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April 20, 2011

***VIA ELECTRONIC FILING  
AND OVERNIGHT DELIVERY***

Chris Petrie  
Secretary and Chief Counsel  
Wyoming Public Service Commission  
2515 Warren Avenue, Suite 300  
Cheyenne, Wyoming 82002

**RE: Docket No. 20000-383-EA-10 (Record No. 12686)  
Rebuttal Testimony of Jeffery W. Bumgarner**

Dear Mr. Petrie:

In accordance with the Rules of Practice & Procedure and General Regulations of the Public Service Commission of Wyoming, Rocky Mountain Power ("Company") hereby submits for electronic filing the Rebuttal Testimony of Jeffery W. Bumgarner. Eight (8) hard copies will be provided for the docket file.

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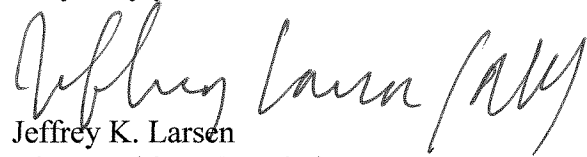
Wyoming Public Service Commission

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Information inquiries related to this report may be directed to David Mosier, (307) 632-2677.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jeffrey K. Larsen" with a stylized flourish at the end.

Jeffrey K. Larsen

Vice President, Regulation

Enclosures

cc: Service List

CERTIFICATE OF SERVICE

I hereby certify that on this 20<sup>th</sup> day of April, 2011, I caused to be served, via E-mail, a true and correct copy of the foregoing document to the following service list:

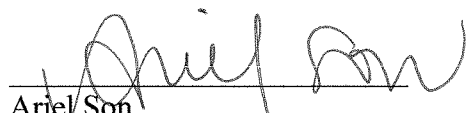
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Docket No. 20000-383-EA-10  
Witness: Jeffery W. Bumgarner

BEFORE THE WYOMING PUBLIC SERVICE  
COMMISSION

ROCKY MOUNTAIN POWER

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Rebuttal Testimony of Jeffery W. Bumgarner

April 2011

1 **Q. Please state your name, business address, by whom you are employed and**  
2 **your current position.**

3 A. My name is Jeffery W. Bumgarner and my business address is 825 NE  
4 Multnomah Boulevard, Suite 600, Portland Oregon, 97232. I am the director of  
5 demand-side management for Rocky Mountain Power (the “Company” or  
6 “RMP”).

7 **Q. Please describe your responsibilities as director of demand-side**  
8 **management?**

9 A. My responsibilities include the development of demand-side management  
10 (“DSM”) program strategy and planning. I work closely with the Company’s  
11 integrated resource planning (“IRP”) department to identify and incorporate DSM  
12 resource opportunities into the resource planning process. Identification of DSM  
13 resource potential, program planning, introduction of new DSM programs,  
14 modifications and terminations of DSM programs all fall within the scope of my  
15 responsibilities.

16 **Q. Please describe your educational and utility industry background.**

17 A. I received a Bachelor of Science in Finance and Business Management in 1981  
18 from the University of Oregon. Thereafter, I joined PacifiCorp in 1981 in the  
19 customer service department and have held various management positions in the  
20 customer care, new product and business development and demand-side  
21 management departments. I have held my current position since July of 2000.

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

23 A. The purpose of my testimony is to:

- 1           • Respond to Wyoming Office of Consumer Advocate (OCA) witness Mr.  
2           Bryce J. Freeman on suggestions regarding quarterly or semi-annual  
3           surcharge adjustment filings and deferring the reinstatement of the  
4           surcharge six months beyond the date the balancing accounts become  
5           balanced as a way to avoid possible future over collections.
- 6           • Respond to recommendations by Wyoming Industrial Energy Consumers  
7           (WIEC) witness Mr. Kevin C. Higgins regarding establishing an explicit  
8           spending cap and redesign recommendation to the Self-Direction program.
- 9           • Respond to numerous recommendations made by Southwest Energy  
10          Efficiency Program (SWEET) witness Mr. Keith Freischlag regarding  
11          Rocky Mountain Power program enhancements, additions and  
12          suggestions.

13   **Q.   Please summarize your testimony as it relates to the suggestions made by**  
14   **OCA in this preceding.**

15   A.   While the Company appreciates the efforts of the OCA and the insightful  
16   testimony of Mr. Freeman, the Company does have concerns with two of Mr.  
17   Freeman's suggestions: 1) proposed adjustments to the Company's Customer  
18   Surcharge collection rates more frequently than annually; and 2) delaying the  
19   reinstatement of Customer Surcharges for a period of time beyond the point in  
20   which the balancing accounts balance (revenues collected equal program  
21   expenses).

1 **Q. What are your concerns with making adjustments to the Customer**  
2 **Surcharges on a quarterly or semi-annually basis?**

3 A. I have three basic concerns: 1) significant changes to program expense forecasts  
4 generally don't change that rapidly (nor do Company revenue forecasts); 2) the  
5 purpose of the balancing accounts is rate stability; and 3) it would add to the  
6 program's administrative costs.

7 While the Company monitors program expenditures on a monthly basis,  
8 any attempt to incorporate data on a real-time basis into revised forecasts on a  
9 monthly or bi-monthly basis (for the purpose of quarterly or semi-annual  
10 adjustments in Customer Surcharges) would not result in meaningful changes in  
11 near-term forecasts. Market trends generally take many months to develop, while  
12 seasonal fluctuations in program activity and revenue, the completion of a large  
13 project, and other variables can lead to short-term variations and misalignment of  
14 revenues collected to program expenses.

15 The use of balancing accounts is intended to account for these short-term  
16 fluctuations and result in the stabilization of the Customer Surcharge collection  
17 rates. Less frequent adjustments lead to more predictable customer rates and  
18 Customer Surcharge stability. The Company initially proposed setting Customer  
19 Surcharge collection rates based on an average of the program's first two years of  
20 projected expenditures because it realized that first year program results may not  
21 be indicative of possible program performance, and further why the Company  
22 delayed an adjustment to the Customer Surcharge rates until there was time to  
23 further study the market and see what program changes might be warranted prior

1 to taking action to reduce collections.

2 Finally, requiring the Company to constantly re-forecast would be  
3 administratively burdensome and would increase program administrative costs.  
4 Creating a program forecast requires the work of many players, from project  
5 managers working with non-residential customers on the status and timeline of  
6 their individual efficiency projects to program delivery vendors studying market  
7 indicators and polling local retailers, contractors, and consultants. This work is  
8 best reserved for times when meaningful market activity is found to be occurring  
9 and or during the program's annual review. That said, the Company suggests a  
10 better approach might be for the Company to provide quarterly or semi-annual  
11 informational filings to the Commission and other parties that contain the running  
12 balances in each of the three balancing accounts. These reports would serve to  
13 keep all parties aware of the changing balances in the three balancing accounts  
14 and provide greater assurance that the Company is monitoring the account  
15 balances and will propose adjustments as warranted.

16 **Q. What is your concern with delaying the reinstatement of Customer**  
17 **Surcharges for a period of time beyond when the balancing accounts**  
18 **balance?**

19 A. The concern is that now that the programs have been running for just over two  
20 years, program expenditures are more predictable and certain. Delaying the  
21 reinstatement of Customer Surcharges to mitigate possible over-collections going  
22 forward would actually exasperate the situation in the opposite direction; it would  
23 lead to a certain under-collection requiring the Company to request an increase in

1 the Customer Surcharges when reinstated beyond the funds necessary to fund  
2 current program operations. Unlike a reduction or suspension of the Customer  
3 Surcharge due to over-collections, an action more easily absorbed by customers,  
4 under-collections throw the revenue requirement in the opposite direction and  
5 lead to higher Customer Surcharges than would otherwise be necessary to fund  
6 current operations. Given what we know today, this may have been an appropriate  
7 strategy when the program first started, however, building in such a delay today  
8 would add to the Customer Surcharge volatility which the use of balancing  
9 accounts is designed to control against.

10 **Q. Please summarize your testimony as it relates to the recommendations made**  
11 **by WIEC in this preceding.**

12 A. Rocky Mountain Power appreciates WIEC's support on the Company's proposals  
13 to suspend Customer Surcharges until the three balancing accounts are balanced  
14 and consolidating the Self-Direction program's three annual bill caps (credit caps)  
15 into a single \$750,000 a year credit cap. However, the Company has concerns  
16 regarding WIEC's suggestions that the broader program requires an explicit  
17 spending cap or "circuit breaker" to control against overspending and that the  
18 Self-Direction program incentives perhaps should be paid upfront rather than over  
19 time, as a credit against the Customer Surcharge.

20 **Q. What is your objection with the suggestion that the program requires an**  
21 **explicit spending cap to control against overspending?**

22 A. I have three primary concerns with imposing and having to manage to a pre-  
23 determined spending cap. The first is philosophical in nature; placing a spending

1 cap on a least cost resource suggests that once a predetermined level of  
2 investment is achieved (regardless of additional resource opportunity) the  
3 Company would turn to a more expensive resource option in meeting our  
4 customer electricity requirements.

5 Second, the market has a built-in spending cap or control that in most  
6 cases, in conjunction with the active management of program incentive levels,  
7 limits aggregate investments in demand side management resources. The control  
8 is a customer's ability and willingness to provide the capital needed to co-fund  
9 demand side management projects. It's only when there are significant changes in  
10 market pricing and program adjustments are not approved and implemented in a  
11 timely manner that this market control can temporarily breakdown; as was the  
12 case in Utah in 2009.

13 Third, managing to spending caps restricts program activity and growth  
14 opportunities. To effectively manage spending to a pre-determined level requires  
15 developing spending controls down to the individual program level, which entails  
16 adding tariff language and developing market communications stating that  
17 program services and incentives are "subject to funding availability". While these  
18 controls do provide a utility the ability to refuse service and manage program  
19 costs within a certain period such as a year, they also add market uncertainty,  
20 upset customers and limit program opportunity. It's not the Company's contention  
21 that there is or should be an open checkbook or unlimited budget, despite resource  
22 cost-effectiveness. It is our contention, however, that as long as the approved  
23 programs are in place customers should be able to access the program services

1 and incentives to help them complete their energy efficiency projects. Should the  
2 Company find it necessary, due to program activity, to request an increase in the  
3 surcharge percentages beyond the levels agreed to by parties and approved by the  
4 Commission in October 2008, the Company will provide evidence of the need and  
5 file the request with the Commission for review and approval. If the Commission  
6 were to decide at that time not to grant the Company's request or to modify that  
7 request to a lower amount, then the Company would take whatever action is  
8 necessary to adjust program investments to recuperate unrecovered funds and  
9 operate the program to the funding levels the Commission decides are  
10 supportable.

11 Probable actions to reduce program funding might include a reduction in  
12 program services or incentives and or reducing the number of programs offered.  
13 While these actions would conflict with my first objection, acquiring higher cost  
14 resources when lower cost demand side management resources are available, they  
15 would act to reduce program funding requirements and would be more  
16 manageable than having to manage to a pre-determined spending cap prior to a  
17 determination whether a higher level of funding is warranted and would be  
18 supported.

19 Furthermore, as I indicated in response to Mr. Freeman's testimony, the  
20 Company would support a quarterly or semi-annual balancing account  
21 informational filing to keep all parties apprised of the running level of program  
22 expenditures in relation to surcharge revenues, a key indicator of a pending need  
23 for possible adjustments, up or down, in the surcharge percentages.

1 **Q. What is the Company’s response to Mr. Higgins suggestion for possible**  
2 **changes to the Self-Direction program to accommodate the “specialized**  
3 **needs of Wyoming Industrial customers and to maximize the implementation**  
4 **of cost-effective energy efficiency investment.”**

5 A. The Company would welcome discussions on how Rocky Mountain Power’s  
6 program offerings could better meet the needs of customers, increase customer  
7 participation, and generate additional cost-effective program savings. However,  
8 program design and redesign in most cases requires a comprehensive review prior  
9 to implementing changes. For instance, implementing a change in the Self-  
10 Direction program that provides qualifying funding to participating customer  
11 upfront requires a substantial redesign in the program and on the surface would  
12 likely introduce greater year-on-year uncertainty in program funding  
13 requirements. Large projects or multiple projects in a given year could drive more  
14 dramatic fluctuations in balancing account activity and lead to a need for more  
15 dramatic and frequent Customer Surcharge rate adjustments to maintain the  
16 account in balance.

17 Furthermore, the design of the Company’s Wyoming business programs;  
18 Energy FinAnswer, FinAnswer Express, and the Self-Direction program are  
19 intended to closely align but not overlap each other and provide the greatest  
20 breadth of services and delivery characteristics in assisting customers in  
21 implementing efficiency projects. Implementing a major change in any of the  
22 three offerings would require a review of all the programs to ensure the programs  
23 continue to work together.

1           The suggestion that the Self-Direction program is not providing WIEC  
2 customers the flexibility they desire is new information to the Company. We  
3 would propose parties interested in program design agree to discuss the program  
4 outside of the current application, and, if changes are warranted they be provided  
5 to the Commission for consideration at a later date.

6   **Q.   Please summarize your testimony as it relates to the recommendations made**  
7   **by SWEEP in this preceding.**

8   A.   The Company appreciates SWEEP’s Wyoming program recommendations and  
9 strong support in helping advance energy efficiency programs in the region.  
10 However, the Company believes many of the recommendations have already been  
11 incorporated, in full or in part, within the Company’s programs or pending  
12 application while others would take additional time to study and/or be challenging  
13 to offer cost-effectively in the Company’s Wyoming service area. I will attempt to  
14 categorize and respond to many of Mr. Freischlag’s recommendations and where  
15 applicable recommend possible ways to incorporate the recommendations or  
16 define a process to study the recommendations for possible Commission  
17 consideration at a later date.

18   **Q.   Please provide some examples of SWEEP program recommendations that**  
19   **already exist within Rocky Mountain Power’s Wyoming program.**

20   A.   There are two notable recommendations that fall into this category. The Company  
21 spends a great deal of time, in both the non-residential and residential sectors,  
22 working with trade allies, contractors and retailers to educate them on the  
23 Company’s programs. Third parties under contract to the Company manage the

1 non-business program trade alliance network of lighting, heating, ventilation and  
2 air conditioning, motors, and other equipment contractors, equipment suppliers,  
3 and installation contractors. PEGI and Jaco manage the residential contractors and  
4 retailers (excluding low income community action agencies that are managed by  
5 Rocky Mountain Power directly). Trade ally education and assistance is a  
6 longstanding practice and is vital to the successful delivery of the Company's  
7 programs and services.

8 The Company also provides non-business sector energy audits to program  
9 qualifying customers at no direct customer cost through both the Energy  
10 FinAnswer and FinAnswer Express business programs. The Company contracts  
11 with local and near-local energy engineering talent that can help customers  
12 identify project opportunities at their facilities and calculate project economics.  
13 Many are specialists in industry specific disciplines such as oil and gas  
14 production, industrial processes and commercial facilities.

15 The Company also provides no cost audit services to residential  
16 customers, however, they are online audits rather than the more comprehensive  
17 and customer subsidized site-based audit that SWEEP is recommending. The  
18 Company's residential audit tools consist of a link from Rocky Mountain Power's  
19 website to the United States Department of Energy's free do-it-yourself online  
20 audit tool and the Company's Home Energy Analysis audit (postage paid mail-in  
21 audit).

22 In addition to the audits, the Company provides other low and no cost  
23 recommendations customers can take to reduce their energy usage as well as

1 information on the Company programs available to assist them.

2 **Q. Please provide examples of SWEEP recommendations that are contained, in**  
3 **full or part, within the Company's proposed program changes and**  
4 **application.**

5 The Company believes that three of SWEEP's recommendations fall into this  
6 category. The first is SWEEP's recommendation to increase non-residential  
7 lighting rebates within the FinAnswer Express program relative to those available  
8 under the standard Energy FinAnswer program. In addition to adding emerging  
9 lighting measures to the incentive list and making adjustments in lighting  
10 qualifications to account for advancing codes and standards, the Company's  
11 current proposal reflects an average increase in prescriptive incentive levels in  
12 retrofit projects of approximately 20 percent. Lighting is a key lower cost  
13 resource opportunity across all customer sectors and maintaining productive  
14 lighting offerings is necessary to grow customer participation and maintain a cost-  
15 effective program.

16 The second recommendation accounted for in the Company application is  
17 SWEEP's suggestion to increase the customer participation incentive and  
18 program advertising in the Company's refrigerator recycling program. Although  
19 the Company is not proposing to increase the incentive from \$30 to \$75 per unit  
20 as SWEEP suggests, the Company is proposing to increase the incentive to \$40  
21 per unit, increase program advertising, and re-evaluate the contents of the instant  
22 savings kits provided customers as an added participation incentive/benefit. The  
23 kit redesign includes consideration of low flow showerheads and aerators for

1 customers with electric water heating, another SWEEP suggestion. Collectively  
2 these changes are designed to improve the program's visibility, participation and  
3 benefit/savings per customers.

4 The final recommendation in this category is SWEEP's recommendation  
5 that the Company "brand" the demand-side program in order to improve customer  
6 awareness and increase participation. They recommend the Company introduce a  
7 communications campaign similar to the Company's Utah *wattsmart* program.  
8 The Company's recommendation to increase outreach and communication  
9 spending by \$150,000 a year is consistent with the SWEEP recommendation as is  
10 the Company's intent to leverage our *wattsmart* "brand", advertising designs, and  
11 marketing materials to promote the Wyoming program.

12 **Q. What SWEEP recommendations does the Company believe may not be cost-**  
13 **effective or at a minimum would require additional time to study or**  
14 **implement?**

15 A. There are four SWEEP recommendations that the Company believes would be  
16 challenging to deliver as proposed. The first is the introduction of a  
17 comprehensive residential audit program similar to Home Performance with  
18 Energy Star program. Based on the 2010 state-wide performance (including  
19 customer participation) of the Wyoming Business Council Home Performance  
20 with Energy Star audit program (funded by American Recovery and Reinvestment  
21 Act of 2009 dollars) it's difficult to see a circumstance under which the Company  
22 might offer a similar program cost-effectively. That being said, the general  
23 concept is one the Company has interest in and would be willing to discuss

1 further. Offering customer site based audit programs outside of large urban areas  
2 tends to be challenging for single fuel utilities due to available benefits in relation  
3 to program costs. The geographical challenges in delivering the audits, their  
4 general cost, and gross numbers of participants needed to drive acceptable net  
5 project work/savings are the general market barriers. Making them economical in  
6 urban areas for electric utilities is impacted by the growing availability of natural  
7 gas and the saturation of natural gas space and water heating.

8 According to the Company's last end-use survey of our Wyoming service  
9 area, natural gas is available in 85 percent of our neighborhoods served, 60  
10 percent of our customers heat their homes and 70 percent heat their water with  
11 natural gas, suggesting the saturation of natural gas heated homes is even higher  
12 in the Company's more urban service areas than the percentages suggest. With  
13 this greater saturation of natural gas comes less savings opportunity for  
14 comprehensive shell savings (i.e. insulation, windows, and air infiltration for  
15 instance) needed to fully support cost-effective audit programs. As gas utilities'  
16 demand side management programs grow in Wyoming the best solution may be to  
17 seek partnerships with those gas utilities with the greatest service area overlap  
18 looking to split audit costs commensurate the savings opportunities.

19 SWEEP's second recommendation in this category is that the Company  
20 introduce a Home Energy Report pilot offering to 20,000 customers at a cost of  
21 \$325,000 per year. SWEEP estimates the pilot will generate an additional 5 GWh  
22 per year of cost-effective savings, engage customers, and improve program  
23 awareness. While Rocky Mountain Power doesn't disagree in general with the

1 relative costs and savings opportunities that SWEEP cites in their  
2 recommendation, the Company recently completed an investigation and report on  
3 Home Energy Reports in Utah. The report looked into program characteristics  
4 including economic drivers, savings assumptions and costs. As a result of upfront  
5 implementation and ongoing support costs, the Company estimates that in order  
6 for a pilot program in Wyoming to be economically break even (within two years)  
7 the program would need to be twice the size recommended by SWEEP; be offered  
8 to 40,000 customers at an average cost of \$600,000 a year. The Company's  
9 findings suggest that to reach acceptable economics, better than break-even, a  
10 start-up Home Energy Report program should be run for a minimum of three  
11 years and include 75,000 participants. A pilot program with 75,000 participants  
12 would cost on average \$940,000 a year. While the Home Energy Report  
13 recommendation has merit, additional work is needed before a viable program is  
14 ready for offering to Rocky Mountain Power's Wyoming customers. Offering  
15 Home Energy Reports in Wyoming may benefit from a multi-state  
16 implementation whereby startup and support costs can be shared across more than  
17 one state, but until this happens the Company would not support SWEEP's  
18 recommendation for a Home Energy Report in Wyoming.

19 The third recommendation in this category is to add low flow showerheads  
20 to the Company's Home Energy Savings program as a low cost or no-cost  
21 measure for customers with electric water heating. This recommendation is  
22 reasonable and in fact is something that the Company has discussed recently in  
23 other jurisdictions. The Company needs additional time, however, to

1 competitively procure a showerhead distributor and complete our analysis of the  
2 opportunity.

3 SWEEP's fourth recommendation is that the Commission direct Rocky  
4 Mountain Power to implement a combined heat and power (CHP) support  
5 program. Rocky Mountain Power supports investments in supply-side customer  
6 sited distributed generation resources, including CHP by providing incentives to  
7 Schedule 37, Avoided Cost Purchases from Qualifying Facilities. Most customers  
8 in this category receive analysis and feasibility support from project developers  
9 who specialize in installations. The Company believes that should any additional  
10 support services and benefits be developed for CHP investments it must be done  
11 across a broader audience than within a demand side management  
12 program/resource application.

13 **Q. Are there any additional recommendations made by SWEEP that the**  
14 **Company would like to comment on?**

15 A. Yes, The first is SWEEP's recommendation that the Company participate,  
16 financially, in the implementation of a building energy code support program. The  
17 Company acknowledges the importance of energy codes in advancing building  
18 practices and energy efficiencies. The Company supports these efforts, especially  
19 when support is shown to be beneficial to the state, customers and the Company.  
20 For instance, the Company's co-support in Utah's multi-party statewide code  
21 training program is beneficial to the delivery of the Company's Energy Star new  
22 homes program, ensuring local inspectors and builders are educated on existing  
23 energy requirements. The training helps capture savings that would otherwise be

1 lost if a home isn't built to Utah's energy code and hasn't been certified through  
2 the Company's Energy Star program. The Company's support began in Utah upon  
3 the state's adoption the 2006 International Energy Conservation Code (IECC)  
4 standards and the need arose to bring parties up to speed on the emerging  
5 requirements. The Company is receptive to working with the Wyoming Business  
6 Council and other local parties on code development and training provided similar  
7 needs and ties can be made, the support is accompanied by clear objectives and  
8 deliverables and is supported by the Commission and other interested parties.

9 My final comments are in regards to SWEEP's recommendation for the  
10 Company to create a low income working group with community stakeholders  
11 active in fulfilling the weatherization needs of low income customers. The  
12 Company has been engaged with local community stakeholders responsible for  
13 fulfilling the needs of Wyoming's low income customers since 2008. We have  
14 contractual relationships with two weatherization agencies providing  
15 weatherization services in the state, the Council of Community Services (CCS)  
16 and the Wyoming Energy Council (WEC), and work closely with staff from the  
17 Wyoming Department of Family Services who administers government funding  
18 (funding from the Department of Energy, Health and Human Services, ARRA and  
19 the state of Wyoming). Progress to partner with the third and largest agency  
20 serving Rocky Mountain Power's customers, Wyoming Weatherization Services  
21 (WWS), has been slowed by the surplus of funds available in the market, not a  
22 lack of stakeholder coordination, program marketing, incentive levels and other  
23 factors suggested. Until the surplus funding is no longer available, the Company

1 will continue to provide benefits through a direct distribution channel, offering  
2 program benefits such as free CFLs and the proposed refrigerator replacement  
3 program.

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

5 A. Yes.