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Kay Barnes
Oregon Public Utility Commission
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RE: OR Docket No. UM-1610
OPUC Data Request (19-22)

Please find enclosed PacifiCorp's Responses to OPUC Data Request Numbers 19-22. Also provided is Attachment OPUC 22.

If you have any questions, please call me at 503-813-5934.

Sincerely,

_____/s/_____
Cathie Allen
Manager, Regulatory Affairs

Enclosures

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OPUC Data Request 19

Please refer to Exhibit [X] of PacifiCorp's Amended Application filed August 9, 2019, and the term "DNR Request transmission study" on page 1.

- (a) Is this study equivalent to one of the specific standard studies produced by PacifiCorp Transmission in response to interconnection and/or transmission service requests? If so, which study? If not, how does this study differ?
- (b) What is the typical response time after PacifiCorp ESM's request to designate a QF as a network resource under its NITS agreement with PacifiCorp's transmission function?

Response to OPUC Data Request 19

- (a) The referenced study is equivalent to an open access transmission tariff study issued by a transmission provider in response to a queued request for network transmission service. This is sometimes shorthand as a "DNR request" because a request for network transmission service may more specifically involve a transmission customer's request that the transmission provider "designate" a resource as a "network resource" (a "DNR") or "designate" a load as a "network load" (sometimes shorthand as "DNL") under a network integration transmission service agreement (or "NITSA").
- (b) PacifiCorp Transmission responds to all requests for transmission service (regardless of transmission service type) within 30 calendar days, either to approve the request, or to notify the customer that a transmission service study is required.

OPUC Data Request 20

Does PacifiCorp ESM schedule non-QF Designated Network Resources to PacifiCorp load via a third party transmission provider, e.g., BPA? Please describe the process.

- (a) What type of transmission service does PacifiCorp ESM acquire?
- (b) Who provides the resource schedule(s) provided to the third party's transmission function?
- (c) How are the costs of "firming" the resource output to whole MW for scheduling accounted for?

Response to OPUC Data Request 20

In accordance with PacifiCorp's discussions with OPUC staff regarding the intended scope of OPUC Data Request 20 and 21, PacifiCorp has provided an answer to the following refined inquiry: Assume that PacifiCorp's merchant function has requested network transmission service for a resource (QF or non-QF) interconnected with PacifiCorp's transmission system. Also assume that, in response to that request, PacifiCorp's transmission function has issued a transmission service study that identifies an excess generation condition that requires PacifiCorp's merchant function to make point-to-point transmission service arrangements across a third-party transmission system as a prerequisite to securing the requested network transmission service on PacifiCorp's transmission system. Please review the potential point-to-point, ancillary service, and losses charges that the third-party transmission provider could assess PacifiCorp's merchant function associated with the point-to-point transmission service reservation, and provide tariff citations supporting these potential charges.

PacifiCorp's merchant function has reviewed the tariffs governing service over the two third-party transmission systems over which PacifiCorp's merchant function is most likely to be directed to secure point-to-point transmission service under the assumed scenario above, i.e., the Bonneville Power Administration tariff and the Portland General Electric tariff. While it is impossible to perfectly predict every charge that PacifiCorp's merchant function might be assessed as a point-to-point customer, generally speaking, the chart below provides PacifiCorp's merchant function's assessments of the key charges.

Of note, in response to feedback in this proceeding, PacifiCorp's merchant function took a closer look at the provisions governing certain charges associated with what is sometimes referred to as "balancing" services, and it has determined that those charges should be excluded from the chart because they are indeed only assessed if the relevant resource and/or load is located in the third-party transmission provider's balancing authority area (BAA). That is not the case under the scenario described above where both

the resource and the load are assumed to be in PacifiCorp's BAA. Any such charges will also be removed from the relevant proposed schedules and exhibits submitted in this proceeding.

Tariff Charge	Bonneville Power Administration Tariff	Portland General Electric Tariff
Point-to-point rate	BPA PTP-20	PGE Schedule 7
Real power losses	BPA Tariff Sec. 15.7 and Schedule 11	PGE Schedule 11
Ancillary Services:		
Schedule, System Control and Dispatch	BPA, ACS-20	PGE Schedule 1
Reactive Supply and Voltage Control	BPA, ACS-20 and PTP-20(IV)(A)	PGE Schedule 2

OPUC Data Request 21

Please describe the existing process for hourly scheduling and delivery of a Qualifying Facility (QF) resource from PacifiCorp's BAA to PacifiCorp load via third party (BPA) transmission in the case where the QF has executed an agreement for such service.

- (a) What type of transmission service does PacifiCorp ESM acquire for the deliveries?
- (b) Does PacifiCorp ESM schedule hourly deliveries in whole MW over BPA's system?
- (c) How are differences between metered resource output to PacifiCorp's system and hourly deliveries in whole MW via third party transmission accounted for?

Response to OPUC Data Request 21

Please refer to the company's response to OPUC Data Request 20.

OPUC Data Request 22

Please populate a cross-functional flowchart (“swim lane” diagram, example below) for an example project, from draft PPA through commercial operation. Actions below are representative only.

Third Party Transmission Provider (BPA)

- Establishes transmission rates
- Processes long-term firm transmission reservation

QF Project Developer

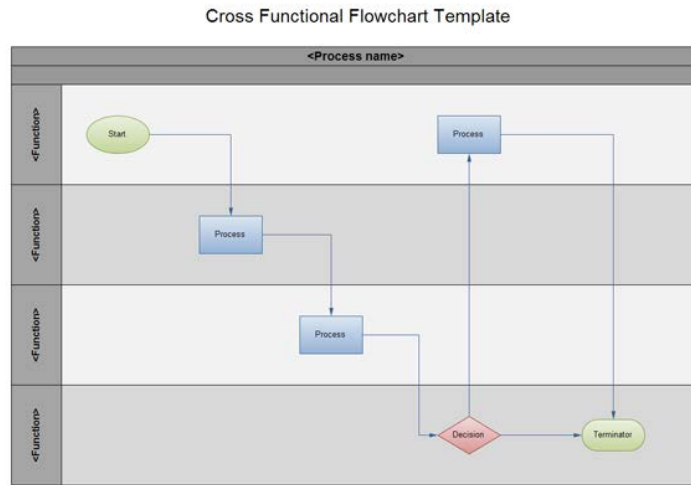
- Submits complete interconnection application
- Executes PPA
- Proceeds through study process
- Receives notification of the need for third party transmission; selects fixed 5-year option
- Enters into interconnection agreement with PacifiCorp Transmission

PacifiCorp Energy Supply Management

- Forecasts transmission costs to include in standard avoided cost price schedule
- Executes standard PPA
- Adds QF to Designated Network Resource list with PacifiCorp Transmission
- Receives notification from PacifiCorp Transmission that third party transmission is needed
- Notifies QF of the need for transmission
- Reserves BPA transmission, including capacity needed and Service Commencement Date, up to 10 years prior.

PacifiCorp Transmission

- Processes PacifiCorp addition of QF to DNR list
- Conducts interconnection studies
- Notifies PacifiCorp ESM of the need for transmission
- Processes TSR



Source: <https://www.edrawsoft.com/en/swimlane-example.html>

Response to OPUC Data Request 22

Please refer to Attachment OPUC 22. Information is provided in table format rather than as a diagram.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.