ROCKY MOUNTAIN POWER.
A DIVISION OF PACIFICORP

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November 9, 2022

VIA ELECTRONIC DELIVERY

Idaho Public Utilities Commission
1131 W. Chinden Blvd
Building 8 Suite 201A
Boise, ID 83714

Attn: Jan Noriyuki
Commission Secretary

Re: CASE NO. PAC-E-22-15
IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER FOR AUTHORITY TO IMPLEMENT THE RESIDENTIAL RATE MODERNIZATION PLAN
Errata Filing

Dear Ms. Noriyuki:

On October 20, 2022, Rocky Mountain Power (the "Company") submitted its Application and direct testimony of Robert M. Meredith in the above-referenced matter. Since that submission, the Company was made aware of an error on the header of table 5 and table 6 on page 15 and page 16 of Mr. Meredith's direct testimony. The tables have been corrected to "cents per kWh" to match the units of measurement in the remainder of the testimony. The Company hereby submits the corrected pages from Mr. Meredith's testimony followed by a corrected and clean copy of the entire application.

Informal inquiries may be directed to Ted Weston, Idaho Regulatory Manager at (801) 220-2963.

Sincerely,

Joelle R. Steward
Senior Vice-President of Regulation and Customer Solutions

Enclosures

Rate Design Calculations

Q. What prices does the Company propose for Schedule 1 and Schedule 36 for the five-year Residential Rate Modernization Plan?

A. Exhibit No. 2 shows the proposed prices, billing determinants, and anticipated revenue for the Residential Rate Modernization Plan. The anticipated residential revenue for each year of the transition is the same, demonstrating that the Company's proposed prices are revenue neutral. In each successive year of the transition period, the Customer Service Charge increases and revenue from Energy Charges decreases. Additionally, for Schedule 1, the difference between the first and second block Energy Charges decreases in each transition year until tiered rates are eliminated in the final transition. Table 5 summarizes the proposed prices for Schedule 1 for each year of the transition:

Table 5. Proposed Schedule 1 Prices by Transition Year

	Summer Season		Winter Season		
Transition Year	First Tier Energy Charge (cents/kWh)	Second Tier Energy Charge (cents/kWh)	First Tier Energy Charge (cents/kWh)	Second Tier Energy Charge (cents/kWh)	Customer Service Charge
Present	11.1966	13.0999	9.3305	10.9165	$8.00
1	10.6887	12.2114	8.9073	10.1761	$12.25
2	10.1809	11.3229	8.4841	9.4357	$16.50
3	9.6731	10.4344	8.0609	8.6953	$20.75
4	9.1652	9.5459	7.6377	7.9549	$25.00
5	8.6574	8.6574	7.2145	7.2145	$29.25

Table 6 summarizes the proposed prices for Schedule 36 for each year of the transition:

Table 6. Proposed Schedule 36 Prices by Transition Year

	Summer Season		Winter Season		
Transition Year	On-Peak Energy Charge (cents/kWh)	Off-Peak Energy Charge (cents/kWh)	On-Peak Energy Charge (cents/kWh)	Off-Peak Energy Charge (cents/kWh)	Customer Service Charge
Present	15.2201	5.3672	13.0395	4.9346	$15.00
1	14.8656	5.2422	12.7359	4.8196	$17.75
2	14.5112	5.1172	12.4322	4.7047	$20.75
3*	15.5632	4.9922	13.3335	4.5898	$23.50
4	15.1420	4.8672	12.9726	4.4749	$26.50
5	14.7738	4.7423	12.6572	4.3600	$29.25

* - On-Peak period and seasons change in year three of the transition period.

Q. How were prices for the five-year Residential Rate Modernization transition calculated?

A. The $29.25 Customer Service Charge was calculated by taking residential revenue from both Schedule 1 and Schedule 36 and multiplying by the proportion of cost of service related to all other fixed costs besides production and transmission costs and dividing by the count of monthly Customer Service Charges. This value was rounded to the nearest quarter of a dollar. To determine prices for the transition, the Customer Service Charge was increased by one fifth of the difference between the present Customer Service Charge and $29.25 in each year of the transition.

In the final transition year for Schedule 1, flat seasonal Energy Charges were determined by maintaining the present seasonal differential of 20 percent and solving for the remaining revenue required for the class after removing the proposed Customer Charge revenue. Prices for each transition year were determined by decreasing the energy charge by one fifth of the difference between the present and final transition

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OF COMPLETE FILING

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Attorney for Rocky Mountain Power

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER FOR AUTHORITY TO IMPLEMENT THE RESIDENTIAL RATE MODERNIZATION PLAN	)))))	**CASE NO. PAC-E-22-15** **APPLICATION**

Rocky Mountain Power, a division of PacifiCorp (the "Company"), hereby petitions the Idaho Public Utilities Commission (the "Commission") for authority to modernize its residential rates over a five-year transition period ("Residential Rate Modernization Plan"). In support of this Application, Rocky Mountain Power states:

1. The Company is an Oregon corporation providing electric service to retail customers as Rocky Mountain Power in the states of Idaho, Utah, and Wyoming, and as Pacific Power in the states of California, Oregon, and Washington.

2. Rocky Mountain Power is authorized to do business in the state of Idaho as a public utility providing retail electric service to approximately 86,500 customers. Rocky Mountain Power is a public utility subject to the jurisdiction of the Commission pursuant to Idaho Code § 61-129.

3. This Application is filed pursuant to Commission Procedural Rules 52 and 121 and Idaho Code §§ 61-301, 61-307, 61-622, and 61-623. Commission Procedural Rules 52 and 121 provide for an application to change rates. Idaho Code § 61-623 empowers the Commission to determine the propriety of proposed rate schedules, §§ 61-307 and 61-622

require Commission approval prior to any change in rates, and § 61-301 requires Idaho retail electric rates to be just and reasonable.

4. Communications regarding this Application should be addressed to:

Ted Weston
1407 W. North Temple, Suite 330
Salt Lake City, Utah 84116
Telephone: (801) 220-2963
Email: ted.weston@pacificorp.com

Joe Dallas
825 NE Multnomah, Suite 2000
Portland, OR 97232
Telephone: (360) 560-1937
Email: joseph.dallas@pacificorp.com

In addition, the Company respectfully requests that all data requests regarding this matter be addressed to one or more of the following:

By e-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

5. This Application seeks Commission approval of the Residential Rate Modernization Plan. The Residential Rate Modernization Plan proposes to modify residential rates over a five-year transition period in the following ways:

a) Increase the Customer Service Charge for both Electric Service Schedule No. 1 – Residential Service ("Schedule 1") and Electric Service Schedule No. 36 – Optional Time of Day – Residential Service ("Schedule 36") to $29.25 per month and lower Energy Charges commensurately.

b) Eliminate inclining block tiered rates for Schedule 1, so that Energy Charges are flat in each season.

c) Change the time of use periods in Schedule 36, so the definitions of on- and off-peak periods match those listed on Electric Service Schedule No. 9 – General Service – High Voltage ("Schedule 9").

6. Rocky Mountain Power's direct case consists of this Application and the testimony and exhibits of Robert M. Meredith. Mr. Meredith's testimony provides an overview of the rationale of the Residential Rate Modernization Plan, discusses the calculations that support the Company's proposed multi-year prices, and describes the estimated customer billing impact. Mr. Meredith's testimony is supported by five exhibits. Below is a summary of each exhibit:

a) Exhibit No. 1 contains a break-down of the cost-of-service by different categories for the two residential classes expressed in dollars per kWh and dollars per customer per month.

b) Exhibit No. 2 summarizes the proposed prices, billing determinants, and anticipated revenue for the Residential Rate Modernization Plan.

c) Exhibit No. 3 has the billing comparisons and distribution of the bill impacts to individual customers for the Residential Rate Modernization Plan.

d) Exhibit No. 4 is the Company's proposed redlined revised tariff sheets.

e) Exhibit No. 5 is the Company's proposed revised tariff sheets.

7. As illustrated in the testimony and exhibits of Mr. Meredith, as currently designed, the Company's residential rates do not align well with cost causation. The current residential rate structure is comprised of the Customer Service Charge, which is a monthly fixed charge, and Energy Charges, which are usage- based or volumetric charges. The Customer Service Charge falls far short of covering the fixed costs that are incurred by

residential customers and those fixed costs are therefore recovered through the volumetric Energy Charges. Accordingly, the Company proposes to increase the monthly Customer Service Charge and commensurately lower the volumetric Energy Charge for Schedules 1 and 36 over a five-year transition period to better align residential rates with the cost causation. Further, having the same Customer Service Charge for both Schedule 1 and Schedule 36 would prevent customers from choosing one schedule over the other based upon the Customer Service Charge.

8. As illustrated in the testimony and exhibits of Mr. Meredith, Schedule 1 customers are subject to seasonal inclining block tiered rates that are not economically justified and unduly penalize certain customers. Eliminating tiered rates from Schedule 1 also makes the comparison to Schedule 36, which does not have tiers, easier for customers to assess regarding the potential benefits of time varying pricing. A customer's decision to opt into the voluntary Schedule 36 time of use program should be motivated by a desire to shift load to lower cost times instead of taking advantage of the rate structure. Additionally, the current time of use periods for Schedule 36 do not reflect the times when it is more costly for the Company to serve. In the third year of the Residential Rate Modernization Plan, the time of use definitions for Schedule 36 would be changed, so that the on-peak period aligns with what is used for Schedule 9. These updated time of use periods would give customers a better price signal to prioritize the more critical times when they should shift load.

9. As previously indicated, the Residential Rate Modernization Plan modifies residential rates gradually over a five-year transition period to mitigate impacts on individual customers. While some customer rates will decrease, others will see a slight increase that results from these proposed changes. The Company's customer impact analysis shows that, for

the majority of customers, any monthly impact from the proposed Residential Rate Modernization Plan will be very modest.

10. The Residential Rate Modernization Plan is designed to be revenue neutral and does not increase the overall revenue collected from customers.

11. In accordance with Commission Rule 121.01(g), Rocky Mountain Power's system-wide costs were allocated[1] to Idaho based on the approved 2020 PacifiCorp Inter-Jurisdictional Allocation Protocol ("2020 Protocol").[2]

12. As part of the Residential Rate Modification Plan, the Company plans to host two customer outreach events. At these meetings, the Company will be available to take feedback and answer questions about the plan. Dates and times for these customer outreach events will be determined after a procedural schedule is established for this filing.

13. Rocky Mountain Power is notifying its customers of this Application by means of a press release sent to local media organizations and bill inserts included in customer bills over the course of the November billing cycle. A copy of the press release and bill insert is provided as Attachment No. 1 to this Application. In addition, this Application will be made available for review on the Company's website.

14. The Company believes that consideration of the proposals contained in this Application do not require an evidentiary proceeding, and accordingly requests that this Application be processed under modified procedure pursuant to Rules 201-204, which allows for consideration of these issues by written submissions rather than by an evidentiary hearing.

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[1] *In the Matter of the Application of Rocky Mountain Power for Authority to increase Its Rates and Charges in Idaho and Approval of Proposed Electric Service Schedules and Regulations*, Case No. PAC-E-21-07.
[2] *In the Matter of Rocky Mountain Power s Application for Approval of the 2020 PacifiCorp Inter-Jurisdictional Allocation Protocol*, Case No. PAC-E-19-20, Order No. 34640 (Apr. 22, 2020).

Rocky Mountain Power respectfully requests that the Commission issue an Order authorizing that this proceeding be processed under modified procedure.

15. The Company respectfully submits that the Commission's approval of Rocky Mountain Power's Application is in the public interest because it promotes residential rates that align better with cost causation. In accordance with Commission Rule 121.01(d), Rocky Mountain Power represents that it stands ready for immediate consideration of this Application.

WHEREFORE, Rocky Mountain Power respectfully requests that the Commission issue an Order: (1) authorizing that this proceeding be processed under modified procedure, and (2) approving the implementation of the Residential Rate Modernization Plan effective December 1, 2022.

DATED this 20th day of October 2022.

Respectfully submitted,

By 

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Attorney for Rocky Mountain Power

ROCKY MOUNTAIN POWER.

POWERING YOUR GREATNESS

FOR IMMEDIATE RELEASE
Media Hotline: 801-220-5018

For release Oct. 20, 2022 **FINAL DRAFT, rev. 10-20-22, 9 a.m. MDT**

Changes proposed to modernize residential rates

New prices would better reflect costs and enhance fairness

BOISE — Rocky Mountain Power has proposed updated rates for residential customers to the Idaho Public Utilities Commission for its review and approval. The changes are designed to balance the needs of all customers while the utility continues building the secure energy grid of the future and implements the transition to a net zero emissions future for electricity production.

Residential rates contain two components, a fixed monthly customer service charge and the energy rate, or price per kilowatt-hour. The utility proposes a gradual transition over five years to increase the customer service charge for the two main residential rate schedules, which will allow energy charges to be reduced. The change is proposed for Electric Service Schedule No. 1 – Residential Service, and Electric Service Schedule No. 36 – Optional Time-of-Day Residential Service.

Importantly, these updates to residential rates will not increase the amount of revenue for Rocky Mountain Power. Rather, the change will ensure fairness for all residential customers, whether they are large or small users of electricity. For most customers, the change to their monthly bill will be less than a dollar in each of the annual price changes.

The variable cost of energy that customers use is a relatively small part of the cost of serving residential customers, about 23 percent of the total. The remaining 77 percent of costs are fixed and are not driven by energy consumption. Specifically, in its pricing proposal, the company is requesting to increase the fixed customer service cost to better cover some of these costs which include the costs of installing and maintaining neighborhood equipment, such as poles, wires, transformers and substations, together with billing and other customer services. These costs of maintaining the distribution system and of providing customer service don't change with the volume of energy used.

By increasing the customer service charge to cover local neighborhood equipment and customer service, and decreasing the per kilowatt-hour energy charge, residential customer rates will better cover the actual costs of providing service, and ensure customers pay a fair price for the energy they use.

Rocky Mountain Power proposes to gradually increase the current $8 per month customer service charge to $29.25 per month over five years. At the same time energy charges will be lowered

accordingly, keeping the overall revenue coming to the utility the same. The company proposes the first change, from $8 to $12.25 for Schedule 1, with subsequent changes annually for the next four years. These changes must be approved by the Idaho Public Utilities Commission.

The five-year transition to a more accurate customer service charge is in line with what other Idaho electric utilities charge. A survey of fixed monthly charges for residential customers from 11 other utilities shows that the average is about $23 per month, and ranges from $5 to $40.

In testimony filed to support the request, Rocky Mountain power outlined how the transition would proceed, if approved. The table below shows how the customer service charge would increase over the five-year transition for **Residential Schedule 1 customers**, and how energy charges would be reduced accordingly.

	Summer Season		Winter Season		
Transition Year	First Tier Energy Charge ($/MWh)	Second Tier Energy Charge ($/MWh)	First Tier Energy Charge ($/MWh)	Second Tier Energy Charge ($/MWh)	Customer Service Charge
Present	11.1966	13.0999	9.3305	10.9165	$8.00
1	10.6887	12.2114	8.9073	10.1761	$12.25
2	10.1809	11.3229	8.4841	9.4357	$16.50
3	9.6731	10.4344	8.0609	8.6953	$20.75
4	9.1652	9.5459	7.6377	7.9549	$25.00
5	8.6574	8.6574	7.2145	7.2145	$29.25

For **Schedule 36, Time-of-Use residential customers**, the transition is detailed below:

	Summer Season		Winter Season		
Transition Year	On-Peak Energy Charge ($/MWh)	Off-Peak Energy Charge ($/MWh)	On-Peak Energy Charge ($/MWh)	Off-Peak Energy Charge ($/MWh)	Customer Service Charge
Present	15.2201	5.3672	13.0395	4.9346	$15.00
1	14.8656	5.2422	12.7359	4.8196	$17.75
2	14.5112	5.1172	12.4322	4.7047	$20.75
3*	15.5632	4.9922	13.3335	4.5898	$23.50
4	15.1420	4.8672	12.9726	4.4749	$26.50
5	14.7738	4.7423	12.6572	4.3600	$29.25

* - On-Peak period and seasons change in year three of the transition period.

For customers taking service on Time of Day Schedule 36 the rate modernization plan also includes updates in the third year of the transition to shorten the on-peak period, better aligning the on-peak / off-peak periods with today's costs of providing energy.

For customers taking service on Standard Residential Schedule 1, tiered rates that penalize customers with higher prices for monthly energy usage over 700 kilowatt-hours in the summer season and over 1,000 kilowatt-hours in the winter season, would be phased out over the transition period.

For some smaller energy users, they would pay a little more per month. The most a customer's monthly bill would increase would be about $4 in any of the annual price changes during the transition. Generally, for customers who use more than average, their bills would decrease. For more details on Rocky Mountain Power's filing, visit https://www.rockymountainpower.net/about/rates-regulation/idaho-regulatory-filings.html.

The Idaho commission will examine Rocky Mountain Power's requests and will determine whether the request should be accepted as filed, modified, or rejected. The public will have an opportunity to comment on the proposal as the commission studies the company's request. A copy of the company's application is available for public review on the commission's website, www.puc.idaho.gov, under Case No. PAC-E-22-15. Customers may also subscribe to the commission's RSS feed to receive periodic updates via email. The request is required to be available at the company's offices in Rexburg, Preston, Shelley and Montpelier, or on the company's website above.

Idaho Public Utilities Commission
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11331 W. Chinden Blvd. Building 8, Suite 201-A
Boise, ID 83714

Rocky Mountain Power offices
Rexburg – 127 East Main
Preston – 509 S. 2nd East
Shelley – 852 E. 1400 North
Montpelier – 24852 U.S. Hwy 89

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About Rocky Mountain Power
Rocky Mountain Power provides safe and reliable electric service to more than 1.1 million customers in Utah, Wyoming and Idaho. The company supplies customers with electricity from a diverse portfolio of generating plants including hydroelectric, thermal, wind, geothermal and solar resources. Rocky Mountain Power is part of PacifiCorp, one of the lowest-cost electricity providers in the United States, with two million customers in six western states. For more information, visit www.rockymountainpower.net.

Rocky Mountain Power proposes to modernize residential prices

On October 20, 2022, Rocky Mountain Power filed a request with the Idaho Public Utilities Commission proposing to modernize its prices for residential customers.

Residential rates contain two components, a fixed monthly customer service charge and an energy rate or price per kilowatt-hour. The utility proposes a gradual transition over five years to increase the customer service charge for the two residential rate schedules, which will allow energy charges to be reduced. The change is proposed for Electric Service Schedule No. 1 – Residential Service, and Electric Service Schedule No. 36 – Optional Time-of-Day Residential Service.

For Schedule 1, Rocky Mountain Power proposes to gradually increase the current $8 per month customer service charge to $29.25 per month over five years. At the same time energy charges will be lowered accordingly, keeping the overall revenue coming to the utility the same. The company proposes the first change, from $8 to $12.25 for Schedule 1, with subsequent changes annually for the next four years. These changes must be approved by the Idaho Public Utilities Commission.

If approved, the table below shows how the customer service charge would increase over the five-year transition for **Residential Schedule 1 customers**, and how energy charges would be reduced accordingly.

	Summer Season		Winter Season		
Transition Year	First Tier Energy Charge ($/MWh)	Second Tier Energy Charge ($/MWh)	First Tier Energy Charge ($/MWh)	Second Tier Energy Charge ($/MWh)	Customer Service Charge
Present	11.1966	13.0999	9.3305	10.9165	$8.00
1	10.6887	12.2114	8.9073	10.1761	$12.25
2	10.1809	11.3229	8.4841	9.4357	$16.50
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4	9.1652	9.5459	7.6377	7.9549	$25.00
5	8.6574	8.6574	7.2145	7.2145	$29.25

For **Schedule 36, Time-of-Use residential customers**, the transition is detailed below:

	Summer Season		Winter Season		
Transition Year	On-Peak Energy Charge ($/MWh)	Off-Peak Energy Charge ($/MWh)	On-Peak Energy Charge ($/MWh)	Off-Peak Energy Charge ($/MWh)	Customer Service Charge
Present	15.2201	5.3672	13.0395	4.9346	$15.00
1	14.8656	5.2422	12.7359	4.8196	$17.75
2	14.5112	5.1172	12.4322	4.7047	$20.75
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4	15.1420	4.8672	12.9726	4.4749	$26.50
5	14.7738	4.7423	12.6572	4.3600	$29.25

*On-peak period and seasons change in year three of the transition period.

For customers taking service on Standard Residential Schedule 1, tiered rates that penalize customers with higher prices for monthly energy usage over 700 kWh in the summer season and over 1,000 kWh in the winter season would be phased out over the transition period.

For customers taking service on Time of Day Schedule 36, the request also includes updates in the third year of the transition to shorten the on-peak period, better aligning the on-peak and off-peak periods with today's costs of providing energy.

For most customers, the change to their monthly bill will be less than a dollar in each of the annual price changes. The most a customer's monthly bill would increase would be about $4 in any of the annual price changes during the transition. Generally for customers who use more energy than average, their bills would decrease.

The Idaho commission will examine Rocky Mountain Power's request and will determine whether the request should be accepted as filed, modified, or rejected.

The public may comment on the proposal as the commission studies the company's request. A copy of the company's application is available for public review on the commission's website, www.puc.idaho.gov, under Case No. PAC-E-22-15. Customers may also subscribe to the commission's RSS feed to receive periodic updates via email. The request is also available at the company's offices in Rexburg, Preston, Shelley and Montpelier, or on the web at RockyMountainPower.net/Rates.

Idaho Public Utilities Commission
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Rocky Mountain Power offices
Rexburg – 127 East Main
Preston – 509 S. 2nd East
Shelley – 852 E. 1400 North
Montpelier – 24852 U.S. Hwy 89

ROCKY MOUNTAIN POWER.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER FOR AUTHORITY TO IMPLEMENT THE RESIDENTIAL RATE MODERNIZATION PLAN	))))	**CASE NO. PAC-E-22-15** **DIRECT TESTIMONY OF ROBERT M. MEREDITH - ERRATA**

ROCKY MOUNTAIN POWER

CASE NO. PAC-E-22-15

November 2022

Q. Please state your name, business address and present position with PacifiCorp d/b/a Rocky Mountain Power ("the Company").

A. My name is Robert M. Meredith. My business address is 825 NE Multnomah Street, Suite 2000, Portland, Oregon 97232. My present position is Director, Pricing and Tariff Policy.

Qualifications

Q. Please describe your education and professional background.

A. I have a Bachelor of Science degree in Business Administration and a minor in Economics from Oregon State University. In addition to my formal education, I have attended various industry-related seminars. I have worked for the Company for 18 years in various roles of increasing responsibility in the Customer Service, Regulation, and Integrated Resource Planning departments. I have over 12 years of experience preparing cost of service and pricing related analyses for all of the six states that PacifiCorp serves. In March 2016, I became Manager, Pricing and Cost of Service. In February 2022, I assumed my current position.

Q. What are your responsibilities?

A. I am responsible for regulated retail rates, tariff policy, and cost of service analysis in the Company's six state service territory.

Q. Have you appeared as a witness in previous regulatory proceedings?

A. Yes. I have testified for the Company in regulatory proceedings in Idaho, Utah, Oregon, Wyoming, Washington, and California.

Purpose and Summary

Q. What is the purpose of your testimony?

A. I present the Company's proposal to modernize its residential rates over a five-year transition period ("Residential Rate Modernization Plan").

Q. Please summarize your testimony.

A. In my testimony, I first provide an overview of the Company's Residential Rate Modernization Plan and discuss the rationale behind it. Next, I discuss the calculations supporting the Company's proposed multi-year prices. Finally, I describe the estimated customer billing impacts of the Company's proposal.

Q. Please summarize the exhibits that support your testimony.

A. The exhibits I present in my testimony are as follows:

- Exhibit No. 1 shows a break-down of cost of service by different categories for the two residential classes expressed in dollars per kWh and dollar per customer per month.
- Exhibit No. 2 shows the proposed prices, billing determinants, and anticipated revenue for the Residential Rate Modernization Plan.
- Exhibit No. 3 shows billing comparisons and distributions of the bill impacts to individual customers for the Residential Rate Modernization Plan.
- Exhibit No. 4 is the Company's proposed redlined revised tariff sheets.
- Exhibit No. 5 is the Company's proposed revised tariff sheets.

Residential Rate Modernization Plan Overview

Q. What is the Company's Residential Rate Modernization Plan?

A. The Company proposes a five-year transition period to modify the structure of its

residential rates in the following ways:

1. Increase the Customer Service Charge for both Electric Service Schedule No. 1 – Residential Service ("Schedule 1") and Electric Service Schedule No. 36 – Optional Time of Day – Residential Service ("Schedule 36") to $29.25 per month and lower Energy Charges commensurately. If the Company files a general rates case during the Residential Rate Modernization Plan the rates in this application would be updated to reflect any Commission approved rate changes.
2. Eliminate inclining block tiered rates for Schedule 1, so that Energy Charges are flat in each season.
3. Change the time of use periods in Schedule 36, so that the definitions of on- and off-peak periods match those listed on Electric Service Schedule No. 9 – General Service – High Voltage ("Schedule 9").

Q. When does the Company propose these changes occur?

A. The Company proposes that the first price change occur on December 1, 2022. Subsequent price changes would take effect on December 1 with the final change of the transition occurring on December 1, 2026.

Q. Has the Company provided proposed revised tariffs for these changes?

A. Yes. Exhibit No. 5 contains proposed tariff revisions to Schedules 1 and 36.

Q. Are the proposed tariff revisions to Schedules 1 and 36 revenue neutral for the Company?

A. Yes. The Residential Rate Modernization Plan is revenue neutral and does not modify the Company's revenue requirement.

Q. How does the Company propose the Residential Rate Modernization Plan would operate if the Company had a general rate case in the intervening years of the transition period?

A. If there is a base rate change for residential customers as the result of a general rate case, the Company proposes that the current residential prices at that time as well as the prices laid out for subsequent transition periods would all change by an equal percentage, so that the transition can proceed in an orderly manner.

Residential Rate Modernization Plan Rationale

Q. Why is the Company making this proposal?

A. The Company's current residential rate structure does not adequately reflect cost causation. The electric utility industry requires a significant amount of capital infrastructure, which is largely a fixed cost once infrastructure goes into service. The current residential rate structure is comprised of the Customer Service Charge, which is a monthly fixed charge, and energy charges, which are usage- based or volumetric charges. The Customer Service Charge falls far short of covering the fixed costs that are incurred by residential customers and those fixed costs are therefore recovered through volumetric energy charges. Energy Charges in Schedule 1 are also tiered, so that usage over a specific threshold in a monthly billing period gets priced at a higher rate. The effect of a low Customer Service Charge and tiered energy charges is that customers with low monthly usage are subsidized by customers with higher monthly usage. For Schedule 36, which is an optional time of use rate schedule, the time of use period definitions have been the same for several decades, since the schedule's inception in the early 1980's. The Company proposes modifying those definitions to

better reflect the hourly differences in the Company's cost of providing energy.

Q. Why isn't the Company proposing to make these changes in general rate cases?

A. The Residential Rate Modernization Plan includes a five-year transition to gradually update rate design. Progress was made in the Company's most recent general rate case, Case No. PAC-E-21-07 ("2021 Rate Case"), where the Company proposed and the Commission approved an increase to the residential Customer Service Charge from $5 per month to $8 per month and a partial flattening of tiered Energy Charges. However, rate cases historically have not been filed very often and prior to the 2021 Rate Case, it had been about ten years since the Company's last case in 2011, Case No. PAC-E-11-12. Further, a host of different issues are raised in general rate cases which can make it challenging to make significant progress on rate design. In order to facilitate a transition, the Company is requesting these changes to residential rates now so that the intraclass subsidies between large and small users can be resolved sooner in this proceeding, rather than in a future general rate case, and so that the other issues that arise in a general rate case will not distract from progress on this important topic.

Q. Why is the Company proposing that these changes occur over a five-year transition?

A. The Company is proposing that residential rates be modified gradually over this timeframe to moderate bill impacts on individual customers. While it is important to make these changes to better align rates with the cost of service, this must be balanced with how these changes affect some customers. I will describe later in my testimony the billing impact distribution of the price changes and why the Company's proposal achieves this balance.

Customer Service Charge

Q. What is the Customer Service Charge?

A. The Customer Service Charge is a flat fixed amount that a customer pays every month regardless of usage.

Q. How much is the Customer Service Charge?

A. For Schedule 1, the Customer Service Charge is presently $8 per month.[1] For Schedule 36, it is $15 per month.

Q. What proportion of a residential customer's cost of service is related to fixed costs?

A. On average, the cost of service for a residential customer is $97.32 per month. $22.84 or about 23 percent of this value is energy related. The remaining $74.48 or about 77 percent is fixed and not energy related. Exhibit No. 1 shows in greater detail how cost of service breaks down by category for Schedule 1, Schedule 36, and for all residential customers in total. To develop this exhibit and subsequent exhibits and pricing analysis that I describe in this testimony, the cost-of-service study that the Company filed in the 2021 Rate Case was used, but with the final settled revenue requirement increase of $8.0 million input into the model.

Q. What proportion of revenues from residential customers is recovered through the fixed Customer Service Charge?

A. For Schedule 1, only about nine percent of revenue is recovered through the Customer

[1] The Company recently filed a general rate case with the Commission to better align the revenues collected with the cost of providing electric service to customers. In that case, the Company took the first step in over ten years to increase the Customer Service Charge from $5 to $8 per month. *In the Matter of the Application of Rocky Mountain Power for Authority to increase Its Rates and Charges in Idaho and Approval of Proposed Electric Service Schedules and Regulations*, Case No. PAC-E-21-07, Order No. 35277 (Dec. 27, 2021).

Service Charge. For Schedule 36, only about eleven percent of revenue is recovered through the Customer Service Charge.

Q. Why is this problematic?

A. The Company's current rate structure for residential customers recovers a high proportion of fixed costs through energy charges instead of through fixed charges. This dynamic results in larger customers who use more energy subsidizing smaller customers who use less energy.

Q. What costs does the Company propose be recovered by the Customer Service Charge?

A. The Company proposes to recover all costs related to the distribution system and customer service through the Customer Service Charge. It is appropriate to include these costs in the fixed monthly charges that residential customers pay, because they represent the fixed costs to the Company of delivering power on the distribution system, providing a bill, and responding to customer inquiries. These costs are fixed in nature and do not change with changes in volumetric energy usage. If a residential customer uses more energy, that incremental usage will not cause the Company to deploy more poles and wires or set more transformers, nor will the cost to answer phone calls or send customers a bill change. These costs are therefore appropriately recovered through the fixed Customer Service Charge. The Company proposes to recover all other costs, production, and transmission costs, through Energy Charges.

Q. What Customer Service Charge does the Company propose for the end of the five-year transition?

A. The Company proposes that the Customer Service Charge be set at $29.25 for both

Schedule 1 and Schedule 36.

Q. Why is the Company proposing the same Customer Service Charge for both Schedule 1 and Schedule 36?

A. Schedule 1 and Schedule 36 presently have different Customer Service Charges, because the metering cost has historically been higher for Schedule 36 customers who require usage to be measured by time of day. With the Company's deployment of advanced metering infrastructure ("AMI"), this distinction in metering cost will no longer exist, since any residence equipped with an AMI meter will be able to measure usage by time of day. Additionally, Schedule 36 is an optional rate schedule that residential customers can choose. Ideally, the Company would like residential customers to opt into time of use, because they want the opportunity to save money by shifting usage to off-peak periods, not because they could benefit as a larger user from a rate design that recovers more costs in the Customer Service Charge than the Energy Charge. Having the same Customer Service Charge for both Schedule 1 and Schedule 36 would prevent customers from choosing one schedule or the other based upon the fixed charge/energy charge recovery dynamic.

Q. How does $29.25 per month compare to the basic charges for other electric utilities in Idaho?

A. At $29.25 per month, the Company's residential Customer Service Charge would be within the same range of the fixed monthly rates that other Idaho electric utilities charge residential customers. Table 1 below shows the fixed monthly residential charges for all Idaho electric utilities with more than 1,000 customers:

Table 1. Fixed Monthly Residential Charges for Major Idaho Electric Utilities

Utility	Price
Avista	$7.00
City of Idaho Falls	$18.00
Fall River Rural Electric Coop	$39.00
Idaho Power	$5.00
Inland Power & Light Company	$24.55
Kootenai Electric Cooperative	$32.50
Lower Valley Energy	$16.00
Northern Lights	$30.00
Raft Rural Electric Coop	$22.50
Salmon River Electric Coop	$40.00
United Electric Coop	$22.00
Average	$23.32

Note - Prices were those available from each utility's website as of Septemer 13, 2022

Tiered Energy Charge

Q. Please explain how the Company's current tiered energy charges work for Schedule 1.

A. Schedule 1 customers are subject to seasonal inclining block tiered rates where the price of energy is more expensive when a customer uses more than a given threshold during a monthly billing period. Additionally, energy charges vary in price by season, with higher energy pricing in the summer season of June through October and lower pricing in the winter season of November through May. Table 2 shows the Company's current residential Schedule 1 energy charge prices:

Table 2. Schedule 1 Residential Energy Rates

June through October	
1st 700 kWh	11.1966 ¢/kWh
All additional kWh	13.0999 ¢/kWh
November through May	
1st 1,000 kWh	9.3305 ¢/kWh
All additional kWh	10.9165 ¢/kWh

Q. Historically, why were tiered energy charges implemented?

A. The inclining block rate structure has been used as a tool for encouraging customers to use less energy. The theory is that the first block covers some basic level of usage at a lower rate to help keep the overall bill affordable for customers and a second or third block with a higher rate makes incremental energy usage more expensive to encourage energy efficiency. For a customer with usage in the higher tier, making an energy efficient choice like installing light emitting diode ("LED") light bulbs would yield greater savings than under a flat energy charge rate design.

Q. Do you believe that tiered energy charges encourage energy efficiency?

A. Not necessarily. As explained in more detail below, the total energy that a residential customer uses during a month may vary based upon factors other than energy efficiency like household size and fuel type.

Q. Why is the Company proposing to eliminate energy tiers and move to flat seasonal rates for Schedule 1?

A. While well intentioned, tiered rates produce more problems than they solve because they are not economically justified and unduly penalize customers.

Q. Please explain why tiered rates are not economically justified.

A. There is no cost-based reason why after using 700 kWh or 1,000 kWh in a given month the next kWh consumed by a customer should cost more. On the other hand, the timing

of energy consumption, both seasonally and during different hours, can affect the utility's cost of providing service to the customer. Similarly, the load factor or the effective utilization of kWh consumption relative to peak kilowatt demand can also change the average cost of providing energy. However, additional overall usage in a monthly billing period does not make it incrementally more expensive for the utility to produce that next kWh of electricity.

Q. Please explain why tiered rates unduly penalize customers.

A. Charging higher prices for greater usage in a given month causes larger users to subsidize smaller users. Under a tiered rate structure, customers who heat their home with natural gas benefit and those who use electric heat are punished. A large household with a lot of people living under one roof will be more likely to have usage in the higher second block rate than a person living alone. Effectively, inclining block rates unfairly reward some customers and punish others, often for reasons outside the customer's control.

Q. Do you have any evidence that specific groups of residential customers tend to use more energy per month?

A. Yes. In 2021, the Company conducted an email survey of its customers and collected end use and demographic information from participants. Using this information and comparing the household size indicated by the respondent to average monthly usage at the site, the Company found that there is a clear trend of greater usage for larger household size in the Company's Idaho service territory. Table 3 shows this finding:

Table 3. Usage by Household Size from the 2021 Residential Email Survey

Household Size	Average Monthly Usage (kWh)	Sample Size
1	675	327
2	970	941
3	1,052	288
4	1,074	276
5	1,215	189
6	1,300	158
7 or more	1,316	157

The Company's survey information also indicated that usage is considerably higher for customers who utilize electricity as their main source of heating equipment compared to other fuels. Table 4 shows this information:

Table 4. Usage by Fuel for Main Source of Heating Equipment from the 2021 Residential Email Survey

Fuel for Main Source of Heating Equipment	Average Monthly Usage (kWh)	Sample Size
Electricity	1,414	635
Other (natural gas, propane, oil, wood or pellets)	878	1,867

In summary, the total energy that a residential customer uses during a month may vary based upon factors other than energy efficiency like household size and fuel type. Penalizing customers with a higher cost per kWh for usage in excess of a threshold is unfair and not supported by cost causation.

Q. Is there another reason why eliminating tiers from Schedule 1 is advantageous?

A. Yes. As I indicated earlier in my testimony, ideally a customer's decision to opt into the voluntary Schedule 36 time of use program would be motivated by a desire to shift load to lower cost times instead of to take advantage of a rate structure that favors larger users. Eliminating tiers for Schedule 1 makes the comparison to Schedule 36, which does not have tiers, easier for customers to assess regarding the potential benefits of

time varying pricing.

Time of Use

Q. What are the current time of use periods for Schedule 36 and what changes does the Company propose?

A. Presently, the on-peak period for Schedule 36 is weekdays from 8 A.M. to 11 P.M. during summer months and from 7 A.M. to 10 P.M. during winter months excluding holidays. The off-peak period is during all other times. The summer season is defined as May through October and the winter season is defined as November through April. In the 2021 Rate Case, the month of May was reclassified as a lower cost winter month for most other rate schedules, but not for Schedule 36 because such a change would entail reprogramming meters and did not make sense with AMI deployment close on the horizon.

The Company is proposing that, in the third year of the Residential Rate Modernization Plan, the time of use definitions for Schedule 36 be changed to those used for Schedule 9. Specifically, the on-peak period would be every day from 3 P.M. to 11 P.M. during the summer months and from 6 A.M. to 9 A.M and again from 6 P.M. to 11 P.M. during the winter months. The seasonal definition would be revised so that the month of May would move to the lower cost winter season.

Q. Why is the Company proposing to change the time of use periods for Schedule 36?

A. The time of use periods for Schedule 36, that have been in place since the early 1980's, are no longer reflective of costs and use a long 15-hour period of time during non-holiday weekdays for the on-peak period. The Company is proposing to change the time of use periods to a shorter window of time for the on-peak period that better

reflects times when it is more costly for the Company to serve. This more focused on-peak period would give customers a better price signal to prioritize the more critical times when they should shift load.

Q. Why did the Company select these particular on-/off-peak periods for Schedule 36?

A. In the 2021 Rate Case, the Company identified these hours as the times during both seasons when the Energy Imbalance Market ("EIM") pricing was the highest and used them to set time varying pricing definitions that are currently in place for Schedule 9. This analysis was conducted recently, and the Company does not believe that a more current evaluation is necessary.

Q. Why is the Company proposing that this change take place in the third year of the transition plan?

A. While AMI deployment is well underway, it is not yet completed. Waiting until AMI is deployed is important, because AMI meters can be re-programmed to use new time of use periods remotely without the need to send a truck to the site and have a meterman physically re-program the meter. Additionally, the time of use periods for Schedule 36 have been in place for a very long period of time. The Company is therefore requesting that this change occurs in the third year of the transition, so that AMI will be fully deployed, and the Company will have an opportunity to properly notify customers of the change.

Rate Design Calculations

Q. What prices does the Company propose for Schedule 1 and Schedule 36 for the five-year Residential Rate Modernization Plan?

A. Exhibit No. 2 shows the proposed prices, billing determinants, and anticipated revenue for the Residential Rate Modernization Plan. The anticipated residential revenue for each year of the transition is the same, demonstrating that the Company's proposed prices are revenue neutral. In each successive year of the transition period, the Customer Service Charge increases and revenue from Energy Charges decreases. Additionally, for Schedule 1, the difference between the first and second block Energy Charges decreases in each transition year until tiered rates are eliminated in the final transition. Table 5 summarizes the proposed prices for Schedule 1 for each year of the transition:

Table 5. Proposed Schedule 1 Prices by Transition Year

	Summer Season		Winter Season		
Transition Year	First Tier Energy Charge (cents/kWh)	Second Tier Energy Charge (cents/kWh)	First Tier Energy Charge (cents/kWh)	Second Tier Energy Charge (cents/kWh)	Customer Service Charge
Present	11.1966	13.0999	9.3305	10.9165	$8.00
1	10.6887	12.2114	8.9073	10.1761	$12.25
2	10.1809	11.3229	8.4841	9.4357	$16.50
3	9.6731	10.4344	8.0609	8.6953	$20.75
4	9.1652	9.5459	7.6377	7.9549	$25.00
5	8.6574	8.6574	7.2145	7.2145	$29.25

Table 6 summarizes the proposed prices for Schedule 36 for each year of the transition:

Table 6. Proposed Schedule 36 Prices by Transition Year

	Summer Season		Winter Season		
Transition Year	On-Peak Energy Charge (cents/kWh)	Off-Peak Energy Charge (cents/kWh)	On-Peak Energy Charge (cents/kWh)	Off-Peak Energy Charge (cents/kWh)	Customer Service Charge
Present	15.2201	5.3672	13.0395	4.9346	$15.00
1	14.8656	5.2422	12.7359	4.8196	$17.75
2	14.5112	5.1172	12.4322	4.7047	$20.75
3*	15.5632	4.9922	13.3335	4.5898	$23.50
4	15.1420	4.8672	12.9726	4.4749	$26.50
5	14.7738	4.7423	12.6572	4.3600	$29.25

* - On-Peak period and seasons change in year three of the transition period.

Q. How were prices for the five-year Residential Rate Modernization transition calculated?

A. The $29.25 Customer Service Charge was calculated by taking residential revenue from both Schedule 1 and Schedule 36 and multiplying by the proportion of cost of service related to all other fixed costs besides production and transmission costs and dividing by the count of monthly Customer Service Charges. This value was rounded to the nearest quarter of a dollar. To determine prices for the transition, the Customer Service Charge was increased by one fifth of the difference between the present Customer Service Charge and $29.25 in each year of the transition.

In the final transition year for Schedule 1, flat seasonal Energy Charges were determined by maintaining the present seasonal differential of 20 percent and solving for the remaining revenue required for the class after removing the proposed Customer Charge revenue. Prices for each transition year were determined by decreasing the energy charge by one fifth of the difference between the present and final transition

year price in each subsequent period.

To determine proposed Schedule 36 Energy Charges, the final transition year off-peak energy charges were set at a level that was proportionately lower to reflect the increase in the recovery from the higher Customer Service Charge. Off-peak energy charges were calculated for each year of the transition similar to how Schedule 1 Energy Charges during the transition were determined with the off-peak energy charges being set for each year of the transition by decreasing by one fifth of the difference between final and present off-peak energy charges for each subsequent period. The on-peak energy charges were calculated by solving for the prices required to make up the remaining revenue needed for the class while maintaining the same relative seasonal differential. In the third year of the transition, the billing determinants for on- and off-peak energy were modified to reflect the change in the time of use definitions. On- and off-peak energy from the new time of use periods were estimated from hourly load research information.

Customer Bill Impacts

Q. How would the Company's proposed Residential Rate Modernization impact customers at different usage levels?

A. Exhibit No. 3 shows bill comparisons for the proposed transition. Page one of Exhibit No. 3 shows a bill comparison table, similar to the ones the Company uses in rate cases, for the bill impact of the first year of the transition for Schedule 1 customers across different usage levels. The largest increase across the different usage levels shown is a $3.88 per month increase for a customer using 100 kWh. Page two shows the same thing, but for the change over the entire transition. The largest increase for the usage

levels shown for the entire transition is $19.38 per month for the same typical customer using 100 kWh per month. The difference between these values demonstrates the need to make the changes in price over the requested five-year period to moderate customer impacts. Pages three and four of Exhibit No. 3 show the same information, except for the proposed transition for Schedule 36.

Q. Did the Company prepare an analysis that examines the impact on individual customers that would result from the Company's proposed Residential Rate Modernization Plan?

A. Yes. Page five of Exhibit No. 3 shows the distribution of impacts across Schedule 1 customers examining their actual monthly usages for the first-year price change of the transition. Page six of Exhibit No. 3 shows the same thing but expressed in percentage terms. Pages seven and eight of Exhibit No. 3 show the same analysis as is presented on pages five and six, but for the price change across the entire five-year transition. Pages nine through 12 show the same estimated bill impact distribution analysis for Schedule 36 customers. Hourly usage for individual Schedule 36 customers is not available, so the impacts shown assume that each Schedule 36 customer has the average profile estimated from load research. The analysis of the customer impact distributions shows that for the majority of customers, the monthly impact of the Company's proposal will be very modest.

Customer Outreach

Q. Does the Company plan to do any customer outreach for its proposal?

A. Yes. In addition to the usual customer noticing required for rate changes, the Company plans to host two customer outreach events where customers can provide feedback to

and ask questions of Company personnel about the Residential Rate Modernization Plan. The Company plans to schedule these events after a procedural schedule is established for this filing.

Conclusion

Q. What is your recommendation to the Commission?

A. I recommend that the Commission approve the Company's Residential Rate Modernization Plan with its associated tariff revisions.

Q. Does this conclude your direct testimony?

A. Yes.

Case No. PAC-E-22-15
Exhibit No. 1
Witness: Robert M. Meredith

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

ROCKY MOUNTAIN POWER

Exhibit Accompanying Direct Testimony of Robert M. Meredith

October 2022

Rocky Mountain Power
State of Idaho
Cost of Service Unit Cost Summary

	Schedule 1		Schedule 36		All Residential	
Description	$/KWH	$/customer-mo	$/KWH	$/customer-mo	$/KWH	$/customer-mo
PRODUCTION-DEMAND	0.041	31.82	0.037	51.50	0.040	35.24
PRODUCTION-ENERGY	0.022	17.43	0.022	31.26	0.022	19.83
TRANSMISSION-DEMAND	0.012	9.32	0.011	15.31	0.012	10.36
TRANSMISSION-ENERGY	0.003	2.66	0.003	4.68	0.003	3.01
DISTRIBUTION-SUBSTATION	0.001	1.16	0.001	1.47	0.001	1.22
DISTRIBUTION- P & C	0.013	10.14	0.009	13.26	0.012	10.68
DISTRIBUTION-TRANSFORMER	0.007	5.38	0.005	6.97	0.006	5.65
DISTRIBUTION-SERVICE	0.005	3.62	0.003	3.79	0.004	3.65
DISTRIBUTION-METER	0.001	1.04	0.001	1.28	0.001	1.08
RETAIL	0.007	5.70	0.004	6.09	0.006	5.77
MISC	0.001	0.76	0.001	1.12	0.001	0.83
Total	0.114	89.03	0.098	136.73	0.109	97.32
Total - Energy-Related	*0.026*	*20.08*	*0.026*	*35.93*	*0.026*	*22.84*
Total - All Others	*0.088*	*68.95*	*0.072*	*100.79*	*0.084*	*74.48*

Case No. PAC-E-22-15
Exhibit No. 2
Witness: Robert M. Meredith

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

ROCKY MOUNTAIN POWER

Exhibit Accompanying Direct Testimony of Robert M. Meredith

October 2022

ROCKY MOUNTAIN POWER
STATE OF IDAHO
NORMALIZED BILLING DETERMINANTS
ADJUSTED HISTORICAL 12 MONTHS ENDED DECEMBER 2020

	Adjusted 2020 Units	Present Price	Present Revenue Dollars	Year End State Price	5 Revenue Dollars	Year 1 Price	Year 1 Revenue Dollars	Year 2 Price	Year 2 Revenue Dollars	Year 3 Price	Year 3 Revenue Dollars	Year 4 Price	Year 4 Revenue Dollars
SCHEDULE NO. 1 - Residential Service													
Customer Charge	667,912	$8.00	$5,343,296	$29.25	$19,536,426	$12.25	$8,181,922	$16.50	$11,020,548	$20.75	$13,859,174	$25.00	$16,697,800
Seasonal Service Charge	1	$96.00	$96	$351.00	$351	$147.00	$147	$198.00	$198	$249.00	$249	$300.00	$300
All kWh (Jun - Oct)													
<= 700 kWh	139,307,348	11.1966 ¢	$15,597,626	8.6574 ¢	$12,060,390	10.6887 ¢	$14,890,179	10.1809 ¢	$14,182,732	9.6731 ¢	$13,475,284	9.1652 ¢	$12,767,837
> 700 kWh	55,100,424	13.0999 ¢	$7,218,076	8.6574 ¢	$4,770,262	12.2114 ¢	$6,728,514	11.3229 ¢	$6,238,951	10.4344 ¢	$5,749,388	9.5459 ¢	$5,259,825
All kWh (Nov - May)													
<= 1,000 kWh	241,159,647	9.3305 ¢	$22,501,313	7.2145 ¢	$17,398,456	8.9073 ¢	$21,480,742	8.4841 ¢	$20,460,171	8.0609 ¢	$19,439,599	7.6377 ¢	$18,419,028
> 1,000 kWh	87,758,124	10.9165 ¢	$9,580,157	7.2145 ¢	$6,331,308	10.1761 ¢	$8,930,387	9.4357 ¢	$8,280,617	8.6953 ¢	$7,630,847	7.9549 ¢	$6,981,077
Subtotal	523,325,543		$60,240,564		$60,097,193		$60,211,891		$60,183,217		$60,154,541		$60,125,867
Temperature Adj. (Jun-Oct) <= 700 kWh	(3,190,194)	11.1966 ¢	($357,192)	8.6574 ¢	($276,188)	10.6887 ¢	($340,991)	10.1809 ¢	($324,790)	9.6731 ¢	($308,589)	9.1652 ¢	($292,389)
Temperature Adj. (Jun-Oct) > 700 kWh	(1,261,822)	13.0999 ¢	($165,297)	8.6574 ¢	($109,241)	12.2114 ¢	($154,086)	11.3229 ¢	($142,874)	10.4344 ¢	($131,663)	9.5459 ¢	($120,452)
Temperature Adj. (Nov-May) <= 1,000 kWh	(182,214)	9.3305 ¢	($17,001)	7.2145 ¢	($13,146)	8.9073 ¢	($16,230)	8.4841 ¢	($15,459)	8.0609 ¢	($14,688)	7.6377 ¢	($13,917)
Temperature Adj. (Nov-May) > 1,000 kWh	(66,308)	10.9165 ¢	($7,239)	7.2145 ¢	($4,784)	10.1761 ¢	($6,748)	9.4357 ¢	($6,257)	8.6953 ¢	($5,766)	7.9549 ¢	($5,275)
Subtotal	(4,700,538)		($546,729)		($403,359)		($518,055)		($489,380)		($460,706)		($432,033)
Unbilled	4,481,734		$453,357		$453,357		$453,357		$453,357		$453,357		$453,357
Total	523,106,739		$60,147,192		$60,147,191		$60,147,193		$60,147,194		$60,147,192		$60,147,191
	Tier diff	1.9033		0		1.5226		1.1420		0.7613		0.3807	
	Season diff	1.2		1.2	4	1.2		1.2		1.2		1.2	
	Decimal			8	0								
SCHEDULE NO. 36 - Residential Service Optional TOD													
Customer Charge	140,530	$15.00	$2,107,950	$29.25	$4,110,503	$17.75	$2,494,408	$20.75	$2,915,998	$23.50	$3,302,455	$26.50	$3,724,045
Seasonal Service Charge	0	$180.00	$0	$351.00	$0	$213.00	$0	$249.00	$0	$282.00	$0	$318.00	$0
On-Peak kWh (June - Oct)	*23,025,427*			*14.7738 ¢*	*$3,401,740*					*15.5632 ¢*	*$3,583,502*	*15.1420 ¢*	*$3,486,507*
Off-Peak kWh (June - Oct)	*35,898,561*			*4.7423 ¢*	*$1,702,402*					*4.9922 ¢*	*$1,792,141*	*4.8672 ¢*	*$1,747,271*
On-Peak kWh (Nov - May)	*51,012,076*			*12.6572 ¢*	*$6,456,721*					*13.3335 ¢*	*$6,801,716*	*12.9726 ¢*	*$6,617,613*
Off-Peak kWh (Nov - May)	*86,424,295*			*4.3600 ¢*	*$3,768,088*					*4.5898 ¢*	*$3,966,716*	*4.4749 ¢*	*$3,867,402*
Subtotal	*196,360,359*		*$0*		*$15,328,951*		*$0*		*$0*		*$16,144,075*		*$15,718,793*
Temperature Adj. (June-Oct) - On-Peak	*(199,876)*			*14.7738 ¢*	*($29,529)*					*15.5632 ¢*	*($31,107)*	*15.1420 ¢*	*($30,265)*
Temperature Adj. (June-Oct) - Off-Peak	*(311,623)*			*4.7423 ¢*	*($14,778)*					*4.9922 ¢*	*($15,557)*	*4.8672 ¢*	*($15,167)*
Temperature Adj. (Nov-May) - On-Peak	*(442,819)*			*12.6572 ¢*	*($56,049)*					*13.3335 ¢*	*($59,043)*	*12.9726 ¢*	*($57,445)*
Temperature Adj. (Nov-May) - Off-Peak	*(750,220)*			*4.3600 ¢*	*($32,709)*					*4.5898 ¢*	*($34,434)*	*4.4749 ¢*	*($33,572)*
Subtotal	*(1,704,538)*		*$0*		*($133,065)*		*$0*		*$0*		*($140,141)*		*($136,449)*
On-Peak kWh (May - Oct)	32,898,588	15.2201 ¢	$5,007,182	13.4479 ¢	$4,424,155	14.8656 ¢	$4,890,576	14.5112 ¢	$4,773,971	14.1567 ¢	$4,657,366	13.8023 ¢	$4,540,761
Off-Peak kWh (May - Oct)	42,534,180	5.3672 ¢	$2,282,896	4.7423 ¢	$2,017,080	5.2422 ¢	$2,229,733	5.1172 ¢	$2,176,570	4.9922 ¢	$2,123,407	4.8672 ¢	$2,070,243
On-Peak kWh (Nov - Apr)	50,633,712	13.0395 ¢	$6,602,394	11.5212 ¢	$5,833,624	12.7359 ¢	$6,448,640	12.4322 ¢	$6,294,886	12.1285 ¢	$6,141,132	11.8249 ¢	$5,987,378
Off-Peak kWh (Nov - Apr)	70,293,879	4.9346 ¢	$3,468,692	4.3600 ¢	$3,064,804	4.8196 ¢	$3,387,915	4.7047 ¢	$3,307,137	4.5898 ¢	$3,226,359	4.4749 ¢	$3,145,582
Subtotal	196,360,359		$17,361,164		$15,339,663		$16,956,864		$16,552,564		$16,148,264		$15,743,964
Temperature Adj. (May-Oct) - On-Peak	(677,898)	15.2201 ¢	($103,176)	13.4479 ¢	($91,163)	14.8656 ¢	($100,774)	14.5112 ¢	($98,371)	14.1567 ¢	($95,968)	13.8023 ¢	($93,565)
Temperature Adj. (May-Oct) - Off-Peak	(876,446)	5.3672 ¢	($47,041)	4.7423 ¢	($41,563)	5.2422 ¢	($45,945)	5.1172 ¢	($44,850)	4.9922 ¢	($43,754)	4.8672 ¢	($42,659)
Temperature Adj. (Nov-Apr) - On-Peak	(62,888)	13.0395 ¢	($8,200)	11.5212 ¢	($7,245)	12.7359 ¢	($8,009)	12.4322 ¢	($7,818)	12.1285 ¢	($7,627)	11.8249 ¢	($7,436)
Temperature Adj. (Nov-Apr) - Off-Peak	(87,306)	4.9346 ¢	($4,308)	4.3600 ¢	($3,807)	4.8196 ¢	($4,208)	4.7047 ¢	($4,108)	4.5898 ¢	($4,007)	4.4749 ¢	($3,907)
Subtotal	(1,704,538)		($162,725)		($143,778)		($158,936)		($155,147)		($151,356)		($147,567)
Unbilled	1,681,621		$141,671		$141,671		$141,671		$141,671		$141,671		$141,671
Total-Present TOU	196,337,442		$19,448,060		$19,448,059		$19,434,007		$19,455,086		$19,441,034		$19,462,113
Total-Proposed TOU	196,337,442				$19,448,060						$19,448,060		$19,448,060
On-Off Peak Ratio-Preset TOU-Summer	Summer	284%		284%		284%		284%		284%		284%	
On-Off Peak Ratio-Preset TOU-Winter	Winter	264%		264%		264%		264%		264%		264%	
On-Off Peak Ratio-Proposed TOU-Summer	Summer			312%						312%		311%	
On-Off Peak Ratio-Proposed TOU-Winter	Winter			290%	4					291%		290%	
	Decimal			8	0								

Case No. PAC-E-22-15
Exhibit No. 3
Witness: Robert M. Meredith

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

ROCKY MOUNTAIN POWER

Exhibit Accompanying Direct Testimony of Robert M. Meredith

October 2022

Rocky Mountain Power
State of Idaho
Monthly Billing Comparison
First Year Change
Schedule 1
Residential Service

	Monthly Billing[1]				Change				Annual	
	Present		Year 1		$		%		Average Change	
kWh	Summer	Winter	Summer	Winter	Summer	Winter	Summer	Winter	$	%
100	$19.18	$17.27	$23.01	$21.19	$3.83	$3.91	19.9%	22.7%	$3.88	21.5%
200	$30.19	$26.37	$33.49	$29.85	$3.31	$3.48	11.0%	13.2%	$3.41	12.2%
300	$41.19	$35.46	$43.98	$38.51	$2.79	$3.05	6.8%	8.6%	$2.94	7.8%
400	$52.19	$44.56	$54.46	$47.17	$2.27	$2.61	4.3%	5.9%	$2.47	5.2%
500	$63.19	$53.65	$64.94	$55.84	$1.75	$2.18	2.8%	4.1%	$2.00	3.5%
600	$74.20	$62.75	$75.43	$64.50	$1.23	$1.75	1.7%	2.8%	$1.53	2.3%
700	$85.20	$71.84	$85.91	$73.16	$0.71	$1.32	0.8%	1.8%	$1.06	1.4%
783 a	$95.95	$79.39	$95.90	$80.35	($0.04)	$0.96	0.0%	1.2%	$0.54	0.6%
800	$98.15	$80.94	$97.95	$81.82	($0.20)	$0.88	-0.2%	1.1%	$0.43	0.5%
900	$111.10	$90.03	$109.99	$90.48	($1.11)	$0.45	-1.0%	0.5%	($0.20)	-0.2%
1,000	$124.05	$99.13	$122.03	$99.14	($2.01)	$0.02	-1.6%	0.0%	($0.83)	-0.8%
1,200	$149.94	$120.56	$146.11	$119.06	($3.83)	($1.50)	-2.6%	-1.2%	($2.47)	-1.9%
1,400	$175.84	$141.99	$170.19	$138.98	($5.65)	($3.01)	-3.2%	-2.1%	($4.11)	-2.6%
1,600	$201.74	$163.42	$194.27	$158.90	($7.47)	($4.52)	-3.7%	-2.8%	($5.75)	-3.2%
1,800	$227.64	$184.86	$218.35	$178.82	($9.28)	($6.04)	-4.1%	-3.3%	($7.39)	-3.6%
2,000	$253.53	$206.29	$242.43	$198.74	($11.10)	($7.55)	-4.4%	-3.7%	($9.03)	-4.0%
2,500	$318.28	$259.87	$302.64	$248.53	($15.64)	($11.34)	-4.9%	-4.4%	($13.13)	-4.6%
3,000	$383.02	$313.45	$362.84	$298.33	($20.18)	($15.12)	-5.3%	-4.8%	($17.23)	-5.0%
5,000	$642.00	$527.78	$603.64	$497.52	($38.35)	($30.26)	-6.0%	-5.7%	($33.63)	-5.8%

[1] Includes current Schedule 34-BPA Credit, ECAM, TAA and Customer Efficiency Services Rate Adjustment.

a: Annual average usage.

Rocky Mountain Power
State of Idaho
Monthly Billing Comparison
Change Over Full Transition Period
Schedule 1
Residential Service

	Monthly Billing[1]				Change				Annual	
	Present		Year 5		$		%		Average Change	
kWh	Summer	Winter	Summer	Winter	Summer	Winter	Summer	Winter	$	%
100	$19.18	$17.27	$38.31	$36.84	$19.13	$19.56	99.7%	113.3%	$19.38	107.3%
200	$30.19	$26.37	$46.72	$43.77	$16.54	$17.40	54.8%	66.0%	$17.04	60.9%
300	$41.19	$35.46	$55.13	$50.70	$13.94	$15.24	33.8%	43.0%	$14.70	38.8%
400	$52.19	$44.56	$63.53	$57.63	$11.34	$13.07	21.7%	29.3%	$12.35	25.9%
500	$63.19	$53.65	$71.94	$64.56	$8.75	$10.91	13.8%	20.3%	$10.01	17.4%
600	$74.20	$62.75	$80.35	$71.49	$6.15	$8.75	8.3%	13.9%	$7.66	11.4%
700	$85.20	$71.84	$88.75	$78.43	$3.55	$6.58	4.2%	9.2%	$5.32	6.9%
783 a	$95.95	$79.39	$95.73	$84.18	($0.22)	$4.79	-0.2%	6.0%	$2.70	3.1%
800	$98.15	$80.94	$97.16	$85.36	($0.99)	$4.42	-1.0%	5.5%	$2.17	2.5%
900	$111.10	$90.03	$105.57	$92.29	($5.53)	$2.26	-5.0%	2.5%	($0.99)	-1.0%
1,000	$124.05	$99.13	$113.97	$99.22	($10.07)	$0.09	-8.1%	0.1%	($4.14)	-3.8%
1,200	$149.94	$120.56	$130.78	$113.08	($19.16)	($7.48)	-12.8%	-6.2%	($12.34)	-9.3%
1,400	$175.84	$141.99	$147.60	$126.94	($28.24)	($15.05)	-16.1%	-10.6%	($20.55)	-13.2%
1,600	$201.74	$163.42	$164.41	$140.80	($37.33)	($22.62)	-18.5%	-13.8%	($28.75)	-16.0%
1,800	$227.64	$184.86	$181.22	$154.67	($46.41)	($30.19)	-20.4%	-16.3%	($36.95)	-18.2%
2,000	$253.53	$206.29	$198.04	$168.53	($55.50)	($37.76)	-21.9%	-18.3%	($45.15)	-20.0%
2,500	$318.28	$259.87	$240.07	$203.18	($78.21)	($56.69)	-24.6%	-21.8%	($65.66)	-23.1%
3,000	$383.02	$313.45	$282.10	$237.84	($100.92)	($75.61)	-26.3%	-24.1%	($86.16)	-25.2%
5,000	$642.00	$527.78	$450.23	$376.46	($191.77)	($151.32)	-29.9%	-28.7%	($168.17)	-29.2%

[1] Includes current Schedule 34-BPA Credit, ECAM, TAA and Customer Efficiency Services Rate Adjustment.

a: Annual average usage.

Rocky Mountain Power
State of Idaho
Monthly Billing Comparison
First Year Change
Schedule 36
Residential Service-Optional Time of Day

	Monthly Billing[1]				Change				Annual	
	Present		Year 1		$		%		Average Change	
kWh	Summer[2]	Winter[3]	Summer[2]	Winter[3]	Summer	Winter	Summer	Winter	$	%
100	$24.84	$23.45	$27.42	$26.06	$2.58	$2.61	10.4%	11.1%	$2.60	10.8%
150	$29.59	$27.50	$32.06	$30.01	$2.47	$2.51	8.3%	9.1%	$2.49	8.7%
200	$34.34	$31.55	$36.69	$33.97	$2.35	$2.41	6.8%	7.7%	$2.38	7.2%
300	$43.85	$39.66	$45.97	$41.88	$2.12	$2.22	4.8%	5.6%	$2.17	5.2%
400	$53.35	$47.77	$55.24	$49.79	$1.89	$2.02	3.5%	4.2%	$1.95	3.9%
500	$62.85	$55.88	$64.51	$57.70	$1.66	$1.82	2.6%	3.3%	$1.74	2.9%
600	$72.36	$63.99	$73.78	$65.61	$1.43	$1.62	2.0%	2.5%	$1.52	2.2%
700	$81.86	$72.10	$83.05	$73.52	$1.19	$1.42	1.5%	2.0%	$1.31	1.7%
800	$91.36	$80.21	$92.32	$81.43	$0.96	$1.22	1.1%	1.5%	$1.09	1.3%
900	$100.86	$88.31	$101.60	$89.34	$0.73	$1.02	0.7%	1.2%	$0.88	0.9%
1,000	$110.37	$96.42	$110.87	$97.25	$0.50	$0.83	0.5%	0.9%	$0.66	0.6%
1,200	$129.37	$112.64	$129.41	$113.07	$0.04	$0.43	0.0%	0.4%	$0.23	0.2%
1,397 *	$148.09	$128.61	$147.68	$128.65	($0.42)	$0.04	-0.3%	0.0%	($0.19)	-0.1%
1,400	$148.38	$128.86	$147.96	$128.89	($0.42)	$0.03	-0.3%	0.0%	($0.20)	-0.1%
1,600	$167.38	$145.07	$166.50	$144.71	($0.88)	($0.37)	-0.5%	-0.3%	($0.62)	-0.4%
1,800	$186.39	$161.29	$185.04	$160.53	($1.35)	($0.76)	-0.7%	-0.5%	($1.05)	-0.6%
2,000	$205.40	$177.51	$203.59	$176.35	($1.81)	($1.16)	-0.9%	-0.7%	($1.48)	-0.8%
2,500	$252.91	$218.05	$249.95	$215.90	($2.96)	($2.15)	-1.2%	-1.0%	($2.56)	-1.1%
3,000	$300.43	$258.59	$296.31	$255.45	($4.12)	($3.14)	-1.4%	-1.2%	($3.63)	-1.3%
5,000	$490.49	$420.76	$481.75	$413.64	($8.74)	($7.12)	-1.8%	-1.7%	($7.93)	-1.7%

[1] Includes current Schedule 34-BPA Credit, ECAM, TAA and Customer Efficiency Services Rate Adjustment.

[2] Bills are based on 44%-56% on-peak to off-peak ratio in the summer

[3] Bills are based on 42%-58% on-peak to off-peak ratio in the winter

* Annual average usage

Rocky Mountain Power
State of Idaho
Monthly Billing Comparison
Change Over Full Transition Period
Schedule 36
Residential Service-Optional Time of Day

		Monthly Billing[1]				Change				Annual	
		Present		Year 5		$		%		Average Change	
kWh		Summer[2]	Winter[3]	Summer[2]	Winter[3]	Summer	Winter	Summer	Winter	$	%
100		$24.84	$23.45	$38.26	$37.02	$13.42	$13.58	54.0%	57.9%	$13.39	55.5%
150		$29.59	$27.50	$42.43	$40.58	$12.84	$13.08	43.4%	47.6%	$12.81	44.9%
200		$34.34	$31.55	$46.60	$44.14	$12.26	$12.59	35.7%	39.9%	$12.22	37.1%
300		$43.85	$39.66	$54.95	$51.26	$11.11	$11.59	25.3%	29.2%	$11.04	26.4%
400		$53.35	$47.77	$63.30	$58.37	$9.95	$10.60	18.7%	22.2%	$9.86	19.5%
500		$62.85	$55.88	$71.65	$65.49	$8.79	$9.61	14.0%	17.2%	$8.69	14.6%
600		$72.36	$63.99	$79.99	$72.60	$7.64	$8.61	10.6%	13.5%	$7.51	11.0%
700		$81.86	$72.10	$88.34	$79.72	$6.48	$7.62	7.9%	10.6%	$6.33	8.2%
800		$91.36	$80.21	$96.69	$86.83	$5.33	$6.63	5.8%	8.3%	$5.16	6.0%
900		$100.86	$88.31	$105.04	$93.95	$4.17	$5.64	4.1%	6.4%	$3.98	4.2%
1,000		$110.37	$96.42	$113.39	$101.06	$3.02	$4.64	2.7%	4.8%	$2.80	2.7%
1,200		$129.37	$112.64	$130.08	$115.30	$0.71	$2.66	0.5%	2.4%	$0.45	0.4%
1,397	*	$148.09	$128.61	$146.53	$129.31	($1.57)	$0.70	-1.1%	0.5%	($1.87)	-1.3%
1,400		$148.38	$128.86	$146.78	$129.53	($1.60)	$0.67	-1.1%	0.5%	($1.90)	-1.4%
1,600		$167.38	$145.07	$163.47	$143.76	($3.91)	($1.31)	-2.3%	-0.9%	($4.26)	-2.7%
1,800		$186.39	$161.29	$180.17	$157.99	($6.22)	($3.30)	-3.3%	-2.0%	($6.61)	-3.8%
2,000		$205.40	$177.51	$196.86	$172.22	($8.53)	($5.29)	-4.2%	-3.0%	($8.96)	-4.7%
2,500		$252.91	$218.05	$238.60	$207.80	($14.31)	($10.25)	-5.7%	-4.7%	($14.85)	-6.3%
3,000		$300.43	$258.59	$280.34	$243.38	($20.08)	($15.21)	-6.7%	-5.9%	($20.73)	-7.4%
5,000		$490.49	$420.76	$447.30	$385.69	($43.19)	($35.07)	-8.8%	-8.3%	($44.26)	-9.7%

[1] Includes current Schedule 34-BPA Credit, ECAM, TAA and Customer Efficiency Services Rate Adjustment.

[2] Bills are based on 44%-56% on-peak to off-peak ratio in the summer

[3] Bills are based on 42%-58% on-peak to off-peak ratio in the winter

* Annual average usage

Rocky Mountain Power
State of Idaho
Schedule 1 - Dollar Distribution of Monthly Bill Impacts across Customers for First Year Change

Change $ Range	Number of Customers	AVG $ Change	AVG KWH
-145	1	-144	19,732
-90	1	-89	11,997
-80	1	-80	11,130
-75	1	-75	10,365
-70	2	-68	9,619
-65	1	-63	8,923
-55	3	-55	7,866
-50	3	-49	7,251
-45	4	-45	6,481
-40	9	-40	5,975
-35	30	-35	5,388
-30	35	-29	4,598
-25	84	-25	4,038
-20	218	-19	3,380
-15	627	-15	2,763
-10	2,154	-9	2,116
-5	7,302	-4	1,466
0	28,687	1	738
5	8,019	3	228

Rocky Mountain Power
State of Idaho
Schedule 1 - Percentage Distribution of Monthly Bill Impacts across Customers for First Year Change

Change % Range	Number of Customers	AVG $ Change	AVG KWH
-6	876	-20	3,390
-3	11,324	-5	1,556
0	15,249	0	856
3	10,085	2	543
6	4,257	3	364
9	1,968	3	264
12	1,063	3	201
15	581	4	156
18	355	4	124
21	246	4	100
24	191	4	80
27	129	4	65
30	110	4	53
33	103	4	41
36	60	4	33
39	64	4	25
42	75	4	18
45	69	4	13
48	51	4	8
51	98	4	3
54	228	4	0

Rocky Mountain Power
State of Idaho
Schedule 1 - Dollar Distribution of Monthly Bill Impacts across Customers Over Full Transition Period

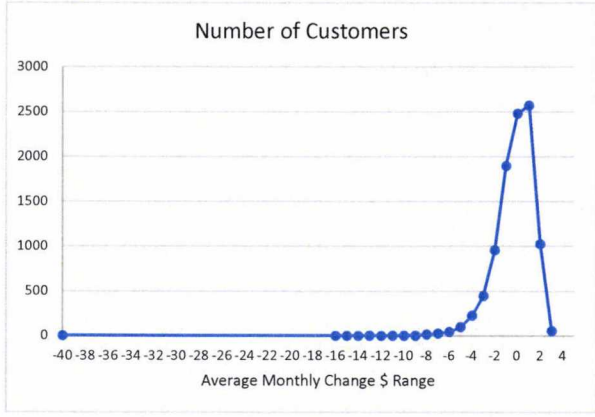
Change $ Range	Number of Customers	AVG $ Change	AVG KWH
-720	1	-721	19,732
-440	1	-446	11,997
-400	1	-401	11,130
-380	1	-376	10,365
-340	2	-342	9,619
-320	1	-316	8,923
-280	3	-276	7,866
-260	1	-252	7,578
-240	2	-242	7,088
-220	6	-219	6,448
-200	7	-195	5,859
-180	22	-180	5,475
-160	18	-160	4,946
-140	40	-140	4,428
-120	79	-120	3,952
-100	174	-98	3,404
-80	390	-79	2,911
-60	1,000	-59	2,403
-40	2,727	-39	1,889
-20	7,352	-18	1,359
0	23,304	2	766
20	12,050	14	297

Rocky Mountain Power
State of Idaho
Schedule 1 - Percentage Distribution of Monthly Bill Impacts across Customers Over Full Transition Period

Change % Range	Number of Customers	AVG $ Change	AVG KWH
-30	876	-98	3,390
-15	11,324	-26	1,556
0	15,247	-1	856
15	10,085	9	543
30	4,258	13	364
45	1,968	15	264
60	1,064	17	201
75	581	18	156
90	355	18	124
105	246	19	100
120	190	19	80
135	130	20	65
150	110	20	53
165	103	20	41
180	60	20	33
195	64	21	25
210	75	21	18
225	69	21	13
240	51	21	8
255	98	21	3
270	228	21	0

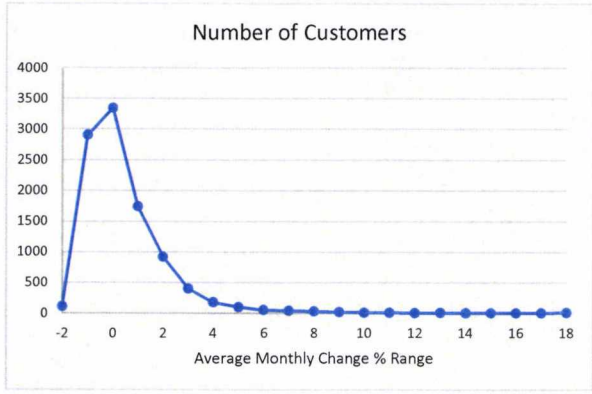
Rocky Mountain Power
State of Idaho
Schedule 36 - Dollar Distribution of Monthly Bill Impacts across Customers for First Year Change

Change $ Range	Number of Customers	AVG $ Change	AVG KWH
-40	1	-40	20,240
-16	1	-16	8,489
-15	1	-15	8,407
-14	2	-14	7,728
-13	5	-13	7,337
-12	2	-12	7,106
-11	5	-11	6,411
-10	3	-10	6,122
-9	6	-9	5,442
-8	17	-8	5,094
-7	29	-7	4,670
-6	46	-6	4,146
-5	99	-5	3,642
-4	228	-4	3,233
-3	448	-3	2,727
-2	956	-2	2,256
-1	1,898	-1	1,791
0	2,483	0	1,317
1	2,572	1	836
2	1,026	2	438
3	56	3	57



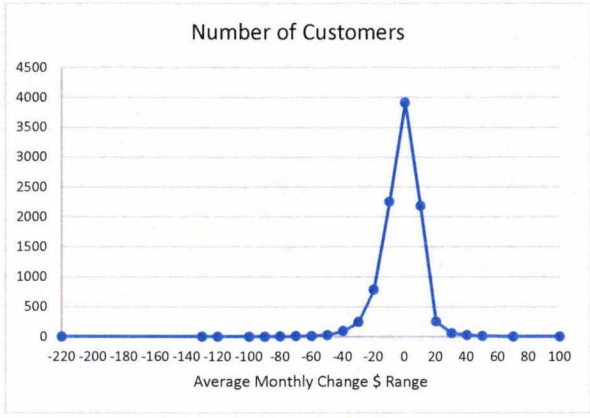
Rocky Mountain Power
State of Idaho
Schedule 36 - Percentage Distribution of Monthly Bill Impacts across Customers for First Year Change

Change % Range	Number of Customers	AVG $ Change	AVG KWH
-2	110	-8	5,157
-1	2,899	-2	2,308
0	3,345	0	1,381
1	1,739	1	888
2	916	1	644
3	401	2	493
4	175	2	391
5	98	2	330
6	51	2	271
7	42	2	220
8	29	2	183
9	21	2	164
10	10	3	117
11	8	3	114
12	4	3	76
13	9	3	56
14	4	3	42
15	4	3	37
16	6	3	20
17	5	3	12
18	8	3	1



Rocky Mountain Power
State of Idaho
Schedule 36 - Dollar Distribution of Monthly Bill Impacts across Customers Over Full Transition Period

Change $ Range	Number of Customers	AVG $ Change	AVG KWH
-220	1	-217	20,240
-130	1	-134	7,346
-120	2	-118	7,109
-100	2	-98	7,120
-90	2	-90	8,020
-80	3	-79	6,384
-70	12	-70	5,703
-60	13	-60	5,434
-50	26	-49	3,955
-40	92	-40	3,602
-30	242	-29	3,023
-20	787	-19	2,438
-10	2,258	-9	1,830
0	3,913	0	1,217
10	2,181	9	763
20	252	19	1,107
30	59	29	1,798
40	25	38	2,128
50	11	51	2,568
70	1	66	4,118
100	1	97	3,610



Rocky Mountain Power
State of Idaho
Schedule 36 - Percentage Distribution of Monthly Bill Impacts across Customers Over Full Transition Period

Change % Range	Number of Customer	AVG $ Change	AVG KWH
-20	8	-73	3,623
-15	97	-41	2,935
-10	942	-23	2,508
-5	2,837	-9	1,872
0	2,535	0	1,345
5	1,519	5	1,025
10	827	8	825
15	418	11	746
20	246	14	732
25	137	15	605
30	80	19	661
35	55	18	511
40	39	18	457
45	33	20	456
50	29	17	300
55	18	19	297
60	18	19	257
65	12	16	128
70	7	15	80
75	7	14	52
80	2	14	22
85	6	14	22
90	6	14	9
95	6	14	0

Case No. PAC-E-22-15
Exhibit No. 4
Witness: Robert M. Meredith

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

ROCKY MOUNTAIN POWER

Exhibit Accompanying Direct Testimony of Robert M. Meredith

October 2022

ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

I.P.U.C. No. 1

Twelfth ~~Eleventh~~ Revision of Sheet No. 1.1
Canceling Eleventh~~Tenth~~ Revision of Sheet No. 1.1

ROCKY MOUNTAIN POWER

ELECTRIC SERVICE SCHEDULE NO. 1

STATE OF IDAHO

Residential Service

AVAILABILITY: At any point on the Company's interconnected system where there are facilities of adequate capacity.

APPLICATION: This Schedule is for alternating current electric service supplied at approximately 120 or 240 volts through one kilowatt-hour meter at a single point of delivery for all service required on the premises for Residential purposes.

When conditions are such that service is supplied through one meter to more than one dwelling or apartment unit, the charge for such service will be computed by multiplying the minimum charges by the maximum number of dwelling or apartment units that may be served.

When a portion of a dwelling is used regularly for business, professional or other gainful purposes, the premises will be classified as nonresidential and the appropriate schedule applied. However, if the wiring is so arranged that the service for Residential purposes can be metered separately, this Schedule will be applied to such service.

MONTHLY BILL:

	Year 1 12/1/2022 to 11/30/2023	Year 2 12/1/2023 to 11/30/2024	Year 3 12/1/2024 to 11/30/2025	Year 4 12/1/2025 to 11/30/2026	Year 5 12/1/2026
Customer Service Charge					
per customer	$12.25	$16.50	$20.75	$25.00	$29.25
Energy Charge (¢/kWh)					
Billing months June through October inclusive					
per kWh first 700 kWh	10.6887	10.1809	9.6731	9.1652	8.6574
per kWh all additional kWh	12.2114	11.3229	10.4344	9.5459	8.6574
Billing months November through May inclusive					
per kWh first 1,000 kWh	8.9073	8.4841	8.0609	7.6377	7.2145
per kWh all additional kWh	10.1761	9.4357	8.6953	7.9549	7.2145
Seasonal Service Charge					

Submitted Under Case No. PAC-E-22~~1~~-15~~07~~

ISSUED: ~~November 8, 2021~~October 20, 2022

EFFECTIVE: ~~January 1, 2022~~December 1, 2022

ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

I.P.U.C. No. 1

Twelfth ~~Eleventh~~ Revision of Sheet No. 1.1
Canceling Eleventh~~Tenth~~ Revision of Sheet No. 1.2

minimum per season per customer	$147.00	$198.00	$249.00	$300.00	$351.00

~~**Customer Service Charge:**~~
~~$8.00 per Customer~~

~~**Energy Charge:**~~
~~(1) Billing months June through October inclusive~~

~~11.1966 ¢ per kWh first 700 kWh~~
~~13.0999 ¢ per kWh all additional kWh~~

~~(C~~(Continued)

ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

I.P.U.C. No. 1 **Twelfth ~~Eleventh~~ Revision of Sheet No. 1.2**
Canceling Eleventh~~Tenth~~ Revision of Sheet No. 1.2

ELECTRIC SERVICE SCHEDULE NO. 1 – Continued

~~**MONTHLY BILL:** (continued)~~

~~(2) Billing months November through May inclusive~~

~~9.3305¢ per kWh first 1,000 kWh~~
~~10.9165¢ per kWh all additional kWh~~

MONTHLY BILLING REDUCTION: Rates in this schedule shall be reduced by the monthly kilowatt-hour credit adjustment set forth under "Monthly Rates" in the currently effective Electric Service Schedule No. 34.

SEASONAL SERVICE: When seasonal service is supplied under this Schedule, the minimum seasonal charge will be applied plus energy charges~~$96.00~~.

CONTRACT PERIOD: One year or longer.

ELECTRIC SERVICE REGULATIONS: Service under this Schedule will be in accordance with the terms of the Electric Service Agreement between the Customer and the Company. The Electric Service Regulations of the Company on file with and approved by the Idaho Public Utilities Commission, including future applicable amendments, will be considered as forming a part of and incorporated in said Agreement.

ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

I.P.U.C. No. 1

Thirteenth ~~Twelfth~~ Revision of Sheet No. 36.2
Canceling Twelfth~~Eleventh~~ Revision of Sheet No. 36.2

ELECTRIC SERVICE SCHEDULE NO. 36 - Continued

MONTHLY BILL:

	Year 1 12/1/2022 to 11/30/2023	Year 2 12/1/2023 to 11/30/2024	Year 3 12/1/2024 to 11/30/2025	Year 4 12/1/2025 to 11/30/2026	Year 5 12/1/2026
Customer Service Charge					
per customer	$17.75	$20.75	$23.50	$26.50	$29.25
Energy Charge (¢/kWh)					
Billing Months May through October inclusive					
On-Peak kWh	14.8656	14.5112			
Off-Peak kWh	5.2422	5.1172			
Billing Months November through April inclusive					
On-Peak kWh	12.7359	12.4322			
Off-Peak kWh	4.8196	4.7047			
Billing Months June through October inclusive					
On-Peak kWh			15.5632	15.1420	14.7738
Off-Peak kWh			4.9922	4.8672	4.7423
Billing Months November through May inclusive					
On-Peak kWh			13.3335	12.9726	12.6572
Off-Peak kWh			4.5898	4.4749	4.3600
Seasonal Service Charge					
minimum per season per customer	$213.00	$249.00	$282.00	$318.00	$351.00

~~**Rate:**~~

	~~Billing Months May through October, Inclusive~~		~~Billing Months November through April, Inclusive~~	
~~**Customer Service Charge:**~~	~~$15.00~~	~~per Customer~~	~~$15.00~~	~~per Customer~~
~~On Peak Energy Charge:~~	~~15.2201¢~~	~~per kWh~~	~~13.0395¢~~	~~per kWh~~
~~Off Peak Energy Charge:~~	~~5.3672¢~~	~~per kWh~~	~~4.9346¢~~	~~per kWh~~

~~**Minimum Bill: Customer Service Charge.**~~

On Peak:

Before December 1, 2024

May through October inclusive ~~Summer months All kWh used from~~ 8:00 a~~A~~.m~~M~~. to 11:00 p~~P~~.m~~M~~., Monday through Friday, except holidays.

November through April inclusive~~Winter months All kWh used from~~ 7:00 a~~A~~.m~~M~~. to 10:00 p~~P~~.m~~M~~., Monday through Friday, except holidays.

Holidays include only: New Year's Day, President's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.

Submitted Under Case No. PAC-E-2~~1~~2-15~~07~~

ISSUED: ~~November 8, 2021~~October 20, 2022 **EFFECTIVE**: ~~January 1, 2022~~December 1, 2022

ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

I.P.U.C. No. 1

Thirteenth ~~Twelfth~~ Revision of Sheet No. 36.2
Canceling TwelfthEleventh Revision of Sheet No. 36.2

On and after December 1, 2024
June through October inclusive 3:00 p.m. to 11:00 p.m., all days.

November through May inclusive 6:00 a.m. to 9:00 a.m. and 6:00 p.m. to 11:00 p.m., all days.

Off Peak:
All other kWh usage.

~~Due to the expansions of Daylight Saving Time (DST) as adopted under Section 110 of the U.S. Energy Policy Act of 2005 the time periods shown above will begin and end one hour later for the period between the second Sunday in March and the first Sunday in April, and for the period between the last Sunday in October and the first Sunday in November.~~

~~**SEASONAL SERVICE**: When seasonable service is supplied under this Schedule, the minimum seasonal charge will be $180.00 plus energy charges.~~

~~**CONTRACT PERIOD**: One year or longer.~~

~~**MONTHLY BILLING REDUCTION**: Rates in this schedule shall be reduced by the monthly kilowatt-hour credit adjustment set forth under "Monthly Rates" in the currently effective Electric Service Schedule No. 34.~~

(Continued)

Submitted Under Case No. PAC-E-2~~1~~2-150~~7~~

ISSUED: ~~November 8, 2021~~October 20, 2022

EFFECTIVE: ~~January 1, 2022~~December 1, 2022

ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

I.P.U.C. No. 1 **~~First~~ Second Revised Sheet No. 36.3**
Canceling ~~Original~~ First Revised Sheet No. 36.3

ELECTRIC SERVICE SCHEDULE NO. 36 – Continued

SEASONAL SERVICE: When seasonable service is supplied under this Schedule, the minimum seasonal charge will be ~~$180.00~~applied plus energy charges.

CONTRACT PERIOD: One year or longer.

MONTHLY BILLING REDUCTION: Rates in this schedule shall be reduced by the monthly kilowatt-hour credit adjustment set forth under "Monthly Rates" in the currently effective Electric Service Schedule No. 34.

ELECTRIC SERVICE REGULATIONS: Service under this Schedule will be in accordance with the terms of the electric Service Agreement between the Customer and the Company. The Electric Service Regulations of the Company on file with and approved by the Idaho Public Utilities Commission, including future applicable amendments, will be considered as forming a part of and incorporated in said Agreement.

Case No. PAC-E-22-15
Exhibit No. 5
Witness: Robert M. Meredith

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

ROCKY MOUNTAIN POWER

Exhibit Accompanying Direct Testimony of Robert M. Meredith

October 2022

ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

I.P.U.C. No. 1

Twelfth Revision of Sheet No. 1.1
Canceling Eleventh Revision of Sheet No. 1.1

ROCKY MOUNTAIN POWER

ELECTRIC SERVICE SCHEDULE NO. 1

STATE OF IDAHO

Residential Service

AVAILABILITY: At any point on the Company's interconnected system where there are facilities of adequate capacity.

APPLICATION: This Schedule is for alternating current electric service supplied at approximately 120 or 240 volts through one kilowatt-hour meter at a single point of delivery for all service required on the premises for Residential purposes.

When conditions are such that service is supplied through one meter to more than one dwelling or apartment unit, the charge for such service will be computed by multiplying the minimum charges by the maximum number of dwelling or apartment units that may be served.

When a portion of a dwelling is used regularly for business, professional or other gainful purposes, the premises will be classified as nonresidential and the appropriate schedule applied. However, if the wiring is so arranged that the service for Residential purposes can be metered separately, this Schedule will be applied to such service.

MONTHLY BILL:

	Year 1	Year 2	Year 3	Year 4	Year 5
	12/1/2022 to 11/30/2023	12/1/2023 to 11/30/2024	12/1/2024 to 11/30/2025	12/1/2025 to 11/30/2026	12/1/2026
Customer Service Charge					
per customer	$12.25	$16.50	$20.75	$25.00	$29.25
Energy Charge (¢/kWh)					
Billing months June through October inclusive					
per kWh first 700 kWh	10.6887	10.1809	9.6731	9.1652	8.6574
per kWh all additional kWh	12.2114	11.3229	10.4344	9.5459	8.6574
Billing months November through May inclusive					
per kWh first 1,000 kWh	8.9073	8.4841	8.0609	7.6377	7.2145
per kWh all additional kWh	10.1761	9.4357	8.6953	7.9549	7.2145
Seasonal Service Charge					
minimum per season per customer	$147.00	$198.00	$249.00	$300.00	$351.00

(Continued)

ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

Twelfth Revision of Sheet No. 1.2
I.P.U.C. No. 1 **Canceling Eleventh Revision of Sheet No. 1.2**

ELECTRIC SERVICE SCHEDULE NO. 1 – Continued

MONTHLY BILLING REDUCTION: Rates in this schedule shall be reduced by the monthly kilowatt-hour credit adjustment set forth under "Monthly Rates" in the currently effective Electric Service Schedule No. 34.

SEASONAL SERVICE: When seasonal service is supplied under this Schedule, the minimum seasonal charge will be applied plus energy charges.

CONTRACT PERIOD: One year or longer.

ELECTRIC SERVICE REGULATIONS: Service under this Schedule will be in accordance with the terms of the Electric Service Agreement between the Customer and the Company. The Electric Service Regulations of the Company on file with and approved by the Idaho Public Utilities Commission, including future applicable amendments, will be considered as forming a part of and incorporated in said Agreement.

ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

I.P.U.C. No. 1

Thirteenth Revision of Sheet No. 36.2
Canceling Twelfth Revision of Sheet No. 36.2

ELECTRIC SERVICE SCHEDULE NO. 36 - Continued

MONTHLY BILL:

	Year 1	Year 2	Year 3	Year 4	Year 5
	12/1/2022 to 11/30/2023	12/1/2023 to 11/30/2024	12/1/2024 to 11/30/2025	12/1/2025 to 11/30/2026	12/1/2026
Customer Service Charge					
per customer	$17.75	$20.75	$23.50	$26.50	$29.25
Energy Charge (¢/kWh)					
Billing Months May through October inclusive					
On-Peak kWh	14.8656	14.5112			
Off-Peak kWh	5.2422	5.1172			
Billing Months November through April inclusive					
On-Peak kWh	12.7359	12.4322			
Off-Peak kWh	4.8196	4.7047			
Billing Months June through October inclusive					
On-Peak kWh			15.5632	15.1420	14.7738
Off-Peak kWh			4.9922	4.8672	4.7423
Billing Months November through May inclusive					
On-Peak kWh			13.3335	12.9726	12.6572
Off-Peak kWh			4.5898	4.4749	4.3600
Seasonal Service Charge					
minimum per season per customer	$213.00	$249.00	$282.00	$318.00	$351.00

On Peak:

Before December 1, 2024
May through October inclusive 8:00 a.m. to 11:00 p.m., Monday through Friday, except holidays.

November through April inclusive 7:00 a.m. to 10:00 p.m., Monday through Friday, except holidays.

Holidays include only: New Year's Day, President's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.

On and after December 1, 2024
June through October inclusive 3:00 p.m. to 11:00 p.m., all days.

November through May inclusive 6:00 a.m. to 9:00 a.m. and 6:00 p.m. to 11:00 p.m., all days.

Off Peak:

All other kWh usage.

(Continued)

ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

I.P.U.C. No. 1 **Second Revised Sheet No. 36.3**
Canceling First Revised Sheet No. 36.3

ELECTRIC SERVICE SCHEDULE NO. 36 – Continued

SEASONAL SERVICE: When seasonable service is supplied under this Schedule, the minimum seasonal charge will be applied plus energy charges.

CONTRACT PERIOD: One year or longer.

MONTHLY BILLING REDUCTION: Rates in this schedule shall be reduced by the monthly kilowatt-hour credit adjustment set forth under "Monthly Rates" in the currently effective Electric Service Schedule No. 34.

ELECTRIC SERVICE REGULATIONS: Service under this Schedule will be in accordance with the terms of the electric Service Agreement between the Customer and the Company. The Electric Service Regulations of the Company on file with and approved by the Idaho Public Utilities Commission, including future applicable amendments, will be considered as forming a part of and incorporated in said Agreement.