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

November 15, 2010

IDAHO PUBLIC
UTILITIES COMMISSION

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
In the Matter of the Application of Rocky Mountain Power for Approval of Changes to its Electric Service Schedules and a Price Increase of \$27.7 Million, or Approximately 13.7 Percent

Dear Ms. Jewell:

Please find enclosed for filing an original and nine copies of Rocky Mountain Power's ~~Rebuttal~~ Testimony in the above-referenced matter. Also enclosed is a CD containing the summary of testimony, testimony and exhibits, and a confidential CD containing confidential testimony and exhibits. To the attention of the Court Reporter is a paper copy of all documents along with a CD containing all testimony and exhibits in their original formats.

Rocky Mountain Power would note that, in accordance with Order No. 32098, Rocky Mountain Power has not addressed in rebuttal testimony the statements made by Monsanto witnesses related to the curtailment valuation.

Very truly yours,

Jeffrey K. Larsen
Vice President, Regulation

cc: Service List

Enclosures

CERTIFICATE OF SERVICE

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I hereby certify that on this 16th day of November, 2010, I caused to be served via E-mail, a true and correct copy of Rocky Mountain Power's Rebuttal Testimony and Exhibits in PAC-E-10-07 to the following:

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IDaho PUBLIC UTILITIES COMMISSION

Eric L. Olsen
Racine, Olson, Nye, Budge & Bailey,
Chartered
201 E. Center
P.O. Box 1391
Pocatello, ID 83204-1391
E-Mail: elo@racinelaw.net

Randall C. Budge
Racine, Olson, Nye, Budge & Bailey,
Chartered
201 E. Center
P.O. Box 1391
Pocatello, ID 83204-1391
E-Mail: rcb@racinelaw.net

Tim Buller
Jason Harris
Agrium, Inc.
3010 Conda Road
Soda Springs, ID 83276
E-Mail: tbuller@agrium.com
JAHarris@agrium.com

Scott Woodbury
Deputy Attorney General
Idaho Public Utilities Commission
472 W. Washington (83702)
PO Box 83720
Boise, ID 83720-0074
E-Mail: scott.woodbury@puc.idaho.gov

Brad Purdy
CAPAI
2019 N. 17th St.
Boise, ID. 83702
E-mail: bmpurdy@hotmail.com

Anthony Yankel
29814 Lake Road
Bay Village, Ohio 44140
E-mail: tony@yankel.net

Paul J. Hickey
Hickey & Evans, LLP
1800 Carey Ave. , Suite 700
PO Box 467
Cheyenne, WY 82003
E-Mail: phickey@hickeyevans.com

Katie Iverson (E-mail only)
Brubaker & Associates
17244 W. Cordova Court
Sunrise, Arizona 85387
E-Mail: kiverson@consultbai.com

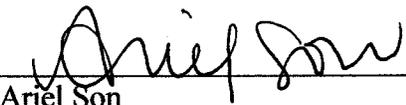
Benjamin J. Otto
Idaho Conservation League
710 N. 6th St.
P.O. Box 844
Boise, Idaho 83702
E-mail: botto@idahoconservation.org

Melinda J. Davison
Davison Van Cleve, P.C.
333 S.W. Taylor, Suite 400
Portland, OR 97204
E-mail: mjd@dvc1aw.com

Ronald L. Williams
Williams Bradbury, P.C.
1015 W. Hays St.
Boise ID, 83702
E-mail: ron@williamsbradbury.com

James R. Smith (E-mail only)
Monsanto Company
P.O. Box 816
Soda Springs, Idaho 83276
E-Mail: jim.r.smith@monsanto.com

Dr. Don Reading (E-mail Only)
Idaho Conservation League
6070 Hill Road
Boise, ID 83703
E-mail: dreading@mindspring.com


Ariel Son
Coordinator, Administrative Services

**ROCKY MOUNTAIN POWER
SUMMARY OF REBUTTAL TESTIMONY
PAC-E-10-07**

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Rocky Mountain Power, a division of PacifiCorp, provides this summary of its testimony filed in support of its general rate case application. Copies of the Company's filing are available online at www.pacificorp.com; click on "News and Info" and then select "Regulatory Information" and "Idaho." Copies of the filing may also be reviewed during regular business hours at the offices of the Idaho Public Utilities Commission in Boise and in these Rocky Mountain Power offices:

- 25 East Main, Rexburg
- 509 South 200 East, Preston
- 852 East 1400 North, Shelley
- 24852 U.S. Highway 89, Montpelier

A. RICHARD WALJE

President, Rocky Mountain Power

Company witness Walje provides a summary of the Company's rebuttal position for the 2010 Idaho general rate case, and addresses certain policy issues raised by intervening parties and the implications those issues would have to the Company if implemented. Mr. Walje testifies that the Company requires a revenue \$24.9 million or a 12.3 percent average increase over Rocky Mountain Power's current rates, which is a reduction of \$2.8 million from the Company's original requested increase \$27.7 million, or 13.7 percent overall. Commission approval of this increase will enable the Company to maintain the financial strength necessary to attract the requisite capital to meet the electrical service needs of its Idaho customers.

Mr. Walje's testimony also discusses the Company's efforts to control costs while maintaining reliable service and customer satisfaction, and responds to the testimony filed by Monsanto regarding the effect of rising electricity prices on its business.

BRUCE N. WILLIAMS

Vice President and Treasurer

Company witness Williams' rebuttal testimony responds to the capital structure recommendations offered by Monsanto witness Michael P. Gorman and Idaho Public Utilities Commission Staff witness Ms. Terri Carlock. Mr. Williams' also rebuts the adjustment to pension expense proposed by Idaho Public Utilities Commission Staff witness Mr. Donn English.

SAMUEL C. HADAWAY

FINANCO, Inc.

Dr. Hadaway's rebuttal testimony responds to the rate of return on equity ("ROE") recommendations offered by Idaho Public Utilities Commission Staff witness Ms. Terri

Carlock and Monsanto witness Mr. Michael P. Gorman. His analysis demonstrates that their rate of return recommendations are not consistent with the ongoing equity market volatility or the continuing financial distress that the U.S. economy is undergoing. Dr. Hadaway also responds to the other witnesses' comments on the methodology used in his direct testimony to estimate Rocky Mountain Power's cost of equity. Dr. Hadaway's updated ROE analysis for current market costs and conditions continues to show that the Company's requested ROE of 10.6 is reasonable.

MARK R. TALLMAN

Vice President of Renewable Resource Development

Company witness Tallman rebuts the testimony of Mr. Joe Leckie of the Idaho Public Utilities Commission Staff as it relates to rate base associated with the Dunlap wind project and operations and maintenance costs associated with wind administration and the High Plains, McFadden Ridge I, and Dunlap wind projects.

CHAD A. TEPLY

Vice President of Resource Development and Construction for PacifiCorp Energy

Company witness Teply's rebuttal testimony responds to the direct testimony of Randall J. Falkenberg on behalf of the PacifiCorp Idaho Industrial Customers regarding the Company's management and financial modeling of unplanned thermal unit outages and also responds to the direct testimony of Don Reading on behalf of the Idaho Conservation League regarding prudence of the Company's pollution control expenditures for coal-fired power generation plants.

CAROL L HUNTER

Vice President of Services

Ms. Hunter responds to or rebuts certain issues raised in the testimonies of Mr. Randy Lobb and Mr. Gary Grayson of the Idaho Public Utilities Commission Staff as it relates to the investment in the company's energy efficiency and load control programs.

CINDY A. CRANE

Vice President, Interwest Mining Company and Fuel Resources

Company witness Crane rebuts the testimony of Idaho Public Utilities Commission Staff witness Mr. Leckie regarding IPUC's proposed disallowance of the Company's Fuel Stock and the testimony of PacifiCorp Idaho Industrial Consumers witness Mr. Falkenberg regarding fuel quality problems at the Jim Bridger plant.

DARRELL T. GERRARD

Vice President of Transmission Planning

Company witness Gerrard provides rebuttal testimony to the direct testimony filed by Mr. Dennis E. Peseau on behalf of Monsanto Company and to the direct testimony of Mr.

Randy Lobb, on behalf of the Idaho Public Utilities Commission staff, regarding the Company's Populus to Terminal transmission project. In particular, Mr. Gerrard responds to assertions that the Populus to Terminal transmission project is not "used and useful" and is oversized.

ERICH D. WILSON

Director, Human Resources

Company witness Wilson rebuts employee salary and annual incentive adjustments proposed by PacifiCorp Idaho Industrial Consumers witness Greg Meyer and Idaho Public Utilities Commission Staff witness Donn English.

DR. HUI SHU

Manager, Net Power Costs

Company witness Shu testifies in support of the Company's revised net power costs of \$1.063 billion system-wide, which is approximately \$69 million on an Idaho allocated basis as calculated using the Generation and Regulation Initiatives Decision Tools (GRID) model. Dr. Shu also responds to the adjustments to the Company's filed net power costs proposed by Mr. Bryan Lanspery of the Idaho Public Utilities Commission Staff, Mr. Randall J. Falkenberg on behalf of the PacifiCorp Idaho Industrial Customers, and Mr. Mark T. Widmer on behalf of Monsanto.

GREGORY N. DUVALL

Director, Long Range Planning and Net Power Costs.

Company witness Duvall will respond to Mr. Brian Collins and Ms. Kathryn Iverson's testimony that was filed on behalf of Monsanto. Mr. Duvall will rebut Mr. Collins' comments regarding the treatment of Monsanto's load and interruptible products in the Company's Integrated Resource Plan (IRP), and Ms. Iverson's comments regarding the interruptible nature of Monsanto's load and the appropriate regulatory treatment of Monsanto.

BARBARA A. COUGHLIN

Director, Customer and Regulatory Liaison

Ms. Coughlin will respond to testimony of Ms. Marilyn Parker and Mr. Curtis Thaden of Idaho Public Utilities Commission Staff (Staff) and Ms. Teri Ottens representing Community Action Partnership Association of Idaho (CAPAI). Ms. Coughlin will address several customer service related issues raised by these witnesses regarding landlord interim billing and Link Programs, Red Flag Rules, rebilling, customer notification for rebilling, unbilled usage, meter upgrade, moratorium and winter payment plan communications, Lend-A-Hand contributions, energy conversation education, low income weatherization funding; and low income weatherization matching funds.

DR. PETER C. EELKEMA

Lead/Senior Consultant, Load and Revenue Forecasting

Company witness Eelkema's testimony rebuts the increase in test year irrigation sales proposed by Mr. Anthony Yankel on behalf of Idaho Irrigation Pumpers Association and the increase in residential revenues proposed by Mr. Greg Meyers on behalf of the PacifiCorp Idaho Industrial Customers.

STEVEN R. MCDUGAL

Director, Revenue Requirement

Company witness McDougal testifies in support of the calculation of \$24.9 million revenue increase and the sources of the data used in determining the normalizing adjustments related to revenue, operations and maintenance expense, net power costs, depreciation and amortization, taxes, and rate base in developing the Idaho revenue requirement. Mr. McDougal's rebuttal testimony responds to adjustments proposed in the pre-filed direct testimony filed by the intervening parties regarding the Company's revenue requirement.

C. CRAIG PAICE

Regulatory Consultant in the Pricing and Cost of Service Department

Company witness Paice's rebuttal testimony includes revised exhibits to reflect changes in the Idaho Results of Operations contained in the rebuttal testimony of Company witness Mr. Steven R. McDougal. Additionally, Mr. Paice responds to the testimony of Idaho Public Utilities Commission Staff witness Mr. Bryan Lanspery, Idaho Industrial Customers witness Mr. Donald Schoenbeck, and Community Action Partnership Association of Idaho witness Ms. Teri Ottens.

WILLIAM R. GRIFFITH

Director, Pricing, Cost of Service & Regulatory Operations

Company witness Griffith's rebuttal testimony provides updated proposed rate spread and rate design exhibits that reflect adjustments to the cost of service study to which the Company has agreed. Mr. Griffith also addresses the direct testimony of Mr. Bryan Lanspery of the Idaho Public Utilities Commission staff, Dr. Don C. Reading of the Idaho Conservation League, and Ms. Teri Ottens of the Community Action Partnership Association of Idaho (CAPAI) concerning residential rate design issues.

Accordingly, Rocky Mountain Power proposes the following allocation of the net price increase for major customer classes:

<u>Customer Class</u>	<u>Proposed Price Change</u>
Residential – Schedule 1	7.2%
Residential – Schedule 36	14.6%
General Service	
Schedule 23/23A	9.7%
Schedule 6/6A/35/35A	13.3%
Schedule 9	12.8%
Schedule 19	10.8%
Irrigation	
Schedule 10	7.6%
Special Contracts	
Schedule 400	18.2%
Schedule 401	14.7%
Public Street Lighting	
Schedules 7/7A, 11, 12	0%