

Docket No. UE 263
Exhibit PAC/800
Witness: Erich D. Wilson

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

PACIFICORP

Direct Testimony of Erich D. Wilson

March 2013

DIRECT TESTIMONY OF ERICH D. WILSON

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1 **Q. Please state your name, business address, and present position with**
2 **PacifiCorp d/b/a Pacific Power (PacifiCorp or Company).**

3 A. My name is Erich D. Wilson. My business address is 825 NE Multnomah Street,
4 Suite 1800, Portland, Oregon 97232. My present position is Director, Human
5 Resources.

6 **QUALIFICATIONS**

7 **Q. Briefly describe your education and professional experience.**

8 A. I received a Bachelor's degree in Economics (Business) from the University of
9 California, San Diego, in 1992. In addition, I achieved Certified Compensation
10 Professional status from the American Compensation Association in 1999 and
11 have kept this certification current by attending various educational programs and
12 seminars. Before coming to the Company, I held various positions in the area of
13 human resources (operations, benefits, and staffing), but for the majority of my
14 career I have directed the design and administration of compensation programs.
15 I joined the Company in 2001 as Director of Compensation. I assumed my
16 current position as Director of Human Resources in 2006.

17 **Q. Please describe your current duties.**

18 A. My primary responsibilities include managing the Company's human resource
19 department, including compensation, benefits, compliance, staffing, training and
20 development, employee and labor relations, and payroll. I focus on assisting the
21 Company in attracting, retaining, and motivating qualified employees, along with
22 the administration of all associated human resource programs and employee
23 experiences.

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PURPOSE AND OVERVIEW OF TESTIMONY

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to provide an overview of the compensation and benefit plans provided to the Company’s employees and to support the costs related to these areas included in the test period.

Q. Does your testimony address both union and non-union compensation and benefit plans?

A. The focus of my testimony is on the plans and programs provided to the Company’s non-union workforce. The Company’s union workforce and the compensation and benefit plans provided to them are governed by their respective collective bargaining agreements. These agreements are reached between the Company and each union to provide market-level competitive compensation, benefits, and work rules.

Q. Please provide an overview of your testimony.

A. This testimony focuses on the total compensation plan (consisting of base pay and annual incentive), pension plan, and health care benefit plans. These plans are designed to allow the Company to attract and retain the employee talent necessary to deliver safe and reliable service at a reasonable cost. I also demonstrate that the Company continues to control increases in labor and benefit costs. Moreover, increases in benefit costs have been maintained at a reasonable level that reflects the economic conditions and market.

TOTAL COMPENSATION

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Q. What factors does the Company consider with respect to its compensation and benefit costs?

A. First, the Company is continually working to keep operations and maintenance and administrative and general costs under control to mitigate the impact on customer rates. Second, while it is important to keep compensation and benefit costs under control, it is still critical for the Company to be able to retain and attract competent and qualified personnel to manage and operate the system. To do so, the Company continues to align its wage levels with the labor market. The challenges facing the economy have resulted in wage increase levels below what had been seen in prior periods. This is evident by the Company's wage increase levels in 2009 of 1.0 percent to 1.75 percent, and in 2010 and 2011 of 2.0 percent, compared to previous levels in the 3.0 to 4.0 percent range. The level implemented in 2012 was 2.0 percent, and the actual level beginning in January 2013 is 2.22 percent. In addition, the market continues to see a shift to employees bearing more of the cost of benefits. Accordingly, the Company continues to shift a greater percentage of the cost of benefit plans to its employees.

Q. What is the Company's compensation philosophy?

A. Two fundamental principles underlie the Company's compensation philosophy. First, the Company's primary goal in determining employee compensation is to provide pay at or near the market average. Competitive compensation is critical to attracting and retaining qualified employees. The market for the skilled positions required to manage and operate a utility system is extremely

1 competitive. Thus, the Company strives to provide the same general pay levels
2 and benefits in its total compensation package as provided by others in the
3 industry. The Company believes that providing total compensation at or near
4 market levels results in reasonable total compensation costs.

5 The Company encourages superior performance, by placing a portion of
6 each employee's total compensation "at risk." Receipt of the "at-risk" portion of
7 total compensation is dependent upon individual performance and achievement of
8 a limited number of specific business goals. I discuss in detail how this Annual
9 Incentive Plan operates later in my testimony.

10 **Q. How does the Company determine the total compensation package for each**
11 **position?**

12 A. Each of the Company's positions has been assigned a grade within the Company's
13 overall salary structure. At least annually, the Company collects market data for
14 comparable positions and calculates the average data point for total cash
15 compensation for each grade. Market data is provided through a variety of
16 compensation studies produced by experts and organizations, including Aon
17 Hewitt, Towers Watson, and Mercer. The Company also uses an online tool
18 called "MarketPay.com." MarketPay.com provides electronic access to all of the
19 compensation studies the Company has traditionally used and some additional
20 surveys, allowing the Company to more efficiently perform information searches
21 and job and pay comparisons.

22 After the Company determines the appropriate level of total cash
23 compensation for a specific grade, it then determines the at risk portion of the

1 compensation for each grade. The Company sets the at-risk portion by reviewing
2 market compensation using the various compensation studies described above.
3 The at-risk portion is typically in the 10-25 percent range; however, incentive pay
4 for a few employees is set as high as 75 percent. In general, the higher the
5 position is within the Company, the higher the amount of pay at risk and thus the
6 higher the percentage of potential incentive pay. The at-risk portion of
7 compensation (referred to as “incentive compensation”) is administered through
8 the Annual Incentive Plan. The remaining percentage of total compensation is
9 referred to as “base compensation.” This base-plus-incentive compensation
10 structure is the same as the structure presented in the Company’s previous Oregon
11 rate cases, including the Company’s 2012 general rate case
12 (docket UE 246).

13 **Q. Has the Company made changes to the Annual Incentive Plan in response to**
14 **Commission feedback?**

15 A. Yes. In 2006, the Company adjusted its Annual Incentive Plan in response to
16 feedback from the Commission. Before that time, the Company sought recovery
17 of all awards made to employees under the plan, whether or not those awards
18 resulted in total employee compensation that was above a target (competitive
19 market) level. In response to the Commission’s previous decisions on recovery of
20 employee compensation, including incentives, the Company now seeks to recover
21 only that portion of incentive payments that result in compensation at the target
22 level.

ANNUAL INCENTIVE PLAN

Q. What is the objective of the Annual Incentive Plan?

A. The objective of the Annual Incentive Plan is to provide employees with an incentive to perform at an above-average level. The plan is not a bonus; the incentive compensation is not layered upon base compensation that is already at market levels. As discussed above, base compensation for each position is set at a level below the market level for total compensation for that position. Only if an employee performs at an acceptable level for the position will the employee earn total compensation at or near comparable positions in the market. If an employee fails to perform at an acceptable level, the employee will receive less than the target incentive or no incentive at all. When this occurs, the employee will be paid less than the comparable total cash compensation in the market for that year. Conversely, for exceptional performance, an employee may receive above his or her target incentive level.

The ability to earn a higher-than-target incentive payment provides the employee with an incentive to exceed average performance. This opportunity is an essential counterbalance to the risk the employee faces that his or her performance in a particular year will be less than acceptable, with the consequence that total compensation will be less than market in that year. The symmetry of the incentive element provides the Company with the financial tool to encourage exceptional performance and discourage less than acceptable performance.

1 **Q. Does incentive compensation benefit customers?**

2 A. Yes. Customers benefit from the higher level of overall employee performance
3 that is achieved when a portion of employees' pay is at-risk. In addition, the
4 Company's incentive compensation plan enables the Company to attract and
5 retain talented employees in the increasingly competitive market for skilled labor,
6 which also benefits customers. Therefore, while the total cost of the Company's
7 compensation program (base plus incentive) is equal to average total cash
8 compensation (just as a salary-only program would be), the benefit to customers
9 is greater.

10 **Q. How is the incentive compensation plan implemented?**

11 A. First, before the distribution of the at-risk compensation dollars, senior Company
12 management assesses the Company's achievement of certain critical business
13 goals such as safety, customer satisfaction, and managing expenses in relation to
14 revenues. Underperformance by the Company in satisfying critical business goals
15 may result in a downward adjustment of the total pool of at-risk dollars available
16 for distribution to all Company personnel. For example, the Company's
17 underperformance in satisfying one or more of these goals resulted in reduction in
18 the total amount of incentive compensation available for distribution to 85 percent
19 in 2010, 87 percent in 2011, and 85 percent in 2012.

20 At approximately the same time as the evaluations of the Company's
21 achievements are being performed, supervisors meet with each of the employees
22 in their group to conduct an assessment of the employee's performance
23 throughout the year against the employee's individual goals, the employee's

1 performance against group goals (including safety goals), and the employee's
2 success in addressing new issues and opportunities that may arise during the year.
3 The results of these performance reviews and associated scores are reported to
4 Human Resources.

5 Then, after the total pool of at-risk compensation has been determined by
6 senior management, supervisors are informed of the amount of incentive
7 compensation available for distribution within their group. Based on this
8 information, each supervisor submits the recommended incentive payments for
9 each employee in their group to Human Resources for review.

10 **Q. What are an employee's individual goals and how are they set?**

11 A. Individual goals start with the goals set for the Company as a whole. Each year,
12 the Company's senior management, in conjunction with MidAmerican Energy
13 Holdings Company, set the overall goals for the Company. All of these goals
14 focus on delivering safe and reliable electricity to customers and providing
15 excellent customer service. Goals include safety goals such as reducing lost time
16 and recordable, preventable, and restricted duty incidents. Customer service goals
17 include implementing local and regional customer service improvements,
18 improving visibility and relations with industrial customers and consumer
19 associations, and improving overall customer satisfaction. Some individual goals
20 relate to operating within established budgets, including maintaining operating
21 costs, controlling the cost of capital expenditures, and achieving operational
22 efficiencies and financial targets that allow the Company to remain a low-cost
23 utility. Other key goals relate to operational performance, major project delivery,

1 organizational planning and development, and quality of service and regulatory
2 commitments. The achievement of each and every one of these goals will benefit
3 our customers.

4 **Q. How do the Company goals relate to individual employee goals?**

5 A. The Company-wide goals serve as the foundation for the goals set for each
6 individual employee. Thus, when an individual employee establishes individual
7 goals for the year, the employee focuses on how that employee's position can
8 advance the overall goals of the Company. The employee's performance on
9 individual goals accounts for approximately 70 percent of his or her overall
10 evaluation. In addition to performance against individual goals, all employees are
11 evaluated with reference to six performance factors. These performance factors
12 describe the characteristics the Company believes are important to the success of
13 all employees—customer focus, job knowledge, planning and decision making,
14 productivity, building relationships, and leadership. The employee's performance
15 with respect to these factors accounts for approximately 30 percent of the
16 employee's overall evaluation.

17 **Q. Are any of the employees judged on the financial performance of the**
18 **Company?**

19 A. No. While all employees are expected to operate within applicable budgets,
20 corporate financial performance and returns are not a factor in determining the
21 amount of incentive compensation awarded under the plan. The Company does
22 maintain a separate plan for executives (the Long-Term Incentive Partnership

1 Plan) that bases awards on overall corporate performance; however, these costs
2 are not recovered in customer rates.

3 **Q. Please explain the level of incentive compensation that is included in this**
4 **filing.**

5 A. As shown in exhibit PAC/1002, Tawwater/4.2, the Company's filing includes
6 annual incentive in the test year using a three-year average of the ratio of annual
7 incentive expense to base wages. Based on this approach, annual incentive
8 expense of \$29.5 million (\$20.3 after capitalization) is included in the test year on
9 a total-company basis. The Oregon portion of this expense is approximately
10 \$8.5 million (\$5.8 after capitalization). This amount recognizes that the pool of
11 incentive compensation made available was reduced below 100 percent of the
12 indicated market level in 2010, 2011, and 2012.

13 **Q. Does the Company recommend including incentive compensation plus base**
14 **compensation in rates?**

15 A. Yes, for several reasons. First, customers should fully support the cost of
16 incentive compensation because, as previously mentioned, it is an essential
17 component of an overall market-based competitive compensation program.
18 Reducing customer support for incentive pay would result in under-market
19 salaries, making it impossible for the Company to recruit and maintain a qualified
20 labor force, which would in turn make it impossible for the Company to provide
21 safe and reliable service. Moreover, the goals of the plan are designed to
22 encourage superior performance on the part of employees in pursuing the goals
23 that directly benefit customers—safety, reliability, and customer service. This is

1 precisely the type of prudently designed incentive plan program that provides
2 direct benefits to customers and that customers should therefore support.

3 **RETIREMENT PLANS**

4 **Q. Please describe the Company's retirement plan.**

5 A. The Company strives to provide a competitive retirement plan offering with
6 reduced expense volatility for the benefit of employees and customers. The
7 Company provides non-represented employees hired before January 1, 2008, the
8 ability to receive their retirement through either a cash balance or 401k only
9 design. This choice was offered in 2008, and 41 percent of the eligible population
10 elected the 401k design. All non-represented employees hired after January 1,
11 2008, receive retirement benefits through the 401k design approach. Retirement
12 plan benefits for represented employees are determined through the collective
13 bargaining process, through which the Company has maintained its focus to shift
14 the retirement approach from the traditional defined benefit to defined
15 contribution (401k) approach.

16 **Q. Are there increases in costs related to retirement program offerings?**

17 A. Yes. As shown in Exhibit PAC/1002, Tawwater/4.2, the Company has adjusted
18 retirement plan costs consistent with the escalation applied to wages and salaries.

19 **EMPLOYEE HEALTH BENEFITS**

20 **Q. Please describe the Company's health care benefits.**

21 A. As with all benefits, the Company attempts to provide employees with the same
22 level of health care benefits provided by the employers with whom the Company
23 competes for labor. For the Company, this means offering employees market-

1 average health benefits. The Company seeks to provide these benefits as
2 economically as possible.

3 **Q. How does the Company determine that it is providing these competitive**
4 **benefits as economically as possible?**

5 A. The Company relies on the advice of its consultant, Aon Hewitt, to confirm that it
6 is securing market competitive benefits at the best possible rate. Aon Hewitt is a
7 respected expert in the field, and the Company has relied on this expertise for
8 many years. In consultation with Aon Hewitt, the Company periodically reviews
9 and adjusts the sharing of health-care-related costs with employees in an effort to
10 stabilize costs, manage volatility, and respond to changing market practices.

11 **Q. Has the Company faced any particular challenges in the past several years**
12 **relevant to its provision of health care benefits?**

13 A. Yes. It is widely understood that health care costs have been rising over the past
14 several years. As a result, the Company continues to experience increases in its
15 health care benefit costs.

16 **Q. Has the Company taken any action to contain these cost increases?**

17 A. Yes. Beginning in 2008, the Company has been making adjustments to cost
18 sharing and plan design to reduce costs and to align with market practices.
19 Employees are shouldering a larger share of the costs. In particular, in 2012 and
20 2013, the Company had a base medical plan with a high deductible and a cost
21 sharing of 84/16. The Company continues to offer other medical plan choices,
22 but, except for a \$600 deductible plan that is offered in rural areas, these plans are
23 set at a cost sharing of 70/30. In addition, in 2012, the Company implemented a

1 higher cost-sharing component for all covered dependants; in 2013 that level is
2 further increased. All new hires as of January 1, 2008, have the option of
3 selecting the high deductible plan or opting out of coverage.

4 **Q. What is the Company's rationale for sharing health-care-related costs with**
5 **employees?**

6 A. This structural shift adheres to the Company's goal of providing competitive
7 benefits to its employees, while doing so in a manner that is fair and helps to
8 control costs.

9 **Q. Please explain the level of health care costs included in this filing and**
10 **compare that to previous fiscal year expenses.**

11 A. As discussed above, there has been an upward trend in health care costs in recent
12 years. For calendar years 2009, 2010, and 2011, actual total company health care
13 expenses totaled \$57.9, \$57.9, and \$61.8 million respectively. Consistent with
14 this trend, the Company has included in this filing health care expenses on a total-
15 company basis of \$65.3 million (\$44.9 million after capitalization), as shown in
16 Exhibit PAC/1002, Tawwater/4.2. The Oregon allocated share of health care
17 expense is \$18.7 million (\$12.9 million after capitalization).

18 Along with these increases, Aon Hewitt has informed the Company that
19 current trends indicate the rates for the Company's health benefits are anticipated
20 to increase annually by a range of eight to 10 percent. This is driven by the
21 demographics and claims experience of our workforce. This projected increase is
22 not included in the Company's filing. The Company continues to work to

1 mitigate these increases through plan design and overall cost sharing with
2 employees.

3 **Q. Has the Company made changes to the retiree medical plan that affect the**
4 **FAS 106 post-retirement benefits (other than pension costs) included in this**
5 **case?**

6 A. Yes. The Company implemented benefit design changes to the post-retirement
7 welfare plans. These changes help to offset the other areas of cost increases that
8 I have addressed, to the benefit of customers.

9 **Q. Please explain the changes.**

10 A. Health care reform legislation is causing many employers, including the
11 Company, to change their approach to retiree health care benefits. With recent
12 changes to Medicare, individual plans have become more widely available and
13 affordable. These changes, which were effective January 1, 2012, not only
14 provide savings to the customers through reduced expense, but also provide more
15 flexibility to the retiree to choose from a variety of plan options to select the
16 coverage that works best for them. Instead of the monthly subsidy structure, the
17 Company now provides an annual contribution to a health reimbursement account
18 that can be managed by the retiree and used to pay for the care and services
19 received.

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

21 A. Yes.