

Exhibit No.\_\_\_\_(DMR-1T)  
Docket UE-14\_\_\_\_  
Witness: Dana M. Ralston

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFIC POWER & LIGHT COMPANY,  
a division of PacifiCorp

Respondent.

Docket UE-14\_\_\_\_

**PACIFIC POWER & LIGHT COMPANY  
DIRECT TESTIMONY OF DANA M. RALSTON**

**May 2014**

1 **Q. Please state your name, business address, and present position with Pacific**  
2 **Power & Light Company (Pacific Power or Company), a division of PacifiCorp.**

3 A. My name is Dana M. Ralston. My business address is 1407 West North Temple,  
4 Suite 320, Salt Lake City, Utah 84116. My present position is Vice President of  
5 Thermal Generation for PacifiCorp Energy. I am responsible for the coal, gas, and  
6 geothermal resources owned by the Company.

7 **QUALIFICATIONS**

8 **Q. Please describe your education and professional background.**

9 A. I have a Bachelor of Science degree in Electrical Engineering from South Dakota  
10 State University. I have been the Vice President of Thermal Generation since January  
11 2010. Before 2010, I held a number of positions of increasing responsibility with  
12 MidAmerican Energy Company for 28 years in the generation organization, including  
13 the plant manager position at the Neal Energy Center, a 1600-megawatt generating  
14 complex located in Sioux City, Iowa. In my current role, I am responsible for the  
15 operation and maintenance of the thermal generation fleet.

16 **PURPOSE OF TESTIMONY**

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

18 A. The purpose of my testimony is to provide information supporting the prudence of the  
19 cooling tower replacement project at Unit 1 of the Jim Bridger generating plant.

20 I describe the scope of the project and discuss the Company's economic analysis.

21 **PROJECT DESCRIPTION**

22 **Q. Please describe the Jim Bridger Unit 1 cooling tower replacement project.**

23 A. The cooling tower is used to reject the heat absorbed by the cooling water used in the

1 steam condensing process. The cooling water passes though the tubes of the  
2 condenser, and the steam flows around the outside of the tubes after it passes though  
3 the turbine. This process condenses the steam back into water so that it can be  
4 reused. The cooling water needs to reject the heat absorbed before it is returned to  
5 the condenser for reuse. The existing Jim Bridger Unit 1 cooling tower (cells 1–9)  
6 has been in service since 1990 and is supported by a structure made of wood. Cells  
7 10 and 11 were replaced with fiberglass construction in 2005. Based on design life  
8 and condition of the wood structure, the existing cooling tower needs to be replaced.

9 **Q. Why does the cooling tower need to be replaced?**

10 A. Cooling tower manufacturers design wood cooling towers for a useful life of  
11 approximately 30 years. But the actual service life of the material is dependent on the  
12 quality of the water used in the process. In some cases, the actual service life of a  
13 cooling tower can be as low as 20 years. Experience at the Jim Bridger plant  
14 indicates that cooling tower service life is approximately 25 years for wood  
15 structures. To confirm the condition of the Jim Bridger Unit 1 cooling tower, several  
16 lumber samples of the support structure were removed and replaced with new lumber.  
17 The samples were then sent to a third-party engineering lab to determine strength and  
18 remaining life. The evaluation of lumber samples taken in 2010 and 2013 provided a  
19 range for the remaining useful life of the lumber structure supporting the Jim Bridger  
20 Unit 1 cooling tower. The high end of the range indicates that the lumber will reach  
21 or exceed its useful life in 2018; the low end of the range indicates that the lumber  
22 will reach or exceed its useful life in 2014. Based on the low end of the range, the

1 Jim Bridger Unit 1 cooling tower is scheduled to be replaced during the 2014 planned  
2 maintenance outage to minimize costs and unplanned outage time.

3 **Q. What are the consequences if the tower is not replaced?**

4 **A.** If it is not replaced, eventually the lumber in the support structure degrades to the  
5 point that the entire cooling tower can collapse. This type of collapse has occurred at  
6 several plants—not owned by the Company—across the country, causing a safety risk  
7 to employees that need to work on the cooling tower and causing extended outages of  
8 the plant to remove and replace the cooling tower on an emergency basis.

9 **Q. Can the Jim Bridger Unit 1 cooling tower be repaired and replaced at a  
10 later date?**

11 **A.** Replacement of the Jim Bridger Unit 1 cooling tower at this time is the most cost-  
12 effective option. Planned maintenance outages are scheduled on a four-year cycle.  
13 The next two planned maintenance outages are scheduled in 2014 and 2018. The  
14 Company analyzed the option of temporarily repairing the tower by replacing several  
15 structural elements in 2014 and delaying full replacement until the 2018 planned  
16 maintenance outage. When the present value revenue requirement (PVRR) for a full  
17 replacement in 2014 was compared to the PVRR of the two-step process of making  
18 repairs in 2014 followed by a full replacement in 2018, the full replacement in 2014  
19 was the most cost-effective option and provided assurance that the tower would not  
20 collapse. The PVRR benefit of a full replacement of the cooling tower in 2014 versus  
21 a repair in 2014 and replacement in 2018 is \$426,000.

1 **Q. What is the capital investment associated with the Jim Bridger Unit 1 cooling**  
2 **tower replacement project?**

3 A. The Jim Bridger Unit 1 cooling tower replacement project is expected to cost  
4 approximately \$5.9 million on a total-company basis, or approximately \$1.4 million  
5 on a Washington-allocated basis. These costs are included in this case as reflected in  
6 the testimony and exhibits of Ms. Natasha C. Siores.

7 **Q. When will the Jim Bridger Unit 1 cooling tower replacement project be placed**  
8 **in service?**

9 A. The project is expected to be placed in service in May 2014.

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

11 A. Yes.