ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

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IDAHO PUBLIC UTILITIES COMMISSION

201 South Main, Suite 2300
Salt Lake City, Utah 84111

August 6, 2010

VIA OVERNIGHT DELIVERY

Jean D. Jewell
Commission Secretary
Idaho Public Utilities Commission
472 W. Washington
Boise, ID 83702

Re: Case No. PAC-E-10-07
Rocky Mountain Power is providing supplemental testimony supporting the prudency determination of the Company's Demand-Side Management programs as ordered by the Idaho Public Utilities Commission in Order No. 32023.

Dear Ms. Jewell:

Please find enclosed for filing an original and (9) nine copies of Rocky Mountain Power's supplemental testimony and exhibit. Also enclosed is a CD containing the testimony and exhibit. To the attention of the Court Reporter is a paper copy of all documents along with a CD containing the testimony and exhibit in its original format.

In Order No. 32023 the Commission stated that it "reserves questions of the prudency and cost-effectiveness of the Company's DSM programs and expenditures for the Company's pending rate case (PAC-E-10-07)" and encouraged parties "to address these issues in the rate case." In compliance with Commission Order No. 32023 the Company is providing the attached testimony and exhibit and requesting a prudency determination of the Company's 2008 and 2009 DSM programs from the Idaho Public Utilities Commission as part of Case No. PAC-E-10-07.

All formal correspondence and regarding this supplemental testimony should be addressed to:

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Communications regarding discovery matters, including data requests issued to Rocky Mountain Power, should be addressed to the following:

By E-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah St., Suite 2000
Portland, OR 97232

Informal inquiries may be directed to Ted Weston, Idaho Regulatory Manager at (801) 220-2963.

Very truly yours,

Jeffrey K. Larsen
Vice President, Regulation

cc: Service List

Enclosures

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of August, 2010, I caused to be served, via Overnight delivery and E-mail, a true and correct copy of Rocky Mountain Power's Supplemental Testimony supporting prudency determination in the Company's Demand-Side Management programs as ordered by the IPUC in Order No. 32023 in PAC-E-10-07 to the following:

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UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE	)	
APPLICATION OF ROCKY	)	**CASE NO. PAC-E-10-07**
MOUNTAIN POWER FOR	)	
APPROVAL OF CHANGES TO ITS	)	**Supplemental Testimony of**
ELECTRIC SERVICE SCHEDULES	)	**Brian K. Hedman**
AND A PRICE INCREASE OF $27.7	)	
MILLION, OR APPROXIMATELY	)	
13.7 PERCENT	)	

ROCKY MOUNTAIN POWER

CASE NO. PAC-E-10-07

August 2010

Q. Please state your name, business and business address.

A. My name is Brian K. Hedman. I am employed by The Cadmus Group, Inc, at 720 S.W. Washington, Suite 400, Portland, Oregon, 97205.

Qualifications

Q. What is your current position at The Cadmus Group (Cadmus) and your employment history?

A. I joined Cadmus (then Quantec, LLC) in 2002 and hold the position of Principal. Prior to joining Cadmus I was employed by PacifiCorp for 20 years in a variety of positions. My last position at PacifiCorp was Manager of DSM Policy. In that role I was responsible for preparing and filing the Company's Integrated Resource Plan and energy efficiency programs in Oregon, Washington, Idaho, California, Utah and Wyoming.

Q. What are your responsibilities at Cadmus?

A. I am responsible for designing and evaluating energy efficiency and low income programs, supporting integrated resource planning and preparing testimony in support of utility cost of service, rate design and energy efficiency tariff filings.

Q. What is your educational background?

A. I hold a Bachelor's degree in business from the University of Washington and a Master's degree in economics from Portland State University.

Q. What other jurisdictions do you work in?

A. In addition to PacifiCorp, I currently support clients in Oregon, Washington, California, Utah, Iowa, Missouri, Arizona, Colorado, Kansas, Nebraska, New

Mexico, New York, Delaware, Maryland, Washington D.C., Ontario and British Colombia.

Q. Have you appeared as a witness in previous regulatory proceedings?

A. I have testified before regulatory commissions and legislative committees in Idaho, Utah, Washington, Oregon, Montana, and New York as well as the Federal Energy Regulatory Commission. In addition, I have prepared testimony for my clients in Missouri, Kansas, Nebraska, Maryland, Delaware and Washington D.C.

Q. What is the purpose of your testimony in this proceeding?

A. The purpose of my testimony is to demonstrate that Rocky Mountain Power's demand-side management (DSM) investments made on behalf of Idaho customers were prudent. Specifically, my testimony will address the following:

- I will provide an overview of the Company's DSM programs and results for the period from January 1, 2008, through December 31, 2009;
- I will explain the generally accepted methodologies used for determining energy efficiency program cost effectiveness and whether the Company conforms to these methodologies; and,
- I will demonstrate the cost effectiveness of the Company's Idaho DSM programs and why they are prudent and in the public interest.

Q. Are you sponsoring an exhibit as part of your direct testimony?

A. Yes. I am sponsoring Exhibit No. 56 which was prepared under my supervision and direction. Exhibit No. 56 documents the benefits, costs and cost-effectiveness results of Rocky Mountain Power's Idaho DSM programs.

Q. Is this prudency filing consistent with the memorandum of understanding (MOU) for prudency determination of DSM expenditures that was signed by Rocky Mountain Power, Avista and Idaho Power in December 2009 and by the Idaho Public Utilities Commission staff in January 2010?

A. Yes, the filing is consistent with the MOU. Rocky Mountain Power filed annual reports in March of 2009 and March of 2010 for program years 2008 and 2009 respectively. These reports provide the narrative program descriptions, costs, savings and cost effectiveness anticipated by the MOU. The 2009 report also includes the status of the impact and process evaluations.

Overview of Idaho DSM Programs

Q. Please provide an overview of Rocky Mountain Power's Idaho DSM program portfolio.

A. Rocky Mountain Power's Idaho DSM portfolio consists of eight distinct programs offering incentives for a wide variety of energy efficiency measures and participation in load management programs to the Company's residential, business and agricultural customers. Rocky Mountain Power continues to work with their customers and the Idaho Public Utilities Commission ("Commission") to provide a comprehensive suite of DSM programs that provide the greatest opportunity for participation by all customer sectors.

Q. What DSM programs are available to Rocky Mountain Power customers subject to the Electric Service Schedule No. 191, Customer Efficiency Services Rate?

A. The Company offers eight DSM programs, consisting of three residential, three agricultural, and two business programs. Collectively, the programs offer a wide range of services and financial support capable of assisting customers with virtually any energy efficiency project they wish to pursue. The eight DSM programs are as follows:

Residential Programs

Schedule 21 – Low Income Weatherization

Schedule 117 – Refrigerator/Freezer Recycling

Schedule 118 – Home Energy Savings Incentive

Agricultural Programs

Schedule 72 – Irrigation Load Control Credit Rider

Schedule 72A – Irrigation Load Control Credit Rider Dispatch Program

Schedule 155 – Agricultural Energy Services

Business Programs

Schedule 115 – FinAnswer Express

Schedule 125 – Energy FinAnswer

In addition to the eight programs, the Company's Idaho portion of the Northwest Energy Efficiency Alliance (NEEA) sponsorship is funded through the revenues collected from the Customer Efficiency Service Rate. With the exception of the Energy FinAnswer program as modified to provide incentives, Schedule 125, (available to Idaho customers beginning in May, 2008) these programs are ongoing and represent the same program portfolio for which prudency was determined for program years 2006 and 2007 in Case No. PAC-E-07-05, Commission Order 30482.

Q. What were the Company's DSM results for 2008 and 2009?

A. Energy efficiency program savings at the meter (including NEEA) in 2008 were 10,389 MWH and in 2009 were 14,744 MWH. Rocky Mountain Power's irrigation load management programs (Schedules 72 and Schedule 72a) had participating loads under management of 215 MW in 2008 and 258 MW in 2009.

Cost Effectiveness Methodology

Q. What is the general approach to analyzing the cost effectiveness of demand-side management programs?

A. Utilities can meet their future load requirements by increasing their supply of energy through new generation and purchased power or by reducing those future load requirements through energy efficiency and load management programs (together referred to as demand-side management or DSM) or by a combination of new supply and DSM. In order to determine the optimal mix of new supply and DSM, the utility must compare the costs of both their supply and demand side options. If the cost of a DSM program is lower than the cost of acquiring additional supply the DSM program is determined to be "cost effective".

Q. How is cost effectiveness illustrated?

A. Cost effectiveness is illustrated through multiple cost-benefit tests. Results are displayed as the net benefits or as a ratio of benefits to costs. A ratio of the benefits of the resource to the costs of the resource that is greater than 1.0 demonstrates a resource is cost effective when compared to the alternatives.

Q. What tests are commonly used to determine cost effectiveness?

A. It is informative to view cost effectiveness from different perspectives. Typically, cost effectiveness is tested from the utility, participant, non-participant and all customers' perspective. These tests are referred to as the Utility Cost Test (UCT), Participant Cost Test (PCT), Rate Impact Measurement (RIM) and Total Resource Cost Test (TRC). A variant on the TRC, called the Societal Cost Test, is often calculated as well. The Societal Cost Test expands on the TRC by adding quantifiable non-energy costs and benefits, such as emissions reduction. Another reference for this test is TRC + Conservation Adder.

Q. Is there a generally accepted formulation of these tests?

A. Yes. California was first state to formally adopt the tests described above. In 1983 the California Public Utilities Commission first published the Standard Practice Manual with mathematical formulations for each of the tests. Since then, the formulations contained in that manual have become the industry standard formulation. The most current version of the manual is the 2001 version. The formulations are not specific to California.

Q. Does Rocky Mountain Power's cost effectiveness analysis conform to the standard tests?

A. Yes. The models and inputs used by Rocky Mountain Power are based on the California formulations of the cost effectiveness tests. The Total Resource Cost test is presented both with and without a 10 percent adder that reflects non-quantified benefits.

Q. How do the tests account for a customer who would have made an energy efficiency investment without receiving a program incentive?

A. Each of these tests is calculated based on a "but for" case. That is, "but for" the program, what would have happened? In most instances, DSM programs provide information and incentives to customers to encourage the purchase or adoption of energy efficiency measures and practices. Absent the program, some of these customers would have purchased the measures or undertaken the practices on their own accord. It would not be appropriate to credit the program with changing these customers' behavior. If they receive an incentive from the program for these actions, absent program influence, they are considered "free-riders". In other words, it was not necessary for the utility to provide these customers with an incentive and the utility should not get credit for their actions. Energy savings from free-riders are not included in the total program energy savings for the purposes of cost-effectiveness determination and customer costs associated with free-riders are not included in the program costs. Any payments by the utility to the customer are included as costs of the program, however.

Q. **How is free-ridership quantified?**

A. Free-ridership is expressed as a net-to-gross factor that combines the impacts of the free-ridership (incentive recipients that would have purchased the energy efficiency measure with no incentive) and spillover (additional purchases influenced by the program but for which no incentive is paid).

Q. **How are net-to-gross factors estimated?**

A. In the planning phase net-to-gross assumptions are derived from sources such as prior evaluations of the Company's programs and the Data Base of Energy Efficiency Resources (DEER), which contains the results of hundreds of program evaluations. These are typically the factors used in program filings. Net-to-gross factors are estimated through post implementation evaluation of programs. Customer interviews and market analysis are used to estimate the free-ridership and spillover.

Q. Is Rocky Mountain Power's process for determining annual savings and cost effectiveness consistent with the process used by utilities in other jurisdictions?

A. Yes. The process used by Rocky Mountain Power in its annual report is consistent with that used by other utilities. The costs reflect the actual expenditures incurred by the company while the savings are based on an estimate derived from the planning assumptions. Rocky Mountain Power reviews program costs and participation throughout the program year and adjusts the programs to reflect changes that occur. In addition, Rocky Mountain Power performs third party process and impact evaluations of the programs consistent with the terms of the MOU. These evaluations help the Company further refine the programs to increase participation, increase energy savings acquisitions and maintain or improve their cost effectiveness on an ongoing basis.

Q. How do Rocky Mountain Power's Idaho programs compare to other programs Cadmus has assessed cost effectiveness of or evaluated?

A. Cadmus has evaluated and assessed the cost effectiveness of hundreds of programs implemented by utilities nationwide, including PacifiCorp's. The Company's programs are designed using widely accepted practices that aim to maximize participation while minimizing utility costs and rate impacts. Mid-course adjustments to the programs are noted in the annual reports and indicate that the Company continuously monitors the programs to assure program relevance, market acceptance and cost effectiveness.

Idaho DSM Investment Prudency Demonstration

Q. Why is Rocky Mountain Power requesting a finding of prudence for their DSM investments in this case?

A. In Order No. 32023 approving the 1 percent increase in the Company's Schedule No. 191, Customer Efficiency Services Rate, the Idaho Public Utilities Commission ordered "that the Commission reserves questions of the prudency and cost-effectiveness of the Company's DSM programs and expenditures for the Company's pending rate case (PAC-E-10-07)".

Q. Have the Company's Idaho DSM program's undergone any reviews or evaluations?

A. Yes. The Company has conducted reviews of the load management programs through annual program reports and presentations to the Idaho Public Utilities Commission staff. Program performance results, including cost effectiveness assessments, were also filed on the Company's DSM program portfolio for the calendar year reporting periods of 2008 and 2009. In addition, Cadmus is conducting an evaluation of the 2006-2008 energy efficiency programs.

Q. Have these reviews and the analysis results shown in Exhibit No. 56 found Rocky Mountain Power's Idaho DSM programs are cost-effective?

A. Yes. The portfolio of programs is cost-effective from both a Total Resource Cost (TRC) and Utility Cost Test (UCT) perspective. Exhibit No. 56 shows that the TRC benefit-to-cost ratio for the overall DSM portfolio for 2008 and 2009 combined (load management and energy efficiency, excluding NEEA costs and savings) is 3.7, with a net TRC benefit to customers of over $32 million (Exhibit No. 56, Table 2). The TRC and UCT cost for the load management programs were $14.53/kW-yr and $43.24/kW-yr, respectively, and can be compared against utility avoided costs of $67.05/kW-yr (Exhibit No. 56, Table 3). The levelized TRC and UCT cost of the energy efficiency programs were 6.5 cents and 4.4 cents per kWh, respectively, compared against utility avoided costs of 8.8 cents (Exhibit No. 56, Table 3). Though allowed by the California cost effectiveness formulations, the benefit-to-cost ratios do not include non-energy benefits or other fuel benefits and are calculated utilizing net savings, i.e., inclusive of the impacts of free-ridership and spillover. This presents a conservative estimate of the program's cost effectiveness. As an overall portfolio, the DSM investments were also cost-effective from both a Rate Impact Test (RIM) and Participant Cost Test (PCT) perspective with benefit-to-cost ratios of 1.372 and 11.436, respectively (Exhibit No. 56, Table 2). The energy efficiency portfolio was cost-effective under all cost tests except the RIM test where the benefit-to-cost ratio was .68 (Exhibit No. 56, Tables 4 and 5).

Q. **Are the process and impact evaluation of these programs complete?**

A. No. The process and impact evaluations are in various stages of completion. Field work, surveys and data analysis are largely complete and the quality assurance process is underway. I expect the results to be finalized by the end of the year.

Q. Please summarize your conclusions.

A. The Company's expenditures of Schedule 191 revenue (and the funds utilized for irrigation load control participation credits) have been reasonable and prudent. A portfolio of programs covering all customer classes has been offered with total savings of over 258 MW of annual load control available and total energy savings of over 25 GWh (including NEEA) over the 2008 and 2009 calendar periods. A levelized utility cost per saved kilowatt hour of 4.4 cents has been achieved. The levelized avoided costs over the same period were 8.8 cents per kWh. From a conservative UCT perspective, the cost per kW for load management investments was $43.24/kW-yr against the Company's avoided cost of $67.05/kW-yr. Based on program performance, annual reports already filed with the Commission and the analysis provided in Exhibit No. 56, the 2008 and 2009 program costs were prudently incurred.

Q. Does this conclude your testimony?

A. Yes.

Case No. PAC-E-10-07
Exhibit No. 56
Witness: Brian K. Hedman

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

ROCKY MOUNTAIN POWER

Exhibit Accompanying Supplemental Testimony of Brian K. Hedman

2008 and 2009 Energy Efficiency Program Results

August 2010

The tables below present the cost effectiveness findings of the Idaho 2008-2009 demand side management (DSM) program portfolio. The cost effectiveness analysis was conducted using the 2007 Integrated Resource Plan (IRP) decrement values for 2008 program year and the 2008 IRP decrement values for the 2009 program year. The irrigation load control programs were analyzed using the 2007 and 2008 irrigation avoided cost studies. The portfolio includes the following programs:

Residential Programs
Schedule 21 – Low Income Weatherization
Schedule 117 – Refrigerator/Freezer Recycling
Schedule 118 – Home Energy Savings Incentive

Agricultural Programs
Schedule 72 – Irrigation Load Control Credit Rider
Schedule 72A – Irrigation Load Control Credit Rider Dispatch Program
Schedule 155 – Agricultural Energy Services Schedule

Business Programs
Schedule 115 – FinAnswer Express
Schedule 125 – Energy FinAnswer

Table 1: Common Inputs (2008, 2009)

Parameter	Value
Discount Rate	7.1%, 7.4%
Line Loss Residential	11.389%
Line Loss Commercial	10.698%
Line Loss Irrigation	10.392%
Residential Energy Rate ($/kWh)	$0.0804, $0.0831
Commercial Energy Rate ($/kWh)	$0.0679, $0.0796
Irrigation Energy Rate ($/kWh)	$0.0525, $0.0621

Table 2: 2008-2009 Program Portfolio

All Measures	Costs	Benefits	Net Benefits	Benefit/Cost Ratio
Total Resource Cost Test (PTRC) + Conservation Adder	$11,822,258	$44,218,459	$32,396,201	3.740
Total Resource Cost Test (TRC) No Adder	$11,822,258	$40,198,599	$28,376,341	3.400
Utility Cost Test (UCT)	$23,429,849	$40,198,599	$16,768,749	1.716
Rate Impact Test (RIM)	$29,300,935	$40,198,599	$10,897,664	1.372
Participant Cost Test (PCT)	$1,694,377	$19,377,082	$17,682,705	11.436

Table 3: 2008-2009 TRC and UCT (broken down by Energy Efficiency and Load Management Portfolios)

Electric DSM Program Portfolio

Total Resource Cost (TRC)	$5,091,493
Weighted Average Measure Life	11.97
kWh Energy Savings	10,680,403
TRC Levelized Cost	$0.065
Utility Cost (UCT)	$3,397,116
Weighted Average Measure Life	11.97
kWh Energy Savings	10,680,403
UCT Levelized Cost	$0.044
Comparative Electric Utility Avoided Cost	$0.088

Electric Load Management Portfolio

Total Resource Cost (TRC)	$6,730,764
Total Resource Benefits	$37,113,227
Benefit Cost Ratio	5.51
TRC Cost per kW	$14.53
Utility Cost (UCT)	$20,032,734
Utility Benefits	$33,739,297
Benefit Cost Ratio	1.68
Utility Cost per kW	$43.24
Comparative Electric Utility Avoided Cost	$67.05

Table 4: 2008-2009 TRC and UCT (Energy Efficiency Program Portfolio with low income program broken out)

Total Resource Cost Test	Regular Income Portfolio	Limited Income Portfolio	Total Portfolio
Avoided Costs	$6,022,106	$437,196	$6,459,302
10% avoided cost adder	$602,211	$43,720	$645,930
Total TRC Benefits	$6,624,317	$480,915	$7,105,232
Non-Incentive Costs	$1,686,345		$1,686,345
Customer Costs	$3,066,791	$338,357	$3,405,148
Total TRC Costs	$4,753,136	$338,357	$5,091,493
Net TRC Benefits	$1,871,181	$142,558	$2,013,739
Benefit Cost Ratio	1.39	1.42	1.40

Utility Cost Test	Regular Income Portfolio	Limited Income Portfolio	Total Portfolio
Avoided Costs	$6,022,106	$437,196	$6,459,302
Total UCT Benefits	$6,022,106	$437,196	$6,459,302
Non-Incentive Costs	$1,686,345		$1,686,345
Incentive Costs	$1,372,414	$338,357	$1,710,771
Total UCT Costs	$3,058,759	$338,357	$3,397,116
Net UCT Benefits	$2,963,347	$98,839	$3,062,186
Benefit Cost Ratio	1.97	1.29	1.90

Table 5: 2008-2009 PCT and RIM (Energy Efficiency Program Portfolio with low income program broken out)

Participant Test	Regular Income Portfolio	Limited Income Portfolio	Total Portfolio
Lost Revenues	$5,604,215	$470,898	$6,075,113
Total Lost Revenues	$5,604,215	$470,898	$6,075,113
Customer Project Costs	$3,066,791	$338,357	$3,405,148
Incentive Costs	($1,372,414)	($338,357)	($1,710,771)
Total Participant Costs	$1,694,377	$0	$1,694,377
Net Participant Benefits	$3,909,838	$470,898	$4,380,736
Benefit Cost Ratio	3.31		3.59

Non-Participant Test	Regular Income Portfolio	Limited Income Portfolio	Total Portfolio
Avoided Costs	$6,022,106	$437,196	$6,459,302
Total Avoided Costs	$6,022,106	$437,196	$6,459,302
Lost Revenues	$5,604,215	$470,898	$6,075,113
Incentive Costs	$1,372,414	$338,357	$1,710,771
Non-Incentive Costs	$1,686,345	$0	$1,686,345
Total Non-Participant Costs	$8,662,974	$809,255	$9,472,229
Net Non-Participant Benefits	($2,640,868)	($372,059)	($3,012,927)
Benefit Cost Ratio	0.70		0.68