



January 14, 2011

VIA OVERNIGHT DELIVERY

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

RECEIVED

2011 JAN 14 AM 10:24

IDAHO PUBLIC
UTILITIES COMMISSION

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

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 Phase II of the above-referenced matter regarding valuation of Monsanto's interruptible products. Enclosed is a CD containing the summary of 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.

Very truly yours,

Jeffrey K. Larsen
Vice President, Regulation

cc: Service List

Enclosures

CERTIFICATE OF SERVICE

RECEIVED

I hereby certify that on this 14th of January, 2011, I caused to be served, via E-mail and Overnight delivery, a true and correct copy of Rocky Mountain Power's Request for Testimony & Exhibits Phase II in PAC-E-10-07 to the following:

2011 JAN 14 AM 10:24
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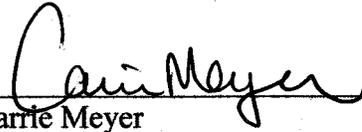
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A handwritten signature in cursive script that reads "Carrie Meyer". The signature is written in black ink and is positioned above a horizontal line.

Carrie Meyer
Coordinator, Administrative Services

ROCKY MOUNTAIN POWER
SUMMARY OF REBUTTAL TESTIMONY PHASE II
VALUATION OF MONSANTO INTERRUPTIBLE PRODUCTS
PAC-E-10-07

Rocky Mountain Power, a division of PacifiCorp, provides this summary of its rebuttal testimony filed in support of its general rate case application regarding valuation of Monsanto's interruptible products. 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

PAUL H. CLEMENTS

Originator/Power Marketer

Company Witness Clements responds to the direct testimony of Monsanto witnesses Mr. Brian C. Collins and Ms. Kathryn E. Iverson and the direct testimony of staff witness Mr. Keith D. Hessing as it relates to the determination of an appropriate valuation of Monsanto's interruptible products. Mr. Clements also responds to Mr. Collins' critique of the Company's valuation proposal and provides evidence demonstrating that Monsanto's peaker method is not appropriate for use in determining the value of Monsanto's interruptible products. In addition, Mr. Clements testifies regarding Mr. Hessing's valuation method and suggests reasonable and needed modifications to the method that must be implemented should the Commission elect to adopt it.

GREGORY N. DUVALL

Director, Long Range Planning and Net Power Costs.

Company witness Duvall will respond to testimony filed by Monsanto regarding: (1) the methodology used to value the Idaho Irrigation Load Control Program; (2) the treatment of Monsanto's load and interruptible products in the Company's Integrated Resource Plan ("IRP"); and (3) Monsanto's claims that the avoided peaker costs should be increased by 12 percent based on Monsanto witness Mr. Collins' assertion that Monsanto allows the Company to avoid planning reserves.

STEVEN R. MCDUGAL

Director, Revenue Requirement

Company witness McDougal testifies regarding how Monsanto witness Ms. Iverson's testimony inappropriately values Monsanto's curtailment by altering jurisdictional allocation to reflect an inappropriate level of Monsanto demand in the monthly coincident peaks.