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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION OF
ROCKY MOUNTAIN POWER FOR
MODIFICATION OF TERMS AND
CONDITIONS OF PURPA PURCHASE
AGREEMENTS AND FOR
MODIFICATION OF ITS AVOIDED
COST METHODOLOGY

CASE NO. PAC-E-15-03

**PETITION OF ROCKY MOUNTAIN
POWER**

PACIFICORP

DIRECT TESTIMONY

OF

PAUL H. CLEMENTS

1 **Q. Please state your name, business address, and present position with Rocky**
2 **Mountain Power (the “Company”), a division of PacifiCorp.**

3 A. My name is Paul H. Clements. My business address is 201 S. Main, Suite 2300,
4 Salt Lake City, Utah 84111. My present position is Senior Originator/Power
5 Marketer for PacifiCorp Energy. PacifiCorp Energy and Rocky Mountain Power
6 are divisions of PacifiCorp.

7 **Q. How long have you been in your present position?**

8 A. I have been in my present position since December 2004.

9 **Q. Please describe your education and business experience.**

10 A. I have a B.S. in Business Management from Brigham Young University. I have
11 been employed with PacifiCorp since 2004 as an originator/power marketer
12 responsible for negotiating qualifying facility contracts, negotiating interruptible
13 retail special contracts, and managing wholesale or market-based energy and
14 capacity contracts with other utilities and power marketers. I also worked in the
15 merchant energy sector for approximately six years in pricing and structuring,
16 origination, and trading roles for Duke Energy and Illinova.

17 **PURPOSE AND SUMMARY OF TESTIMONY**

18 **Q. What is the purpose of your testimony?**

19 A. The purpose of my testimony is to support and present the Company’s application
20 to modify certain terms and conditions related to contracting and pricing for non-
21 standard qualifying facility (“QF”) contracts that the Company must enter into
22 under the Public Utility Regulatory Policies Act of 1978 (“PURPA”). The
23 Company is seeking immediate relief on one item in order to protect its customers