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August 13, 2012

***Via FedEx and Electronic Mail***

Public Utility Commission  
Attn: Filing Center  
550 Capitol St. NE #215  
P.O. Box 2148  
Salem OR 97308-2148

Re: In the Matter of PACIFICORP 2013 Request for a General Rate Revision  
**Docket No. UE 246**

Dear Filing Center:

Enclosed please find an original and five (5) copies of the Rebuttal Testimony and Exhibit of Michael C. Deen on behalf of the Industrial Customers of Northwest Utilities in the above-referenced docket. Please also find one (1) CD containing the testimony and exhibit of Michael C. Deen.

Please return one file-stamped copy of the Direct Testimony of Michael C. Deen in the self-addressed, stamped envelope provided.

Thank you for your assistance, and please do not hesitate to contact our office if you have any questions.

Sincerely yours,

/s/ Sarah A. Kohler  
Sarah A. Kohler  
Paralegal

Enclosures

cc: Service List

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the foregoing Testimony and Exhibit on behalf of the Industrial Customers of Northwest Utilities upon the parties, on the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid, and via electronic mail where paper service has been waived.

Dated at Portland, Oregon, this 13th day of August, 2012.

/s/ Sarah A. Kohler  
Sarah A. Kohler

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**BEFORE THE OREGON PUBLIC UTILITY COMMISSION**

**UE 246**

In the Matter of	)
	)
PACIFIC POWER & LIGHT	)
(dba PACIFICORP)	)
	)
2013 Request for General Rate Revision	)
_____	)

**REBUTTAL TESTIMONY OF MICHAEL C. DEEN**

**ON BEHALF OF**

**THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES**

**August 13, 2012**

**I. INTRODUCTION AND SUMMARY**

**Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

**A.** My name is Michael C. Deen, and my business address is 900 Washington Street, Suite 780, Vancouver, Washington 98660. I am employed by Regulatory and Cogeneration Services, Inc. ("RCS"), a utility rate and consulting firm.

**Q. HAVE YOU PREVIOUSLY PROVIDED TESTIMONY IN THIS PROCEEDING?**

**A.** Yes. I am the same Michael C. Deen who previously testified in this proceeding. As before, I am testifying on behalf of the Industrial Customers of Northwest Utilities ("ICNU"). ICNU is a non-profit trade association whose members are large industrial customers served by electric utilities throughout the Pacific Northwest, including PacifiCorp (the "Company").

**Q. WHAT TOPICS WILL THIS TESTIMONY ADDRESS?**

**A.** This testimony will address certain aspects of the Company's Reply testimony. First, it will address the reply testimony of Mr. Dalley, PAC/1600, regarding the proposed Mona-to-Oquirrh transmission project tariff rider. Second, this testimony will address arguments raised by the Company in the reply testimonies of Mr. Bird, PAC/1700, and Mr. Duvall, PAC/1800, regarding the need for and structure of a Power Cost Adjustment Mechanism ("PCAM") for the Company. The Company did not substantively respond to ICNU's proposal to eliminate or make significant changes to the transition adjustment mechanism ("TAM"), and my testimony does not need to respond to the Company's testimony on this issue.

1 **Q. PLEASE BRIEFLY SUMMARIZE YOUR RECOMMENDATIONS IN THIS**  
2 **TESTIMONY.**

3 **A.** ICNU continues to oppose the need and basis for the special transmission rider for the  
4 Mona-to-Oquirrh project. ICNU also continues to oppose the Company's need for a  
5 PCAM and particularly the justification for the Company's proposed structure as a  
6 consequence of Oregon's renewable portfolio standard.

7 **II. MONA-TO-OQUIRRH TRANSMISSION PROJECT**

8 **Q. HAS THE COMPANY PROVIDED REPLY TESTIMONY REGARDING THE**  
9 **PROPOSED TREATMENT OF THE MONA-TO-OQUIRRH TRANSMISSION**  
10 **PROJECT IN A SEPARATE TARIFF RIDER?**

11 **A.** Yes. In PAC/1600 the Company makes a three-part argument in response to ICNU and  
12 Staff testimony that the Mona-to-Oquirrh project should not be included in rates during  
13 the rate year through the proposed special tariff rider. The Company argues in essence  
14 that the Mona-to-Oquirrh project meets the used and useful standard to be included in  
15 rates, that the purpose of rate regulation should be to minimize regulatory lag issues for  
16 utilities, and that the Company's proposal is not an attempt to "cherry-pick" rate issues at  
17 the detriment of consumers.

18 **Q. DOES ICNU ACCEPT THE COMPANY'S ARGUMENTS?**

19 **A.** No. The Company has not presented compelling arguments in its initial or reply  
20 testimony. The transmission project was developed primarily to meet load growth on the  
21 Company's eastern system, and there is no reason why Oregon should deviate from  
22 standard rate making procedure to allow extraordinarily early recovery of its costs.

23 **Q. PLEASE EXPLAIN.**

24 **A.** Most importantly, the Commission has established the practice that utility investments  
25 should be completed before the test year in question to be included in rates. The project

1 in question does not meet this standard and as such should not be included either in base  
2 rates or in a special rider at this time. If the Mona-to-Oquirrh project was of special  
3 importance to the Company's filing, the Company had discretion and ability to file a rate  
4 case later for a test year that would have included the project. As matter stands, the  
5 Company is seeking to cherry-pick this rate issue to the detriment of consumers. The  
6 Company's proposal is one-sided in that it will allow the Company to receive a rate  
7 increase earlier than it would otherwise and then also receive special treatment for the  
8 Mona-to-Oquirrh investment. As a policy matter, special ratemaking treatment should be  
9 reserved for special circumstances. The Company has not provided any rationale for  
10 extraordinary ratemaking treatment of this investment, other than the fact that it would  
11 not normally be included in rates under the Commission's practice. If the Company  
12 wished to revisit the principle of when an investment must be completed to be included in  
13 rate base, it should have done so as a policy matter. Under the Company's current  
14 approach, it has failed to demonstrate any particular or compelling rationale for why it  
15 should receive special treatment.

16 **Q. HAVE YOU REVIEWED THE COSTS OF THE MONA-TO-OQUIRRH**  
17 **INVESTMENT?**

18  
19 **A.** No. Due to the fact that the project is not yet complete and should not be considered in  
20 this case, ICNU has not reviewed the costs of Mona-to-Oquirrh. The costs should be  
21 reviewed in PacifiCorp's next general rate case when the costs are known and not merely  
22 an estimate.

23 **Q. WHAT IS ICNU'S RECOMMENDATION ON THE MONA-TO-OQUIRRH**  
24 **ISSUE IN THIS CASE?**

25 **A.** The Commission should reject the Company's proposed special rate treatment. The  
26 investment does not meet the standard of other investments included in the rate base in

1 this proceeding, and the Company has not demonstrated a need for special treatment that  
2 will be to the detriment of consumers.

3 **III. PCAM NEED AND STRUCTURE**

4 **Q. HAS THE COMPANY PROVIDED ADDITIONAL TESTIMONY REGARDING**  
5 **ITS NEED AND PROPOSED STRUCTURE FOR A PCAM?**

6 **A.** Yes. The Company has provided additional testimony on these topics in PAC/1700 and  
7 PAC/1800.

8 **Q. PLEASE BRIEFLY SUMMARIZE YOUR UNDERSTANDING OF THE**  
9 **COMPANY'S ADDITIONAL TESTIMONY REGARDING THE PROPOSED**  
10 **PCAM.**

11 **A.** The Company is again claiming that it is systematically under-recovering its Company-  
12 wide Net Power Costs ("NPC") as a result of its compliance with SB 838 in Oregon and  
13 that a PCAM (with no cost sharing or deadbands) would permit full recovery of these  
14 costs in a manner in which current ratemaking practice is not capable. The Company also  
15 makes a legal argument about what costs SB 838 requires the Commission to allow  
16 PacifiCorp to recover. ICNU will respond to these legal arguments in posthearing briefs.

17 **Q. ARE THESE ESSENTIALLY THE SAME POINTS THE COMPANY TRIED TO**  
18 **SUPPORT IN ITS INITIAL FILING?**

19 **A.** Yes. ICNU provided extensive rebuttal to these suppositions previously in this  
20 proceeding in ICNU/100, Deen/8-14. My earlier testimony is equally applicable to the  
21 "new" evidence provided by the Company in its reply testimony.

22 **Q. PLEASE DISTILL THE COMPANY'S OVERALL RATIONALE FOR ITS**  
23 **PROPOSED PCAM IN THIS PROCEEDING.**

24 **A.** The Company has provided testimony asserting that it has under-recovered its level of  
25 Company-wide NPC in Oregon rates over the last five years to varying degrees. During  
26 this time amount of wind integrated in the Company's resource portfolio has increased



1 substantially. Further, the Company points to a number of operational challenges  
2 imposed by wind generation that are not inherent to more “traditional” dispatchable  
3 resource portfolios. Finally, the Company asserts that there is a causal relationship  
4 between the increase in wind resources as a result of complying with SB 838 in Oregon  
5 and the Company’s system-wide NPC under-recovery.

6 In the Company’s view, there are two sources for the under-recovery of NPC  
7 allegedly caused by renewable resource integration. First, there are operational changes  
8 caused by variable resources. Second, the Company asserts that as a net seller of  
9 electricity at the wholesale level, increased wind power in the region has depressed  
10 market prices and therefore damaged the Company’s revenue from wholesale sales.

11 **Q. PLEASE RESPOND.**

12 **A.** As described previously, the Company’s reasoning on these issues is extremely  
13 unpersuasive. ICNU, however, does not disagree that the integration of large amounts of  
14 variable renewable energy resources has changed utility operations in the Northwest, nor  
15 that there have been challenges associated with those changes. Asserting that these  
16 changes have caused a massive, systematic under-recovery of NPC in the Company’s  
17 Oregon rates is misleading at best.

18 The Company’s alleged under-recovery of system-wide NPC in 2007, when it had  
19 essentially zero wind integrated on its system, was approximately 12.8%. ICNU/100,  
20 Deen/11. In 2011, after a 17-fold increase in integrated wind generation to  
21 approximately 2,375 MW, the Company’s system-wide under-recovery was only 10.5%  
22 percent. Id. This pattern is not supportive of the Company’s assertion, nor was it  
23 addressed by the Company in its reply testimony.

1 Further, consider Portland General Electric Company (“PGE”), which is also  
2 integrating unprecedented amounts of wind generation onto its system due to the same  
3 SB 838 requirements faced by PacifiCorp in recent years. PGE has actually had an issue  
4 with *over-recovery* of its power costs in recent years. This is evidenced by the fact that,  
5 in Docket No. UE 250, PGE’s most recent Annual Update Tariff, it is proposing a  
6 reduction from its currently authorized power costs, and further, that PGE recently filed  
7 to give a refund to customers under Docket No. UE 256, its most recent annual power  
8 cost variance mechanism (note that this refund is beyond the deadbands and earnings test  
9 included in the PGE mechanism).

10 As I explained in my responsive testimony, PacifiCorp has not actually proven  
11 that it is under-recovering its NPC due to a systematic flaw in the current regulatory  
12 paradigm. In addition, if PacifiCorp is concerned that its power cost modeling somehow  
13 does not adequately reflect the costs associated with its operations on a normalized basis,  
14 then it should provide better evidence of the cause of the alleged under-recovery and  
15 address those problems directly. As PGE has demonstrated, it is clearly possible to  
16 recover prudently incurred power costs under the current regulatory framework in  
17 Oregon while also complying with the requirements of SB 838.

18 **Q. PLEASE ADDRESS THE IMPACTS OF WIND GENERATION ON MARKET**  
19 **PRICES AND THEREFORE ON THE COMPANY’S WHOLESALE POWER**  
20 **SALES.**

21 **A.** The other half of PacifiCorp’s argument appears to be that increases in regional wind-  
22 power development have depressed wholesale power prices, which in turn has adversely  
23 affected PacifiCorp’s revenues from wholesale market activities as a net seller and  
24 allegedly led to systematic under-recovery of system NPC in Oregon rates.

1           This line of reasoning is equally unpersuasive. First, it is essential to note that it  
2           is not the absolute level of market prices that affects PacifiCorp's level of NPC recovery.  
3           Instead, the relevant issue is the relative level compared to the TAM forecast used in  
4           setting the level of NPC in rates. In other words, as a net seller, a decrease in market  
5           prices will lower PacifiCorp's sales revenues (causing NPC to increase). However, to  
6           cause an under-recovery at any given level of NPC, market prices would have to be lower  
7           than the forecast used to set the value of wholesale revenues in the most recent TAM. In  
8           other words, market prices would have to not only decline but decline faster than  
9           anticipated.

10           The Company has in no way established that compliance with SB 838 has had any  
11           significant impact on its NPC. Northwest power markets are dynamic and are driven by  
12           many fundamental factors beyond the level of wind power in the region. Weather, loads,  
13           hydro conditions, and natural gas prices represent major factors in the Company's NPC,  
14           which the Company has not adequately (if at all) addressed in its analysis of NPC under-  
15           recovery in this proceeding. The omission of consideration of the historic transformation  
16           in natural gas prices over the last five years is particularly glaring given the status of  
17           natural gas as the marginal resource at many times in the Northwest.

18   **Q.   HAS PACIFICORP ACKNOWLEDGED THAT ISOLATING THE EFFECT OF**  
19   **WIND GENERATION ON ITS LEVEL OF NPC RECOVERY IS EXTREMELY**  
20   **DIFFICULT?**

21   **A.**   Yes. As described by PacifiCorp in PAC/1800, Duvall/9: "Because of their inherent  
22           volatility, the variable and indirect costs of intermittent renewable resources are difficult  
23           to isolate and quantify."

1 **Q. HAS PACIFICORP ACQUIRED ANY RESOURCES TO COMPLY WITH SB 838**  
2 **THAT IT WAS NOT ALREADY PLANNING TO ACQUIRE?**

3 **A.** PacifiCorp does not claim that SB 838 has resulted in the Company building or acquiring  
4 any renewable resources that it was not otherwise planning to acquire. ICNU/112,  
5 Deen/1 (PacifiCorp response to ICNU DR 9.1). PacifiCorp allegedly planned these  
6 renewable resources because they would be the lowest cost and risk. If this is true, then  
7 SB 838 has had no impact at all on PacifiCorp's NPC.

8 **Q. PLEASE SUMMARIZE ICNU'S ANALYSIS OF THE COMPANY'S**  
9 **RATIONALE THAT ITS PROPOSED PCAM IS NECESSITATED FROM AND**  
10 **BY COMPLIANCE WITH SB 838 IN OREGON.**

11 **A.** As described above, and also in ICNU/100, PacifiCorp has not established in any way  
12 that it has under-recovered its Oregon portion of system-wide NPC as a result of SB 838  
13 compliance. Interpreting the extremely weak (at best) correlation between NPC recovery  
14 and increased wind integration as a causal relationship represents flawed logic.  
15 PacifiCorp has not isolated the impact that renewable resources have on its NPC, and is  
16 not seeking recovery of only its cost of renewable resources but all of its NPC. The vast  
17 majority of its NPC variability is related to its market purchases, coal generation, gas  
18 generation, and changes in loads, and PacifiCorp is seeking a PCAM to address the  
19 variability in these long standing factors that it has been able to manage without a PCAM.

20 Given this fundamental issue in the Company's reasoning for the need and  
21 structure of its proposed PCAM, the Commission should reject the Company's proposal  
22 as filed. PacifiCorp is seeking 100% recovery of its NPC. In no other of the five main  
23 states<sup>1/</sup> that it operates in has PacifiCorp taken such an extreme approach. This proposed  
24 mechanism provides no incentive for PacifiCorp to manage its costs, as it is essentially a

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<sup>1/</sup> PacifiCorp has an unusual rate recovery mechanism in California.

1 flow through mechanism. Given the annual rate increases associated with the TAM, this  
2 proposal is not only unnecessary but unbalanced for consumers.

3 **Q. IF THE COMMISSION SHOULD DECIDE TO GRANT A PCAM TO**  
4 **PACIFICORP, DOES ICNU STILL SUPPORT THE USE OF SHARING,**  
5 **DEADBANDS, AND AN EARNINGS TEST?**

6 **A.** Very much. If the Commission decides to grant PacifiCorp a PCAM at this time, ICNU  
7 continues to recommend the structure proposed earlier in this proceeding in ICNU/100.  
8 This structure will better ensure equity between shareholders and customers as well as  
9 PacifiCorp's incentives to manage its costs aggressively in the case that the Commission  
10 believes a PCAM is prudent to deal with the normal risks of PacifiCorp's business.

11 ICNU believes it is important to note that the PCAM proposed by PacifiCorp in  
12 this proceeding is substantially different than both the PCAMs currently in place for PGE  
13 and Idaho Power and also those in place in the Company's Utah, Wyoming, and Idaho  
14 jurisdictions, which all include consumer protections of the type advocated by ICNU,  
15 Staff, CUB, and Kroger in this proceeding. In addition, PacifiCorp does not have a  
16 PCAM in Washington, which also has a renewable portfolio standard. Oregon should  
17 also reject a PCAM for PacifiCorp, and if it grants one, there is no reason to provide one  
18 that is far more generous than PacifiCorp's other states, which are likely the main causes  
19 of any NPC variability given the relative size of PacifiCorp's Oregon loads.

20 **Q. DO YOU HAVE ANY OTHER COMMENTS REGARDING PACIFICORP'S**  
21 **ANALYSIS FOR REQUIRING A PCAM WITHOUT AN EARNINGS TEST OR**  
22 **DEADBANDS?**

23 **A.** Yes. PacifiCorp's "analysis" regarding the "risk" associated with its wind fleet in  
24 PAC/1800, Duvall/4-6 is both misleading and irrelevant to the questions being addressed  
25 in this proceeding. In this section of testimony the Company presents hypothetical dollar  
26 "market values" of its wind generation based on TAM levels of generation and market

1 prices versus actual generation and market prices for the five year period of 2007-2011  
2 on a total Company basis. The Company then grosses up these historical values to  
3 represent the higher levels of wind generation in 2013 and then projected in 2025.

4 PacifiCorp's implication appears to be that this calculation is representative of the  
5 variability that wind generation combined with market price changes can have on the  
6 Company's NPC recovery. However, the analysis is arbitrary and inappropriate.  
7 PacifiCorp's recovery of NPC related to its wind resources is unconnected to the "market  
8 value," because PacifiCorp is not recovering the costs of its wind resources by selling  
9 their output in wholesale markets.

10 **Q. HAS ICNU'S POSITION REGARDING THE TAM IN THIS PROCEEDING**  
11 **CHANGED?**

12 **A.** No. ICNU continues to advocate that the TAM should be eliminated in its current form  
13 or substantially revised. As described already by ICNU, the TAM process has functioned  
14 to the detriment of consumers and is simply unnecessary given the extremely minimal  
15 amount of direct access load in PacifiCorp's Oregon service territory. At a minimum  
16 ICNU continues to recommend that the TAM be abandoned in its current form until a  
17 minimum threshold of direct access load is actually present.

18 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

19 **A.** Yes.

**ICNU Data Request 9.1**

Please refer to PAC/1700, Bird/2. Please identify all renewable resources that PacifiCorp would not have acquired if Oregon had not passed Senate Bill 838.

**Response to ICNU Data Request 9.1**

The Company objects to this request to the extent it requires development of information not maintained in the ordinary course of business or preparation of a special study. Without waiving this objection, the Company responds as follows:

The Company has not prepared an analysis of what it would have done in the absence of Senate Bill 838. All of the renewable resources acquired by PacifiCorp have been consistent with its various integrated resource plans.