

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF THE )**  
**APPLICATION OF ROCKY )**  
**MOUNTAIN POWER FOR )**  
**AUTHORITY TO INCREASE RATES )**  
**BY \$2.2 MILLION TO RECOVER )**  
**DEFERRED NET POWER COSTS )**  
**THROUGH THE ENERGY COST )**  
**ADJUSTMENT MECHANISM )**

**CASE NO. PAC-E-13-03**

**Direct Testimony of Brian S. Dickman**

**ROCKY MOUNTAIN POWER**

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**CASE NO. PAC-E-13-03**

**February 2013**

1 **Q. Please state your name, business address and present position with**  
2 **PacifiCorp, dba Rocky Mountain Power (the "Company").**

3 A. My name is Brian S. Dickman. My business address is 825 NE Multnomah St.,  
4 Suite 600, Portland, Oregon, 97232. My title is Manager, Net Power Costs.

5 **Qualifications**

6 **Q. Briefly describe your education and business experience.**

7 A. I received a Master of Business Administration from the University of Utah with  
8 an emphasis in finance and a Bachelor of Science degree in accounting from Utah  
9 State University. Prior to joining the Company, I was employed as an analyst for  
10 Duke Energy Trading and Marketing. I have been employed by the Company  
11 since 2003 including positions in revenue requirement and regulatory affairs, and  
12 I assumed my current role managing the Company's net power cost group in  
13 March 2012.

14 **Q. Have you testified in previous regulatory proceedings?**

15 A. Yes. I have filed testimony in proceedings before the Idaho Public Utilities  
16 Commission, the Wyoming Public Service Commission, and the Utah Public  
17 Service Commission.

18 **Summary of Testimony**

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

20 A. My testimony presents the Company's calculation of the Energy Cost Adjustment  
21 Mechanism ("ECAM") balancing account for the 12-month period from  
22 December 1, 2011 through November 30, 2012 ("Deferral Period"). More  
23 specifically, my testimony provides the following:

- 1 • A summary of the ECAM calculation, including changes made to comply  
2 with the Commission order in the Company's previous ECAM filing  
3 (Case No. PAC-E-12-03).
- 4 • Details supporting the addition of \$15.9 million to the deferral balance  
5 ("2012 Deferral"), bringing the total balance of the account to \$25.5  
6 million as of November 30, 2012.
- 7 • Background on the Company's ECAM and a description of the  
8 Company's net power costs ("NPC").

9 **Q. Are additional witnesses presenting testimony in this case?**

10 A. Yes. Ms. Joelle R. Steward, Director, Pricing, Cost of Service & Regulatory  
11 Operations, is sponsoring testimony supporting the Company's proposed ECAM  
12 collection rates in Schedule 94. The Company anticipates that effective April 1,  
13 2013, Schedule 94 will collect approximately \$15.2 million on an annual basis as  
14 compared to the current collection rate of approximately \$13.0 million.

15 **Summary of the ECAM Deferral Calculation**

16 **Q. Please briefly describe the Company's ECAM authorized by the**  
17 **Commission.**

18 A. In general, the ECAM tracks deviations between actual NPC and the NPC in base  
19 rates and defers 90 percent of the difference for later recovery.<sup>1</sup> Other items, such  
20 as sales of sulfur dioxide ("SO<sub>2</sub>") emission allowances or renewable energy  
21 credits ("RECs"), may also be accounted for in the ECAM as a mechanism to true

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<sup>1</sup> Order No. 30904 in Case No. PAC-E-08-08 approved the stipulation entered into by the Commission Staff, the Idaho Irrigation Pumpers Association, Monsanto and the Company that set up the structure and content of the ECAM mechanism.

1 up to actual experience. The deferred balance that accumulates over a one-year  
2 period is then passed on to customers as a rate surcharge or credit. The ECAM  
3 Schedule 94 rate, which appears as a separate line item on customer bills, collects  
4 or credits to customers the balance of deferred costs at the end of a deferral  
5 period. Schedule 94 is adjusted as needed in the Company's annual ECAM  
6 filings. The annual deferral period for the ECAM is December 1 to November 30.  
7 The Company is required to file an application with the Commission by February  
8 1 of each year to seek approval of the deferral amount and to adjust the ECAM  
9 rate effective April 1.

10 **Q. How are the 2012 ECAM deferral calculations presented in your testimony?**

11 A. The 2012 ECAM deferral calculations are contained in Exhibit No. 1. A summary  
12 of the major components is contained in Table 1 below. Later in my testimony I  
13 discuss the details of the ECAM deferral calculations contained in Exhibit No. 1.

14 **Q. What changes to the ECAM calculation have been implemented to comply  
15 with Commission Order 32597 from Case No. PAC-E-12-03?**

16 A. The Company has reflected the changes to the ECAM calculation approved by the  
17 Commission in the Company's 2012 ECAM filing, including:

- 18 • Replacement energy consumed by special contract customers during periods  
19 where they buy through curtailment events is removed from the jurisdictional  
20 load and the cost of the replacement energy is removed from NPC.  
21 Replacement energy during curtailment events is passed-through directly to  
22 these customers at a market price and should not have an impact on the  
23 ECAM deferral calculation.

- 1           • To calculate the load change adjustment rate (“LCAR”) Monsanto’s actual  
2           load is adjusted to be on the same basis as the load used to set NPC in base  
3           rates, i.e. the full load is reflected as if no curtailment events occurred. This  
4           treatment ensures Monsanto is not penalized in the LCAR for reduced energy  
5           use during curtailment events initiated by the Company.
- 6           • Transmission line losses are applied to Monsanto and Agrium metered load  
7           when grossing up the metered load to the load at input. The loss adjustment  
8           recognizes the impact of moving power through Idaho for wholesale  
9           transactions.
- 10          • The intra-hour component of the non-owned wind integration cost is excluded  
11          from the deferral balance, at a rate of \$2.98 per MWh.

12   **Incremental 2012 Deferral**

13   **Q.    Please describe the ECAM components that make up the 2012 Deferral.**

14   A.    The 2012 Deferral is the sum of customers’ 90 percent share of the following  
15   items: the difference between the actual and in-rates NPC, the LCAR, the SO<sub>2</sub>  
16   allowance sales adjustment, and the Emerging Issues Task Force (“EITF”) 04-6  
17   adjustment. An additional true-up of 100 percent of the revenue difference from  
18   the sale of RECs is included. Detailed calculations are provided in Exhibit No. 1  
19   attached to my testimony, and Table 1 below summarizes the various components  
20   making up the deferral.

**Table 1  
Summary of ECAM Deferral Account Balance**

	<u>Tariff</u>			<u>Total</u>
	<u>Customers</u>	<u>Monsanto</u>	<u>Agrium</u>	
NPC Differential for Deferral	10,481,031	7,320,329	557,414	18,358,774
LCAR	(601,098)	(90,098)	(22,411)	(713,607)
SO2	(1,212)	(512)	(40)	(1,764)
EITF 04-6 Adjustment	(11,520)	(16,269)	(2,230)	(30,019)
	9,867,201	7,213,450	532,734	17,613,384
	90%	90%	90%	90%
Customer Responsibility	8,880,481	6,492,105	479,460	15,852,046
REC Deferral	176,961	(143,783)	(15,980)	17,197
<b>Total Company Recovery for NPC Deferral</b>	<b>9,057,441</b>	<b>6,348,322</b>	<b>463,480</b>	<b>15,869,243</b>
<b>Balancing Account Activity</b>				
Prior Deferral	16,352,216	6,812,973	471,163	23,636,352
ECAM Revenue Collection	(12,780,472)	(1,407,870)	(96,019)	(14,284,361)
Interest	153,150	100,182	7,023	260,355
<b>Activity Through November 30, 2012</b>	<b>3,724,894</b>	<b>5,505,285</b>	<b>382,167</b>	<b>9,612,346</b>
<b>November 30, 2012 Balance For Collection</b>	<b>12,782,335</b>	<b>11,853,607</b>	<b>845,648</b>	<b>25,481,589</b>
Schedule 94 Collection - Dec 2012 - March 2013	(2,886,335)	(795,088)	(63,425)	(3,744,847)
<b>Expected Balance as of April 1, 2013</b>	<b>9,896,000</b>	<b>11,058,519</b>	<b>782,223</b>	<b>21,736,742</b>
Schedule 94 Collection - April 2013 - March 2014	(10,450,734)	(4,471,206)	(313,865)	(15,235,804)
<b>Expected Balance as of April 1, 2014 (Excluding Incremental 2013 Deferral)</b>	<b>(554,734)</b>	<b>6,587,313</b>	<b>468,358</b>	<b>6,500,937</b>
<b>Monsanto/Agrium Amortization</b>				
2012 ECAM Balance (2011 Deferral) - 3 Yr Amortization		2,355,099	159,371	2,514,470
2013 ECAM Balance (2012 Deferral) - 3 Yr Amortization		2,116,107	154,493	2,270,601
2014 ECAM Balance (2013 Deferral) - 2 Yr Amortization				

- 1 **Q. Please explain the calculation of the ECAM balance for the Deferral Period.**
- 2 A. Table 1 above summarizes the components of the ECAM balance, broken into
- 3 three customer groups. The \$15.9 million is almost entirely made up of the
- 4 customers' share of the NPC differential, offset by adjustments for the LCAR,
- 5 SO<sub>2</sub> allowance sales, and EITF 04-6. A reduction in actual REC revenue
- 6 compared to the base caused an increase to the deferral of \$17,197.

7 The first section of Table 1 summarizes the Idaho-allocated share of those

8 items for which Idaho customers and the Company share responsibility: NPC

1 differential, LCAR, SO<sub>2</sub> sales, and EITF 04-6 adjustment. The next section  
2 calculates the 90 percent customer share of the above items and adds in the Idaho-  
3 allocated REC revenue true-up, for which customers are refunded or surcharged  
4 100 percent of the difference. The total of these items constitutes the 2012  
5 Deferral.

6 The next section, Balancing Account Activity, starts with the \$23.6  
7 million balance approved in Order 32597 in the ECAM deferral account. That  
8 balance is adjusted for collections and interest accrued during the Deferral Period.  
9 When the 2012 Deferral is added the total outstanding balance as of November  
10 30, 2012, is \$25.5 million. The final rows in Table 1 illustrate the expected  
11 Schedule 94 collections between December 1, 2012, and March 31, 2013, and  
12 then over the next collection period from April 1, 2013, to March 31, 2014.  
13 Finally, the table shows the annual amount that would need to be collected from  
14 Monsanto and Agrium according to the multi-year amortization schedules agreed  
15 to in the settlement agreement approved by the Commission in Case No. PAC-E-  
16 11-12 ("2011 Rate Case").

17 **Q. Based on your calculations, what is the balance expected to be in the ECAM**  
18 **deferral account as of April 1, 2013?**

19 **A.** As of April 1, 2013, there will be an estimated balance of \$21.7 million due for  
20 collection. Monsanto is responsible for \$11.1 million, Agrium is responsible for  
21 \$0.8 million, and the remaining \$9.9 million will be due from other retail  
22 customers.

1 **Q. What is the proposed collection amount due from customers under Schedule**  
2 **94 beginning April 1, 2013?**

3 A. As discussed by Company witness Ms. Steward, the Company proposes to collect  
4 \$10.5 million from retail tariff customers beginning April 1, 2013. This will  
5 require no change to the ECAM surcharge rate for these customers. The surcharge  
6 rate for Monsanto and Agrium will be set at approximately \$4.8 million,  
7 combined, to reflect the three year amortization outlined in the stipulation  
8 between the parties and approved by the Commission in the 2011 Rate Case.

9 **Q. The stipulation in the 2011 Rate Case stated the Company would track in the**  
10 **ECAM Idaho's share of the customer load control service credit for the**  
11 **irrigation load control program. Have you included an adjustment to true up**  
12 **these expenses?**

13 A. No. The tracking was intended as a mechanism to deal with uncertainty  
14 surrounding the jurisdictional treatment of the dispatchable irrigation load control  
15 program that was under review by the Multi-State Process Standing Committee  
16 during the 2011 Rate Case. While the other states served by the Company have  
17 not accepted a system allocation of these costs, the Company has not made a  
18 determination that a true up of these expenses in Idaho is warranted at this time.

19 **Q. Has the Company worked with parties to the stipulation in the 2011 Rate**  
20 **Case as it related to hedging limits?**

21 A. Yes. The Company met with parties on June 4, 2012 to discuss the Company's  
22 hedging policies and procedures. As a result, the Company committed to provide  
23 a semi-annual report on the Company's hedging activity.

1 **Summary of the NPC Differences**

2 **Q. Please explain the difference between adjusted actual NPC (“Actual NPC”)**  
3 **and the NPC in base rates (“Base NPC”).**

4 A. On a total Company basis, Actual NPC for the Deferral Period were  
5 approximately \$1.501 billion. During the Deferral Period, the Base NPC in rates  
6 originated from two rate cases: Case No. PAC-E-10-07 (“2010 Rate Case”) for  
7 December 1, 2011 through January 9, 2012 and the 2011 Rate Case for January  
8 10, 2012 through November 30, 2012. In the 2010 Rate Case and the 2011 Rate  
9 Case the Base NPC were set at \$1.025 billion and \$1.205 billion, respectively.  
10 The combined Base NPC for the Deferral Period are \$1.176 billion.

11 **Q. Did the Company anticipate that the actual NPC would be higher than the**  
12 **NPC included in rates during the Deferral Period?**

13 A. Yes. Company witness Mr. J. Ted Weston’s testimony, filed on November 2,  
14 2011, in support of the stipulation in the 2011 Rate Case, indicated that the  
15 Company expected actual NPC for 2012 in excess of \$1.5 billion. This projection  
16 is very similar to the Actual NPC for the Deferral Period at \$1.501 billion.

17 Mr. Weston’s testimony also explained that the Company’s original filing  
18 in the 2011 Rate Case included NPC of \$1.311 billion. At that time the Company  
19 expected 2011 actual NPC to be closer to \$1.35 billion.<sup>2</sup> Base NPC of \$1.205  
20 billion from the 2011 Rate Case went into effect January 10, 2012 and were in  
21 effect during 2012 even though the Company anticipated NPC to be in excess of  
22 \$1.5 billion that year.

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<sup>2</sup> Ultimately, the Company’s 2011 actual NPC were \$1.39 billion.

1 Q. What are the major drivers that result in a difference between Actual NPC  
2 and Base NPC?

3 A. The approximate \$325 million difference between the combined Base NPC and  
4 Actual NPC in the Deferral Period is summarized in Table 2 by major category in  
5 the NPC report.

**Table 2**  
**Deferral Period NPC Reconciliation (\$ millions)**

<b>Base NPC</b>	<b>\$ 1,176</b>
<b>Increase/(Decrease) to NPC:</b>	
Wholesale Sales Revenue	392
Purchased Power Expense	(187)
Coal Fuel Expense	23
Natural Gas Expense	6
Wheeling, Hydro and Other Expenses	(3)
<b>Total Increase/(Decrease)</b>	<b>\$ 231</b>
<b>Settlement Adjustment</b>	<b>95</b>
<b>Adjusted Actual NPC</b>	<b>\$ 1,501</b>

6 The comparison of Base NPC to Actual NPC is hampered by the disparity in  
7 timing between the test periods used to determine Base NPC in general rate cases  
8 and the period over which those rates are in effect. As described earlier, Base  
9 NPC relies partially on rates set in the 2010 Rate Case as well as the 2011 Rate  
10 Case. The historical nature of the test periods used in those cases causes the Base  
11 NPC to be out of date during the Deferral Period. For example, for the month of  
12 December the actual NPC in December 2011 are compared to Base NPC for  
13 December 2010. Test period timing causes large changes in NPC categories such  
14 as wholesale sales revenue and purchase power expense because the underlying

1 assumptions in Base NPC do not accurately reflect conditions during the Deferral  
2 Period.

3 An apples-to-apples comparison is also difficult due to the “black box”  
4 settlement adjustment used to reduce Base NPC in the 2011 Rate Case.  
5 Removing the “black box” settlement adjustment from Base NPC accounts for 29  
6 percent of the difference between Actual NPC and Base NPC during the Deferral  
7 Period. Mr. Weston’s stipulation testimony described that increasing NPC was a  
8 significant driver of the overall rate increase sought in the 2011 Rate Case. He  
9 explained that the stipulation in that case spread the known increase in NPC over  
10 a period of two years in order to mitigate the rate impact of the rate case.<sup>3</sup> He  
11 stated, “Ultimately, 90 percent of the difference between actual net power costs  
12 and in-rates net power costs will be deferred and collected in the ECAM,  
13 customers get the benefit of the delay in paying the higher level until the costs  
14 become “actual” and also benefit from 10 percent of the incremental difference  
15 not being included in the ECAM deferral.”

16 **Q. Did parties to the stipulation understand the impact the settlement would**  
17 **have on the ECAM?**

18 A. Yes. As noted by Mr. Weston the parties supported this approach knowing they  
19 would benefit from the delay in paying the higher level of net power costs.

20 **Q. Notwithstanding the issues you describe above, can you explain some of the**  
21 **differences in NPC categories?**

22 A. Yes. Much of the variance in NPC is due to lower actual wholesale market prices

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<sup>3</sup> Case No. PAC-E-11-12, Testimony of J. Ted Weston at 7-8.

1 for electricity and natural gas compared to the price forecasts used in Base NPC.  
2 On average, wholesale electricity prices were approximately 23 percent lower,  
3 and natural gas prices were lower by approximately 38 percent.

4 **Q. How does the change in market prices impact NPC?**

5 A. The lower market prices for electricity result in lower wholesale sales revenue,  
6 which increases NPC as shown in Table 2. Actual wholesale sales revenue was  
7 \$392 million lower than the level included in Base NPC, and wholesale sales  
8 volumes were 4,308 GWh (29 percent) lower. The impact of reduced wholesale  
9 sales revenue was partially offset by lower purchased power expenses. In  
10 addition, several large contracts that were included in Base NPC expired prior to  
11 the Deferral Period, including: the BPA peaking contract, contracts for output of  
12 Mid-Columbia hydro facilities, and several qualifying facility purchases from  
13 large industrial customers.

14 **Q. Did changes in load also impact NPC?**

15 A. Yes. Actual system load during the deferral period was 1,574 GWh (2.7 percent)  
16 higher than the load in Base NPC. Higher load, combined with the reduced  
17 purchased power volume, also contributed to the reduction in wholesale sales  
18 volume.

19 **Q. Please explain the change in natural gas and coal fuel expense.**

20 A. Actual natural gas fuel expense was \$6 million higher than the level included in  
21 Base NPC due to increased generation volume. The drop in market prices for  
22 natural gas led to an increase in gas generation of 1,341 GWh (22 percent).  
23 However, the effect of lower prices was offset by increased generation volume,

1 resulting in higher overall natural gas fuel expenses. Coal fuel expense increased  
2 approximately \$23 million, or 3.1 percent, compared to the level in Base NPC,  
3 and actual coal generation was approximately 120 GWh (0.3 percent) higher.

#### 4 **Description of the ECAM Calculations**

5 **Q. Please describe the ECAM calculations in Exhibit No. 1.**

6 A. The ECAM deferral is calculated by comparing the Actual NPC to the Base NPC  
7 on a monthly basis and deferring the differences into an ECAM balancing  
8 account. The deferral amount is the difference in the system dollar per megawatt-  
9 hour rate multiplied by the Idaho retail load. Exhibit No. 1 details the ECAM  
10 calculation and contains supporting information, portions of which are  
11 confidential.

12 **Q. How are the Base NPC and Actual NPC dollar per megawatt-hour rates**  
13 **calculated?**

14 A. The monthly NPC dollar amounts for Base NPC in the Deferral Period are  
15 divided by the corresponding monthly normalized load to express the costs on a  
16 dollar per megawatt-hour basis (Exhibit No. 1, line 1). The Actual NPC rate on a  
17 dollar per megawatt-hour basis is calculated by dividing the monthly Actual NPC  
18 dollar amount by the actual monthly system load (Exhibit No. 1, line 8). On a  
19 dollar per megawatt-hour basis, the Base NPC average is \$20.31 per megawatt-  
20 hour, and the Actual NPC averages to \$25.24 per megawatt-hour, \$4.93 per  
21 megawatt-hour higher.

22 **Q. Please describe how the NPC deferral is calculated.**

23 A. The deferral is calculated on a monthly basis by subtracting the Base NPC rate

1 from the Actual NPC rate. The resulting monthly NPC rate differential (Exhibit  
2 No. 1, line 9) is then multiplied by three groups of actual Idaho retail load at  
3 input: tariff customers, Monsanto, and Agrium (Exhibit No. 1, lines 10 through  
4 12) to calculate the NPC differential for deferral for each customer group,  
5 (Exhibit No. 1, lines 14 through 16). For the 12-month period ended November  
6 2012 the NPC differential was approximately \$18.4 million before application of  
7 the 90 / 10 sharing.

8 **Q. What costs are included in the NPC differential for deferral?**

9 A. The NPC differential for deferral captures all components of NPC as defined in  
10 the Company's general rate case proceedings and modeled by the Company's  
11 production dispatch model ("GRID"). Specifically, Base NPC and Actual NPC  
12 include amounts booked to the following Federal Energy Regulatory Commission  
13 ("FERC") accounts:

14 Account 447 – Sales for resale, excluding on-system wholesale sales and  
15 other revenues that are not modeled in GRID,

16 Account 501 – Fuel, steam generation; excluding fuel handling, start-up  
17 fuel (gas and diesel fuel, residual disposal) and other costs  
18 that are not modeled in GRID,

19 Account 503 – Steam from other sources,

20 Account 547 – Fuel, other generation,

21 Account 555 – Purchased power, excluding the Bonneville Power  
22 Administration ("BPA") residential exchange credit pass-  
23 through if applicable, and

1 Account 565 – Transmission of electricity by others.

2 **Q. Are adjustments made to the Actual NPC prior to comparing to Base NPC?**

3 A. Yes. The Actual NPC recorded on the Company's books are adjusted to remove  
4 entries that are not included in the determination of the Company's Base NPC for  
5 regulatory purposes, such as out of period accounting entries. In addition, Actual  
6 NPC adjustments are applied to reflect prior Commission approved adjustments,  
7 such as the revenue imputation of the sales contract with the Sacramento  
8 Municipal Utility District and removal of the effect of special contract customers  
9 buying through curtailment.

10 **Q. What constitutes an out of period accounting entry?**

11 A. Out of period accounting entries are items booked during the Deferral Period but  
12 that pertain to an operating period prior to the inception of the ECAM on July 1,  
13 2009.

14 **Q. Why is the cutoff of July 1, 2009, used to demarcate out of period entries?**

15 A. Since the ECAM took effect, customers' rates have been adjusted to recover  
16 essentially all of the Company's actual net power costs, excluding any differences  
17 lost due to the 90 / 10 sharing. As a result, any accounting entries made during the  
18 current Deferral Period that relate to any operating period since the ECAM took  
19 effect should also be reflected in customer rates, whether they increase or  
20 decrease Actual NPC. Accounting entries related to operating periods prior to the  
21 inception of the ECAM should not impact the ECAM deferral. In this case, out of  
22 period entries reduce the total Company Actual NPC by approximately \$1.1  
23 million.

1 **Q. In addition to the comparison of Actual NPC to Base NPC, what other**  
2 **components are included in the ECAM?**

3 A. There are four additional components included in the ECAM calculations: (i)  
4 LCAR adjustment, (ii) credit for any SO<sub>2</sub> allowance sales variances, (iii)  
5 adjustment for deferred costs associated with coal mine stripping activities  
6 recorded under the Financial Accounting Standards Board ("FASB") EITF 04-6,  
7 (iv) true-up of REC revenues as authorized by the Commission in Order No.  
8 32196.

9 **Q. Please describe the LCAR adjustment.**

10 A. The calculation of the LCAR adjustment is a symmetrical adjustment for over- or  
11 under-collection of the energy-related portion of the Company's embedded  
12 revenue requirement for production facilities as specified in Case No. GNR-E-10-  
13 03, Order No. 32206. The LCAR accounts for variances in Idaho load that cause  
14 the Company to collect more or less of these production-related costs. The LCAR  
15 rate was last set in Order No. 32432 at \$5.47 per megawatt-hour. This rate has  
16 been in effect since April 1, 2011.

17 **Q. How is the LCAR adjustment calculated and what is the impact on the 2012**  
18 **Deferral?**

19 A. The LCAR adjustment is calculated by subtracting the Idaho load at input  
20 established in rates ("Base Load" shown in Exhibit No. 1, lines 18 through 20),  
21 from actual Idaho load at input ("Actual Load" shown in Exhibit No. 1, lines 22  
22 through 24). The difference (Exhibit No. 1, lines 26 through 28) is then multiplied  
23 by the LCAR of \$5.47 per megawatt-hour in all months of the Deferral Period

1 (Exhibit No. 1, line 30) to arrive at the LCAR adjustment (Exhibit No. 1, lines 31  
2 through 33) of \$713,607 before the 90 / 10 sharing.

3 **Q. How are SO<sub>2</sub> sales revenues included in the ECAM?**

4 A. Line 35 of Exhibit No. 1 contains the total Company SO<sub>2</sub> sales revenue during the  
5 Deferral Period on a total Company basis. Line 37 of Exhibit No. 1 is Idaho's  
6 allocated share of the SO<sub>2</sub> sales revenue which is calculated using Idaho's System  
7 Energy ("SE") allocation factor authorized by the Commission from the 2011  
8 Rate Case. For the Deferral Period, the total SO<sub>2</sub> sales revenue credit is a \$1,764  
9 reduction to the NPC deferral balance before the 90 / 10 sharing.

10 **Q. How is the adjustment for accounting pronouncement EITF 04-6 included in  
11 the ECAM?**

12 A. Line 38 of Exhibit No. 1 reflects Idaho's allocated differences between the coal  
13 stripping costs incurred by the Company and recorded on the Company's books  
14 pursuant to the guidance of the accounting pronouncement EITF 04-6, and the  
15 amortization of the coal stripping costs when the coal was excavated. For the  
16 Deferral Period, the total EITF 04-6 coal stripping deferral adjustment is a  
17 \$30,019 reduction to the NPC deferral balance before the 90 / 10 sharing.

18 **Q. Please explain the sharing ratio between the Company and customers in the  
19 ECAM.**

20 A. The ECAM includes a symmetrical sharing ratio in which customers either pay or  
21 receive 90 percent of the ECAM deferral balance and the Company is responsible  
22 for the remaining 10 percent. Lines 52 through 54 of Exhibit No. 1 represent the  
23 customers' 90 percent share of the monthly deferral shown on lines 47 through 49

1 of Exhibit No. 1. For the Deferral Period, the customers' share of the deferred  
2 balance is approximately \$15.9 million. The remaining balance of approximately  
3 \$1.8 million is not included in the deferral calculation and is not recoverable from  
4 customers.

5 **Q. What is the amount of REC revenue true-up in the current filing?**

6 A. As authorized by the Commission in Case No. PAC-E-10-07, Order No. 32196,  
7 the Company included the difference between actual REC revenues during the  
8 Deferral Period and the amount of REC revenues included in base rates. The REC  
9 revenue true-up included in the ECAM is symmetrical but no sharing band is  
10 applied – the entire difference between base and actual REC revenues is either  
11 refunded or surcharged to customers. Base rates during the Deferral Period  
12 included \$6.58 million<sup>4</sup> in Idaho-allocated REC revenue. Idaho's actual REC  
13 revenues for that same time period were approximately \$6.56 million, a difference  
14 of \$17,197 (Exhibit No. 1, line 58). While the actual REC revenue was nearly  
15 equal to the amount in rates for the deferral period in this case, the Company  
16 expects actual REC revenue will be lower in the future.

17 **Q. What is the total ECAM deferred balance as calculated in Exhibit No. 1?**

18 A. The total ECAM deferred balance as of November 30, 2012 is \$25.5 million,  
19 shown on line 85 of Exhibit No. 1.

20 **Q. How is this balance divided among customers?**

21 A. The ECAM deferral is divided into three customer groups based on each group's  
22 actual load during the deferral period. Of the \$25.5 million, \$12.8 million is

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<sup>4</sup> \$6.58 million is the product of 1 month 9 days of \$7.0 million from PAC-E-10-07 and 10 months 22 days of \$6.5 million from PAC-E-11-12.

1 allocated to the tariff customers (Exhibit No. 1, Line 70), \$11.9 million to  
2 Monsanto (Exhibit No. 1, Line 77) and \$0.8 million to Agrium (Exhibit No. 1,  
3 Line 84). The Company will amortize and collect Monsanto's and Agrium's share  
4 of the Commission approved 2012 ECAM balance over three years pursuant to  
5 the stipulation approved by the Commission in Order No. 32432.

6 **Q. Does the calculation of the deferred NPC adjustment in this application**  
7 **comply with the parameters of the Idaho ECAM as approved by the**  
8 **Commission?**

9 A. Yes.

10 **Q. Does this conclude your direct testimony?**

11 A. Yes.

**CONFIDENTIAL**  
Case No. PAC-E-13-03  
Exhibit No. 1  
Witness: Brian S. Dickman

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

ROCKY MOUNTAIN POWER

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**CONFIDENTIAL**  
Exhibit Accompanying Direct Testimony of Brian S. Dickman

February 2013

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