BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of	Docket No	
INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES,	AFFIDAVIT OF DONALD W. SCHOENBECK	
For a Declaratory Order Requiring Puget Sound Energy, Inc. to Provide Access to the AURORA Model in its 2011 General Rate Case.		
STATE OF OREGON)	SS.	
County of MULTNOMAH)	55.	
I, Donald W. Schoenbeck, being first duly sw	vorn, do say:	
1. My name is Donald W. Schoe	nbeck. I am over the age of 18, a citizen of the	
United States, and competent to be a witness.		
2. I am President of Regulatory &	& Cogeneration Services, Inc. ("RCS"). I have been	
retained as a consultant by the Industrial Cus	tomers of Northwest Utilities ("ICNU") for review	
of net power costs in Puget Sound Energy, In	ac.'s ("PSE") 2011 general rate case ("GRC"). My	
business address is: 900 Washington Street,	Suite 780, Vancouver, WA 98660.	
3. PSE has indicated to ICNU th	at it will file its 2011 GRC in early June. PSE has	
also indicated that it plans to use the AURORA model to calculate its net power costs.		

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1	4. The AURORA model is a proprietary model owned by EPIS, Inc. ("EPIS"). As
2	indicated on the EPIS website, the cost to obtain a full license to use AURORA is at least
3	\$51,500. Based on a long-standing relationship between RCS and EPIS, other pricing options
4	have also been discussed on a confidential basis.
5	5. It is necessary to have access to the model used by PSE to test and understand the
6	inputs and assumptions that are used to generate the calculations for net power costs, and to
7	propose adjustments to PSE's calculations of its net power costs.
8	6. PacifiCorp and Portland General Electric Company both provide access to their
9	power cost models at no cost.
10	7. ICNU and I collaborated with Avista Corporation ("Avista") to obtain access to
11	the AURORA model through a computer at Avista dedicated to use by ICNU. I will be able to
12	access the dedicated computer and run the AURORA model through a virtual private network
13	during the pendency of the Avista GRC. Access to AURORA for the Avista GRC is provided
14	through Avista's license, and ICNU will not be assessed any licensing fees.
15	8. ICNU has attempted to negotiate with PSE to obtain access to AURORA on terms
16	similar to those provided by Avista, and PSE has, to date, refused to cooperate.
17	9. I cannot effectively review the power cost issues in the rate case without full
18	access to the AURORA model. It is burdensome and inadequate to have PSE run the model for

20 10. The cost of obtaining a full license to use AURORA for the PSE 2011 GRC,

\$1,500, is an unreasonable and burdensome expense for an intervenor.

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me.

1	SIGNED THIS 6th day of June, 2011, at Portland, Oregon.
2	Gorald W. Schoenbeck
3 4	DONALD W. SCHOENBECK State of Oregon
5	County of Multnomah
6	SUBSCRIBED AND SWORN to before me this 6th day of June, 2011.
7	OFFICIAL SEAL STATE OF THE SEA
8	SARAH A KOHLER NOTARY PUBLIC FOR OREGON NOTARY PUBLIC FOR OREGON
9	COMMISSION NO. 456729 MY COMMISSION EXPIRES MARCH 10, 2015 MY COMMISSION EXPIRES MARCH 10, 2015 MY COMMISSION EXPIRES MY COMMISSION EXPIRES