

Docket No. 20000-633-ER-23  
Witness: Gary W. Hooegeveen

BEFORE THE WYOMING PUBLIC SERVICE  
COMMISSION

ROCKY MOUNTAIN POWER

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Rebuttal Testimony of Gary W. Hooegeveen

September 2023

1 **Q. Are you the same Gary W. Hoogeveen that provided direct testimony on behalf of**  
2 **PacifiCorp d/b/a Rocky Mountain Power (“Rocky Mountain Power” or the**  
3 **“Company”)?**

4 A. Yes.

5 **I. PURPOSE AND SUMMARY OF TESTIMONY**

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

7 A. My rebuttal testimony responds to several general concerns expressed in the intervenor  
8 testimony and public comments. In particular, I respond to concerns over the magnitude  
9 of the Company’s overall proposed rate increase and concerns that investment in  
10 renewable generation and coal plant retirements are driving the requested increase.  
11 Lastly, I introduce the Company witnesses that provide rebuttal testimony in support  
12 of Rocky Mountain Power’s rate request.

13 **Q. Do you have any overall comments on the public comments received regarding**  
14 **the proposed rate increase in this proceeding?**

15 A. Yes. There appears to be a misunderstanding concerning the cost drivers of the  
16 requested increase in this proceeding. I would like to clarify what this rate case is about  
17 and what it is not about. The primary driver of this rate case is net power costs, which  
18 comprises over 95 percent of the requested increase in this proceeding. Net power costs  
19 are the costs the Company pays to third parties for the fuel (coal and natural gas)  
20 required to run Company-owned generation facilities and electricity market purchases  
21 necessary for the Company to deliver reliable and least-cost power to its customers.  
22 These are expenses for the Company that are outside of the Company’s control. Net  
23 power costs have seen significant increases since 2020. Actual net power costs in 2020

1           were \$1.510 billion total-Company and \$2.022 billion total-Company in 2022, an  
2           increase of over \$500 million. The drivers of net power costs include higher market  
3           power costs,<sup>1</sup> higher natural gas market prices,<sup>2</sup> higher coal fuel prices,<sup>3</sup> and an impact  
4           to low-cost hydroelectric generation due to a continuing drought in the Pacific  
5           Northwest – all factors largely outside of the Company’s control. These net power costs  
6           are prudent and reasonable costs that the Company incurred to fulfill its obligation to  
7           serve its customers safe, reliable, and affordable service.

8                       Contrary to some of the comments received, the Company’s investment in  
9           renewable resources and policies in other states are not drivers of the net power cost  
10          increase. In fact, as I explain later in my testimony, it is the Company’s investment in  
11          these renewable resources that have mitigated the increase in net power costs. Without  
12          the Company’s investment in these resources, the increase in net power costs would  
13          have risen an additional \$85.4 million or 65 percent in Wyoming.

14                      Net power costs for the Company are akin to gasoline for a gas station. A gas  
15          station has the facilities for an automobile owner to fill its automobile with gasoline  
16          but the gas station relies on third-party suppliers to purchase the gasoline or commodity  
17          to be able to sell it to its customers. If a gas station’s third-party suppliers raise their  
18          cost, the gas station will pass that increase to its customers in the form of a higher price  
19          per gallon. In other words, the gas station will purchase the gasoline necessary to serve  
20          its customers at the cost dictated by the market for gasoline. The Company is in the  
21          same situation. However, there are notable differences. First, while a gas station can

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<sup>1</sup> Palo Verde trading hub increase of 199 percent since 2020.

<sup>2</sup> Opal gas trading hub increase of 89 percent since 2020.

<sup>3</sup> A 38 percent increase is forecasted in 2024.

1 raise its prices on a timely basis to recover actual commodity costs, the Company must  
2 seek review and approval through an extensive administrative process before  
3 increasing rates. Second, while a gas station can timely pass-through actual commodity  
4 costs incurred, the Company is subject to potential regulatory lag and a sharing  
5 mechanism in Wyoming for variable commodity costs.

6 Rocky Mountain Power is a major employer, taxpayer, and energy producer and  
7 provider in the state of Wyoming. The Company is also a proud member of the  
8 communities it serves and has a deep connection to its communities through employee  
9 engagement, sponsorship of community events, and donations to organizations  
10 providing services to Wyoming communities. The Company's core mission has been  
11 and continues to be to provide energy solutions in the form of safe, reliable, and  
12 affordable energy to customers in Wyoming and throughout the West. The Company  
13 has upheld this ideal for over 110 years and remains steadfast in this commitment even  
14 as the electricity sector transforms through changing economics and public policies,  
15 emerging and maturing technologies, and the rise of a regional energy market. The  
16 Company strives to control the costs it can and mitigate the costs that are not in its  
17 control to provide affordable service to customers. This proceeding demonstrates its  
18 commitment to its customers as its actions have mitigated rising net power costs and it  
19 continues to make long-term investments that further mitigate these cost pressures.

## II. OVERALL RATE INCREASE

1  
2 **Q. Several parties and public commenters expressed concern over the magnitude of**  
3 **the proposed rate increase.<sup>4</sup> How do you respond to this concern?**

4 A. The Company understands customer concerns and takes customer impacts seriously,  
5 regardless of the magnitude of the rate increase. The Company prefers to keep rates  
6 low. In this case, however, the increased rates are driven by rapidly increasing net  
7 power costs, which are largely the product of broader market forces that are outside the  
8 Company's control. What the Company can control, however, is the choice of resources  
9 used to serve Wyoming customers. And in recent years, the Company has diversified  
10 its generation portfolio and increased generation from renewable resources with zero-  
11 fuel costs, which have offset the market's upward pressure on net power costs. The  
12 capital and operating costs of these same zero-fuel cost resources are significantly  
13 offset by production tax credits ("PTCs"), which are *fully* passed through to customers.  
14 The Company has also worked across the region to help develop innovative markets,  
15 like the Western Energy Imbalance Market ("EIM"), to extract efficiencies from a  
16 wider pool of regional resources to produce significant tangible net power cost benefits  
17 for Wyoming customers. These efforts, which I described in my direct testimony and  
18 in more detail below, have mitigated what could have been an even greater increase  
19 driven by broader market forces.

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<sup>4</sup> See, e.g., Direct Testimony of Colin T. Fitzhenry at 4 (WOCA Exhibit No. 603) (stating that the Company's proposed increase "is far greater than increases in coal and natural gas prices since the Company's last General Rate Case filing").

1 **Q. How does the Company’s average rate after the updated proposed rate increase**  
2 **compare to other utilities in the region?**

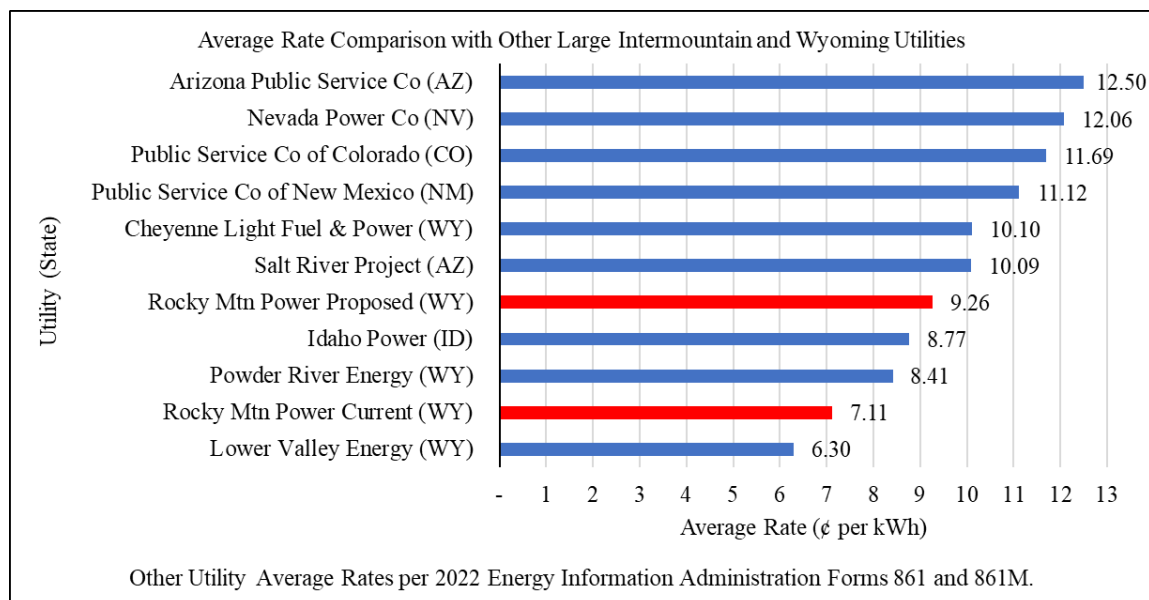
3 A. Figure 1 shows that even with the recommended rate increase in 2024 the Company  
4 will continue to compare well to what the average rates of other regional electric service  
5 providers were in 2022. I would note that Figure 1 does not include recent or pending  
6 rate increases by other utilities, for example Idaho Power Company has a pending  
7 general rate case before the Idaho Public Utilities Commission (“IPUC”) and has  
8 proposed an 8.61 percent overall rate increase,<sup>5</sup> Arizona Public Service Company has  
9 a pending general rate case before the Arizona Corporation Commission (“ACC”) and  
10 has proposed a 22.9 percent overall rate increase,<sup>6</sup> and earlier this year, the Commission  
11 approved an increase for Cheyenne Light Fuel and Power Company, which included  
12 an increase to residential rates of 8.6 percent.<sup>7</sup>

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<sup>5</sup> *In the Matter of the Application of Idaho Power Company For Authority to Increase its Rates and Charges for Electric Service in the State of Idaho and for Associated Regulatory Accounting Treatment*, IPUC Case No. IPC-E-23-11, filed June 1, 2023.

<sup>6</sup> *In the Matter of the Application of Arizona Public Service Company for a Hearing to Determine the Fair Value of the Utility Property of the Company for Ratemaking Purposes, to Fix a just and Reasonable Rate of Return There On, to Approve Rate Schedules Designed to Develop Such a Return*, ACC Docket No. E-01345A-22-0144 filed October 28, 2022. The net increase requested is 13.6 percent.

<sup>7</sup> *In the Matter of the Application of Cheyenne Light, Fuel and Power Company D/B/A Black Hills Energy for a General Rate Increase of \$15,366,026 Per Annum and Authority to Revise Its Power Cost Adjustment Mechanism*, Docket No. 20003-214-ER-22 (Record No. 17072), Memorandum Opinion and Order Approving Stipulation and Agreement with Modification at 2-3 (April 3, 2023).

Figure 1<sup>8</sup>

1 Also, the Company's proposed residential rates are not unreasonable for Wyoming.  
 2 According to the Commission's compilation of average residential rates for Wyoming  
 3 electric utilities,<sup>9</sup> the Company's proposed residential rate of 13.86 cents per kWh  
 4 would remain less than the average rate of 14.51 cents per kWh for Wyoming rural  
 5 electric associations, and less than the average rate of 14.28 cents per kWh for  
 6 Wyoming non-Company investor-owned utilities.

<sup>8</sup> In addition to base rates, the Figure 1 rates include all riders, most of which are temporary. Without riders, base rates will increase from 7.2 to 8.7 cents per kWh.

<sup>9</sup> The Commission's data is available here: <https://psc.wyo.gov/home/utility-rate-comparison> According to the Commission, its analysis is based on monthly residential consumption of 750 kWh.

1 **Q. You stated that the Company takes customer impacts seriously. How many rate**  
2 **cases has the Company filed in the last 10 years?**

3 A. Setting aside the current proceeding, the Company has filed three rate cases in the last  
4 10 years: 2014,<sup>10</sup> 2015,<sup>11</sup> and 2020.<sup>12</sup> In the 2014 rate case, the Company requested an  
5 increase of \$36.1 million, or 5.3 percent, and was granted an increase of \$20.2 million  
6 or 2.9 percent.<sup>13</sup> In the 2015 rate case, the Company requested an increase of \$32.4  
7 million, or 4.5 percent, and was granted an increase of \$16.0 million or 2.3 percent.<sup>14</sup>  
8 In the Company's last rate case, the Company requested an increase of \$7.1 million, or  
9 1.1 percent,<sup>15</sup> and was granted an increase of \$6.98, or 1.1 percent, but that amount was  
10 offset by a tax reduction and resulted in an overall rate *decrease* of 3.5 percent.<sup>16</sup>

11 This history demonstrates that the Company has very much taken customer  
12 impacts seriously and proactively and aggressively controls those costs that it can as

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<sup>10</sup> *In the Matter of the Application of Rocky Mountain Power for Approval of a General Rate Increase in Its Retail Electric Utility Service Rates in Wyoming of \$36.1 Million per Year or 5.3 percent*, Docket No. 20000-446-ER-14 (Record No. 13816), Findings of Fact, Conclusions of Law, Decision and Order (Dec. 30, 2014).

<sup>11</sup> *In the Matter of the Application of Rocky Mountain Power for Approval of a General Rate Increase in Its Retail Electric Utility Service Rates in Wyoming of \$32.4 Million per Year or 4.5 Percent*, Docket No. 20000-469-ER-15 (Record No. 14076), Memorandum Opinion, Findings of Fact, Decision and Order (Dec. 30, 2015).

<sup>12</sup> *In the Matter of the Application of Rocky Mountain Power for Authority to Increase Its Retail Electric Service Rates by Approximately \$7.1 Million per Year or 1.1 Percent, To Revise the Energy Cost Adjustment Mechanism, and to Discontinue Operation at Cholla Unit 4*, Docket No. 20000-578-ER-20 (Record No. 15464), Memorandum Opinion, Findings and Order (July 15, 2021).

<sup>13</sup> Docket No. 20000-446-ER-14 (Record No. 13816), Findings of Fact, Conclusions of Law, Decision and Order at ¶¶ 2, 22.

<sup>14</sup> Docket No. 20000-469-ER-15 (Record No. 14076), Memorandum Opinion, Findings of Fact, Decision and Order at ¶¶ 2, 21.

<sup>15</sup> Docket No. 20000-578-ER-20 (Record No. 15464), Memorandum Opinion, Findings and Order at ¶ 4. In rebuttal testimony, the Company updated its overall increase request to \$9.1 million. *Id.*, at ¶ 6.

<sup>16</sup> Docket No. 20000-578-ER-20 (Record No. 15464), Memorandum Opinion, Findings, and Order at ¶ 1 (“The Commission approved RMP’s Application for a rate increase, with adjustments, for a revenue requirement increase of \$6,982,603, or 1.1% per annum . . . The Commission also directed credits to ratepayers totaling approximately \$90 million, including interest, over 36 months to account for the effect of the Tax Cuts and Jobs Act of 2017, producing an overall net reduction in rates of approximately 3.5% during the 36-month refund period.”).



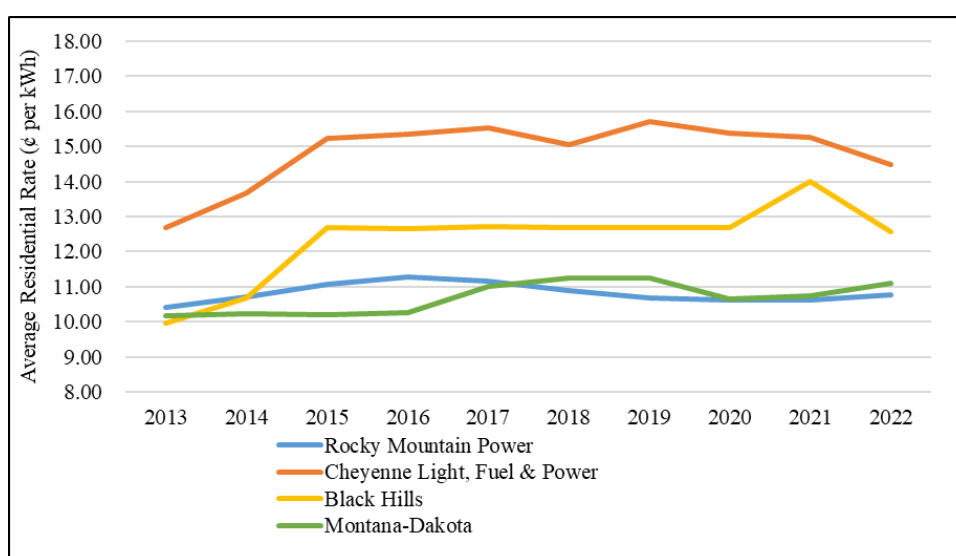
1 demonstrated by the relatively modest revenue requirement increases the Company has  
 2 sought in the last decade.

3 **Q. For the last 10 years, how have Rocky Mountain Power's residential rates**  
 4 **compared to other investor-owned utilities in Wyoming?**

5 A. As shown in Figure 2, the Company's residential rates have been among the lowest as  
 6 compared to other investor-owned utilities in Wyoming.

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**Figure 2<sup>17</sup>**

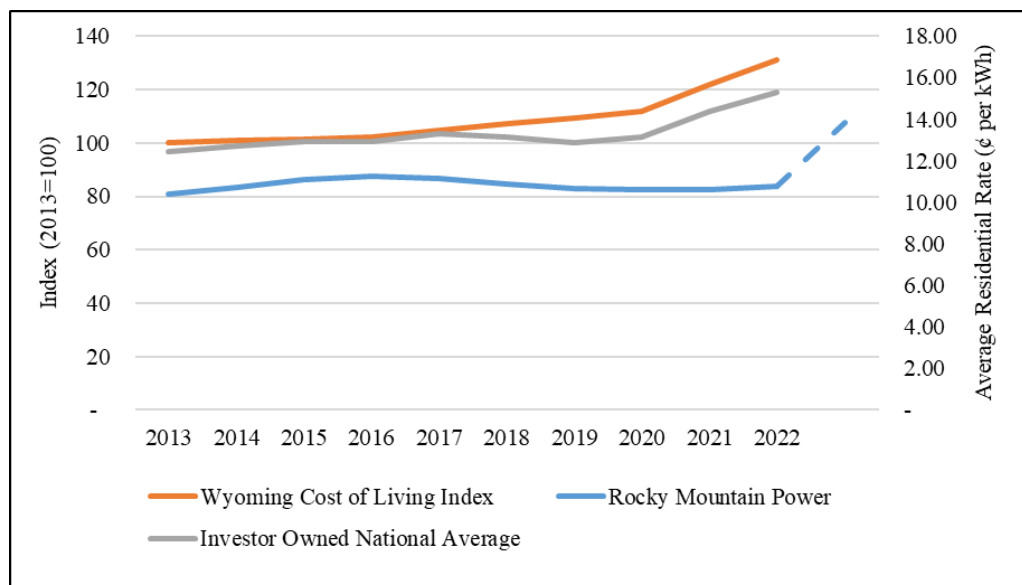


8 **Q. For the last 10 years, how have the Company's residential rates compared to**  
 9 **inflation?**

10 A. Since 2013, the Company's residential rates have increased far less than inflation, as  
 11 measured by the national consumer price index and Wyoming's cost of living index,  
 12 even accounting for the proposed rate increase here, as shown in Figure 3.

<sup>17</sup> Source: U.S. Energy Information Administration Form EIA-861M.

1

Figure 3<sup>18</sup>

2

### III. ROLE OF RENEWABLE GENERATION

3 Q.

**Customers and public commenters are also concerned that the rate increase results from the Company's increased investment in renewable resources. How do you respond?**

4 A.

The Company's investment in zero-fuel cost generation has *decreased* the net power costs that would have otherwise been incurred to serve Wyoming customers. As a general matter, and as explained in Company witness Ramon J. Mitchell's direct testimony, increased penetration of renewable resources across the west has tended to lower regional power market prices,<sup>19</sup> which is not unexpected—when you increase supply, costs tend to go down, all else equal. While market prices have increased significantly in recent years, increased supply of renewable generation across the region is not a driving force.

<sup>18</sup> Sources: Investor-Owned National Average per Edison Electric Institute Typical Bills and Average Rates Reports. Wyoming Cost of Living Index per Wyoming Department of Administration and Information Economic Analysis Division (see <http://eadiv.state.wy.us/wcli/wcli.html>).

<sup>19</sup> Direct Testimony of Ramon J. Mitchell at 13 (RMP Exhibit 10.0).

1           Moreover, specific to the Company, generation from zero-fuel cost resources  
2           has demonstrably decreased net power costs. For example, Company witness Mr.  
3           Mitchell’s testimony highlighted that since 2020 the Company’s new and repowered  
4           wind facilities and new transmission lines reduced 2024 net power cost by \$343 million  
5           on a total-Company basis, or approximately \$47 million on a Wyoming-allocated basis  
6           relative to what the net power costs would have been without those new resources.<sup>20</sup>  
7           When the value of PTCs is included, total system costs are approximately \$625 million  
8           lower in the 2024 forecast because of increased renewable generation, \$85.4 million  
9           Wyoming allocated.<sup>21</sup>

10           The Gateway South transmission line enables the interconnection of over 1,600  
11           megawatts (“MW”) of renewable generation. In the three months the line is included  
12           in the test year used to set rates in this case, it has a revenue requirement of  
13           approximately \$7 million<sup>22</sup>—and decreases net power costs by \$19 million, resulting  
14           in a net benefit of \$12 million in this proceeding.<sup>23</sup> These net power cost benefits are  
15           over and above the increased reliability and improved operational flexibility provided  
16           by Gateway South, which has also allows for the release of “trapped energy” from coal  
17           resources in Wyoming enabling those resources to serve load elsewhere on the  
18           Company’s system.<sup>24</sup>

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<sup>20</sup> Direct Testimony of Ramon J. Mitchell at 52 (RMP Exhibit 10.0).

<sup>21</sup> *See*, Direct Testimony of Gary W. Hoogeveen at 7 (RMP Exhibit 2.0) (citing Direct Testimony of Ramon J. Mitchell at 52 (RMP Exhibit 10.0) for NPC savings and ECAM Base Details (RMP Exhibit 11.5) for PTC’s included in rates).

<sup>22</sup> RMP’s response to WIEC Data Request (“DR”) 8.4 and 1<sup>st</sup> supplemental response to WIEC DR 8.4.

<sup>23</sup> Direct Testimony of Ramon J. Mitchell at 21 (RMP Exhibit 10.0); *see also* Direct Testimony of Rick T. Link at 16 (RMP Exhibit 5.0) (1,641 MW of resources selected in the 2020 All-Source Request for Proposal require Gateway South to interconnect).

<sup>24</sup> Direct Testimony of Ramon J. Mitchell at 21 (RMP Exhibit 10.0).

1 **Q. Does the generation from renewable resources, like wind and solar, compromise**  
2 **the reliability of service, as suggested in some customer comments?**

3 A. No. New generation capacity, even intermittent wind and solar, enhances customer  
4 reliability by decreasing the Company's reliance on market purchases at a time when  
5 resource adequacy concerns are rising, as discussed in the direct testimony of Company  
6 witness Rick T. Link.<sup>25</sup> An over-reliance on market purchases presents the real risk that  
7 the Company may not have the generation resources to serve load, especially during  
8 extreme weather events. The market forces driving higher net power costs in this case  
9 vividly illustrate the pitfalls of over-reliance on the market, which is mitigated by  
10 increased renewable generation.

11 **Q. Are the cost increases here driven by state policies in Oregon, Washington, and**  
12 **California?**

13 A. No. The Company's increasingly diversified generation portfolio is driven by  
14 economics, not any state-specific policies. As described by Company witness Mr. Link,  
15 the new renewable resources included in this case were procured through a competitive  
16 solicitation process that was not limited to renewable generation.<sup>26</sup> The best new  
17 resources supplied by the market, however, were renewables.

#### 18 **IV. CONTINUED RELIANCE ON COAL FLEET**

19 **Q. Are the increased costs in this case driven by the Company's retirement of coal**  
20 **facilities?**

21 A. No. The test period in this case includes no coal unit retirements. On the contrary, as  
22 Company witness Mr. Mitchell explains, the net power cost increase in this case is

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<sup>25</sup> Direct Testimony of Rick T. Link at 10-12 (RMP Exhibit 5.0).

<sup>26</sup> *Id.*, at 15.

1 driven, in part, by increasing coal costs and market supply limitations, which has forced  
2 the Company to rely more heavily on the wholesale power market.<sup>27</sup> The limitations  
3 on coal generation in this case therefore are not the result of the Company retiring units.

4 **Q. Is the Company retiring its Wyoming coal fleet in the near term to allow for**  
5 **greater renewable generation?**

6 A. No. PacifiCorp's coal resources will continue to play a pivotal role in providing service  
7 and following fluctuations in renewable energy. Over the next 10 years, only three  
8 Wyoming coal units are expected to retire—Dave Johnston Unit 3 in 2027 and Units 1  
9 and 2 in 2028.<sup>28</sup> The remainder of the Wyoming fleet will retire in 2039 (Dave Johnston  
10 Unit 4 and Wyodak) or be converted to natural gas and continue to operate (Jim Bridger  
11 Units 1 to 4; Naughton Units 1 and 2).<sup>29</sup> While broader coal unit retirements in the  
12 region are impacting market prices, as discussed by Company witness Mr. Mitchell,<sup>30</sup>  
13 the Company has no plan to retire its units in the near term even as additional zero-fuel  
14 cost resources are added to its generation portfolio to reduce reliance on volatile  
15 wholesale markets.

16 **Q. Does this case reflect the Company's continued reliance on its coal fleet to serve**  
17 **Wyoming customers?**

18 A. Yes. Company witness Mr. Mitchell's testimony points out that coal generation remains  
19 the single largest resource type used to serve Wyoming customers and coal and gas

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<sup>27</sup> Direct Testimony of Ramon J. Mitchell at 36 (RMP Exhibit No. 10.0).

<sup>28</sup> PacifiCorp, 2023 Integrated Resource Plan at 301-02 (Mar. 31, 2023) (available at [https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2023-irp/2023\\_IRP\\_Volume\\_I.pdf](https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2023-irp/2023_IRP_Volume_I.pdf)) (last visited Sept. 19, 2023).

<sup>29</sup> *Id.*

<sup>30</sup> Direct Testimony of Ramon J. Mitchell at 14 (RMP Exhibit 10.0).

1 generation together comprise nearly 60 percent of the generation mix in the Company's  
2 net power cost forecast for 2024.<sup>31</sup>

3 **V. INTRODUCTION OF WITNESSES**

4 **Q. Please identify the witnesses supporting the Company's rebuttal position and the**  
5 **subject of their testimony.**

6 A. In addition to myself, the Company witnesses filing rebuttal testimony and the subjects  
7 of their testimony are as follows:

8 **Joelle R. Steward**, Senior Vice President, Regulation and Customer & Community  
9 Solutions, Rocky Mountain Power, describes and summarizes the Company's updated  
10 request in rebuttal, responds to intervenor testimony regarding certain net power costs  
11 issues, the Gateway South Transmission Line, insurance premiums, a proposed  
12 Renewable Energy Certificate tariff, the Integrated Resource Plan and resource  
13 procurement.

14 **Nikki L. Koblha**, Vice President, Chief Financial Officer, and Treasurer, discusses the  
15 Company's updated cost of capital recommendation and responds to intervenor  
16 testimony regarding capital structure.

17 **Ann E. Bulkley**, Principal at The Brattle Group, supports the Company's revised  
18 recommendation for return on equity ("ROE"). She also responds to intervenor  
19 testimony regarding ROE.

20 **Timothy J. Hemstreet**, Vice President of Renewable Energy Development, responds  
21 to intervenor testimony regarding the Foote Creek II-IV repowering project.

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<sup>31</sup> Rebuttal Testimony of Ramon J. Mitchell at 23 (RMP Exhibit 10.7).

1       **Ramon J. Mitchell**, Manager, Net Power Costs, responds to intervenor testimony  
2 regarding net power costs and the Company’s proposed change to the annual Energy  
3 Cost Adjustment Mechanism sharing band.

4       **Nicholas L. Highsmith**, Manager of Revenue Requirement, presents modifications to  
5 the revenue requirement due to accepting certain intervenor adjustments, corrections  
6 identified since the direct filing and updates based on current information. He also  
7 responds to intervenor testimony regarding recommended revenue requirement  
8 adjustments, Jim Bridger operation and expense, federal and state tax adjustments,  
9 Foote Creek adjustments, adjustments relating to the Washington Cap and Invest  
10 Program allowance account, and residential revenues.

11       **Robert M. Meredith**, Director of Pricing and Tariff Policy, responds to intervenor  
12 testimony related to cost allocation and rate design and provides the cost of service  
13 study results, rate spread, and rate design reflecting the Company’s revised revenue  
14 requirement.

15       **Mariya V. Coleman**, Vice President of Corporate Insurance and Claims for Berkshire  
16 Hathaway Energy Company, supports the Company’s updated costs associated with  
17 insurance premiums.

18       **Michael G. Wilding**, Vice President, Energy Supply Management, explains ancillary  
19 services under the Company’s Open Access Transmission Tariff and how the Company  
20 is required to provide these services by the Federal Energy Regulatory Commission  
21 (“FERC”), and how the Company’s rates for these services are cost-based, were  
22 accepted by the FERC, and, therefore, are required to be charged for ancillary services.

1       **Amparo Nieto**, Principal at Charles River Associates, responds to the intervenor  
2       adjustment that removes non-native reserves from the calculation of net power costs.

3       **Ryan Fuller**, Senior Tax Director, responds to intervenor testimony regarding the  
4       appropriate production tax credit rate to be used in this proceeding and the proposal to  
5       change how to account for state taxes in rates.

6       **James C. Owen**, Vice President, Environmental, Fuels, & Mining, responds to  
7       testimony regarding Rocky Mountain Power’s approach to providing the coal supply  
8       for its coal-fired generating plants, provides a brief update of recent changes in the coal  
9       market and how those changes impacted the fuel costs, provides an overview and  
10      analysis of new coal supply agreements, and responds to intervenors’ testimony  
11      regarding the current Utah coal market.

12      **Julie Lewis**, Vice President of Human Resources, responds to intervenor testimony  
13      recommending adjustments to certain wage and labor expenses.

14      **Kenneth Lee Elder**, Load Forecasting Manager, responds to intervenor testimony  
15      regarding the Company’s Residential usage-per-customer forecast.

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

17      A. Yes.



**BEFORE THE PUBLIC SERVICE COMMISSION OF WYOMING**

IN THE MATTER OF THE )	
APPLICATION OF ROCKY )	DOCKET NO. 20000-633-ER-23
MOUNTAIN POWER FOR )	(RECORD NO. 17252)
AUTHORITY TO INCREASE ITS )	
RETAIL ELECTRIC SERVICE RATES )	
BY APPROXIMATELY \$140.2 )	
MILLION PER YEAR OR 21.6 )	
PERCENT AND TO REVISE THE )	
ENERGY COST ADJUSTMENT )	
MECHANISM )	

**AFFIDAVIT, OATH AND VERIFICATION**

Gary Hoogeveen (Affiant) being of lawful age and being first duly sworn, hereby deposes and says that:

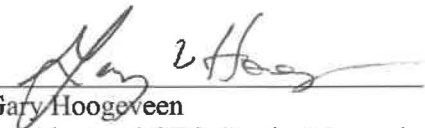
Affiant is the President and Chief Executive Officer (CEO) of Rocky Mountain Power, which is a party in this matter.

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 their official capacity as President and CEO of Rocky Mountain Power.

Further Affiant Sayeth Not.

Dated this 21<sup>st</sup> day of September, 2023

  
 Gary Hoogeveen  
 President and CEO, Rocky Mountain Power

STATE OF Utah )  
 ) SS:  
 COUNTY OF Salt Lake )

The foregoing was acknowledged before me by Gary Hoogeveen on this 21<sup>st</sup> day of September, 2023. Witness my hand and official seal.

  
 Notary Public

My Commission Expires: 02/14/2026

