

Sanger Thompson PC

1041 SE 58th Place Portland, OR 97215

tel (503) 756-7533 fax (503) 334-2235 irion@sanger-law.com

November 11, 2019

Via Electronic Mail

Etta Lockey
Pacific Power
825 NE Multnomah St, Ste 2000
Portland, OR 97232
etta.lockey@pacificorp.com

Jessica Ralston
Pacific Power
825 NE Multnomah St, Ste 1800
Portland, OR 97232
jessica.ralston@pacificorp.com

Re: In the Matter of PACIFICORP, dba PACIFIC POWER, 2019 Integrated Resource Plan
Docket No. LC 70

Dear Ms. Lockey:

Please find the Renewable Energy Coalition's ("REC") first set of data requests to PacifiCorp Power ("PacifiCorp") in this proceeding. PacifiCorp has fourteen days to respond to these data requests, or by November 25, 2019.

Please do not hesitate to contact me with any questions.

Sincerely,

/s/ Irion Sanger
Irion Sanger

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 70

In the Matter of)	
)	RENEWABLE ENERGY
)	COALITION'S FIRST SET OF
PACIFICORP, dba PACIFIC POWER,)	DATA REQUESTS TO PACIFICORP
)	
)	
<u>2019 Integrated Resource Plan</u>)	

Dated: November 11, 2019

I. DEFINITIONS

1. "Documents" refers to all writings and records of every type in your possession, control, or custody, whether or not claimed to be privileged or otherwise excludable from discovery, including but not limited to: testimony and exhibits, memoranda, papers, correspondence, letters, reports (including drafts, preliminary, intermediate, and final reports), surveys, analyses, studies (including economic and market studies), summaries, comparisons, tabulations, bills, invoices, statements of services rendered, charts, books, pamphlets, photographs, maps, bulletins, corporate or other minutes, notes, diaries, log sheets, ledgers, transcripts, microfilm, microfiche, computer data (including E-mail), computer files, computer tapes, computer inputs, computer outputs and printouts, vouchers, accounting statements, budgets, workpapers, engineering diagrams (including "one-line" diagrams), mechanical and electrical recordings, telephone and telegraphic communications, speeches, and all other records, written, electrical, mechanical, or otherwise, and drafts of any of the above.

"Documents" includes copies of documents, where the originals are not in your possession, custody or control.

"Documents" includes every copy of a document which contains handwritten or other notations or which otherwise does not duplicate the original or any other copy.

"Documents" also includes any attachments or appendices to any document.

2. "Identification" and "identify" mean:

When used with respect to a document, stating the nature of the document (e.g., letter, memorandum, corporate minutes); the date, if any, appearing thereon; the date, if known, on which the document was prepared; the title of the document; the general subject matter of the document; the number of pages comprising the document; the identity of each

person who wrote, dictated, or otherwise participated in the preparation of the document; the identity of each person who signed or initiated the document; the identity of each person to whom the document was addressed; the identity of each person who received the document or reviewed it; the location of the document; and the identity of each person having possession, custody, or control of the document.

When used with respect to a person, stating his or her full name; his or her most recently known home and business addresses and telephone numbers; his or her present title and position; and his or her present and prior connections or associations with any participant or party to this proceeding.

3. “Pacific Power” or “PacifiCorp” refers to Pacific Power, PacifiCorp, Rocky Mountain Power, any affiliated company, or any officer, director or employee of Pacific Power, or any affiliated company, and including employees of both PacifiCorp Energy Management Services (“ESM”) and PacifiCorp Transmission unless otherwise restricted in the request.
4. “Person” refers to, without limiting the generality of its meaning, every natural person, corporation, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency, or any other group or organization.
5. “Studies” or “study” includes, without limitation, reports, reviews, analyses and audits.
6. The terms “and” and “or” shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of this discovery any information or documents which might otherwise be considered to be beyond their scope.
7. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular, whenever appropriate in order to bring within the scope of this discovery request any information or documents which might otherwise be considered to be beyond their scope.

II. INSTRUCTIONS

1. These requests call for all information, including information contained in documents, which relate to the subject matter of the Data Request and which is known or available to you.
2. Where a Data Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part or portion. Any objection to a Data Request should clearly indicate the subdivision, part, or portion of the Data Request to which it is directed.
3. The time period encompassed by these Data Requests is from 2005 to the present unless otherwise specified.

4. Each response should be furnished on a separate page. In addition to hard copy, electronic versions of the document, including studies and analyses, must also be furnished if available.
5. If you cannot answer a Data Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why you cannot answer the Data Request in full, and state what information or knowledge you have concerning the unanswered portions.
6. If, in answering any of these Data Requests, you feel that any Data Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using in responding to the Data Request.
7. If a document requested is unavailable, identify the document, describe in detail the reasons the document is unavailable, state where the document can be obtained, and specify the number of pages it contains.
8. If you assert that any document has been destroyed, state when and why it was destroyed and identify the person who directed the destruction. If the document was destroyed pursuant to your document destruction program, identify and produce a copy of the guideline, policy, or company manual describing such document destruction program.
9. If you refuse to respond to any Data Request by reason of a claim of privilege, confidentiality, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document, and specify the number of pages it contains. Please provide: (a) a brief description of the document; (b) date of document; (c) name of each author or preparer; (d) name of each person who received the document; and (e) the reason for withholding it and a statement of facts constituting the justification and basis for withholding it.
10. Identify the person from whom the information and documents supplied in response to each Data Request were obtained, the person who prepared each response, the person who reviewed each response, and the person who will bear ultimate responsibility for the truth of each response.
11. If no document is responsive to a Data Request that calls for a document, then so state.
12. These requests for documents and responses are continuing in character so as to require you to file supplemental answers as soon as possible if you obtain further or different information. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.

13. Whenever these Data Requests specifically request an answer rather than the identification of documents, the answer is required and the production of documents in lieu thereof will not substitute for an answer.
14. To the extent that the Company believes it is burdensome to produce specific information requested, please contact REC to discuss the problem prior to filing an answer objecting on that basis to determine if the request can be modified to pose less difficulty in responding.
15. To the extent the Company objects to any of the requests please contact REC to determine if the request can be modified to produce a less objectionable request.

III. FIRST SET OF DATA REQUESTS:

1. Please provide a complete list of qualifying facility contracts that have entered into PPA with PacifiCorp since 1980 including the following information, and please provide all workpapers in original electronic format:
 - a. Project Name
 - b. PPA execution date
 - c. Resource Type
 - d. Nameplate Capacity
 - e. Actual Commercial Operation Date
 - f. Contracted Commercial Operation Date
 - g. Type of PPA (Standard or Non-Standard)
 - h. Current PPA Expiration date
 - i. Whether the contract is for a new or existing project, and if renewing, then the dates for each contract
 - j. For QFs that began operating and whose contracts expired, whether the QF entered into a new contract with PacifiCorp, and, if not, why not.
2. Please provide the forecast(s) of QF capacity (MW) used in PacifiCorp's IRP portfolio modeling.
3. Please provide PacifiCorp's forecast of new qualifying facilities that it expects to enter into contracts with and be constructed over its planning period. Please provide the

expected megawatts, average megawatts and technology type for such new qualifying facilities. If PacifiCorp has not performed such a forecast, please explain why.

4. Please refer to Oregon Public Utility Commission Order No. 18-138 from LC 67, PacifiCorp's 2017 IRP, page 12, where it notes:

In addition. Renewable Energy Coalition asserts that the company should be required to actually study the capacity benefits that qualifying facilities (QFs) provide, as directed in docket UM 1610. PacifiCorp responds that it has complied with the order by not assuming QFs will renew. We acknowledge that non-renewal may not be the best planning assumption when many (or most) QFs do, in fact, renew, but question the value of additional studies of the capacity of renewing QFs. We direct Staff to work with intervenors and bring this issue to a public meeting so that we can make a decision regarding whether a new study of existing QF capacity would be useful and how existing QF contract renewals should be modeled in the IRP.

What is the status of PacifiCorp's efforts to model the capacity value of QFs?

5. Please explain whether PacifiCorp's Private Generation Long-Term Resource Assessment (Appendix O) includes any forecast of any future QF development.
6. Please provide PacifiCorp's workpapers for its official forward price curve and each of the seven scenarios.
7. Please provide PacifiCorp's methodology and assumptions in developing its official forward price curve and each of the seven scenarios.
8. Please provide the workpapers for PacifiCorp's natural gas price forecast.
9. Please provide the workpapers for Figures 1.8 and 7.4 through 7.8.
10. Please refer to PacifiCorp's 2019 IRP, pages 16-17 and 115-188. Please define the terms "uncommitted market purchases" and "uncommitted FOTs."
11. Please provide the workpapers for Figures 5.3 and 5.4.
12. Please provide the workpapers for Appendix N, the Capacity Contribution Study.