

Docket No. 20000-\_\_-ER-23  
Witness: Joelle R. Steward

BEFORE THE WYOMING PUBLIC SERVICE  
COMMISSION

ROCKY MOUNTAIN POWER

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Direct Testimony of Joelle R. Steward

March 2023

1           **I.       INTRODUCTION OF WITNESS AND QUALIFICATIONS**

2   **Q.    Please state your name, business address, and present position with PacifiCorp,**  
3       **d/b/a Rocky Mountain Power (“Rocky Mountain Power” or the “Company”).**

4   A.   My name is Joelle R. Steward and my business address is 1407 West North Temple,  
5       Salt Lake City, Utah 84116. I am currently employed as Senior Vice President,  
6       Regulation and Customer/Community Solutions.

7   **Q.    Please summarize your education and business experience.**

8   A.   I have a Bachelor of Arts degree in Political Science from the University of Oregon and  
9       an M.A. in Public Affairs from the Hubert Humphrey Institute of Public Policy at the  
10      University of Minnesota. Between 1999 and March 2007, I was employed as a  
11      Regulatory Analyst with the Washington Utilities and Transportation Commission.  
12      I joined the Company in March 2007 as a Regulatory Manager, responsible for all  
13      regulatory filings and proceedings in Oregon. On February 14, 2012, I assumed  
14      responsibilities overseeing cost of service and pricing for PacifiCorp. In May 2015, I  
15      assumed broader oversight over Rocky Mountain Power’s regulatory affairs in addition  
16      to the cost of service and pricing responsibilities. In 2017, I assumed the role as Vice  
17      President, Regulation for Rocky Mountain Power; in November 2021, I assumed my  
18      current role as Senior Vice President, Regulation and Customer/Community Solutions  
19      for PacifiCorp.

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

21   A.   Yes. I have testified on various matters in the states of Idaho, Oregon, Utah,  
22      Washington, and Wyoming.

## II. PURPOSE OF TESTIMONY

1  
2 **Q. What is the purpose of your direct testimony?**

3 A. I provide an overview of Rocky Mountain Power’s current filing and support the  
4 Company’s policy positions throughout this filing. In this general rate case filing, the  
5 Company is requesting an increase in rates of approximately \$140.2 million, or  
6 21.6 percent. Approximately \$135.4 million of the increase, or 97 percent, is related to  
7 resetting the new base for the Energy Cost Adjustment Mechanism (“ECAM”) for net  
8 power costs (“NPC”). Since the Company’s last general rate case (“2020 Rate Case”) net  
9 power costs have been climbing annually at unprecedented levels.<sup>1</sup> Even though  
10 PacifiCorp has and continues to make a concerted effort to manage its controllable  
11 costs, as explained by Company witness Gary W. Hoogeveen, since its 2020 Rate Case  
12 the Company is facing increasing NPC driven by increases in regional market prices  
13 and fuel costs as well as new state and federal environmental compliance  
14 environmental requirements. PacifiCorp understands the impact that a rate increase has  
15 on its customers and the Company is taking long-term actions that continue to position  
16 the Company as a least-cost, least-risk utility through this changing energy landscape.  
17 Actions that the Company has taken, such as construction of new transmission lines to  
18 support reliability and new cost-effective generation and participation in the Energy  
19 Imbalance Market (“EIM”) and the Extended Day Ahead Market (“EDAM”) have and  
20 will mitigate the increases in energy costs over the long-term. This work coupled with  
21 the Company’s cost control measures and investing in cost-effective energy solutions  
22 like the conversion to natural gas for Jim Bridger Units 1 and 2, to facilitate a transition

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<sup>1</sup> *In the Matter of the Application of Rocky Mountain Power for Authority to Increase Rates*, Docket No. 20000-578-ER-20 (Record No. 15464), Memorandum Opinion, Findings and Order (July 15, 2021).

1 of the Company's system, will help position the Company to continue to respond  
2 proactively and ensure delivery of safe, reliable, affordable electric service to its  
3 customers.

4 **Q. How is your direct testimony structured?**

5 A. Section III of my testimony provides an overview of the Company's last rate case filing.  
6 Section IV provides an overview of this rate case filing, including a discussion of  
7 primary drivers. Section V discusses the Company's proposed modification to its  
8 Energy Cost Adjustment Mechanism ("ECAM").

9 **Q. Please summarize the recommendations you make in your direct testimony.**

10 A. I recommend that the Wyoming Public Service Commission ("Commission"):

- 11 • Authorize an increase of \$140.2 million or approximately 21.6 percent. The support  
12 for the overall increase is set forth in my testimony and the testimony of the other  
13 Company witnesses;
- 14 • Approve as prudent the Company's request to include the incremental additions to  
15 the Company's rate base, including Gateway South and Gateway West Segment  
16 D.1 transmission projects, Rock Creek I wind project, and Foote Creek II-IV and  
17 Rock River I repowering projects, for a total rate base of approximately \$2.9 billion,  
18 as discussed in the testimony of various witnesses in this rate case;
- 19 • Approve an overall cost of capital of 7.60 percent, which is comprised of a capital  
20 structure of 51.27 percent equity, 48.72 percent long-term debt, and 0.01 percent  
21 preferred stock as supported by Ms. Nikki L. Kobliha; and a return on equity  
22 ("ROE") of 10.3 percent as supported by Ms. Ann E. Bulkley;

- 1 • Approve the forecasted total-Company NPC for 2024 of \$2.553 billion as supported  
2 by Mr. Ramon J. Mitchell;
- 3 • Approve the proposed modifications to the ECAM as supported by Mr. Mitchell;  
4 and
- 5 • Approve the equitable cost of service and rate design proposals set forth in the  
6 testimony of Mr. Robert M. Meredith.

### 7 III. PREVIOUS RATE CASE HISTORY

8 **Q. Please discuss the Company's most recent general rate case and its outcome.**

9 A. On March 2, 2020, the Company filed its 2020 Rate Case requesting an overall increase  
10 in revenues from Wyoming operations of \$7.1 million or 1.1 percent. In rebuttal  
11 testimony, the Company updated its overall increase request to a \$9.1 million, which  
12 was proposed to be phased in through two rate changes in 2021.<sup>2</sup> Following a litigated  
13 proceeding, the Commission authorized a base rate increase of approximately  
14 \$6.98 million or 1.1 percent.<sup>3</sup> The bill impact, however, was offset by approval of a  
15 three-year refund of tax credits from the 2017 Tax Cuts and Jobs Act, which resulted in  
16 a net decrease of 3.5 percent.

### 17 IV. OVERVIEW OF RATE CASE

18 **Q. What is the purpose of this section of your direct testimony?**

19 A. In this section of my testimony, I explain the various components of the Company's  
20 rate case filing. I also explain the primary drivers of the requested increase in the  
21 Company's rates.

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<sup>2</sup> *Id.*, at 6.

<sup>3</sup> *Id.*, at 2.

1 **Q. What test period is the Company proposing in this rate proceeding?**

2 A. The test period the Company is proposing is a forecasted test year with known and  
3 measurable cost changes for the 12-months ending December 31, 2024. The use of a  
4 forecasted test period is necessary to appropriately align the costs and benefits  
5 associated with the new capital additions that go into service through 2024 and the rate  
6 effective date. The testimony of Mr. Nicholas L. Highsmith discusses the development  
7 of the test period.

8 **Q. What rate of return is the Company requesting in this case?**

9 A. The Company is requesting approval of an overall rate of return of 7.60 percent.  
10 The overall rate of return reflects a 10.3 percent ROE as supported by Ms. Bulkley. As  
11 explained by Ms. Kobliha, PacifiCorp is requesting approval of a capital structure that  
12 is comprised of 51.27 percent equity, 48.72 percent long-term debt, and 0.01 percent of  
13 preferred stock. Mr. Highsmith applies the overall rate of return in the calculation of  
14 the Company's Wyoming-allocated revenue requirement.

15 **Q. Is the Company using the 2020 PacifiCorp Inter-Jurisdictional Allocation**  
16 **Protocol ("2020 Protocol") allocation methodology in this rate case?**

17 A. Yes. The Commission approved the use of the 2020 Protocol beginning on January 1,  
18 2020.<sup>4</sup> As explained by Mr. Highsmith, the Company used the 2020 Protocol to develop  
19 the revenue requirement in this proceeding.

20 **Q. When is the 2020 Protocol set to terminate?**

21 A. The 2020 Protocol is set to terminate on December 31, 2023.

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<sup>4</sup> *In the Matter of the Application of Rocky Mountain Power for Approval of the 2020 Inter-Jurisdictional Cost Allocation Agreement*, Docket No. 20000-572-EA-19 (Record No. 15400), Memorandum Opinion, Findings and Order (Nov. 30, 2020).

1 **Q. Are the Company and the stakeholders in the Multistate Process developing an**  
2 **allocation methodology to replace the 2020 Protocol?**

3 A. Yes. The Company and the stakeholders in the Multistate Process have been working  
4 on the next protocol agreement to replace the 2020 Protocol but require additional time  
5 to work through these complex issues. Therefore, in March 2023, the Company expects  
6 to file with its various state commissions a request to approve an amendment to the  
7 2020 Protocol to extend its use through December 31, 2025. The signatories to the 2020  
8 Protocol have indicated support for the amendment.

9 **Q. Please describe the primary drivers of PacifiCorp's rate request.**

10 A. The primary drivers of the Company's general rate request are: (1) NPC; and (2) capital  
11 additions. I discuss each of these drivers in more detail below.

12 **Q. Please describe the NPC driver in this rate request.**

13 A. As explained by Mr. Mitchell, NPC have greatly increased since the Company's 2020  
14 Rate Case. The Company forecasts base NPC for 2024 to be \$2.553 billion, which is a  
15 significant increase from 2020 GRC forecasted base NPC of \$1.431 billion currently  
16 included in rates. NPC has been trending upward for several reasons, but the largest  
17 drivers are the significant increases in regional power and gas prices. However, the  
18 Company has and continues to make long-term investments that respond to changes in  
19 the industry to ensure continued operation of a safe and reliable portfolio of resources  
20 that are least-cost and least-risk for our customers. For example, the NPC increase is  
21 mitigated by the Company's investment in the Gateway South transmission line  
22 because it allows for the deployment of additional capacity from Wyoming wind and  
23 coal resources. Further, because of its participation in the EIM, the Company's

1 customers have received savings of and reduction to NPC of \$591 million since EIM's  
2 inception.<sup>5</sup> Mr. Mitchell explains in detail the drivers causing the increase in NPC and  
3 actions taken by the Company to offset increasing NPC. He also supports the forecasted  
4 2024 base NPC to be included in Wyoming rates in his testimony.

5 **Q. Is NPC impacted by the uncertainties as to the application of the Ozone Transport**  
6 **Rules to Wyoming in 2023 and 2024?**

7 A. Yes. In 2022 the Environmental Protection Agency's ("EPA") announced an expansion  
8 and revision of its Cross-State Air Pollution Rule (the Ozone Transport Rule ("OTR"))  
9 on nitrogen oxides' ("NO<sub>x</sub>") emissions limits that would impact operation of our  
10 thermal resources in Wyoming and Utah beginning in 2023. Most recently the EPA has  
11 deferred its final decision to disapprove Wyoming's state implementation plan ("SIP")  
12 on cross-state ozone transport until December 15, 2023. The EPA must make a final  
13 determination disapproving Wyoming's SIP before it would have authority to impose  
14 its proposed cross-state ozone transport federal implementation plan ("FIP"), which is  
15 expected to be finalized on March 15, 2023. While this likely means Wyoming will not  
16 be subject to EPA's FIP for the 2023 ozone season, it is uncertain whether EPA will  
17 approve or disapprove Wyoming's SIP by its December deadline.

18 EPA denied 19 other state plans on February 13, 2023. One key factor in  
19 determining whether a state is subject to the FIP is if EPA's modeling shows the state  
20 contributes 0.7 parts per billion ("ppb") or more to downwind air monitors. EPA's latest  
21 modeling, released with its February 2023 decision, shows Wyoming's contribution at  
22 0.68 ppb. In other words, Wyoming is very close to the 0.7 ppb threshold for inclusion

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<sup>5</sup> <https://www.westerneim.com/Pages/About/QuarterlyBenefits.aspx>



1 in the FIP. EPA has reported it is re-evaluating the Wyoming SIP and associated  
2 modeling and monitoring information and may re-propose its action to disapprove  
3 those plans. PacifiCorp is also further evaluating the modeling to better understand the  
4 likelihood that Wyoming could be included in the FIP in 2024 and future years.

5 **Q. How has the Company treated the impacts of OTR on the forecasted 2024 NPC?**

6 A. As explained by Mr. Mitchell, the Company has assumed the OTR is applicable to  
7 Wyoming thermal units in NPC for 2024. However, if it receives guidance from the  
8 EPA following the filing of this general rate case, the Company will update forecasted  
9 NPC at the first opportunity based on the procedural schedule adopted by the  
10 Commission in this proceeding. However, this type of uncertainty that is evolving and  
11 has a material impact on our operations and therefore NPC makes accurately  
12 forecasting NPC more challenging than ever. Accordingly, as I discuss later in my  
13 testimony, the Company is proposing to eliminate the sharing in the ECAM to reflect  
14 actual prudently-incurred NPC in rates so that neither the Company nor customers are  
15 unfairly impacted by these circumstances largely outside of the Company's control.

16 **Q. Please describe the capital additions drivers in this rate request.**

17 A. The Company expects to place into service approximately \$6.7 billion of new capital  
18 projects on a total-Company basis between the end of the base period and the end of  
19 the test period, which includes the Gateway South and Gateway West Segment D.1  
20 transmission projects, Rock Creek I wind project, and Foote Creek II-IV and Rock  
21 River repowering projects. These capital investments are more fully discussed in the  
22 testimonies of Mr. Rick T. Link, Mr. Thomas R. Burns, Mr. Rick A. Vail, Mr. Ryan D.  
23 McGraw, and Mr. Timothy J. Hemstreet.

1 **Q. Please describe the Gateway South and Gateway West Segment D.1 transmission**  
2 **projects.**

3 A. These transmission projects are key components of the Company's Energy Gateway  
4 Transmission Expansion and have been an integral component of the long-term  
5 transmission plan for the region for a decade. Gateway South is a 416-mile, high  
6 voltage 500-kilovolt ("kV") transmission line that will connect southeastern Wyoming  
7 to central Utah. Gateway West Segment D.1 includes the construction of a new 59-  
8 mile, high voltage 230-kV transmission line from the Shirley Basin substation in  
9 southeastern Wyoming to the Windstar substation near Glenrock, Wyoming, and a  
10 rebuild of approximately 57 miles of the existing Dave Johnston-Shirley Basin 230-  
11 kV transmission line. Mr. Vail provides details regarding these transmission projects.

12 **Q. What is the status of construction of the Gateway South and Gateway West**  
13 **Segment D.1 transmission projects?**

14 A. Construction began on the Gateway South and Gateway West Segment D.1  
15 transmission projects in June 2022 and September 2022, respectively. Both  
16 transmission projects are expected to be in-service in the fourth quarter of 2024. Mr.  
17 Vail provides details regarding the construction of these projects.

18 **Q. Did the Company receive certificates of public convenience and necessity**  
19 **("CPCNs") for the Gateway South and Gateway West Segment D.1 transmission**  
20 **projects?**

21 A. Yes. The Company requested and received CPCNs for the Gateway South and Gateway

1 West Segment D.1 transmission projects in Docket No. 20000-588-EN-20.<sup>6</sup>

2 **Q. Do the Gateway South and Gateway West Segment D.1 transmission projects**  
3 **provide benefits to customers?**

4 A. Yes. As explained by Mr. Link and Mr. Vail, the Gateway South and Gateway West  
5 Segment D.1 transmission projects will provide a number of benefits including  
6 relieving congestion on the transmission system in Wyoming, enabling additional  
7 renewable resource interconnections, and improving overall reliability.

8 **Q. Please describe the Rock Creek I wind project.**

9 A. The Rock Creek I wind project will have a name plate capacity of 190 MW and is  
10 located in Carbon and Albany counties in southeast Wyoming. The project is being  
11 developed by Invenergy and was a bid submitted and selected to the final shortlist in  
12 the Company's 2020 All-Source Request for Proposal process in the form of a build-  
13 transfer agreement. Mr. McGraw provides further details regarding the Rock Creek I  
14 wind project.

15 **Q. What is the construction status of the Rock Creek I wind project?**

16 A. Construction on the Rock Creek I wind project is expected to begin in the second  
17 quarter 2023 and the proposed in-service date is December 2024. Mr. McGraw provides  
18 further details on the construction of the project.

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<sup>6</sup> *In the Matter of the Application of Rocky Mountain Power for Sitis & Non-Sitis Certificates of Public Convenience and Necessity for the Gateway South Transmission Project and the Gateway West Segment D.1 Transmission Project*, Docket No. 20000-588-EN-20 (Record No. 15604). The Commission approved the CPCNs in a bench decision on May 10, 2022.

1 **Q. Did the Company request a CPCN for the Rock Creek I wind project?**

2 A. Yes. The Company requested a CPCN for the Rock Creek I wind project in Docket No.  
3 20000-623-EN-22.<sup>7</sup> The Commission held a hearing on the CPCN request on  
4 February 1, 2023.

5 **Q. Does the Rock Creek I wind project provide benefits to customers?**

6 A. Yes. As explained by Mr. Link, the Rock Creek I wind project is a cost-effective way  
7 to meet a substantial near-term need for resources at a time when the region is expected  
8 to be resource deficient.

9 **Q. Please describe the Foote Creek II-IV and Rock River I repowering projects.**

10 A. As explained in the testimony of Mr. Hemstreet, the repowering projects involve  
11 upgrading the wind turbine generator (“WTG”) equipment of existing wind facilities  
12 to increase the power generation from the facility and extend the life of the facility. The  
13 Foote Creek II-IV repowering project, located in Wyoming, will involve installing new  
14 WTGs to replace the older wind turbines of much smaller capacity that were previously  
15 at the site. The Foote Creek II-IV will benefit from the Company’s recent completion  
16 of repowering the Foote Creek I wind facility, which the Commission approved in the  
17 2020 Rate Case. Similarly, the Rock River I repowering project, also located in  
18 Wyoming, will erect new WTGs to replace the smaller capacity turbines originally  
19 installed. Mr. Hemstreet provides testimony on both projects.

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<sup>7</sup> *In the Matter of the Application of Rocky Mountain Power for Certificates of Public Convenience and Necessity for the Rock Creek I and Rock Creek II Wind Projects and the Associated Transmission Infrastructure for Interconnection*, Docket No. 20000-623-EN-22 (Record No. 17154).

1 **Q. What is the construction status of the Foote Creek II-IV and Rock River I**  
2 **repowering projects?**

3 A. The Company began construction on Foote Creek II-IV repowering project in the  
4 summer of 2022 and is expected to be online serving customers in December 2023.  
5 Construction of Rock River I repowering project is expected to begin in the spring of  
6 2023 and is anticipated to be fully online and serving customers December 2024. Mr.  
7 Hemstreet discuss the construction of these projects.

8 **Q. Did the Company receive CPCNs for the Foote Creek II-IV and Rock River I**  
9 **repowering projects?**

10 A. Yes. The Company requested and was granted a CPCN for the Foote Creek II-IV  
11 repowering project in Docket No. 20000-606-EN-21.<sup>8</sup> The Company requested and  
12 was granted a CPCN for the Rock River I repowering project in Docket No. 20000-  
13 613-EN-22.<sup>9</sup>

14 **Q. Do the Foote Creek II-IV and Rock River I repowering projects provide benefits**  
15 **to customers?**

16 A. Yes. As explained by Mr. Burns, Foote Creek II-IV and Rock River I repowering  
17 projects produce net customer benefits across a range of price-policy scenarios.

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<sup>8</sup> *In the Matter of the Application of Rocky Mountain Power for Certificates of Public Convenience and Necessity to Construct New Wind Turbines and Update Collector Lines at the Existing Foote Creek II-IV Wind Energy Facility*, Docket No. 20000-606-EN-21 (Record No. 16955).

<sup>9</sup> *In the Matter of the Application of Rocky Mountain Power for Certificates of Public Convenience and Necessity to Construct New Wind Turbines and Update Collector Lines at the Existing Rock River I Wind Energy Facility*, Docket No. 20000-613-EN-22 (Record No. 17017), Order Granting Certificate of Public Convenience and Necessity (Feb. 3, 2023).

1 **Q. Please explain the Company's overall approach to designing customer rates in this**  
2 **proceeding.**

3 A. The Company continues the Commission's long-established practice of designing rates  
4 to be aligned with the cost of service. The proposed allocation of the revenue  
5 requirement and rates reflect the changing conditions since the Company's last rate  
6 case. For rates, the Company makes several rate design updates, including for  
7 residential customers, eliminating the Energy Charge tier differential in two steps,  
8 merging irrigation schedules, and for large non-residential customers, establishing a  
9 Load Size Charge for Schedule 48T, and increasing the Load Size Charge for Schedule  
10 46 to recover transmission and a portion of fixed production costs. Additionally, the  
11 Company is proposing to reduce line extension contract minimum terms from  
12 perpetuity to 15 years and make some other minor changes to its Rule 12 tariff. The  
13 cost of service study, rate design, and tariffs are explained in greater detail in  
14 Mr. Meredith's testimony.

15 **V. PROPOSED MODIFICATION TO THE ECAM**

16 **Q. What is the purpose of this section of your testimony?**

17 A. In this section of my testimony, I discuss the Company's proposed modification to the  
18 ECAM.

19 **Q. What is the ECAM?**

20 A. The ECAM is a ratemaking mechanism that is filed annually through which the  
21 Company returns to or recovers from customers the difference between Wyoming-  
22 allocated actual NPC that occur during the prior calendar year and the base NPC, which  
23 are forecasted and included in base rates by the Commission in a general rate case. The

1 ECAM also includes the return or recovery of certain other non-NPC items as provided  
2 in the Company's Schedule 95. As originally approved, the ECAM included a sharing  
3 band whereby Company returned to or recovered from customers 70 percent of the  
4 difference between actual and forecast ECAM costs, and the remaining 30 percent of  
5 the difference is retained or absorbed by the Company. However, in the 2020 Rate Case,  
6 the Commission approved a change to the sharing band that allows the Company to  
7 return to or recover from customers 80 percent of the difference between actual and  
8 forecast ECAM costs, and the remaining 20 percent of the difference is retained or  
9 absorbed by the Company ("80/20 sharing band").

10 **Q. What change is the Company proposing to the ECAM?**

11 A. The Company is proposing elimination of the 80/20 sharing band to allow for 100  
12 percent return to or recovery from customers for the ECAM's prudently incurred  
13 revenues and costs.

14 **Q. Why is the Company proposing changes to the ECAM at this time?**

15 A. When the ECAM was first approved in 2010, the Commission concluded that it should  
16 be structured in such a way to provide certain incentives to the Company, such as  
17 encouraging the Company to accurately forecast and control costs. To achieve this  
18 objective, the Commission structured the ECAM with a sharing band. However,  
19 changes to how the Company dispatches resources and how it models NPC have  
20 occurred since the 2020 Rate Case, when the Commission last approved a change to  
21 the ECAM structure. Most notably, there is currently an unprecedented level of  
22 uncertainty in being able to accurately forecast NPC due to market and fuel prices and  
23 to meet state and federal environmental compliance requirements that implicate our

1 operations. Because these NPC drivers are outside of the Company's control, the  
2 Company should not be punished or rewarded through a sharing band in the ECAM.  
3 Additionally, the Company has recently announced that it intends to join the California  
4 Independent System Operator's Extended-Day Ahead Market ("EDAM"). The EDAM  
5 will economically control and optimize most of the Company's NPC. Therefore, the  
6 Company is seeking this change in the ECAM to better reflect how the industry and  
7 the Company's operations have changed since the ECAM was initially adopted in 2010.  
8 Mr. Mitchell supports the Company's ECAM proposal in his testimony.

9 **VII. RECOMMENDATION**

10 **Q. Please summarize the Company's recommendation.**

11 A. I recommend the Commission approve the Company's requested rate increase of  
12 approximately \$140.2 million that includes proposed changes to the ECAM, proposed  
13 updates and changes customer rate designs, and the other recommendations included  
14 within the Company's Application and supporting witness testimony.

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

16 A. Yes.



**BEFORE THE PUBLIC SERVICE COMMISSION OF WYOMING**

IN THE MATTER OF THE ) APPLICATION OF ROCKY ) MOUNTAIN POWER FOR ) AUTHORITY TO INCREASE ITS ) RETAIL ELECTRIC SERVICE RATES ) AND TO REVISE THE ENERGY COST ) ADJUSTMENT MECHANISM )	DOCKET NO. 20000-__-ER-23 (RECORD NO. ____ )
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**AFFIDAVIT, OATH AND VERIFICATION**

Joelle R. Steward (Affiant) being of lawful age and being first duly sworn, hereby deposes and says that:

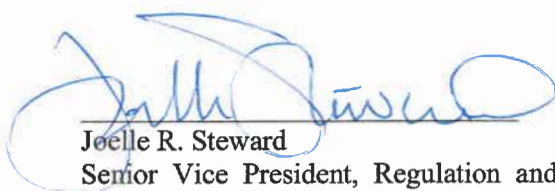
Affiant is the Senior Vice President, Regulation and Customer/Community Solutions for PacifiCorp, which is a party in this matter.

Affiant prepared and caused to be filed the foregoing testimony. Affiant has, by all necessary action, been duly authorized to file this testimony and make this Oath and Verification.

Affiant hereby verifies that, based on Affiant's knowledge, all statements and information contained within the testimony and all of its associated attachments are true and complete and constitute the recommendations of the Affiant in her official capacity as Senior Vice President, Regulation and Customer/Community Solutions.

Further Affiant Sayeth Not.

Dated this 27<sup>th</sup> day of February, 2023



Joelle R. Steward  
 Senior Vice President, Regulation and  
 Customer/Community Solutions  
 1407 West North Temple, STE 330  
 Salt Lake City, UT 84116

STATE OF UTAH )  
 ) SS:  
 COUNTY OF SALT LAKE )

The foregoing was acknowledged before me by Joelle R. Steward on this 27<sup>th</sup> day of February, 2023. Witness my hand and official seal.



Notary Public

My Commission Expires: 2/21/2026

