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RE: ID PAC-E-20-13  
IPUC 2<sup>nd</sup> Set Data Request (14-17)

Please find enclosed Rocky Mountain Power's Responses to IPUC Data Requests 14-17.

If you have any questions, please feel free to call me at (801) 220-2963.

Sincerely,

\_\_\_\_\_/s/\_\_\_\_\_  
J. Ted Weston  
Manager, Regulation

Enclosures

### **IPUC Data Request 14**

Tab: “Tbl 5.12” of the Excel file named “PAC-E-20-13 RMP Workpapers CONFIDENTIAL 10-6-20” submitted electronically with the Application includes an item “Adjustment for Derates” for all the coal plant early shutdowns. Please describe the purpose of this adjustment relative to establishing the capacity deficiency date and explain how it is determined. In addition, please answer if all coal plants included in the Load and Resource Balance are adjusted for derates.

### **Response to IPUC Data Request 14**

A resource with a forced outage rate of 20 percent will be less likely to be available during peak conditions than a resource with a forced outage rate of 10 percent. Therefore, the capacity values shown in Table 5.12 in PacifiCorp’s 2019 Integrated Resource Plan (IRP), and replicated in the Application in this proceeding, are reporting not nameplate capacity, but rather the resource availability after accounting for forced outages. This is sometimes referred to as “pure capacity”. In Table 5.12 in the 2019 IRP, the pure capacity of east thermal resources in 2021 is listed as 5,634 megawatts (MW). The nameplate capacity of the associated resources is 5,993 MW, and is not shown in the table. All coal plants in the load and resource balance are adjusted for derates.

Referencing confidential work paper “PAC-E-20-13 RMP Workpapers CONFIDENTIAL 10-6-20”, tab “Tbl 5.12” is calculating how coal retirements would impact the pure capacity balance reported in the load and resource balance. The coal plant capacity values listed are the Company’s share of plant nameplate and a separate adjustment is necessary to account for the risk of forced outages at these units. The forced outage adjustment for each unit reflects the assumptions used in the 2019 IRP and underlying the aggregate values reported in Table 5.12 of the 2019 IRP. An aggregate derate for forced outages was listed because the unit-specific values were considered confidential.

Recordholder: Dan MacNeil  
Sponsor: To Be Determined

### **IPUC Data Request 15**

Tab: “Tbl 5.12” of the Excel file named “PAC-E-20-13 RMP Workpapers CONFIDENTIAL 10-6-20” submitted electronically with the Application shows that the Company has removed early coal plant retirements (see rows 72 through 79), which were originally included in rows 7 and 29. Please explain the discrepancy in the amount of capacity that was originally included in rows 7 and 9 and the amounts that were removed (see rows 72 through 79). If accurate, please explain why the Company believes the amounts backed out of existing resources are appropriate. For example, the change in the amount of thermal capacity from year 2023 to 2024 for both East (row 7) and West (row 29) regions in total is equal to 312 MW; however, the amount deducted in year 2024 (rows 72 through 79) was 351 MW. Similarly, the change in the amount of thermal capacity from year 2025 to 2026 for both East (row 7) and West (row 29) regions in total is equal to 416 MW; however, the amount deducted in year 2026 (rows 72 through 79) was 439 MW.

### **Response to IPUC Data Request 15**

Please refer to the Company’s response to IPUC Data Request 14 for a discussion of the adjustment for forced outages in the load and resource balance. The Company treated the unit-specific forced outage rates as confidential and did not show any derates until the adjusted deficiency year occurred in 2029. As discussed above, the derated capacity associated with Jim Bridger Unit 1 can be inferred as 312 megawatt (MW) by the change from the prior year, so it appears this particular value cannot be considered confidential. The actual increase in capacity in 2024 would be slightly smaller than what is shown as a result, but this would not impact the adjusted deficiency year of 2029, when the cumulative impact of derates is incorporated. In 2026, the aggregate nameplate capacity of Craig Unit 1, Naughton Unit 1, and Naughton Unit 2 is 439 MW, while the aggregate derated capacity of those units is 416 MW.

Recordholder: Dan MacNeil

Sponsor: To Be Determined

**IPUC Data Request 16**

Please explain why the Company has included “Sales” in the Load and Resource Balance for determining the capacity deficiency date for avoided cost rates.

**Response to IPUC Data Request 16**

The Company includes executed wholesale sales obligations (long-term firm (LTF) contracts for capacity and energy), as part of its load and resource balance. The Company must plan for and meet these contractual obligations through the contract term. For example, the appreciable drop in east sales in the load and resource balance from 2020 to 2021 reflects the expiration of the Arizona Public Service Company (APS) exchange agreement. The sales category in the capacity load and resource balance does not include balancing transactions that could be entered based on economics at a future point in time.

Recordholder: Dan MacNeil  
Sponsor: To Be Determined

**IPUC Data Request 17**

Please explain why the Company has included “Non-owned Reserves” in the load and resource balance for determining the capacity deficiency date for avoided cost rates.

**Response to IPUC Data Request 17**

The Company is obligated to provide ancillary services to transmission customers with loads and resource in PacifiCorp’s balancing authority areas (BAA). For example, PacifiCorp’s Open Access Transmission Tariff (OATT) has rates approved by the Federal Energy Regulatory Commission (FERC) for Schedule 5 (Operating Reserve - Spinning Reserve Service) and Schedule 6 (Operating Reserve - Supplemental Reserve Service). The “Non-owned Reserves” modeled in PacifiCorp’s 2019 Integrated Resource Plan (IRP) represent reserve obligations consistent with historical requirements, as the Company expects that it will continue to be obligated to provide these ancillary services in the future.

Recordholder: Dan MacNeil

Sponsor: To Be Determined