



# **WYOMING OFFICE OF CONSUMER ADVOCATE**

**4<sup>th</sup> Annual Report  
For the 2006 Calendar Year**

Office of Consumer Advocate  
2515 Warren Avenue, Suite 304  
Cheyenne, Wyoming 82002  
Phone: (307) 777-7427  
FAX: (307) 777-5748  
Website: [psc.state.wy.us/oca.htm](http://psc.state.wy.us/oca.htm)

## **TABLE OF CONTENTS**

<b>FROM THE ADMINISTRATOR.....</b>	<b>1</b>
<b>ABOUT THE OFFICE OF CONSUMER ADVOCATE .....</b>	<b>4</b>
<b>STATUTE AUTHORIZING THE OCA.....</b>	<b>5</b>
<b>OFFICE OF CONSUMER ADVOCATE STAFF .....</b>	<b>7</b>
<b>PRIMARY AREAS OF INVOLVEMENT .....</b>	<b>9</b>
<b>GENERAL RATE CASES .....</b>	<b>9</b>
<b>WHOLESALE COMMODITY COST PASS-ONS .....</b>	<b>12</b>
<b>MERGERS, ACQUISITIONS &amp; CORPORATE RESTRUCTURING .....</b>	<b>15</b>
<b>CONSERVATION AND DEMAND-SIDE MANAGEMENT .....</b>	<b>17</b>
<b>RULEMAKINGS .....</b>	<b>20</b>
<b>LEGISLATION .....</b>	<b>22</b>
<b>SUMMARY OF CASE ACTIVITIES.....</b>	<b>24</b>
<b>CUSTOMER OUTREACH.....</b>	<b>26</b>
<b>INVOLVEMENT IN THE REGULATORY COMMUNITY .....</b>	<b>27</b>
<b>ADDITIONAL RESOURCES .....</b>	<b>31</b>

## **FROM THE ADMINISTRATOR**

In last year's annual report, I devoted these pages to a discussion of the energy market forces that are shaping the utility industry, some of the potential impacts of wholesale commodity markets on utility customers, and some of the strategies that the OCA is employing to mitigate the effects of high and volatile commodity prices on utility ratepayers. Because of the natural gas supply interruptions caused by the gulf coast hurricanes in 2005, the high and volatile price of wholesale natural gas and its resulting impact on retail utility rates was of particular concern to me at that time. Over the intervening year since the 2005 Annual Report was issued, I am happy to report that, due to a lack of any significant supply disruptions and a relatively mild winter weather pattern over much of the country for most of the winter heating season, wholesale natural gas prices have stabilized at more reasonable levels.

However, we should not allow this pleasant but unusual coincidence to lull us into a false sense of security about what the future will bring. The balance of supply and demand in the natural gas market remains precariously close, such that any significant increase in demand due to abnormally hot or cold weather, or any significant decrease in supply caused by severe storms or other calamities, could cause the wholesale price of natural gas to again spike to unprecedented levels. As consumers, our first line of defense against higher prices is, to the greatest extent possible, to reduce demand through the wise and efficient use of energy resources.

Although the crisis in the wholesale natural gas market may have taken a temporary hiatus, several developments over the last year present new and equally pressing challenges for the OCA and the utility consumers it represents. The balance of my space in this year's annual report will discuss these emerging issues, their potential impact on Wyoming utility ratepayers, and the OCA's efforts to deal with these challenges.

From city hall to the halls of Congress, the subject of global warming and climate change has emerged as a national priority. Over the last year many states have adopted policies that address green house gas emissions, including policies that require utilities to acquire renewable energy resources, and also limit the amount of carbon dioxide that utilities within their borders can emit into the atmosphere. Carbon dioxide (CO<sub>2</sub>) is the green house gas considered by scientists to be principally responsible for global warming.

Based on the feverish tempo of the national debate over climate change, and in consideration of the actions already taken by some states, with action in other states pending, it seems inevitable that Congress will likewise impose limitations on the amount of CO<sub>2</sub> that can be released into the atmosphere from all sources, including electric generating plants. My sense is that such limitations are likely to be imposed sooner rather than later.

So, how will such policies affect Wyoming utility consumers? Since a majority of the electric generation supplied by utilities in Wyoming is traditional pulverized coal fired generation which emits a relatively large amount of CO<sub>2</sub>, any limits imposed on those emissions will, by definition, result in higher costs to remove and permanently dispose of the CO<sub>2</sub>. New coal fired electric generation plants will have to be developed and designed to capture and permanently sequester produced CO<sub>2</sub> in order to comply with the new emission limits. This will necessarily cause the cost to utility ratepayers to increase.

Beyond the cost of compliance with prospective CO<sub>2</sub> emission limits, which could be substantial, there is a dearth of foundational research and practical experience with carbon capture and sequestration technologies. Because clean coal technologies using CO<sub>2</sub> capture and sequestration have not been demonstrated to work on a commercial scale, utilities are reticent to invest in those technologies, the cost of which may not be recovered from ratepayers. This creates a bias toward lower risk, but ultimately higher cost generation resources such as natural gas fueled generating plants which emit relatively lower amounts of CO<sub>2</sub>.

There is also an increasing emphasis in many states on the development of renewable energy resources. In fact, many states, including several western states, have adopted state laws, often called renewable portfolio standards (RPS) that require a certain amount of utility generation to come from renewable sources, particularly wind, geothermal and solar. While these resources are carbon free, they typically cost far more than traditional generation resources such as coal, natural gas and nuclear generation. Again, the cost of compliance with RPS requirements will be borne by retail utility customers. As part of an interconnected electric system that extends throughout the western part of the country, we are not insulated from the vagaries of regional and national energy policy debates. Certainly, any policies adopted by Congress that impose emission limits will apply in Wyoming as in the rest of the country. Individual or collective actions on climate change taken by other western states may also impact Wyoming ratepayers.

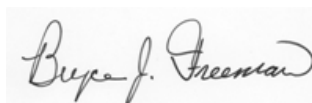
So, how can Wyoming ratepayers prepare for the coming change in utility regulatory policy? First, we should go back to the future and as with natural gas, look at all practical and cost effective means to reduce our

consumption of electricity. Saving energy is almost always cheaper than increasing energy supply and has the added benefit of being carbon free.

But, no matter how conscientious we are about saving energy and reducing demands, I am convinced that it will not be enough to avoid the construction of substantial new generation and transmission capacity. The demand for electric energy is increasing throughout the west. Even in Wyoming where we have a small fraction of the load of other western states with large urban load centers, we are poised to experience explosive load growth over the next five to ten years, primarily due to increasing loads in the mining and drilling industries.

We will need new, yet to be developed technologies to serve these new loads using conventional fuel sources such as coal and natural gas, in order to comply with the prospective emission limits that Congress is sure to adopt. We will also need to incorporate significant amounts of renewable generation into the generation mix in order to aid compliance with increasingly stringent environmental standards. In my view, the federal government should appropriately play a primary role in funding the development and commercialization of such technologies through grants and tax incentives. The OCA will continue to encourage federal legislation that recognizes the need for federal support for public and private research and development of these new technologies. Without significant and sustained federal support to develop technologies that comply with new emission limits we will be left with an unfunded federal mandate to clean up the nation's air that will fall directly on utility ratepayers.

But, make no mistake, even when these new technologies are mature and commercially available they will be more expensive to build and operate than traditional generation resources. As utility ratepayers, we will need to prepare ourselves for the higher rates that will almost certainly result from new state and federal energy policies. We can start by increasing our awareness of energy use and striving to get the most out of every energy dollar we spend. And, I assure you that the OCA will continue to be vigilant in its consumer advocacy to ensure that Wyoming utility consumers pay no more than is absolutely necessary to comply with these new mandates while maintaining safe and reliable utility service.

A handwritten signature in dark ink, reading "Bryce J. Freeman". The signature is written in a cursive, flowing style.

Bryce J. Freeman, Administrator

## **ABOUT THE OFFICE OF CONSUMER ADVOCATE**

The Office of Consumer Advocate (OCA) was created by the Wyoming Legislature in 2003. The OCA is charged with representing the interests of Wyoming citizens and all classes of utility customers in matters involving public utilities. The OCA is dedicated to ensuring that safe, adequate and reliable utility services are available to all Wyoming citizens at affordable rates.

The OCA may act as a party to any proceeding before the Wyoming Public Service Commission [WPSC], appeal actions of the Commission, enter into stipulations with other parties, provide information and assistance to the public regarding proceedings before the Commission, and seek permission to appear as *amicus curiae* in court proceedings concerning public utility matters. The OCA is prohibited by statute from advocating for or on behalf of any individual, organization or entity.

The OCA is an independent division within the Wyoming Public Service Commission that reports directly to the Governor's Office. Funding for the OCA is included in the WPSC's budget for approval by the legislature, and is collected through the uniform utility assessment.

The OCA's 2006-2007 authorized budget level is \$831,841 with more than 65% of the funds dedicated to salaries and benefits for its six, full-time, professional employees.

## **STATUTE AUTHORIZING THE OCA**

### **37-2-401. Office of consumer advocate created; purpose.**

The office of consumer advocate is created as a separate division within the public service commission. The office of consumer advocate shall represent the interests of Wyoming citizens and all classes of utility customers in matters involving public utilities. In the exercise of its powers the office of the consumer advocate shall consider all relevant factors, including, but not limited to, the provision of safe, efficient and reliable utility services at just and reasonable prices.

### **37-2-402. Consumer advocate; powers and duties.**

(a) The consumer advocate shall have the power to:

(i) Act as a party in any proceeding before the commission, with the same rights and subject to the same obligations and requirements and limitations on ex parte communications, including confidentiality requirements, as other parties to the proceeding;

(ii) Appeal actions of the commission in accordance with W.S. 37-2-219;

(iii) Seek permission to appear as amicus curiae in any court proceeding in order to accomplish the purposes specified in this article;

(iv) Provide information and assistance to individual consumers regarding proceedings within the jurisdiction of the commission.

(b) In any commission docketed case initiated by the regulated company in which the consumer advocate is a party, the consumer advocate shall have the same access to books, maps, contracts, reports and records of every description as the commission. For all other instances, the consumer advocate shall have the same access as other parties.

(c) The consumer advocate shall not advocate for or on behalf of any individual, organization or entity.

(d) The consumer advocate may enter into stipulations with other parties in any proceeding to balance the interests of those it represents with the interests of the public utilities as means of minimizing the weaknesses of the adversarial process, improving the quality of resulting decisions in a highly technical environment and minimizing the cost of regulation.



**37-2-403. Consumer advocate; administrator and staff.**

The administrative head of the division shall be an administrator appointed by the governor not later than July 1, 2003. The administrator shall employ and supervise personnel as authorized by legislative appropriation. Except as provided in W.S. 37-2-404 the employees of the office of consumer advocate shall not be supervised or directed by the commission.

**37-2-404. Consumer advocate; funding and expenses.**

(a) Funding for the office of consumer advocate shall be included in the commission's budget and collected through the uniform utility assessment. Incidental administrative and clerical services for the office of consumer advocate shall be provided by the commission. The commission shall decide all matters of shared administrative and clerical personnel.

(b) This article is repealed effective July 1, 2013.

## OFFICE OF CONSUMER ADVOCATE STAFF



**Bryce Freeman, Administrator**  
**(307) 777-5742 or [bfreem@state.wy.us](mailto:bfreem@state.wy.us)**

Mr. Freeman was appointed to his position by Governor Freudenthal in May 2003. He is trained in the areas of business administration, mathematics, and statistics and has more than 12 years of experience in the field of utility regulation. Additionally, he has experience in the areas of property tax appraisal, utility valuation, and capital cost issues. Mr. Freeman is a member of the Executive Committee of NASUCA, as well as being a member of the NASUCA Electricity Committee and the Board of the Wyoming Infrastructure Authority.



**Denise Parrish, Deputy Administrator**  
**(307) 777-5743 or [dparri@state.wy.us](mailto:dparri@state.wy.us)**

Ms. Parrish joined the OCA in 2003. She is a trained accountant and regulatory analyst with 30 years experience in the field of utility regulation. She is a member of the NASUCA Tax and Accounting Committee, and a member of the NARUC Accounting and Finance Committee and NARUC International Committee and the staff of the Federal-State Joint Board on Universal Service. She is also a speaker at a number of regulatory training courses and seminars.



**Ivan Williams, Senior Counsel**  
**(307) 777-5717 or [iwilli@state.wy.us](mailto:iwilli@state.wy.us)**

Mr. Williams joined the OCA in 2005 after having spent about 15 years with the staff of the Wyoming PSC. In addition to being a licensed Wyoming attorney, he is a trained accountant and rate analyst.



**Amy Zamora, Analyst**  
**(307) 777-5744 or [azamor@state.wy.us](mailto:azamor@state.wy.us)**

Ms. Zamora is a trained accountant and regulatory analyst. She has experience in the fields of accounts receivables and payables, financial analysis, and internal auditing, in addition to nearly seven years of experience in the area of utility regulation. She joined the staff of the OCA in 2003 and is a member of the NASUCA natural gas committee.



**David McMullian, Counsel**  
**(307) 777-5709 or [dmcmul@state.wy.us](mailto:dmcmul@state.wy.us)**

Mr. McMullian joined the OCA in 2007. Prior to entering the field of utility regulation, he was in private law practice, prosecuted criminal cases, an investment advisor, and served as an officer in the USAF. He is trained in the areas of political science, Russian studies, and general business in addition to being a licensed Wyoming attorney.



**Thomas L. Wilson, Jr., Analyst**  
**(307) 777-5705 or [twilso@state.wy.us](mailto:twilso@state.wy.us)**

Mr. Wilson joined the OCA in May, 2007. Mr. Wilson has more than twenty-one years of experience in the field of utility regulation, with primary emphasis on telecommunications. He is a trained economist and has experience in both domestic and international regulatory circles.

## PRIMARY AREAS OF INVOLVEMENT

### GENERAL RATE CASES

#### ***Kinder Morgan General Rate Case***

On February 28, 2006, Kinder Morgan, Inc. filed a general rate case in which it sought approximately \$8 million increase in the non-commodity portion of its Wyoming retail revenues. Also requested in the application was approval of a Bad Debt Tracker that would have passed on bad debt expenses on a dollar for dollar basis. Kinder Morgan has three distinct service territories in Wyoming: Torrington, Gillette, and Casper. While the Torrington division had last been subject to a general rate increase in the early 1990's, the Gillette and Casper divisions had not seen a general rate increase for more than 20 years, although all three divisions are regularly subject to wholesale commodity cost increases. The OCA was the only other formal participant/intervenor in the rate case and, after months of study, examination, and discussion, reached a Stipulation and Agreement with Kinder Morgan. This agreed-upon resolution was formalized in writing and submitted to the Commission with supporting testimony in August 2006. After a three-day hearing in September 2006, the terms of the agreement were approved by the Commission with only minor modifications. The approval order may be found at <http://psc.state.wy.us/htdocs/orders/30022-73-16461.htm>.

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Approval of the stipulation allowed Kinder Morgan to increase its general Wyoming retail rates by about \$6.5 million per year effective October 1, 2006. Kinder Morgan agreed not to pursue its Bad Debt Tracker. Additionally, Kinder Morgan agreed to separately file an application that would have abandoned a portion of its storage facilities that had not been used for many years, sell the stored gas, and pass the profit from the sale of that gas on to customers. Finally, as a result of the difficulty of processing this case, in part due to poor recordkeeping attributed to not having a rate case in so long, the parties agreed that Kinder Morgan will file its next general rate case application no later than February 28, 2010, and that a new depreciation study will be included in that case.

### **Rocky Mountain Power General Rate Case**

In October 2005, PacifiCorp (a/k/a Rocky Mountain Power) filed an application to increase its Wyoming electric retail rates by \$40.2 million per annum and for approval of either an alternative form of regulation or an uncontrollable cost adjustment mechanism. Active participants in the case included the OCA, the Wyoming Industrial Energy Consumer (WIEC), AARP, and the Big Horn Basin Irrigators. Rocky Mountain Power and the active participants aggressively worked toward reaching a stipulation in the matter. This stipulation was filed with the Commission on February 2, 2006. This multiparty agreement was heard by the Commission on February 9 and 10, 2006. At the close of the hearing, the Commission approved the Stipulation as submitted by the parties. A written decision followed on March 24, 2006.

(See <http://psc.state.wy.us/htdocs/orders/20000-230-15808.htm>)

The stipulation was a comprehensive agreement that settled not only the pending rate case but also a request to pass-on wholesale commodity costs in the amount of \$16 million and PacifiCorp's complaint in federal district court in which it sought approximately \$150 million relative to a decision in which the Commission denied recovery of certain wholesale power costs. With the resolution of the rate case, PacifiCorp agreed to withdraw both the complaint in federal district court and to withdraw its request for a special pass-on of wholesale power costs.

The rate case stipulation and agreement generally allowed for a \$15 million increase to be effective March 1, 2006, with an additional \$10 million increase effective July 1, 2006. It also authorized a Power Cost Adjustment Mechanism (PCAM) to be effective February 1, 2007, and contains a deadband and a banded sharing mechanism, such that power cost decreases or increases outside of the deadband are shared between customers and shareholders. Additionally, Rocky Mountain Power agreed to begin discussions and studies of potential demand side management programs that may be beneficial for Wyoming customers and file a plan by the end of 2006 for implementing any identified cost effective programs. Parties agreed to further discuss and consider Alternative Forms of Regulation that might be applicable in Wyoming. Rocky Mountain Power also agreed to work with Wyoming irrigators on a load research program to determine if future rate design changes might be beneficial to irrigators.

### **Pinedale Natural Gas General Rate Case**

The Pinedale Natural Gas Company (Pinedale) rate case began as an offshoot of a wholesale commodity pass-on filing, and a concern that Pinedale may have been earning above its most recently authorized return. Since that original pass-on filing, the case has had many fits and starts, many of them procedural in nature and related to the lack of completeness of Pinedale's filings. Starting in February 2006 and continuing for more than a year, Pinedale has filed an abbreviated single issue rate request, modified that request several times, and ultimately supplemented the application and the supporting information. With the OCA as the only intervenor, the matter was heard by the Commission during March and April 2007.

There are several key differences between the OCA's recommendations and Pinedale's request in this rate matter. One key difference is the rate of return, where Pinedale is requesting a return on rate base and a return on equity of 10.15% and 13.0% respectively. The OCA is recommending an overall return of 8.89% and a return on equity of 10.75%. The OCA is also taking issue with several other aspects of Pinedale's requested revenue requirement. Furthermore, the OCA is recommending a different rate design, changes to Pinedale's line extension tariff, and compliance with mandated use of the Uniform System of Accounts. The OCA has also expressed concern regarding Pinedale's lack of approval of its securities. The OCA's pre-filed testimony may be found at <http://psc.state.wy.us/htdocs/oca/cases.htm>.

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This matter was deliberated by the Wyoming Public Service Commission on June 1, 2007, and a written order was issued on June 28, 2007. (See <http://psc.state.wy.us/htdocs/orders/30016-41-16986.htm>. The Commission determined that three classes of rates should be approved (residential, commercial, and for the school) and the return should be established at 8.52%, subject to modification with additional documentation and information relative to certain debt issuances. The deliberations were re-opened on August 20, 2007, in order to incorporate some corrections to the computation of the rates approved by the Commission in its consideration of this matter. Pinedale's request for rehearing remains pending.

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## **WHOLESALE COMMODITY COST PASS-ONS**

### **Kinder Morgan / Source Gas**

The OCA intervened and actively participated in several of Kinder Morgan's (now known as Source Gas) pass-on applications throughout 2006. The first series of pass-on cases in which we participated focused on issues relative to whether or not the applications complied with the Commission's newly enacted pass-on and wholesale commodity rules and regulations. The OCA and Kinder Morgan were able to work through these issues without the need for a hearing. Instead, Kinder Morgan agreed to several changes to its tariff (which were ultimately filed and approved by the Commission) and agreed to supplement its pass-on applications with additional explanation and documentation.

In the second series of cases, the OCA intervened and took issue with the request to change rates relative to changing prices in the wholesale gas markets. In these cases, the OCA expressed concern about the price level at which natural gas prices were being forecast when compared to recent activity in the wholesale natural gas markets. As a result of the participation of the OCA, Kinder Morgan modified its forecasts prior to the approval and implementation of the requested rates. This was again all done without the need for a formal hearing.

### **Pinedale Natural Gas**

The OCA intervened in two pass-on applications that were filed in September 2005 and February 2006. The OCA intervened in the first application as Pinedale was earning over its allowed rate of return. The current rules allowed for pass-on rates to be reduced if a company was over-earning. However, the Commission approved a Stipulation and Agreement between Pinedale and the OCA that allowed for a \$0.40 reduction in non-gas rates since the revenues causing the over-earning situation were received from non-gas rates. The Company also filed a general rate case, discussed above, to try to correct any future over-earnings.

The OCA intervened in the February 2006 filing because the Company's tariffs as related to this pass-on filing were not in compliance with the Commission's newly adopted pass-on and commodity balancing account rules. The Commission has since conducted a hearing on Pinedale's tariff language in which new tariffs were approved.

### **Powder River Energy Corporation**

On February 13, 2006, Powder River Energy Corporation (Powder River) filed an application to modify its retail rates to reflect revised costs of wholesale power pursuant to its Cost of Power Adjustment. The OCA intervened in this proceeding primarily due to its concern that Powder River's tariffs and the associated application to modify rates related to wholesale power costs did not conform to the modified Pass-on and Commodity Balancing Account Commission rules that were effective on and after January 31, 2006. The OCA's concerns included the lack of language in Powder River's tariff describing the calculation of the power cost changes and failure to provide required documentation. After discussions between Powder River and the OCA, resolutions were reached relative to the OCA's concerns, and a Joint Motion was filed on September 29, 2006, indicating such. On November 9, 2006, the Commission issued a written order approving the joint motion and closing the docket. The rates, which had previously been approved on an interim basis, were then made final with the resolution of the OCA's issues.

### **Questar Gas Company**

Throughout 2006, the OCA participated in a series of proceeding where the primary disputed issue was whether the filings made by Questar Gas complied with the Commission's Procedural Rules and Special Regulations. These proceedings, involving tariff language changes and retail rate changes, related to wholesale natural gas costs and included the underlying issue of whether or not certain types of expenses were permitted to be recovered by means of an expedited wholesale cost pass-on, pursuant to the Commission's rules. The OCA filed testimony delineating its issues and on November 6, 2006, a public hearing on the matter was heard. The OCA particularly took issue with the inclusion of bad debt in the pass-on and the proposal to include interest on under-collected balances in the commodity balancing account – a mechanism used to true-up pass-ons to assure only dollar-for-dollar recovery. On April 4, 2007, the Commission issued its written *Memorandum Opinion, Findings and Order*. The gist of the order is that Questar must collect its bad debt from base rates and not through the pass-on mechanism, Questar is not permitted interest on undercollected balances, and Questar is required to clarify its tariff with several suggested language modifications. (See <http://psc.state.wy.us/htdocs/orders/30010-86-16807.htm>)



### **Wyoming Gas Company**

In September 2005, Wyoming Gas filed a pass-on application that outlined a very different procedure for purchasing gas than what was done in several previous cases. The OCA intervened to analyze the Company's past practices of purchasing 80% of its annual supply in September through fixed price contracts and the latest procurement of purchasing only a month's supply at spot prices. At the time of the filing, the spot prices were well below contract rates. The OCA was concerned that the Company had not adequately analyzed whether its past strategy (80% contracted gas in September) was indeed the least cost option reasonably available. The OCA was also concerned with other aspects of the filing such as including bad debts expense. The hearing on this matter was conducted on July 7, 2006, with deliberations held on August 15, 2006. The order can be viewed at <http://psc.state.wy.us/htdocs/orders/30009-41-16366.htm>.

The OCA also intervened in a subsequent pass-on filing where the Company proposed tariff language in the filing to comply with the newly adopted pass-on rules. Wyoming Gas proposed to charge interest on under-collected balances in the commodity balancing account. A hearing was conducted in which the commission denied this proposal.

## **MERGERS, ACQUISITIONS & CORPORATE RESTRUCTURING**

### **PacifiCorp – MidAmerican Energy**

On July 15, 2005, MidAmerican Energy Holdings Company (MEHC) and PacifiCorp filed a Joint application seeking approval of a reorganization whereby PacifiCorp would become a wholly-owned subsidiary of MEHC. The OCA intervened in this matter on July 20, 2005. Other interveners included: the Wyoming Infrastructure Authority; the Wyoming Industrial Energy Consumers; AARP; the Utility Workers Union of America, Local 127; Western Resource Advocates; and Black Hills Corporation.

The OCA actively participated in negotiations which resulted in a Stipulation that was filed, with the Commission, on January 20, 2006. This Stipulation contained a total of 87 commitments which PacifiCorp and MEHC agreed to make in exchange for the parties' collective support of the proposed reorganization. Of these commitments, 53 were applicable to all six states in which PacifiCorp provides service and 34 were specific to Wyoming. Notable commitments included: ring-fencing provisions, offsetable rate credits in the total company amount of \$142,500,000, asymmetrical pricing of certain affiliate transactions, the formation of an IGCC working group, and performance of feasibility studies regarding certain system transmission projects.

Public hearings were held, with regard to this matter, on January 23 through 26, 2006. The Commission issued an order approving the proposed reorganization of February 28, 2006.

### **Kinder Morgan / Source Gas**

In the autumn of 2006, Kinder Morgan filed two separate but related applications to transfer its utility assets and reorganize its corporate structure. The first application requested authority to sell Kinder Morgan's retail natural gas business to Source Gas Holdings, an entity to be owned by Aircraft Services Corporation (an indirect subsidiary of General Electric Company) and Alinda Infrastructure Fund (a private equity fund). The second application, which was primarily an alternative to the first proposal, requested approval to transfer Kinder Morgan's retail assets and utility certificate to Source Gas Distribution which would become an indirect subsidiary of Kinder Morgan. Meanwhile, Kinder Morgan would become a privately held company pursuant to a management led buy-out transaction.

The OCA intervened in both applications expressing its concerns with certain aspects of each filing. Specifically, the OCA was more seriously concerned about the implications of the management buy-out, particularly as it related to the ability of the utility to have access to capital at a reasonable cost in the near term future. Primarily because of this grave concern, the OCA worked with Kinder Morgan and Source Gas to fashion a Stipulation and Agreement that addressed concerns about the utility's

ownership by Aircraft Services and Alinda Infrastructure. This agreement was submitted on February 9, 2007, with OCA supporting testimony filed on February 12, 2007. (See <http://psc.state.wy.us/htdocs/oca/cases/KMGETestimonyDP.pdf>)

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The agreement addressed issues such as cost allocations, ring fencing, future capital costs, transition plans, reporting requirements, and more. As a lesser recommended alternative, the OCA also was party to a stipulation and agreement in response to the proposed management buy-out. Although the OCA recommended conditional approval of both or either application, the OCA took the position that there was little or no need for the buy-out transaction relative to the regulated utility operations if approval of the transfer to Aircraft Services and Alinda Infrastructure was received from all required regulatory bodies in a timely fashion.

After several days of public hearing, the Commission issued its written decisions on the two applications. On March 13, 2007, the Commission issued its written decision approving the Stipulation and Agreement relative to the management buy-out with only slight modification. On March 14, 2007, the Commission issued its written decision approving the Stipulation and Agreement relative to the change in ownership to Aircraft Services and Alinda, with only slight modification. After a brief transition period, the change in ownership became effective in the spring of 2007.

## **CONSERVATION AND DEMAND-SIDE MANAGEMENT**

### **Cheyenne Light, Fuel and Power Energy Awareness Day**

In keeping with our strong commitment to energy efficiency and conservation, the OCA participated in the first annual *Energy Conservation Awareness Day*, sponsored by Cheyenne Light, Fuel & Power in October. In order to promote greater awareness of energy saving measures, Cheyenne Light partnered with many of the local retail home improvement establishments in Cheyenne to promote the purchase of energy saving materials and appliances, including such things as higher value insulation, programmable thermostats, energy efficient replacement windows and doors, ENERGY STAR rated appliances, and compact fluorescent lights when building or remodeling a home. The OCA's presentation related to the incorporation of proven and cost effective energy conservation strategies in new home construction. Energy conservation experts from Cheyenne Light as well as the Wyoming Energy Office also participated in the event. The OCA looks forward to participating in this event annually as well as others as opportunities arise.

### **Montana-Dakota Utilities Conservation Application**

In November 2005, Montana-Dakota Utilities Company (MDU) filed an application for approval of a Conservation Program Tracking Mechanism as well as approval for a portfolio of individual conservation measures and incentives. The general concept of the Tracking Mechanism was to identify and recover the costs associated with the approved conservation measures. It would also allow for recovery of lost revenues associated with reduced usage resulting from the approved conservation program. The OCA intervened in this matter and on June 9, 2006, submitted its *Comments, Concerns, and Suggestions* relative to the proposed application. (See <http://psc.state.wy.us/htdocs/oca/cases/MDU-DSMcomments.pdf>) Our comments ranged from concern about the inputs in the cost-benefit studies to gather additional information about the cost effectiveness of the program over time. In response to the OCA comments, MDU incorporated a number of changes to its proposal. The Commission approved the modified program and tracking mechanism in its order dated September 28, 2006. (See <http://psc.state.wy.us/htdocs/orders/30013-166-16278.htm>.)

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### **Rocky Mountain Power Demand-Side Management Application**

On December 18, 2006, Rocky Mountain Power filed an application requesting approval to implement a three-year demand-side management program. The proposal was negotiated with significant customer groups and public interest representatives during the nine months prior to the filing of the application. Under the proposal, a series of incentives would have been offered to a wide-range of customers to encourage conservation of the usage of electrical energy. The application showed that all customers would have benefited in the long run from the implementation of this package of programs, particularly in an era during which energy is in short supply. The program would have been funded by a one-percent surcharge on customers' bills with all customer classes required to participate in the program except for the large industrial class who had the option to volunteer for the program (in which case the customer would be eligible for the incentive and required to pay the surcharge) or to opt-out. On March 20, 2007, the OCA filed testimony in support of a stipulation that essentially agreed with the proposals contained within the application. (See <http://psc.state.wy.us/htdocs/oca/cases/PacifiCorp/RockyMountainPowerDSMtestimonyParrish.pdf> for the OCA's testimony.) A hearing was held on April 16, 2007, and the matter deliberated by the Commission during July and August 2007. In response to the Commission's deliberations, Rocky Mountain Power, WIEC, and the OCA requested that all further activity on the proposal be held in abeyance pending a modified application. On August 22, 2007, the Commission rejected the stipulation but did not further address the matter of the pending application itself.

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### **Tri-State Member Distribution Cooperatives Demand-Side Management Reports**

Effective January 1, 2007, Tri-State Generation and Transmission Association, Inc. (Tri-State) implemented a new wholesale rate and rate design for its member distribution cooperatives. These cooperatives include Big Horn Rural Electric, Carbon Power & Light, Garland Light & Power, High Plains Power, High West Energy, Niobrara Electric Association, Wheatland Rural Electric, and Wyrulec Company. While Tri-State is not subject to the jurisdiction of the Wyoming Public Service Commission, the rates of the member cooperatives are. As a result, each of these member cooperatives filed applications to pass-on the Tri-State wholesale power cost increase to its retail customers. The result of the new rate design was of concern to the OCA, as it modified the peak and off-peak time periods and arrangements, making it more difficult for customers to take advantage of the off-peak discounts.

As a result of this concern, the OCA asked the Commission to order that each of the distribution cooperatives subject to this wholesale power change examine and report on conservation and other bill-reducing opportunities and incentives available to their retail customers. The Commission generally accepted the OCA's suggestion, and reports were filed by the distribution cooperatives in the spring of 2007 delineating demand-side opportunities available to retail customers. The OCA further encouraged the cooperatives to continue to look for cost effective conservation opportunities and to remind their customers of available existing programs.

## **RULEMAKINGS**

### **Wholesale Commodity Pass-on and Balancing Account Rules**

In November 2003, the Commission first began its efforts to update and revise Sections 249 and 250 of its rules in recognition that the rules had not been modified for more than twenty years. Even though the OCA believed that the existing rules were generally effective, the OCA was an active participant in the multi-year rulemaking process. In 2003 and 2004, we participated in workshops and offered suggestions on proposed changes to the rules, many of which were incorporated into later drafts of the rules. In June 2005, the Commission formally issued proposed rules and sought comments. In April 2005, the OCA filed its comments which may be found at <http://soswy.state.wy.us/RULES/6185.pdf>. The final rules were deemed effective in January 2006. These revised rules require more explicit documentation of wholesale commodity costs that utilities may want to incorporate into rates on an expedited basis. The utilities, OCA, and Commission have spent much of 2006 discussing the proper implementation of the revised rules, and working to assure that the utilities' tariffs properly reflect the content and interpretation of the newly revised rules.

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### **Customer Deposits and Interest on Customer Deposits Rules**

In November 2003, the Commission first began a discussion with interested parties about the need to update the interest rate that utilities are required to pay on customers' security deposits. After an initial round of discussion and formal comments, the Commission modified its proposed changes to not only the provisions regarding the payment of interest, but also the provisions relative to when it is appropriate to collect a security deposit. These revised proposed rules were issued on June 22, 2005, and the OCA filed its comments on August 22, 2005. The modified rules became effective on March 2, 2006. The revised rules incorporate many of the OCA's suggested changes, spelling out much more explicitly when a customer is required to pay a security deposit. Furthermore, rather than looking only at short-term interest rates when determining the interest on customer deposits, as the Commission originally proposed, the new rule is an average of 1-year U.S. Treasury constant maturity rate for a twelve-month period and the Bank prime loan rate. A new rate is computed by the Commission each year such that it is more reflective of current economic conditions. The new rules may be found at <http://soswy.state.wy.us/RULES/6185.pdf>.

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### **Eligible Telecommunications Carrier Annual Certification Rules**

In February 2006, the Public Service Commission commenced a proposed rulemaking to provide criteria for designating telecommunications carriers as eligible to receive universal service funds and provide annual reporting and certification requirements for previously designated carriers. The OCA offered written comments on the proposed rules and appeared at the May 2006 hearing. Our comments may be found at <http://psc.state.wy.us/htdocs/oca/cases/CommentsETCRules.pdf>. At its June 2006 deliberations on the matter, the Commission decided to only adopt the rules relative to the annual reporting and certification requirements while abandoning its proposed rules relative to the criteria for designating carriers eligible to receive federal universal service support. While the OCA finds that the newly adopted rules are more comprehensive than the previous certification process, concerns continue about the lack of public forum and adequate timing for allowing public input into the certification process.

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### **Energy Policy Act of 1995 Rules**

In 2005, the United States Congress passed the Energy Policy Act of 2005. This law modified earlier enacted provisions of the Public Utility Regulatory Policies Act of 1978 and required state commissions to consider adoption of certain standards or rules regarding: (1) net metering, (2) fuel source diversity, (3) fossil fuel efficiency, (4) smart metering, and (5) interconnection. In August, 2006, the Commission issued an order expressing its intent to commence a rulemaking on these matters. The OCA submitted written comments in the matter, as did several other interested parties. (See <http://psc.state.wy.us/htdocs/oca/cases/commentsEPACTrules.pdf>)

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The OCA also appeared at the November 1<sup>st</sup> hearing to present its overall position and to respond to questions. The OCA recommended that none of the proposed rules should be adopted at that time. After thoughtful consideration and deliberation, the Commission decided that none of the rules should be adopted but instead determined that it would hold technical workshops in the future on some of the topics contained within the proposed rules.



## **LEGISLATION**

### **Electric Utility Resource Planning Legislation**

During the spring and summer of 2006, the OCA worked with the Public Service Commission, electric utility industry representatives, industrial customer representatives, and the Joint Minerals, Business and Economic Development Interim Committee on proposed legislation [HB0012] that would have addressed issues related to the addition of new electric utility resources and integrated resource planning. While the OCA participated in the discussions and meetings, it continued to have a concern with the bill that was sponsored by the Joint Minerals, Business and Economic Development Interim Committee during the 2007 legislative session. (See <http://legisweb.state.wy.us/2007/Introduced/HB0012.pdf>) Ultimately, the bill did not become law.

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### **Telecommunications Legislation**

In 1995, legislation was passed that recognized that the telecommunications market was in a transition from a monopoly market to a competitive market. Substantial changes in the telecommunications industry have occurred since the 1995 legislation was enacted. Thus, regulators, industry, and consumer advocates (including the OCA) entered into discussions throughout 2005 and 2006 to take a fresh look at the level of regulatory requirements that should remain in place. These discussions ended with the passage of Enrolled Act No. 57. [Wyoming Telecommunications Act] (See <http://legisweb.state.wy.us/2007/Enroll/SF0078.pdf>)

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The Act includes a number of major and minor changes to the previous law, including: (a) modifying the test to determine whether a telecommunications carrier's services are subject to effective competition; (b) requirements to maintain stand-alone voice service (as opposed to bundled packaged services) for a period into the future with only minimal, if any, price increases; (c) removing the total service long-run incremental cost (TSLRIC) price floor requirement, so that carriers may decrease prices below a point previously allowed; and (d) imposing switched access price ceilings.

### **Electric Cooperative Rate Regulation Legislation**

Prior to the passage of Enrolled Act No. 110, electric distribution cooperatives were generally regulated in the same manner as investor-owned utilities, including the requirement that rates and charges be approved by the Public Service Commission before they became effective. The newly enacted legislation allows the electric cooperatives the option of

self-regulating its rates under certain circumstances. (See <http://legisweb.state.wy.us/2007/Enroll/HB0205.pdf>)

More specifically, the legislation allows the board of directors to adopt a resolution for exemption from the Public Service Commission's retail rate regulation and then submit the resolution to the cooperative's members for a vote. Upon a majority vote and submission of the election results to the Public Service Commission, the electric cooperative would be exempt from rate regulation. The legislation also contains provisions for how customer complaints are to be addressed as well as the potential return to rate regulation by the Public Service Commission. The law is not applicable to cooperatives with annual sales greater than two billion kilowatt hours, which currently applies to only one cooperative, Powder River Energy Corporation.

### **Office of Consumer Advocate Sunset Extension**

The Office of Consumer Advocate's enabling legislation called for the newly authorized activities to sunset as of July 1, 2009, unless otherwise reviewed, modified or eliminated. Enrolled Act No. 40 modifies this date, such that the OCA would no longer exist as of July 1, 2013, unless further legislative action is taken before that time. A copy of the legislation may be found at <http://legisweb.state.wy.us/2007/Enroll/SF0167.pdf>.

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## SUMMARY OF CASE ACTIVITIES

The OCA focuses its efforts and resources on cases having the greatest potential impact on the availability of safe, reliable, reasonably priced utility services. During 2006, the OCA reviewed 98 applications that came before the Commission. These included utilities' request to increase base rates, petitions to pass-on wholesale electricity and natural gas cost increases and decreases, integrated resource plans, miscellaneous tariff revisions, and Commission rule-making proceedings.

	Number of Cases in 2006
Formal Interventions	50
Written Statements of Concerns/Comments	9
No Further Action	37
Currently Under Review	<u>2</u>
Total Cases Reviewed	98

The OCA intervened as a party in 50 of the 98 cases it reviewed during 2006. The OCA filed testimony or comments in all of these matters. The OCA's decision to intervene or otherwise become involved in a given case is generally based on the magnitude of any potential public interest impact, the relative importance of the issues presented, and the adequacy of the information provided by a filing utility. The OCA's analysis also involves review of the accuracy and prudence of items included in rate increases and decreases and the filing utility's policies and procedures, when appropriate.

The OCA filed formal comments or written statements of concerns in nine cases after determining that it was not necessary, or would not be an efficient use of resources, to intervene as a formal party. Rather, the OCA filed comments and statements to provide key information that would be important and helpful to the Commission in making its decision.

In 37 cases, the OCA determined, after review, that the applications were reasonable and adequately supported, so no further action was necessary. Two cases remain under review, with the appropriate action yet to be determined.

Not all cases that the OCA intervenes in result in immediate, measurable savings to customers. Some cases involve interventions simply to assure compliance with rules and standards, and others involve changes to tariffs and regulations that result in longer term, rather than immediate rate impacts. Much of the OCA's work this year falls into these categories rather than the more measurable rate case work. We worked diligently to assure that utilities' followed both the Commission's rules and regulations, as well as their own tariffs. While we have not attempted to quantify the long-term savings that will come from this work, we are confident that customers have and will continue to benefit from our efforts.

Additionally, in several of the cases this year, there were interveners in the case in addition to the Office of Consumer Advocate. This makes it difficult to measure the savings effectuated by any one party, particularly in cases where the issues are resolved pursuant to Stipulations and Agreements. However, we have calculated that in cases in which we were a party, the resulting rates to customers are more than \$16,000,000 less than they would have been had the original requests of the utilities been granted.

## **CUSTOMER OUTREACH**

### **OCA Website**

The OCA maintains a website that contains the formal positions that the OCA has taken in testimony filed with the Public Service Commission as well as the formal comments that it has filed before federal regulatory agencies. It also contains information about the OCA's mission and vision, the OCA staff's contact information, press releases about OCA activities, and general information for customers.

(See <http://psc.state.wy.us/oca.htm>)

### **Speeches and Presentations**

The OCA Administrator and staff members are occasionally asked to provide presentations to various industry, community, or fraternal organizations. Examples of the presentations given in 2006 included: (a) a presentation on OCA views of current issues to the Wyoming Telecommunications Association, (b) participation in a panel discussion on universal service funding at the Wyoming Telecommunications Council's Policy Forum, (c) participation in a panel discussion on Cash Management Issues before the Federal Energy Regulatory Commission as a representative of the National Association of State Utility Consumer Advocates, and (d) participation in a panel discussion on Consumer Advocacy issues at the World Forum on Energy Regulation III.

### **Response to Public Inquiries and Customer Concerns**

Throughout the year, the OCA responded to a number of inquiries from customers, industry representatives, legislators, and the press. These calls related to everything from concerns about proposed prices to inquiries about OCA positions on pending legislation or our recommendations in hearings.

While the OCA is not permitted to formally represent individual customers or customer groups, when customers have a complaint or express a concern, we will: (a) pass the concern on to the appropriate person who can assist them most directly, (b) guide them as to their options for pursuing issues before the Public Service Commission and what those options will entail, (c) encourage them to raise their issue directly with the Commission, if it relates to an on-going current proceeding, (d) incorporate their concerns into OCA recommendations before the Commission, and/or (e) explain the OCA's view of the issue to try to educate the customers as to various viewpoints and facts surrounding industry requests and actions.

## INVOLVEMENT IN THE REGULATORY COMMUNITY

### Involvement Before Federal Regulatory Agencies

The OCA attempts to stay current on major projects and activities at the federal level that may have an impact on Wyoming utility customers. In particular, we make an effort to stay abreast of the current relevant issues that are being taken up by the Federal Communications Commission and the Federal Energy Regulatory Commission, and participate to the extent that resources permit.

In 2006, the OCA was an active participant in two matters before the Federal Regulatory Energy Commission (FERC). In the first matter, *Promoting Transmission Investment through Pricing Reform*, the OCA filed comments on January 9, 2006. These comments may be found at <http://psc.state.wy.us/htdocs/oca/fedcase/TransmissionInvestmentComments.pdf>. Essentially, the OCA was supportive of increasing transmission investment but expressed concern that some of the proposed incentives may not actually achieve their proposed purpose. The OCA recommended that FERC provide additional guidance to applicants relative to showing a need for the proposed incentive and recommended that the final rules be more detailed than were the drafts. FERC's final rule was issued in July 2006 and may be found at <http://www.ferc.gov/whats-new/comm-meet/072006/E-3.pdf>.

In the second FERC matter, the OCA participated as a representative from Wyoming as well as a representative from the National Association of State Utility Consumer Advocates. In December 2006, a technical conference was held on *Cash Management and Money Pool* issues. This matter addressed whether it was important to implement protections of a utility's cash holdings when the utility is part of a larger holding company. The OCA suggested that some minimal level of protection should be considered. The OCA's participation on the panel was followed by written comments filed in January 2007. OCA comments may be found at <http://psc.state.wy.us/htdocs/oca/fedcase/CashMgmtMoneyPoolIssues.pdf>.

As we have in prior years, the OCA also actively participated in Universal Service Funding matters before the Federal Communications Commission (FCC). In March 2006, the OCA again filed comments before the FCC relative to universal service issues and our on-going concern about the lack of affordable voice telephone service in Wyoming and our failure to meet the comparable urban/rural rate principle set forth in federal law. Our

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comments may be found at <http://psc.state.wy.us/htdocs/oca/fedcase/commentsfusfmarch2006.pdf>. Additionally, the OCA has shown its support for trying to find a reasonable solution to the ten year old universal service funding problems that it has faced by volunteering one of its representatives to be a supporting staff person to the Federal-State Joint Board on Universal Service.

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### **National Association of State Utility Consumer Advocates**

The National Association of State Utility Consumer Advocates (NASUCA) is an association representing 44 state utility consumer advocate offices in 41 states and the District of Columbia. NASUCA member offices are authorized by the laws of their respective jurisdictions to represent the interests of utility consumers in matters before state and federal utility regulators and courts. Mr. Freeman, the OCA's Administrator, is the Secretary of NASUCA and a member of its Executive Committee.

NASUCA holds national gatherings three times each year, allowing its members the opportunity to discuss common issues and possible resolutions of those issues and to hear presentations on new and upcoming industry developments. Additionally, the individual Committees of NASUCA communicate on an on-going basis throughout the year on issue development, new legislation and regulations, and other topics via e-mail and regularly scheduled conference calls. The OCA staff members and management regularly participate in the Executive Committee, the Electricity Committee, the Natural Gas Committee, the Telecommunications Committee, and the Tax and Accounting Committee activities. Our participation has allowed us to benefit from the experiences of our colleagues in other states and has assisted us in staying current on developing issues.

### **National Association of Regulatory Utility Commissioners**

The National Association of Regulatory Utility Commissioners (NARUC) is a nonprofit corporation whose membership consists of the governmental agencies engaged in the regulation of utilities. The chief objective of the association is to serve the consumer interest by seeking to improve the quality and effectiveness of public regulation in America. The OCA frequently participates in the meetings, conference calls, e-mail lists, and other activities of NARUC, as well as occasionally serving as discussion panelists or making formal presentations at the meetings.

NARUC holds national meetings three times each year and the OCA has at least one representative at each of these meetings. These meetings allow for discussion of current and developing issues, the sharing of information on specific concerns and possible resolutions, and the sharing of diverse

viewpoints about various national and regional matters. Furthermore, NARUC has a number of Committees and Subcommittees in which the OCA staff participate, including the Accounting and Finance Subcommittee, the Subcommittee on Law, and the Subcommittee on Telecommunications. On several occasions we have been able to use the information we have learned at these meetings in the preparation of recommendations on Wyoming specific matters.

**Western Interstate Energy Board (WIEB), Committee on Regional Electric Power Cooperation (CREPC) and Western Interconnection Regional Advisory Body (WIRAB)**

WIEB serves as the energy arm of the Western Governor's Association. The purpose of the Board is to provide the instruments and framework for cooperative state efforts to "enhance the economy of the West and contribute to the well-being of the region's people." The Board seeks to achieve this purpose through cooperative efforts among member states/provinces and with the federal government in the energy field (See <http://www.westgov.org/wieb>)

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CREPC is an ad-hoc group of western regional energy policy officials, regulators and consumer advocates that operates under the auspices of WIEB. The purpose of CREPC is to facilitate cooperation and collaboration among the states in the western interconnection on issues of mutual concern regarding the electric utility industry and work to improve the efficiency of the western electric power system. CREPC works closely with industry, state and federal officials, and the Western Electric Coordinating Council in compiling data and making reliability and adequacy assessments of the western electric system. CREPC also plays an important role in facilitating planning for future transmission and generation resources in the western interconnection. (See <http://www.westgov.org/wieb/site/crepcpage/index.htm>)

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WIRAB is created under Section 215 of the Federal Power Act by which members are appointed by the Western Governors Association. The WIRAB is to advise the Western Electricity Coordinating Council (WECC), the Electric Reliability Organization (ERO, also known as the North American Electric Reliability Corporation) and the Federal Energy Regulatory Commission (FERC) on whether proposed reliability standards and the governance and budgets of the ERO and WECC are in the public interest. FERC may request that WIRAB provide advice on other topics. WIRAB is currently focused on development and implementation of the mandatory reliability standards required in the Energy Policy Act of 2005 (See <http://www.westgov.org/wieb/site/wirab/wirabindex.htm>)

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OCA Administrator Bryce Freeman continues to be active in the work of CREPC participating in committees and work groups studying issues such as cost allocation, transmission expansion planning, congestion, control area consolidation and resource adequacy assessment, among others. Regional cooperation and collaboration on energy issues will be important as the west seeks to meet its increasing energy demands with environmentally sustainable and affordable energy resources.

### **PacifiCorp Multi-State Working Groups**

PacifiCorp is an electric utility serving six western states, including Wyoming, who is served by Rocky Mountain Power, one of its distribution affiliates. There are a number of common issues that the states work on together, primarily due to the shared generation and transmission resources that serve all six states. Several work groups have been established with representatives of the states and PacifiCorp to share common information and work toward a single solution to common problems. The Wyoming OCA representatives actively participate in a number of these workgroups, including groups associated with examination of the following:

- the engineering, science, and costs associated with clean coal technologies;
- issues surrounding climate change and its impact on resource and operational decisions of the utility;
- allocating the costs of common generation and transmission plant to each separate jurisdiction; and
- integrated resource planning, including the development of forecasts of expected future system demands and anticipated available resources, and how to meet the needs related to any gaps between the expected resources and future system demands.

### **Domestic and International Workshops and Training Programs**

Members of the Office of Consumer Advocate have been asked over the years to participate as instructors in various training programs, with Ms. Parrish being the most active in these activities. In 2006, for the fifth consecutive year, Ms. Parrish was an instructor at Camp NARUC, an annual training program held by the Institute of Public Utilities at Michigan State University to provide basic skills and current issue training primarily for those new to the area of utility regulation. Many members of the Public Service Commission and Office of Consumer Advocate have attended this course as part of their career training. Additionally, Ms. Parrish participated in a regulatory conference of the Energy Regulatory Regional Association in Warsaw, Poland, at the invitation of NARUC and the United States Agency for International Development (USAID).

## ADDITIONAL RESOURCES

### Wyoming Public Service Commission

General Number / Reception	(307) 777-7427
Customer Complaints / Inquiries	(888) 570-9905
Website	<a href="http://psc.state.wy.us/">http://psc.state.wy.us/</a>

### Federal Communications Commission

Customer Complaints	(888) 225-5322
TTY	(888) 835-5322
Website	<a href="http://www.fcc.gov">http://www.fcc.gov</a>

### Do Not Call Registry

Phone	(888) 382-1222
TTY	(866) 290-4236
Website	<a href="http://www.donotcall.gov">http://www.donotcall.gov</a>

### Federal Energy Regulatory Commission

Public Inquiries	(866) 208-3372
State-Federal Relations	(866) 208-3372
Website	<a href="http://www.ferc.gov">http://www.ferc.gov</a>

### U.S. Department of Energy

Phone	(800) 342-5363
Secretary of Energy	<a href="mailto:The.Secretary@hq.doe.gov">The.Secretary@hq.doe.gov</a>
Website	<a href="http://www.energy.gov/">http://www.energy.gov/</a>

### Low Income Energy Assistance Program [LIEAP]

Phone	(800) 246-4221
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### Energy Share of Wyoming

Phone	(877) 461-5719
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