	29-Aug-02	2,796,188	13,708	2,809,896
5	22-Aug-02	3,384,329	615,671	4,000,000
6	25-Jul-02	2,213,115	(13,547)	2,199,568
7	18-Jul-02	1,962,674	(5,747)	1,956,927
8	27-Jun-02	1,767,656	(28,997)	1,738,659
9	20-Jun-02	1,303,123	(46,959)	1,256,164
10	30-May-02	1,285,318	(58,454)	1,226,864
11	23-May-02	1,659,831	(46,883)	1,612,948
12	25-Apr-02	1,936,304	(45,963)	1,890,341
13	18-Apr-02	1,672,103	(44,694)	1,627,409
14	28-Mar-02	1,927,978	(77,047)	1,850,931
15	21-Mar-02	1,996,474	(66,778)	1,929,696
16	28-Feb-02	2,917,131	(99,811)	2,817,320
17	21-Feb-02	2,667,539	(108,783)	2,558,757
18	31-Jan-02	1,872,703	(141,571)	1,731,132
19	24-Jan-02	1,404,453	(157,261)	1,247,192
20	27-Dec-01	1,781,702	(138,025)	1,643,678
21	20-Dec-01	2,053,615	(135,025)	1,918,590
22	28-Nov-01	2,289,937	(48,549)	2,241,388
23	21-Nov-01	2,609,422	(36,235)	2,573,186
24	29-Oct-01	3,789,350	(16,250)	3,773,100
25	18-Oct-01	3,388,631	(54,824)	3,333,807
26	Minimum	\$1,285,318	(\$157,261)	\$1,226,864
27	Maximum	3,789,350	615,671	4,000,000
28	Average	2,305,776	(23,882)	2,281,895
29	Number of Times Va	lue is Negative	20	
30	% Reduction in going	69.3%		

Column (1): Econ. Curtail. from *even* pages of Exhibit No. 36 (500 hours). Column (2): Column (3) - Column (1)

Note: This page uses the fourth box of each page of Exhibit No. 36.

Column (3): Econ. Curtail. from *odd* pages of Exhibit No. 36 (1,000 hours)