

**BEFORE THE
WYOMING PUBLIC SERVICE COMMISSION
DIRECT TESTIMONY
OF
JEFFERY W. BUMGARNER
POWDER RIVER ENERGY CORPORATION**

Docket No. 10014-~~177176~~-CT-16

1 **Q: Please state your name and address.**

2 A: My name is Jeffery W. Bumgarner and my business address is Powder
3 River Energy Corporation, P.O. Box 930, Sundance, WY 82729.

4 **Q: What is your present occupation?**

5 A: I am employed as Vice President of Member Service of Powder River
6 Energy Corporation, hereafter referred to as "PRECorp" or "the
7 Corporation".

8 **Q: What are your duties as Vice President of Member Service of Powder
9 River Energy Corporation?**

10 A: My duties are to manage the member service, communications and
11 economic development functions at PRECorp. As a member of the
12 executive staff I participate in strategic planning and the general operation
13 of the Corporation.

14 **Q: Please state your educational background and professional
15 qualifications.**

16 A: I have a Bachelor of Science in Finance and Business Management from
17 the University of Oregon and have completed the University of Idaho's
18 Utility Executive program, among other management programs. I have
19 been employed in the utility field since 1981, having worked at PacifiCorp
20 for 34 years prior to joining PRECorp in January of 2016. I've held
21 management positions from customer care and new business
22 development to marketing, demand-side management and resource
23 planning.

24 **Q: What is the purpose of your testimony?**

25 A: The purpose of my testimony is to support PRECorp's application to
26 amend its rules and regulations and Tariff Rate Schedules, hereafter
27 referred to as "Tariffs".

28 **Q: Why is PRECorp filing to amend its Tariffs at this time?**

29 A: The filing is intended to comply with a Wyoming Public Service
30 Commission, hereafter referred to as "the Commission", order in Docket
31 No. 90000-125-XO-15 (Record No. 14272), the adoption of Chapters 1
32 through 5 of the Commission's revised Tariffs, which were effective on
33 March 21, 2016. The filing complies with the Commission's order in that
34 Docket issued on July 14, 2016, forbearing the enforcement of Chapter 3,
35 Section 25, Conformance with Revised Commission Rules and
36 Regulations, until September 30, 2016.

37 **Q. Are all of PRECorp’s amendments in the application for the sole**
38 **purpose of conforming the Corporation’s Tariffs with those recently**
39 **adopted by the Commission, and approved on March 21, 2016?**

40 A. No. PRECorp used this opportunity to make amendments to its Tariffs
41 beyond those needed simply to remain in conformance with the
42 Commission’s revised tariffs.

43 **Q. Please summarize the nature of the amendments made by PRECorp**
44 **to its Tariffs in the Application.**

45 A: The amendments are intended to accomplish multiple purposes, they 1)
46 reflect changes intended to standardize, to a large degree, parts of the
47 Corporation’s tariff language with of that of the Commission’s revised
48 tariffs, 2) capture specific language, for the most part agreed to by the
49 Commission staff and members of the rural electric cooperative model
50 tariff working group across nine specific topic, 3) add additional clarity to
51 the Commission language adopted and that contained in the model tariff
52 language, 4) correct inconsistencies and possible contradictions found
53 within PRECorp’s current tariffs, 5) clarify current tariff language to
54 improve member understanding, and 6) address administrative and
55 maintenance issues e.g. standardize how the Corporation and members
56 are referenced within the tariffs, remove outdated language, and updated
57 references such as industry standards and where information can be
58 found in Commission tariffs.

59 **Q. Please provide a couple examples of where PRECorp adopted the**
60 **Commission Tariff language for the purpose of standardizing Tariff**
61 **requirements.**

62 A. In addition to the language adopted across the nine topics covered by the
63 model Tariffs, PRECorp revised its rule in Section III - General Information
64 – “Resale of Electric Power”, to reflect the Commission’s “Direct Sales”
65 heading and language found in the Commission’s tariff Chapter 3, Section
66 36. PRECorp also adopted much of the Commission tariff language in
67 Chapter 3, Section 27 and 28 on “SIRT: Reportable Incidents” and
68 “Service Interruption Reporting”, respectively (PRECorp Tariff reference
69 Section VIII – “Service Interruption Reporting Plan”). Throughout
70 PRECorp’s amendments the Commission’s tariff language, or parts of it,
71 were incorporated where PRECorp had similar topics incorporated in their
72 rules. These are cataloged in more detail in the exhibits accompanying the
73 Corporation’s application.

74 **Q. What are the nine model tariff topics/language incorporated within**
75 **PRECorp’s proposed amendments?**

76 A. Much of the model tariff language on Security Deposits was adopted
77 however was heavily edited by PRECorp in our proposed amendments.
78 The Security Deposit section (Section III) of PRECorp’s Tariff is therefore
79 not included in this Application’s request for approval but rather is being
80 submitted under its own Application in Docket No. 10014-176-CT-16. The
81 other eight (8) model tariff topics in which PRECorp adopted much of the

82 proposed model Tariff language, or amended their Tariffs to include
 83 specific tariff requirements e.g. Meter Testing Program, include:

PSC Section	Section Title
8.	Refusal to Service New Members or Expend Existing Service
9.	Discontinuance of Service to Customers
10.	Reconnection of Service to Customers
15.	Use of Meter
16.	Meter Location
18.	Meter Testing Program
19.	Meter Reading & Billing
20.	Customer Requests for Tests of Meter Accuracy

84

85 **Q. Please provide a few examples of where the amendments are**
 86 **intended to help clarify PRECorp’s Tariffs.**

87 A. In Section III – General Information, language was added that members
 88 not only need to sign an Application for Membership and Electric Service
 89 but abide by its terms and conditions. In Section III – Meter Reading and
 90 Billing, the Corporation added a reference to the “Credit Check/Transfer”
 91 charge listed in Section VII – Rate Schedules, and in Section III –
 92 Unoccupied Premises and Idle Services the Corporation makes it clear
 93 that if an idle line retention charge is being paid that regardless of the
 94 condition of the line when reenergized there would be no charge to the
 95 member.

96 **Q What types of inconsistencies did PRECorp find in its Tariffs that it is**
97 **correcting with these amendments?**

98 A. Minor items such as different power factor rating requirements for LPT-
99 CBM members between the Corporation's Rules and Regulations that
100 found in the Corporation's Rate Sheet for this class service (90% verse
101 95%, respectively), and cleaned up potential contradictions in the
102 requirements in Section IV, Motor Starting Current Limitation, that could
103 lead to disagreements between the Corporation and its members.

104 **Q. Did any of the inconsistencies found result in incorrect member**
105 **billings or application of rates?**

106 A. No.

107 **Q. What types of administrative and maintenance amendments were**
108 **made?**

109 A. While reviewing the documents the Corporation took the opportunity to
110 change information such as converting the use of "customer" to
111 "applicants", "members" or "prospective members". Changing references
112 from the "Cooperative" and "Powder River Energy Corporation" to "the
113 Corporation". Updating references within the tariffs that pointed to an
114 industry standard, or a Commission rule, to more current sources e.g.
115 IEEE 519-2014 (Harmonic Control in Electric Power Systems) rather than
116 IEEE 519-1992, removing the reference to the Commission's rule 246
117 from its prior set of tariffs, and other minor amendments of that nature.

118 **Q. Have you documented the changes in more detail in exhibits to**
119 **assist staff and the Commission in their review?**

120 A. Yes. **Exhibits 1, 2, 3** and **4** to this Application contain copies of the
121 legislative and proposed versions of the Corporation's amended Rules
122 and Regulations, and Rate Sheets, respectively. **Exhibit 5** documents the
123 substantive amendments to PRECorp's tariffs along with the appropriate
124 reference to tariff section. **Exhibit 5** also provides a brief explanation for
125 each amendment documented.

126 **Q: Does this conclude your testimony?**

127 A: Yes.