

**BEFORE THE**  
**THE IDAHO PUBLIC UTILITIES COMMISSION**

**CASE NO. IPC-E-23-11**

IN THE MATTER OF THE APPLICATION OF )  
IDAHO POWER COMPANY FOR )  
AUTHORITY TO INCREASE ITS RATES AND )  
CHARGES FOR ELECTRIC SERVICE IN THE )  
STATE OF IDAHO AND FOR ASSOCIATED )  
REGULATORY ACCOUNT TREATMENT )

**TESTIMONY OF DR. LANCE D. KAUFMAN**  
**SUPPORTING THE SETTLEMENT STIPULATION**

**ON BEHALF OF THE**  
**IDAHO IRRIGATION PUMPERS ASSOCIATION, INC.**

**November 15, 2023**

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**I. INTRODUCTION AND SUMMARY**

**Q. PLEASE STATE YOUR NAME AND OCCUPATION.**

A. My name is Lance D. Kaufman. I am a consultant representing utility customers before state public utility commissions in the Northwest and Intermountain West. My witness qualification statement can be found at LDK-2.

**Q. PLEASE IDENTIFY THE PARTY ON WHOSE BEHALF YOU ARE TESTIFYING.**

A. I am testifying on behalf of the Idaho Irrigation Pumper's Association, Inc. ("IIPA"). IIPA is a non-profit trade association whose members are large energy users in the Idaho, including customers receiving electric services from Idaho Power Company ("IPC" or "Company").

**Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

A. I provide testimony on the following items:

- The proposed settlement.

**Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS.**

A. I make the following recommendations:

- Find the proposed settlement results in fair, just, and reasonable rates.

**II. SUMMARY OF IIPA PARTICIPATION IN THIS CASE**

**Q. PLEASE SUMMARIZE IIPA'S PARTICIPATION, ANALYSIS, AND FINDINGS IN THIS CASE.**

A. IIPA reviewed the opening testimony and workpapers of all company witnesses, issued discovery on cost of capital, test year expenses, and cost of service, and developed positions on potentially appropriate adjustments to the Company's filed case. Prior to participation in settlement discussions IIPA identified and quantified potential adjustments related to the following issues:

- 1 1. Cost of capital,
- 2 2. Rate base,
- 3 3. Expenses,
- 4 4. Load forecast,
- 5 5. Irrigation peak rewards program,
- 6 6. Cost of service,
- 7 7. Rate spread, and
- 8 8. Rate design.

9 IIPA participated in settlement discussions on September 18, October 4, and October 5, 2023.

10 During these discussions all issues considered by IIPA, with the exception of net power supply,  
11 were raised and discussed by parties, including IPC. IPC offered reasonable responses to many  
12 of the issues and concerns raised by parties. Between settlement discussions IIPA met with  
13 members and other intervening parties to discuss issues in the case. IIPA proposed many of the  
14 compromises that led to the final settlement proposal and finds the final proposal contains  
15 terms and conditions that are acceptable to the IIPA, provides an appropriate balance between  
16 the participating parties, and will likely result in fair, just and reasonable rates.

17 **Q. PLEASE DESCRIBE YOUR ANALYSIS OF IPC'S COST OF CAPITAL.**

18 A. IIPA submitted discovery and performed analysis of IPC's cost of capital, including estimates  
19 of cost of equity and evaluation of capital structure and cost of debt. IIPA evaluated cost of  
20 capital using discounted cash flow and capital pricing asset models. The cost of equity agreed  
21 to in the stipulation was contained within the range of estimates of IPC's cost of equity  
22 analysis.

1 IIPA reviewed the company's credit position, debt coverage, debt issuances, and  
2 historical changes in capital structure and did not find any material issues. The overall cost of  
3 capital is consistent with IPC's review.

4 **Q. PLEASE DESCRIBE YOUR REVIEW OF IPC'S EXPENSES**

5 A. IIPA reviewed IPC's base year expense ledgers and test year adjustments. IIPA identified  
6 potential issues with labor escalation, benefits, impacts of turnover on average wage,  
7 depreciation, and tax expense. The final revenue requirement in this case is consistent with  
8 IPC's review of expenses.

9 **Q. PLEASE DESCRIBE YOUR REVIEW OF IPC'S LOAD FORECAST.**

10 A. IIPA compared IPC's proposed billing determinants with the IPC IRP load forecast, and with  
11 the timing decisions imbedded in IPC's requested rate base. IIPA found that billing  
12 determinants did not reflect material anticipated load growth in 2024, and that this was  
13 inconsistent with the basis for IPC's requested rate base. IIPA's primary concern with load  
14 forecast was temporal consistency and IIPA's concerns are addressed in the proposed  
15 stipulation because revenue requirement is based on a level of rate base consistent with IPC's  
16 filed load forecast.

17 **Q. PLEASE DESCRIBE YOUR REVIEW OF IPC'S IRRIGATION PEAK REWARDS**  
18 **PROGRAM.**

19 A. IIPA observed that IPC requested a material increase in demand charges for Schedule 24  
20 Irrigation Service, due in part to increases in IPC's cost of capacity. IIPA was concerned that  
21 the Irrigation Peak Rewards program did not also reflect this increase in cost of capacity. The  
22 proposed settlement includes workshops addressing cost of service modeling and IIPA intends

1 to continue evaluating the peak rewards program in the context of potential revisions to cost of  
2 service modeling in future cases.

3 **Q. PLEASE DESCRIBE YOUR REVIEW OF IPC'S COST OF SERVICE MODEL.**

4 A. IIPA identified several potential changes to IPC's cost of service model. These changes  
5 generally reduced the cost of demand in summer months. The proposed stipulation is  
6 consistent with IIPA's potential changes to cost of service, and parties have agreed to ongoing  
7 workshops and discussions to address IIPA's concerns.

8 **Q. PLEASE DESCRIBE YOUR REVIEW OF IPC'S RATE SPREAD.**

9 A. IIPA's revised cost of service model indicated that excessive costs were allocated to Schedule  
10 24 Agricultural Irrigation Service. IIPA proposed an alternative rate spread that was more  
11 consistent with IIPA's cost of service model during settlement discussions. This alternative rate  
12 spread was adopted in the final proposal and addresses IIPA's rate spread concerns.

13 **Q. PLEASE DESCRIBE YOUR REVIEW OF IPC'S RATE DESIGN.**

14 A. IPC proposed a moderate change to the Schedule 24 monthly fixed charge and a material  
15 increase to Schedule 24 demand charges. IIPA finds the monthly fixed charge change  
16 reasonable, but has ongoing concerns about the large increase to demand charges. While not  
17 specified in the stipulation, IPC has scheduled a meeting with IIPA to discuss treatment of  
18 demand charges in the next general rate case.

19 **Q. ARE ALL OF IIPA'S CONCERNS ADDRESSED IN THE PROPOSED  
20 SETTLEMENT?**

21 A. Yes, all of IIPA's concerns are either directly addressed in the proposed settlement through  
22 changes to revenue requirement and rate spread, or indirectly through agreement for ongoing  
23 collaboration. IIPA recommends that the commission find the proposed settlement to be fair,  
24 just, and reasonable and in the public interest.

1 Q. DOES THIS CONCLUDE YOUR TESTIMONY SUPPORTING THE STIPULATION?

2 A. Yes

## CURRICULUM VITAE

LANCE KAUFMAN  
Western Economics, LLC  
2623 NW Bluebell Place  
Corvallis OR, 97330  
(541) 515-0380  
lance@westernecon.com

### EDUCATION:

University of Oregon	Ph.D.	Economics	2008 – 2013
University of Oregon	M.S.	Economics	2006 – 2008
University of Anchorage Alaska	B.B.A.	Economics	2001 – 2004

### CERTIFICATIONS:

Certified Depreciation Professional	Society of Depreciation Professionals	2018
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### PROFESSIONAL EXPERIENCE:

Consultant	Lance Kaufman Consulting	2014 – Present
Senior Economist	Oregon Public Utility Commission	2015 – 2018
Public Utility Advocate	Alaska Department of Law	2014 – 2015
Senior Economist	Oregon Public Utility Commission	2013 – 2014
Instructor	University of Oregon	2008 – 2012
Research Assistant	University of Alaska Anchorage	2003 – 2008

### PROFESSIONAL MEMBERSHIPS:

Society of Depreciation Professionals	2015 – Present
American Economics Association	2017 – Present

### RESEARCH, CONSULTING, AND ECONOMETRIC ANALYSIS:

- The Municipality of Cedar Falls, Iowa, Cedar Falls, IA 2023  
Retained as a consultant for Cedar Falls Utilities to conduct a depreciation study of their electric, gas, water, and telecommunications utilities.
- Davison Van Cleve, PC, Portland, OR 2023  
Retained as an expert witness for Alliance of Western Energy Consumers regarding revenue requirement, rate spread, and rate design in Portland General Electric Company, Request for a General Rate Revision, Public Utility Commission of Oregon, Docket No. UE 416.
- Davison Van Cleve, PC, Portland, OR 2023  
Retained as an expert witness for Alliance of Western Energy Consumers regarding cost of capital, rate spread, and rate design in PacifiCorp Request for a General Rate Revision, Washington Utilities and Transportation Commission, Docket No. UE-230172.
- Alliance for Retail Energy Markets, La Jolla, CA 2023  
Retained as an expert witness for Alliance for Retail Energy Markets regarding resource adequacy of generation service providers in Arizona Public Service Company, Request



for a General Rate Revision, Arizona Public Utilities Commission, Docket No. E-01345A-22-0144.

- North Carolina Sustainable Energy Association, Raleigh, NC 2023  
Retained as an expert witness for North Carolina Sustainable Energy Association regarding depreciation rates and coal plant securitization in Duke Energy Carolinas, Request for a General Rate Revision, North Carolina Utility Commission Docket No. E-7 Sub 1276.
- Deep Blue Pacific Wind, Portland, OR 2023  
Retained as an expert witness for Deep Blue Pacific Wind regarding least cost planning in Portland General Electric Company, 2023 Integrated Resource Plan, Public Utility Commission of Oregon, Docket No. LC 80.
- Davison Van Cleve, PC, Portland, OR 2022  
Retained as an expert witness for Alliance of Western Energy Consumers regarding revenue requirement, rate spread, and rate design in Portland General Electric Company, Request for a General Rate Revision, Public Utility Commission of Oregon, Docket No. UE 394.
- Davison Van Cleve, PC, Portland, OR 2022  
Retained as an expert witness for Alliance of Western Energy Consumers regarding depreciation rates in Portland General Electric Company Detailed Depreciation Study of Electric Utility Properties, Public Utility Commission of Oregon, Docket No. UM 2152.
- Davison Van Cleve, PC, Portland, OR 2022  
Retained as an expert witness for Alliance of Western Energy Consumers regarding revenue requirement, rate spread, and rate design in Pacific Power Request for a General Rate Revision, Public Utility Commission of Oregon, Docket No. UE 399.
- Davison Van Cleve, PC, Portland, OR 2022  
Retained as an expert witness for Alliance of Western Energy Consumers regarding revenue requirement, rate spread, and rate design in Puget Sound Energy General Rate Case to Update Base Rates, Washington Utility and Transportation Commission, Docket No. UE-220066, UG-220067, UE-210918.
- Davison Van Cleve, PC, Portland, OR 2022  
Retained as an expert witness for Alliance of Western Energy Consumers competitive energy service in AWEC's Investigation into Long-Term Direct Access Programs, Public Utility Commission of Oregon, Docket No. UM 2024.
- Davison Van Cleve, PC, Portland, OR 2021  
Retained as an expert witness for Alliance of Western Energy Consumers competitive energy service in Direct Access Rulemaking, Public Utility Commission of Oregon, Docket No. AR 651.
- Davison Van Cleve, PC, Portland, OR 2022  
Retained as an expert witness for Smart Energy Alliance regarding revenue requirement, rate spread, and rate design in Sierra Pacific General Rate Case to Update Base Rates, Public Utility Commission of Nevada, Docket No. 22-06014.
- Davison Van Cleve, PC, Portland, OR 2022  
Retained as an expert witness for Alliance of Western Energy Consumers regarding revenue requirement, rate spread, and rate design in Avista Corp General Rate Case to

Update Base Rates, Washington Utility and Transportation Commission, Docket No. UE-220053 & UG-220054.

- Georgia Public Service Commission, OR 2022  
Retained as an expert witness for Georgia Public Service Commission depreciation rates and decommissioning costs in Georgia Power Company's 2022 General Rate Case, Georgia Public Service Commission, Docket No. 44280.
- Cable Huston, LLP, Portland, OR 2020  
Retained as an expert witness for Alliance of Western Energy Consumers regarding revenue requirement, rate spread and rate design in Cascade Natural Gas Corporation Request for General Rate Revision, Public Utility Commission of Oregon, Docket No. UG 390.
- Davison Van Cleve, PC, Portland, OR 2020  
Retained as an expert witness for Alliance of Western Energy Consumers regarding net power costs in Portland General Electric Company 2021 Annual Power Cost Update Tariff, Public Utility Commission of Oregon, Docket No. UE 377.
- Davison Van Cleve, PC, Portland, OR 2020  
Retained as an expert witness for Alliance of Western Energy Consumers regarding net power costs in Portland General Electric Company 2021 Annual Update Tariff, Public Utility Commission of Oregon, Docket No. UE 381.
- Davison Van Cleve, PC, Portland, OR 2020  
Retained as an expert witness for Alliance of Western Energy Consumers regarding revenue requirement, rate spread and rate design in Nevada Power Company 2021 General Rate Case, Public Utility Commission of Nevada, Docket No. 20-06003
- Frank & Salahuddin LLC, Denver, Colorado, 2020  
Retained as an expert witness for plaintiffs regarding calculation of lost earnings.
- ba, Denver, Colorado, 2020  
Retained as an expert witness for plaintiffs regarding calculation of lost earnings.
- Level Development Group, LLC, Denver, Colorado, 2020  
Develop real estate valuation model for establishing sale price of newly constructed residential housing.
- Hagens Berman Sobol Shapiro LLP, Phoenix, Arizona, 2020  
**Deposed** as an expert witness for plaintiffs re calculation of economic harm due to breach of contract in Jeff Olberg v. Allstate Insurance Company, Case No. C18-0573-JCC, United States District Court, Western District of Washington at Seattle.
- Hagens Berman Sobol Shapiro LLP, Phoenix, Arizona, 2020  
**Deposed** as an expert witness for plaintiffs re calculation of economic harm due to breach of contract in re Cameron Lundquist v. First National Insurance Company of America, Case No. 18-cv-05301-RJB, United States District Court, Western District of Washington at Tacoma.
- Killmer, Lane, and Newman, LLP, Denver, Colorado, 2020  
**Deposed** as expert witness for plaintiff re racial disparities in police use of force re Brandon Washington V. City Of Aurora, Colorado, Case No. 1:19-cv-01160-RM-MEH, United States District Court, District of Colorado.
- Davison Van Cleve, PC, Portland, OR 2020

- Retained as an expert witness for Alliance of Western Energy Consumers regarding coal plant pollution control investments, coal plant decommissioning costs, rate spread and rate design re PacifiCorp 2020 Request for a General Rate Revision, Public Utility Commission of Oregon Docket No. UE 374.
- Davison Van Cleve, PC, Portland, OR and Washington Attorney General, 2020  
Retained as an expert witness for Packaging Company of America and Washington Public Council regarding decommissioning costs and rate design re PacifiCorp 2020 Request for a General Rate Revision, Washington Utility and Transportation Commission.
  - Sanger Law, PC, Portland, OR, 2019  
Retained as a consultant for Renewable Energy Coalition and for Northwest & Intermountain Power Producers Coalition to provide analysis of PacifiCorp avoided costs in a Utility PURPA Compliance Filing at the Washington Utility and Transportation Commission Docket, No. UE-190666.
  - Sanger Law, PC, Portland, OR, 2019  
Retained as a consultant for Northwest & Intermountain Power Producers Coalition to provide analysis of Portland General Electric avoided costs in support of testimony to the Oregon Legislature.
  - Powder River Basin Resource Council, Laramie, Wyoming, 2019.  
**Testified** as an expert witness for Powder River Basin Resource Council regarding coal plant closures re PacifiCorp 2019 Integrated Resource Plan, Wyoming Public Service Commission Docket No. 90000-147-XI-19.
  - The Law Office of Ralph Lamar, Arvada, CO 2019  
**Deposed** as an expert witness for plaintiffs regarding lost profits of a Farmers insurance agency
  - Jester, Gibson & Moore, Denver, CO 2019  
Retained as an expert witness for plaintiffs regarding lost earnings in an ADEA wrongful termination matter.
  - Albrechta & Coble, Ltd. Fremont, OH 2019  
Retained as an expert witness for plaintiff regarding lost earnings in a race related wrongful termination matter.
  - Conrad Law, PC, Salt Lake City, UT 2019  
Retained as an expert witness for Ellis-Hall Consultants, LLC. regarding economic damages in Ellis-Hall Consultants, LLC. et. al. v. George B. Hofmann IV, United States District Court, District of Utah, Central Division.
  - Davison Van Cleve, PC, Portland, OR 2019  
Retained as an expert witness for Alliance of Western Energy Consumers regarding net variable power cost calculations in PORTLAND GENERAL ELECTRIC COMPANY, 2020 Annual Power Cost Update Tariff Public Utility Commission of Oregon Docket No. UE 359.
  - Sanger Law, PC, Portland, OR, 2019  
**Testified** as an expert witness for Renewable Energy Coalition and Rocky Mountain Coalition for Renewable Energy regarding Qualified Facility avoided costs in Application of Rocky Mountain Power for a Modification of Avoided Cost Methodology

- and Reduced Term of PURPA Power Purchase Agreements Public Service Commission of Wyoming Docket No. 20000-545-ET-18
- Sanger Law, PC, Portland, OR, 2019  
Retained as an expert witness for Cafeto Coffee Company regarding the necessity, design, and location of transmission lines in SPRINGFIELD UTILITY BOARD Petition for Certificate of Public Convenience and Necessity Public Utility Commission of Oregon Docket No. PCN 3.
  - Baumgartner Law, LLC, Denver, CO, 2018  
Retained as an expert witness for plaintiffs re calculation of economic harm due to injury in re Eric Bowman, v. Top Tier Colorado, LLC, Case No. 18CV31359, United States District Court, District of Colorado.
  - Cohen Milstein Sellers & Toll PLLC, Washington DC, 2018  
Retained as an expert witness for plaintiffs re calculation of economic harm due to breach of contract in re Isaac Harris et al. v. Medical Transportation Management, Inc., Civil Action No. 17-1371, United States District Court, District of Columbia.
  - Davison Van Cleve, PC, Portland, OR 2020  
Retained as an expert witness for Alliance of Western Energy Consumers regarding depreciation rates in re PacifiCorp Application for Authority to Implement Revised Depreciation Rates, Public Utility Commission of Oregon Docket No. UM 1968.
  - Davison Van Cleve, PC, Salem, OR and Washington Attorney General, OR 2020  
Retained as an expert witness for Packaging Company of America and Washington Public Council regarding depreciation rates in re Pacific Power 2018 Depreciation Study, Washington Utility and Transportation Commission, Docket No. UE-180778.
  - Hagens Berman Sobol Shapiro LLP, Phoenix, Arizona, 2018  
**Deposed** as an expert witness for plaintiffs re calculation of economic harm due to breach of contract in re Vicky Maldonado and Carter v. Apple Inc., AppleCare Services Company, Inc., and Apple CSC, Inc., Case No. 3:16-cv-04067-WHO, United States District Court, District of California.
  - Hagens Berman Sobol Shapiro, LLP, Phoenix, Arizona, 2018  
**Deposed and testified** as an expert witness for plaintiffs re calculation of unpaid mileage for truck drivers in re Swift Transportation Co., Inc., Civil Action No. CV2004-001777, Superior Court of the State of Arizona, County of Maricopa.
  - Killmer, Lane, and Newman, LLP, Denver, Colorado, 2018  
Retained as expert witness for plaintiffs re reasonable attorney fees in re Jeanne Stroup and Ruben Lee, v. United Airlines, Inc., Case No. 15-cv-01389-WYD-STV, United States District Court, District of Colorado.
  - Klein and Frank, PC, Denver, Colorado, 2018  
Retained as expert witness for plaintiffs re potential jury bias in re Gail Goehrig and Chris Goehrig v. Core Mountain Enterprises, LLC, Case No. 2016CV030004, San Juan County District Court.
  - Robert Belluso, Pennsylvania, 2017  
Retained as expert witness for plaintiff re lost profit in re Robert Belluso D.O. v Trustees of Charleroi Community Park, PHRC Case No. 201505365, Pennsylvania Human Relations Commission.
  - Lowery Parady, LLC, Denver, Colorado, 2017

Analyzed payroll data and calculated unpaid overtime and unpaid hours for plaintiff class action in re Violeta Solis, et al. v. The Circle Group, LLC, et al., Case No. 1:16-cv-01329-RBJ, United States District Court, District of Colorado.

- Sawaya & Miller Law Firm, Denver, Colorado, 2017  
Provided data processing and analysis of employment records.
- Financial Scholars Group, Orinda, California, 2017  
Provided analysis of risk profile in bundled real estate and personal loans in re Old Republic Insurance Company v. Countrywide Bank et al., Circuit Court of Cook County, Illinois, Chancery Division.
- Financial Scholars Group, Orinda, California, 2017  
Provided consultation and analysis of financial market transactions in preparation of settlement claims filings in re Laydon v. Mizuho Bank, Ltd., et al. and Sonterra Capital Master Fund Ltd., et al v. UBS AG et al.
- Clean Energy Action, Boulder, Colorado, 2016 – 2017  
Provided consultation on the appropriate discounting methodology used in energy resource planning in the Public Service Company of Colorado application for approval of the 2016 Electric Resource Plan, Proceeding No. 16A-0396E, Public Utilities Commission of the State of Colorado.
- Confidential Client, 2016  
Provided analysis and report on the probability that distinct crimes are independent events based on geographical analysis of crime rates.
- Christine Lamb and Kevin James Burns, Denver, Colorado, 2016  
Provided data analysis for defendant of the impact of ethnicity on termination decisions in re Aragon et al v. Home Depot USA, Inc., Case No. 1:15-cv- 00466-MCA-KK, United States District Court, District of New Mexico.
- Steptoe & Johnson LLP, Washington, DC, 2015 – 2016  
Programmed analysis of internet traffic data for plaintiffs applying a proprietary probability model developed to identify and verify accounts responsible for repeated infringements of asserted copyrights by defendants' internet subscribers in re BMG Rights Management (US) LLC. and Round Hill Music LP v. Cox Enterprises, Inc., et al., Case No. 1:14-cv-1611(LOG/JFA), United States District Court Eastern District of Virginia, Alexandria Division.
- Padilla & Padilla, PLLC, Denver, Colorado, 2014 – 2016  
Provided research and analysis for plaintiffs re the impact on minority applicants from use of the AccuPlacer Test by the City and County of Denver, and estimated damages in re Marian G. Kerner et al. v. City and County of Denver, Civil Action No. 11-cv-00256-MSK-KMT, United States District Court, District of Colorado.
- U.S. Equal Employment Opportunity Commission, 2013  
Provided statistical analysis of EEOC filings.

#### **OTHER REGULATORY PROCEEDINGS:**

- Portland General Electric 2018 AUT UE 335
- Portland General Electric 2016 Annual Power Cost Variance Docket No. UE 329.
- PacifiCorp 2016 Power Cost Adjustment Mechanism Docket No. UE 327.

- Public Utility Commission of Oregon Staff Investigation into the Treatment of New Facility Direct Access Charges Docket No. UM 1837
- PacifiCorp Oregon Specific Cost Allocation Investigation Docket No. UM 1824.
- PacifiCorp 2018 Transition Adjustment Mechanism Docket No. UE 323.
- Portland General Electric 2018 General Rate Case Docket No. UE 319.
- Avista Corp. 2017 General Rate Case Docket No. UG 325.
- Portland General Electric Affiliated Interest Agreement with Portland General Gas Supply Docket No. UI 376.
- Portland General Electric 2017 Automated Update Tariff Docket No. UE 308
- PacifiCorp 2017 Transition Adjustment Mechanism Docket No. UE 307
- Portland General Electric 2017 Reauthorization of Decoupling Adjustment Docket No. UE 306
- Northwest Natural Gas Investigation of WARM Program Docket No. UM 1750.
- PacifiCorp Investigation into Multi-Jurisdictional Allocation Issues Docket No. UM 1050.
- Idaho Power Company 2015 Power Supply Expense True Up Docket No. UE 305
- Homer Electric Association 2015 Depreciation Study U-15-094
- Submitted prefiled testimony regarding the depreciation study.
- Chugach Electric Association 2015 Rate Case U-15-081
- Developed staff position regarding margin calculations.
- ENSTAR 2014 Rate Case U-14-111
- Submitted prefiled testimony regarding sales forecast.
- Alaska Pacific Environmental Services 2014 Rate Case U-14-114/115/116/117/118  
Submitted prefiled testimony regarding cost allocations, cost of service, cost of capital, affiliated interests, and depreciation.
- Alaska Waste 2014 Rate Case U-14-104/105/106/107  
Submitted prefiled testimony regarding cost of service study, cost of capital, operating ratio, and affiliated interest real estate contracts.
- Fairbanks Natural Gas 2014 Rate Case U-14-102  
Submitted prefiled testimony regarding cost of service study and forecasting models.
- Avista 2015 Rate Case U-14-104  
Submitted analysis supporting OPUC Staff settlement positions regarding Avista's sales and load forecast, decoupling mechanisms and interstate cost allocation methodology. Represented Staff in settlement conferences on November 21, November 26, and December 4, 2013.
- Portland General Electric 2015 Rate Case  
Submitted pre-filed opening testimony addressing PGE's sales forecast, printing and mailing budget forecast, mailing budget, marginal cost study, line extension policy and reactive demand charge. Represented OPUC Staff in settlement conferences on May 20, May 27, and June 12, 2014.
- Portland General Electric 2014 General Rate Case  
Submitted analysis supporting OPUC Staff settlement positions regarding PGE's sales and load forecast, revenue decoupling mechanism, and cost of service study. Represented OPUC Staff in settlement conferences on May 29, June 3, June 6, July 2, and July 9 of 2013. Submitted testimony in support of partial stipulation, pre-filed opening testimony

addressing PGE's decoupling mechanism, and testimony in support of a second partial stipulation.

- PacifiCorp 2014 General Electric Rate Case  
Submitted analysis supporting OPUC Staff settlement positions regarding PacifiCorp's sales and load forecast and cost of service study. Represented Staff in settlement conferences on June 12 through June 14, 2013.