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**Douglas C. Tingey**
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July 9, 2007

***Via Electronic Filing and U.S. Mail***

Oregon Public Utility Commission
Attention: Filing Center
550 Capitol Street NE, #215
PO Box 2148
Salem OR 97308-2148

**Re: UE 192 – 2008 Annual Power Cost Update Tariff Filing**

Attention Filing Center:

Enclosed for filing in UE 192 on behalf of Portland General Electric Company are an original and five copies of:

- **Rebuttal Testimony of Alex Tooman, Jay Tinker and Stephen Schue –PGE/300 (Policy).**
- **Exhibits 301C and 302 C (Both of these are confidential and subject to Protective Order 07-135 and therefore not to be posted on the PUC website).**

Also enclosed are three copies of:

- **Workpapers.** (Confidential and subject to Protective Order 07-135 and therefore not to be posted on the PUC website. They are in Excel file format and will be sent electronically via CD).

These documents are being filed electronically. Hard copies will be sent via postal mail.

An extra copy of this cover letter is enclosed. Please date stamp the extra copy and return it to me in the envelope provided.

Thank you in advance for your assistance.

Sincerely,

DOUGLAS C. TINGEY

DCT:jbf
Enclosures
cc: Service List-UE 192

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF THE STATE OF OREGON**

# UE 192

Annual Update Tariff Filing
For Prices Effective January 1, 2008

**PORTLAND GENERAL ELECTRIC COMPANY**

**Rebuttal Testimony and Exhibits**

**July 9, 2007**

## BEFORE THE PUBLIC UTILITY COMMISSION

## OF THE STATE OF OREGON

# Power Costs

**PORTLAND GENERAL ELECTRIC COMPANY**

Rebuttal Testimony and Exhibits of

***Alex Tooman – Jay Tinker – Stephen Schue***

**July 9, 2007**

## Table of Contents

## I. Introduction

**Q. What are your names and positions with Portland General Electric?**

A. My name is Alex Tooman. I am a project manager for PGE. I am responsible, along with Mr. Tinker, for the development of PGE's revenue requirement forecast. In addition, my areas of responsibility include affiliated interest filings, results of operations reporting, and other regulatory analyses.

My name is Jay Tinker. I am also a project manager for PGE. My areas of responsibility include revenue requirement analyses and other regulatory analyses.

My name is Stephen Schue. I am a senior analyst for PGE. My areas of responsibility include power supply analysis and other regulatory analyses.

Our qualifications appear in Section VI of PGE Exhibit 100.

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

A. The purpose of this testimony is to respond to Staff Exhibits 100 and 102, CUB Exhibits 100 and 102-105, and ICNU Exhibits 100 and 102.

**Q. What specific issues do you address?**

A. In Section II, we discuss Staff's recommendation on how to handle net ancillary service revenues within the context of the Annual Update Tariff (AUT) and Annual Variance or Power Cost Adjustment Mechanism (PCAM). In Section III, we rebut CUB's assertion that the Boardman forced outage rate assumption should exclude data from 2005 and 2006. In Section IV, we rebut ICNU's assertion that the Commission should disallow costs of the Cold Snap contract in the 2008 AUT. In Section V, we agree with ICNU's recommendation that certain costs not be updated in the 2008 AUT.

**Q. Before you discuss those specific issues, do you have any general comments regarding the testimony of CUB and ICNU?**

A. Yes. Both CUB and ICNU suggest changes that appear to go beyond the limited updates allowed under PGE Tariff Schedule 125.

During operation of the AUT's predecessor, the Resource Valuation Mechanism (RVM), other parties, especially CUB and ICNU, disagreed with the level of updates and changes proposed by PGE. For example, in Docket UE 139, CUB stated that "we simply cannot allow for a process that has 163 changes, with most of them unsupported, and no time to investigate those changes." (UE 139, CUB 100 at 6, Lines 11-13). In Docket UE 149, ICNU stated that "PGE proposes to make some 75 changes to the Monet model inputs and logic in this proceeding. Of these changes, PGE considers thirteen to be model 'enhancements,' or inclusion of new costs. Based on the language previously quoted from Schedule 125, only updates to specific pre-existing costs and inputs modeled in Monet are allowed in the RVM annual filing." (UE 149, ICNU 100 at 12, Lines 10-14). In response to this criticism, PGE proposed a revised update mechanism in Docket UE 180 that the Commission adopted in Order No. 07-015. As stated in the current Tariff Schedule 125, updates are limited to:

- Forced Outage Rates based on a four-year rolling average.
- Projected planned plant outages.
- Forward market prices for both gas and electricity.
- Projected loads.
- Contracts for the purchase or sale of power and fuel.
- Changes in hedges, options, and other financial instruments used to serve retail load.

- Transportation contracts.
- No other changes or updates will be made in the annual filings under this schedule.

Thus, according to OPUC Order No. 07-015, modeling changes are not allowed and PGE has foregone proposing a number of changes that it would otherwise include. CUB and ICNU do not appear to feel similarly constrained.

## II. Net Revenues from the Sale of Ancillary Services

**Q. What does Staff recommend regarding net ancillary services?**

A. Staff recommends that the Commission order PGE to revise the base ancillary service revenue forecast for use in the PCAM variance calculation each year. However, given recent data, Staff does not recommend any change for 2008.

**Q. What complications do you see in this approach?**

A. Order 07-015 directs that net ancillary service revenues be included in Other Revenues, which are not subject to the Annual Update Tariff (AUT). "This results in an adjustment of approximately $1.43 million. This adjustment is made to Other Revenues in revenue requirement." (Order 07-015 at 16). However, Staff's approach could require a change to Other Revenues before the next general rate case.

**Q. What do you recommend?**

A. PGE recommends that the net ancillary service revenue forecast of $1.4 million approved by Order No. 07-015 remain in place until the next general rate case. Differences between this forecast and actual revenues remain subject to the annual PCAM. PGE will revisit the net ancillary service revenue forecast in its next general rate case, likely to be based on either a 2009 or 2010 test year.

**Q. Will your approach and Staff's differ for 2008?**

A. No. As noted above, Staff recommends no change to the net ancillary service revenue forecast for 2008. "For the 2008 Annual Update, the forecast of $1.43 million remains reasonable" (Staff 100 at 5, Lines 9-10). However, the two approaches could differ in the future.

## III. Boardman Forced Outage Rate Calculation

**Q. Please summarize this section of your testimony.**

A. In this section, we make three main points. They are:

1. This is not the appropriate docket for consideration of CUB's recommended Boardman forced outage rate calculation.
2. CUB's approach is "results driven," and subjectively selects among years to calculate a low Boardman forced outage rate.
3. CUB incorrectly applies the four-year rolling average methodology to the data it subjectively chooses for its calculation.

**Q. How did PGE calculate the Boardman forced outage rate?**

A. Consistent with Order No. 07-015, PGE excluded the first and second Boardman outage periods (i.e. November 18, 2005, through June 6, 2006) and then applied the traditional four-year rolling average methodology.

**Q. What does CUB recommend as a method for calculating the 2008 Boardman forced outage rate?**

A. CUB recommends entirely excluding 2005 and 2006 from the calculation, and instead computing a simple average of the modified equivalent forced outage rates for the years 2001-2004.

**Q. Why does CUB recommend this change from the long-standing rolling four-year average methodology?**

A. CUB wants to remove 2005 and 2006 forced outage data from the calculation because, in CUB's view, they are too high. CUB acknowledges that "Removing the November 18, 2005, through June 6, 2006, from Boardman's four-year average of forced outages is appropriate and consistent with the Commission's Order in UE 180," (CUB 100 at 2, Lines 8-10) but then goes on to assert that "the portions of 2005 and 2006 that are not removed, also do not represent normal operating performance, and are not, therefore, appropriately used to forecast future, normal plant operation." (CUB 100 at 2, Lines 10-12).

**Q. Do you agree with CUB's recommendation?**

A. No. CUB basically dismisses the decision of the Commission in Order No. 07-015 and substitutes its own judgement.

**Q. Why do you disagree with CUB's approach?**

A. We disagree with CUB for three reasons. First, this is not the appropriate docket for consideration of major changes in forced outage rate methodology. Second, CUB's approach is results-driven. It subjectively selects years which have low forced outage rates for use in its calculation. Finally, even after selecting the years 2001-2004, CUB does not correctly apply the four-year average methodology.

**Q. Why is this not the appropriate docket for considering changes in the long-standing rolling four-year average methodology?**

A. In Order No. 07-015, the Commission stated that it would "open a new docket to review the appropriate method for determining the forced outage rate for generating plants…." (Order No. 07-015 at 56). Staff concurs, stating that a new docket or "investigation into the appropriate methodology for determining 'normal' equivalent forced outage rates is the appropriate docket to revisit the use of NERC data, or other methods, for determining forced outage rates..." (Staff 100 at 4, Lines 8-11). In other words, it is inappropriate to consider changes in the rolling four-year average methodology in this docket.

**Q. Does PGE's Tariff Schedule 125 allow for the change in methodology that CUB advocates?**

A. No. Tariff Schedule 125, which implements the AUT, allows for a very limited list of updates. These include updating forced outage rates "based on the four-year rolling average." For purposes of this docket, Schedule 125 dictates that Boardman's 2008 forced outage rate assumption be computed by applying the four-year rolling average methodology to data from the years 2003-2006, rather than data from the years 2002-2005 (used in Docket UE 180, PGE's last general rate case). It does not provide for changes in methodology that might allow the use of data from 2001-2004.

**Q. Does this mean that CUB's recommendation attempts to expand the list of allowable updates in the AUT process?**

A. Yes.

**Q. Why do you assert that CUB's approach is results driven?**

A. Compared to the four-year rolling average methodology, CUB has substituted data from relatively low forced outage years for data from relatively high forced outage years. This arbitrary data selection approach does produce a much lower result, but, as we state above, it is inconsistent with Order No. 07-015 and violates the limited update provision of the AUT mechanism.

CUB wants to exclude 2005 and 2006 because it believes that forced outage rates are too high in the relevant portions of those years, stating that "Boardman's performance, that PGE includes in its calculation, from January through October of 2005 and June through December of 2006 is extremely poor, so much so that it is difficult to see how these periods could be used as a measure of normal performance." (CUB 100 at 3, Lines 14-17). CUB then adds 2001 and 2002 so as to have four years of data. However, the 2001 modified equivalent forced outage rate that CUB uses is extremely low, the lowest of all years in the 2000-2006 period.

**Q. Why do you assert that, even given its results-driven selection of the years 2001-2004 for the Boardman forced outage rate calculation, CUB's calculation is inconsistent with the four-year rolling average methodology?**

A. CUB takes a simple average of the modified equivalent forced outage rates for the four years. However, the four-year rolling average methodology is more complex. We include the detailed calculation in the confidential work papers to this testimony. This part of CUB's methodology results in a slightly higher forced outage rate, but it is nonetheless an incorrect application of the four-year rolling average methodology.

In summary, CUB applies an incorrect methodology to inappropriate years. Substituting 2001 and 2002 for 2005 and 2006 subjectively adjusts the resulting forced outage rate calculation, in direct contradiction to: 1) CUB's previous statements regarding power cost updates, and 2) Commission Order No. 07-015.

## IV. Cold Snap Contract

**Q. Please summarize this section of your testimony.**

A. In this section, we make three main points. They are:

1. Evidence in Docket UE 180 demonstrated that the Cold Snap contract has no extrinsic value, and this is not the appropriate docket for reconsideration of that finding.
2. ICNU's analysis is entirely dependent on the 2000-2001 energy crisis, a very unusual event.
3. The calculation excludes data not favorable to ICNU's desired results and is inconsistent with the contract's maximum "take" provision.

**Q. What is ICNU's recommendation regarding inclusion of the Cold Snap contract's demand charge in 2008 net variable power costs?**

A. ICNU recommends that "the Commission make an extrinsic value adjustment, but limit it to the value of the Cold Snap demand charge." (ICNU 100 at 9, Lines 3-4).

**Q. What basis does ICNU rely upon to support its position?**

A. ICNU states that "the OPUC did not adopt an adjustment for the Cold Snap contract because there was no suitable evidence in the record to demonstrate the contract's extrinsic value," (ICNU 100 at 7, Lines 13-15) and that "ICNU requested in UE 180 that the Company provide a copy of any studies used to determine the extrinsic value for the contract," but that "no extrinsic value study was provided." (ICNU 100 at 7, Lines 23-24 and at 8, Line 1). ICNU then notes that it "will provide an extrinsic value estimate for the Cold Snap contract, comparable to the estimate adopted by the Commission for the Super Peak contract." (ICNU 100 at 7, Lines 18-20).

**Q. Do you agree with ICNU's assertions?**

A. No. As part of its Response to ICNU Data Request No. 020 in Docket UE 180, PGE provided an extrinsic value analysis for the Cold Snap contract comparable to that adopted by the Commission for the Super Peak contract. Both came from the scoring process that PGE used to rank capacity products bid into its 2003 Request for Proposals. The Cold Snap analysis showed an extrinsic value of less than zero. PGE Confidential Exhibit **301C** is a copy of the Cold Snap contract portion of its Response to ICNU Data Request No. 020 in UE 180. OPUC Staff Exhibit 204 in Docket UE 180 relied on the same analysis that PGE used to rank capacity products bid into its 2003 Request for Proposals, and Staff concluded that the Cold Snap contract had no extrinsic value. PGE Confidential Exhibit **302C** is a copy of Staff Exhibit 204 in Docket UE 180.

**Q. Did ICNU find that the Cold Snap contract had positive extrinsic value in Docket UE 180?**

A. No. ICNU Witness Falkenberg stated "For the other capacity tolling contract (PPM Cold Snap), I performed an extrinsic value analysis but found no extrinsic value." (UE 180, ICNU 103 at 10, Lines 11-12).

**Q. Does the OPUC Staff address the inclusion of no extrinsic value adjustment for the Cold Snap contract in Order No. 07-015?**

A. Yes. Referring to the evidence presented above, Staff states that it "believes the Commission resolved the issue of the extrinsic value of the Cold Snap contract based on this evidence." (Staff 100 at 3, Lines 14-15).

**Q. If there were new information available on possible extrinsic value of the Cold Snap contract, would this be the appropriate docket for its consideration?**

A. No. Based on the evidence presented in Docket UE 180, including ICNU's own statement that its witness "found no extrinsic value" (UE 180, ICNU 103 at 10, Line 12), no party was able to show extrinsic value for the contract. Now ICNU seeks to try again. However, the Commission made its decision on the extrinsic value of capacity contracts in Docket UE 180, and, as Staff states "Any further adjustment to PGE's power costs to account for the extrinsic value of purchased power agreements or generating resources should be made after PGE files its report on stochastic power cost modeling and interested parties have had an opportunity to make recommendations regarding the regulatory treatment of the real option value of these resources in the Commission's upcoming stochastic modeling investigation." (Staff 100 at 2, Lines 15-21). In other words, re-litigation of extrinsic value, including that of the Cold Snap contract, is not appropriate in this docket.

**Q. Does PGE's Tariff Schedule 125, which implements the annual update of net variable power costs, allow for re-litigation of the Cold Snap contract's extrinsic value?**

A. No. ICNU appears to make a liberal interpretation of the Tariff Schedule 125's very limited list of allowable updates, which includes "Contracts for the purchase and sale of electric power and fuel." In the context of the Cold Snap contract, this provision is only intended to provide for updating the demand charge, which PGE did in its April 2, 2007, filing. ICNU's interpretation violates Schedule 125's limited scope. PGE would have liked to re-litigate the extrinsic value estimate for its Super-Peak contract that the Commission determined in Order No. 07-015. However, this is not the appropriate docket for such re-litigation.

**Q. ICNU Exhibit 102 calculates an annual extrinsic value for the Cold Snap contract of more than $12 million. Is this figure reasonable?**

A. No. First, it does not pass a fundamental reasonableness test. Second, the result is driven entirely by an unusual event, the energy crisis of 2000-2001. Third, the calculations are incorrect because they are inconsistent with the contract year maximum "take" provision. The analysis also excludes relevant data.

**Q. How does the ICNU Exhibit 102 analysis fail a fundamental reasonableness test?**

A. It is extremely unlikely that a counterparty would accept the annual demand charge for a contract which ICNU claims has an annual extrinsic value of $12 million. In addition, in Docket UE 180 ICNU recommended an extrinsic value adjustment of $1.4 million for the Super-Peak contract. (Docket UE 180, ICNU 103 at 3, Table 1). It is not credible to then claim that the extrinsic value of the Cold Snap contract, which has a heat rate approximately 2,000 MMbtu/MWh higher, is $12 million.

**Q. How is the ICNU Exhibit 102 result dependent on the energy crisis?**

A. In ICNU's Exhibit 102 analysis, the Cold Snap contract is "in the money" only during the six-month contract year from November 2000 through April 2001, the time of the energy crisis. It has no extrinsic value during any of the other 26 months in the analysis period.

**Q. Did ICNU make use of more recent data from 2002 to the present?**

A. No.

**Q. Do you agree with the approach of using data from 1997-2001, but not from 2002 to the present?**

A. No. The energy crisis from late 2000 through 2001 was an unusual event and should not be the basis of an adjustment. The Cold Snap contract would not have been "in the money" in ICNU's analysis during all or almost all of the post-2001 period. For example, during the first three contractual years (ending April 2007), PGE has not exercised the Cold Snap contract. However, ICNU Exhibit 102 only uses data for certain months from 1996-2001 and 1997-2001. Restricting analysis to this period exaggerates the impact of the unusual energy crisis period.

**Q. Is it appropriate to use energy price data from the energy crisis period in setting Schedule 125 rates?**

A. No. This was a very unusual event and should not be incorporated into base rates. The Request for Proposal (RFP) capacity bid analysis that PGE performed on the Cold Snap and Super Peak contracts did make some consideration for possible extreme events. However, as PGE stated in UE 180, this analysis was used to rank RFP bids, not to set rates. "The need for capacity was the primary factor. An extrinsic value analysis helped to rank capacity resource bids received in response to PGE's 2003 RFP." (UE 180, PGE 2600 at 17, Lines 20-22).

**Q. If very unusual events should not be considered in setting Schedule 125 rates, then how should they be considered?**

A. When the very unusual events occur, they will impact actual net variable power costs, which in turn will impact the Annual Variance calculation under the PCAM mechanism established by Order No. 07-015. The Commission ordered this PCAM structure to allocate the financial effects of unusual events between customers and PGE. This includes the effects of unusual events on the Cold Snap contract.

**Q. You stated above that ICNU's Exhibit 102 calculation does not pass a fundamental reasonableness test. Are there errors in the Exhibit 102 calculation?**

A. Yes. There is one very significant error of which PGE is aware.

**Q. What is the error that PGE is aware of?**

A. The ICNU analysis disregards the contractual year maximum “take” provision of the Cold Snap contract, a copy of which PGE provided to ICNU in its response to ICNU Data Request No. 020 in Docket UE 180.

**Q. What is the effect of disregarding the contract’s maximum “take” provision?**

A. ICNU’s result is dependent on a measure of extrinsic value for the “contract year” in 2000 and 2001. However, ICNU’s analysis allows the contract to “dispatch” almost 10 times the number of hours allowed by the contract.

**Q. Please summarize your findings regarding ICNU’s proposal.**

A. ICNU’s proposal

1. Seeks to re-litigate a matter decided in Order No. 07-015.
2. Violates the limited update provisions of Schedule 125.
3. Incorrectly uses the period of the Western Power Crisis to justify an adjustment.
4. Does not use post-power crisis data.
5. Ignores the contract’s operational constraints.
6. Directly contradicts ICNU’s own testimony in Docket UE 180.

The best forecast for the Cold Snap contract’s 2008 extrinsic value is zero, i.e. no extrinsic value adjustment is appropriate. As we noted above, Order No. 07-015 directs that unexpected events, such as PGE dispatching the Cold Snap contract, be handled by the PCAM mechanism, not the AUT forecast of net variable power costs.

**Q. You assert that the extrinsic value of the Cold Snap contract is zero. Is ICNU’s claim that this contract adds a “’dead weight’ to the model, with no offsetting benefits for ratepayers” (ICNU 100 at 6, Lines 9-10) then true?**

A. No. Speaking of the Cold Snap and Super-Peak contracts, Order No. 07-015 states on page 13 that "The contracts assure supply for peak loads and emergency events, and therefore provide service to customers. For this reason, we include both contracts in rates."

## V. Updating Costs in the AUT Process

**Q. Does ICNU assert that PGE inappropriately updated certain costs in its April 2, 2007, filing?**

A. Yes. ICNU states that "In UE 180, PGE included a number of non-fuel costs in establishing the net power cost base: Boardman Rail Car Mileage Tax, Boardman Coal Sampling, Boardman Rail Car Lease, Boardman Rail Car Maintenance, Boardman Trainset Storage Fee, and Boardman Coal Car Depreciation. While these are legitimate ratemaking expenses, they are not among the costs listed above that are eligible for update under Schedule 125." (ICNU 100 at 10, Lines 4-9) Thus, while ICNU takes a very <u>liberal</u> interpretation of the Schedule 125 language when addressing the Cold Snap contract, it switches to a <u>literal</u> interpretation in this instance.

**Q. Did PGE intend to include these items in the annual update?**

A. Yes. However, as ICNU points out, PGE's wording of Schedule 125 is unintentionally more restrictive, and does not allow annual updates of these items. Therefore, we will remove these cost changes, which total $173,000 (based on the Monet run included in PGE's April 2, 2007 filing) from the update.

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

A. Yes.

## List of Exhibits

| **PGE Exhibit** | **Description** |
|---|---|
| **301C** | Copy of the Cold Snap Contract<br>**(Confidential, provided under separate cover)** |
| **302C** | Copy of Staff Exhibit 204 in Docket UE 180<br>**(Confidential, provided under separate cover)** |

## CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the **REBUTTAL TESTIMONY AND EXHIBITS OF PORTLAND GENERAL ELECTRIC COMPANY (TOOMAN/TINKER/SCHUE) (PGE/300-302)** - to be served by electronic mail to those parties whose email addresses appear on the attached service list, and by First Class US Mail, postage prepaid and properly addressed, to those parties on the attached service list who have not waived paper service.

Dated at Portland, Oregon, this 9th day of July 2007.

DOUGLAS C. TINGEY

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