



ALISHA TILL
Direct (503) 290-3628
alisha@mrg-law.com

January 21, 2021

VIA ELECTRONIC FILING

Attention: Filing Center
Public Utility Commission of Oregon
201 High Street SE, Suite 100
P.O. Box 1088
Salem, Oregon 97308-1088

Re: Docket UM 2032 – Investigation into the Treatment of Network Upgrade Costs for Qualifying Facilities

Attention Filing Center:

Attached for filing in the above-captioned docket is the Joint Utilities' Response to NewSun's Motion for Extension of Time and Schedule Revision.

Please contact this office with any questions.

Sincerely,

Alisha Till
Paralegal

Attachments

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2032

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into Treatment of Network
Upgrade Costs for QFs

**JOINT UTILITIES' RESPONSE TO
NEWSUN'S MOTION FOR
EXTENSION OF TIME AND
SCHEDULE REVISION**

1 Pursuant to Oregon Administrative Rule 860-001-0420 and the Administrative Law
2 Judge (ALJ) Ruling granting expedited treatment, Portland General Electric Company (PGE),
3 PacifiCorp dba Pacific Power (PacifiCorp), and Idaho Power Company (Idaho Power) (together,
4 the Joint Utilities) respectfully submit this Response to NewSun Energy, LLC's (NewSun)
5 Motion for Extension of Time and Schedule Revision. NewSun asks that the deadline for the
6 parties' Second Round of Reply Testimony be extended by at least 28 days and that the
7 remaining schedule for the docket be revised accordingly.¹ However, NewSun has not
8 demonstrated that a 28-day extension is reasonable or justified under the circumstances. If the
9 ALJ is inclined to grant an extension, then the Joint Utilities respectfully request that the ALJ
10 decline to adopt NewSun's proposed schedule and instead direct the parties to work together
11 after their testimony is filed to agree upon a new schedule for this case.

12 **A. NewSun's extension request is unreasonable.**

13 NewSun's decision to issue its first set of data requests in this docket—substantial

¹ New Sun's Motion at 1 (Jan. 19, 2021).

1 discovery requests encompassing broad swaths of issues²—just 16 days before the final round
2 of testimony in the docket does not justify extending the case schedule again. The Joint Utilities
3 already agreed to extend the deadline for response testimony at NewSun’s request, following
4 NewSun’s belated intervention in the docket.³ In NewSun’s petition to intervene, NewSun stated
5 that its participation in this docket would not “unreasonably broaden the issues, burden the
6 record, or unreasonably delay this proceeding,” yet NewSun is now seeking to extend the docket
7 schedule again.

8 NewSun asserts that it was not feasible for it to serve its discovery requests sooner and
9 requests “[a] little flexibility.”⁴ While the Joint Utilities generally support reasonable extension
10 requests, NewSun’s lengthy extension request is not reasonable for two reasons.

11 First, NewSun served these voluminous requests unreasonably late in this proceeding.
12 The parties have already filed three rounds of testimony, and discovery had been ongoing in this
13 case for six months when NewSun issued its requests.⁵ NewSun has been an active participant
14 in this docket for three months—having intervened on October 14, 2020, and filed testimony on
15 October 30. Significantly, none of NewSun’s data requests even reference the Joint Utilities’
16 latest round of testimony. To the extent NewSun claims that it requires the Joint Utilities’ data
17 responses to address the issues presented in the current phase of this docket, the vast majority of
18 NewSun’s discovery could have been issued months ago. To the extent that any of the data

² Attachment A, NewSun’s First Set of Data Requests to PacifiCorp, NewSun’s First Set of Data Requests to PGE, and NewSun’s First Set of Data Requests to Idaho Power.

³ NIPPC had requested a short extension of the response testimony deadline, but NewSun requested a longer extension, which the Joint Utilities agreed to. NewSun petitioned to intervene on October 14, 2020.

⁴ NewSun’s Motion at 4.

⁵ Staff issued its first set of data requests on July 7, 2020. The Northwest and Intermountain Power Producers Coalition (NIPPC) issued its first set of data requests on September 1, 2020.

1 requests relate to the Joint Utilities’ most recent round of testimony, that testimony was filed 26
2 days before NewSun issued its discovery.⁶ NewSun should not be rewarded for issuing its
3 discovery so late in this proceeding by derailing the remainder of the schedule and requiring the
4 parties to select a new hearing date in an already very busy year.

5 Second, much of NewSun’s discovery appears to be targeted at issues that parties have
6 stated in their testimony should be resolved in Phase II. The parties’ testimony filed to date has
7 focused on the two issues identified for Phase I of this docket:

8 (1) Who should be required to pay for Network Upgrades necessary to interconnect the
9 QF to the host utility?

10
11 (2) Should on-system QFs be required to interconnect to the host utility with Network
12 Resource Interconnection Service (NRIS) or should QFs have the option to
13 interconnect with Energy Resource Interconnection Service (ERIS) or an
14 interconnection service similar to ERIS?⁷

15 The Joint Utilities and the Interconnection Customer Coalition appear to be in agreement with
16 Staff’s recommendation that issues related to the implementation of the Commission’s
17 “quantifiable system-wide benefits” test for determining who pays for Network Upgrades should
18 be addressed in Phase II.⁸ Similarly, if the Commission determines that utility customers should
19 pay for Network Upgrades, then the issues list provides that Phase II will address how such
20 payments should be made.⁹ In short, the parties generally agree that details regarding
21 implementation should be deferred to Phase II, yet many of NewSun’s data requests appear to
22 relate to the “quantifiable system-wide benefits” issue that the parties have agreed to defer. To the

⁶ The Joint Utilities filed their opening testimony on August 24, 2020. The Joint Utilities’ reply testimony was filed on December 11, 2020.

⁷ ALJ Ruling (May 22, 2020).

⁸ See Staff/100, Moore/35; ICC/200, Lowe/5; Joint Utilities/300, Wilding-Macfarlane-Williams/6.

⁹ ALJ Ruling (May 22, 2020).

1 extent NewSun is seeking discovery regarding various ways of determining system benefits, that
2 discovery appears premature. It would be unreasonable to delay resolution of Phase I to
3 accommodate this discovery.

4 NewSun's Motion suggests that the Joint Utilities' unwillingness to respond to discovery
5 necessitates the delay.¹⁰ This is simply incorrect. Given the timing of NewSun's discovery
6 requests, NewSun was scheduled to receive (and did receive) a significant amount of information
7 from the Joint Utilities on the discovery deadline, which was *two days before NewSun's testimony*
8 *was due*. Even if the content of NewSun's discovery requests had not triggered the reasonable
9 request for a discovery conference, NewSun's decision to delay serving discovery left it
10 completely out of position to file testimony in this case.

11 In any event, several of NewSun's data requests sought information that had previously
12 been provided in response to Staff and NIPPC data requests or that is publicly available online,
13 and NewSun has had access to that information for many months. As noted, the Joint Utilities
14 provided responses to the vast majority of NewSun's data requests on January 20, the due date,
15 despite the fact that NewSun's data requests were numerous and extremely broad. Each of the
16 utilities received more than 40 individual data requests. Most of the data requests contained more
17 than one question, and many contained 10 or more individual subparts. For example, the requests
18 sought detailed information about *all* requests for PURPA power purchase agreements (PPAs) the
19 utilities have received and about the utilities' non-PURPA PPAs, *all* interconnection requests
20 received, *all* transmission service requests received, and network upgrades constructed or planned
21 going back more than 20 years.

¹⁰ NewSun's Motion at 3.

1 Upon receiving the requests, the Joint Utilities immediately began the effort to understand
2 the requests and gather responsive information. Recognizing their obligation under the
3 Commission’s rules to confer with NewSun regarding objections and attempt to resolve potential
4 discovery disputes informally,¹¹ the Joint Utilities drafted a detailed letter explaining each of their
5 objections and questions, which they provided to NewSun just eight days after receiving the data
6 requests.¹² The Joint Utilities’ diligent efforts to confer and to timely respond were not—as
7 NewSun alleges—a tactic to burden NewSun, but rather a good faith effort to comply with their
8 obligations under the Commission’s rules.¹³ NewSun now has much of the information that it
9 requested, and an extension is not necessary.

10 For all of these reasons, NewSun has not demonstrated that a 28-day, or longer, extension
11 is necessary or appropriate under the circumstances.

12 **B. If an extension is granted, the parties should be directed to work together to agree**
13 **upon an appropriate schedule.**

14 If the ALJ decides to grant an extension, the Joint Utilities oppose adoption of NewSun’s
15 proposed schedule. Instead, the ALJ should set a date for filing the Second Round of Reply
16 Testimony and direct the parties to confer after that testimony is filed to develop a proposed
17 schedule that works for all parties.

¹¹ OAR 860-001-0500(5).

¹² Exhibit A to NewSun’s Motion.

¹³ NewSun characterizes the Joint Utilities’ efforts as “tactics to require NewSun to expend unnecessary resources on objections to data requests which the Joint Utilities intended on answering anyway.” NewSun’s Motion at 3. The Joint Utilities take this allegation seriously, as taking actions in litigation aimed at burdening another party and wasting the party’s resources would be unethical. In reality, the Joint Utilities’ letter clearly stated, “While the Joint Utilities *will nevertheless attempt to answer as many of these requests as possible* within the time allotted, they anticipate that they will not provide all requested information.” Exhibit A to NewSun’s Motion (emphasis added). The Joint Utilities both complied with their obligation to alert NewSun to their objections and to the likelihood that NewSun would not receive complete responses, while also informing NewSun that responses would be forthcoming.

1 The parties to this docket anticipated that multiple rounds of testimony would be
2 necessary in this docket, given the complexity of the subject matter and the need to develop a
3 clear record for the Commission to make well-reasoned policy decisions on the issues raised.
4 Based on the breadth and content of NewSun’s data requests, there is a significant likelihood
5 that NewSun will raise new issues or factual arguments in its final round of testimony, including
6 issues the Joint Utilities understood to be appropriate for Phase II. If so, the Joint Utilities will
7 request that an additional round of testimony be added to the schedule to allow them—as well
8 as the other parties—to respond. NewSun has also indicated that it plans to file a motion to
9 compel, which NewSun recognizes would impact its proposed schedule.¹⁴ For these reasons,
10 the Joint Utilities believe it would be most efficient to wait until the next round of testimony is
11 filed to set a new schedule for the remainder of the docket. Parties will not be able to assess
12 whether additional testimony is needed until after the Second Round of Reply Testimony has
13 been filed.

14 Finally, the Joint Utilities wish to alert the ALJ and parties that the Joint Utilities’ counsel
15 have commitments to other cases and upcoming leave that will complicate efforts to agree upon
16 a new schedule and render NewSun’s proposal to simply push back all dates by several weeks
17 infeasible. If the current schedule in this docket will not be maintained, then the ALJ should
18 simply set a date for parties to file their Second Round of Reply Testimony. After the parties
19 review that testimony and understand whether additional testimony will be required, the parties
20 can confer to develop a new schedule.

¹⁴ NewSun’s Motion at 3.

DATED: January 21, 2020.

McDOWELL RACKNER GIBSON PC



Lisa Rackner
Lisa Hardie
Adam Lowney
Jordan Schoonover
McDowell Rackner Gibson PC
419 SW 11th Avenue, Suite 400
Portland, OR 97205
dockets@mrg-law.com

Donald Light
Portland General Electric Company

Carla Scarsella
Karen Kruse
PacifiCorp, dba Pacific Power

Donovan Walker
Idaho Power Company

Attorneys for Portland General Electric
Company, PacifiCorp, dba Pacific Power, and
Idaho Power Company

ATTACHMENT A

to

**Joint Utilities' Response to NewSun's Motion for
Extension of Time and Schedule Revision**

*NewSun's First Set of Data Requests to
PacifiCorp, PGE and Idaho Power*



January 6, 2021

Via Electronic Mail

Karen Kruse
Pacific Power
825 NE Multnomah St., Ste. 2000
Portland, OR 97232
Karen.kruse@pacificorp.com

Carla Scarsella
Pacific Power
825 NE Multnomah St., Ste. 2000
Portland, OR 97232
Carla.scarsella@pacificorp.com

Re: In the Matter of PULBIC UTILITY COMMISSION OF OREGON, Investigation into the Treatment of Network Upgrade Costs for Qualifying Facilities
Docket No. UM 2032

Dear Karen, Carla:

Please find NewSun Energy LLC's ("NewSun") first set of data requests to PacifiCorp in this proceeding. PacifiCorp has fourteen days to response to these data requests, or by January 20, 2021.

Please do not hesitate to contact me with any questions.

Sincerely,

NewSun Energy LLC

/s/ Marie Barlow

Marie Barlow
In-House Counsel, Policy & Regulatory Affairs

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2032

In the matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into the Treatment of
Network Upgrade Costs for Qualifying
Facilities

**NEWSUN ENERGY LLC'S
FIRST SET OF DATA REQUESTS
TO PACIFICORP**

Dated: January 6, 2021

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

"Documents" include 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 include 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. “PacifiCorp” refers to PacifiCorp, Pacific Power, Rocky Mountain Power or any officer, director, or employee of PacifiCorp, Pacific Power, Rocky Mountain Power, or any affiliated company.
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 to bring within the scope of this discovery any information or documents that might otherwise be considered 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 to bring within the scope of this discovery request any information or documents that might otherwise be considered beyond their scope.

II. INSTRUCTIONS:

1. These requests call for all information, which includes information contained in documents relating to the subject matter of the Data Request, and information known or available to you.
2. Where a Data Request has several 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 which subdivision, part, or portion of the Data Request it directly relates to.

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, why you cannot answer the Data Request in full, and 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 its 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 your 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 NewSun to discuss the problem and determine if the request can be modified to pose less difficulty in responding before filing an answer objecting to the specific information requested.
15. To the extent the Company objects to any of these requests, please contact NewSun to determine if the request can be modified to produce a less objectionable request.

III. FIRST SET OF DATA REQUESTS:

1. Please provide Richard A. Vail's resume or CV.
 - a. Please list all cases in which Richard A. Vail appeared as a witness in the last 10 years.
 - b. Please provide copies of all testimony prepared by Richard A. Vail in the last 10 years.
2. Please provide Kris Bremer's resume or CV.
 - a. Please list all cases in which Kris Bremer appeared as a witness in the last 10 years.
 - b. Please provide copies of all testimony prepared by Kris Bremer in the last 10 years.
3. Please provide Michael G. Wilding's resume or CV.
 - a. Refer to Joint Utilities/200, Wilding-Macfarlane-Williams/1, lines 19-21. Please list all cases in which Michael G. Wilding appeared as a witness in the last 10 years.
 - b. Refer to Joint Utilities/200, Wilding-Macfarlane-Williams/1, lines 19-21. Please provide copies of all testimony prepared by Michael G. Wilding in the last 10 years.
4. Please list all PacifiCorp employees that at any point prior to becoming employed by PacifiCorp have been employed by the Oregon Public Utility Commission. For each employee listed, please:
 - a. Provide the employee's resume or CV,

- b. Indicate the employee's job responsibilities while employed by the Oregon Public Utility Commission,
 - c. List each docket in which that employee took an active part on behalf of the Oregon Public Utility Commission,
 - d. Indicate the employee's job responsibilities while employed by PacifiCorp,
 - e. List each docket in which that employee took an active part on behalf PacifiCorp,
 - f. Provide copies of all testimony prepared by that employee while employed by PacifiCorp.
5. Please list all consultants, independent contractors, or other non-PacifiCorp employees that have been retained by PacifiCorp in any capacity and that at any point prior to being retained by PacifiCorp have been employed by the Oregon Public Utility Commission. For each individual listed, please:
- a. Provide the individual's resume or CV,
 - b. Indicate the individual's job responsibilities while employed by the Oregon Public Utility Commission,
 - c. List each docket in which that individual took an active part on behalf of the Oregon Public Utility Commission,
 - d. Indicate the individual's responsibilities while retained by PacifiCorp,
 - e. List each docket in which that individual took an active part on behalf PacifiCorp,
 - f. Provide copies of all testimony prepared by that individual while retained by PacifiCorp.
6. Please list all power purchase agreements under which PacifiCorp purchases power including:
- a. Project name,
 - b. Nameplate capacity,
 - c. Term of power purchases,
 - d. Whether the purchase agreement was entered into pursuant to PURPA, an RFP, a bi-lateral agreement, or other,
 - e. Whether the facility is certified as a qualifying facility under PURPA,
 - f. Under what interconnection rules/process the facility was interconnected,
 - g. Whether the facility interconnected as ERIS or NRIS,
 - h. The cost of network upgrades funded under the interconnection agreement,
 - i. Whether the generator is eligible to receive refunds for its network upgrades funded under the interconnection agreement,
 - j. The type of transmission service,
 - k. The entity that submitted the transmission service request,
 - l. The cost of network upgrades funded under the transmission service request.

7. For each qualifying facility that has requested a power purchase agreement (PPA) with PacifiCorp from January 1, 2014 until present please provide the following:
 - a. Project name,
 - b. Date of PPA request,
 - c. Nameplate capacity,
 - d. Project location (county and state),
 - e. Generation technology type (wind, solar, etc),
 - f. Interconnecting utility,
 - g. The power purchase agreement, if one was executed,
 - h. The developer or developers that requested or negotiated the power purchase agreement,
 - i. The in-service date, if operating, or scheduled commercial operation date if not,
 - j.

8. For each generator that has submitted an interconnection application to PacifiCorp from January 1, 2014 until present please provide the following:
 - a. Queue Number,
 - b. Project name,
 - c. Date of interconnection request,
 - d. Interconnection request status,
 - e. Nameplate capacity,
 - f. Project location (county and state),
 - g. Generation technology type (wind, solar, etc),
 - h. Whether the project requested interconnection as a QF selling 100% of its net output to PacifiCorp (at initial application or at any point during the interconnection process) and whether it switched from this QF status to non-QF status, and the date it switched (or vice-versa, if it first requested interconnection as a non-QF and later switched to QF),
 - i. Any interconnection studies not publicly available online, including any prior studies which have been superseded by the studies that are posted on the website,
 - j. The interconnection agreement, if one was executed,
 - k. The developer or developers that submitted the interconnection application,
 - l. The in-service date, if operating, or scheduled commercial operation date if not,
 - m. Regarding NR and ER interconnection service:
 1. Which service type was requested at initial application,
 2. Which service type was studied in each of the Feasibility, System Impact, and Facilities studies,
 3. Which service type the project ultimately interconnected under,
 - n. Regarding network upgrade costs (identified in ER or NR or both):
 1. Estimated network upgrade costs in each of the Feasibility, System Impact, and Facilities studies,

2. Final network upgrade costs assigned to the generator,
 3. Whether the network upgrades were ultimately constructed or are under construction,
 - o. Provide a comparative table for all interconnection requests showing the key features of ER/NR (initial and final), interconnection and network upgrade costs (initial and final), withdrawal status, GIA execution, operational status, and QF status.
 - p. Summarize the comparative outcomes of ER interconnection vs NR interconnection applications as relates interconnection and generator outcomes for projects in the following GIR size ranges: 0-10, 11-20, 21-40, 41-60, 61-80. Indicate withdrawal rates and summary numbers, interconnection agreements signed, and average final interconnection costs including network upgrades.
9. Please review PacifiCorp's OASIS Interconnection Generation Queue for the Withdrawn projects, queue number 629. Under the column titled "Request Status Explanation," this queue number states: "original IA signed 7/6/16, new IA signed 5/12/17, terminated 4/22/20," yet no studies are publicly posted on OASIS for this project. Please provide all studies performed for this project including any that may have been withdrawn or overridden by subsequent studies.
10. For each network upgrade constructed since January 1, 2014, please provide:
 - a. The cost of the network upgrade,
 - b. Where PacifiCorp first identified the need for the network upgrade (e.g., load growth, interconnection request, transmission request, integrated resource plan, or other),
 - c. How the network upgrade was funded (e.g., utility funded, queue number funded, other),
 - d. Whether the network upgrade was included in rate base or whether PacifiCorp intends to include it in rate base,
 - e. If the network upgrade was included in rate base, the rate of return earned on the network upgrade,
 - f. The incremental transmission operations resulting from the network upgrade (e.g., increased throughput, increased load serving capability, enhanced reliability, improved transfer capability within the existing system, relief of existing congestion on the transmission system, or others),
 - g. The net increase or decrease in transmission customer rates that resulted from the network upgrade,
11. Please list all QF-funded network upgrades that did not result in any benefit to the transmission system, such benefits to include, but not be limited to, increased load serving capability, enhanced reliability, improved transfer capability within the existing system, or relief of existing congestion on the transmission system?

12. Please list all QF interconnections that resulted in lower transmission rates from Bonneville Power Administration (BPA) for Network Integration Transmission (NT) Service by reducing network load on the hour of the BPA Monthly Transmission System Peak Load?
13. Does PacifiCorp add to rate base the costs of network upgrades paid for by qualifying facilities? Does PacifiCorp add to rate base the costs of network upgrades paid for or financed by non-QF generators who interconnect to PacifiCorp's system?
14. Referring to Joint Utilities/200 (Wilding-Macfarlane-Williams) at 11, please identify all upgrades on the utility's system in Oregon that were required solely to provide adequate transmission capacity for the interconnecting QF.
15. In its response to NIPPC Information Request No. 30, PacifiCorp states that imposing Network Upgrade costs on QFs is necessary to prevent the total cost of the QF, including energy, capacity, and interconnection costs, from exceeding the utility's avoided costs. Identify all examples in which an interconnecting QF would have been paid more than the utility's avoided costs if had not been required to pay for Network Upgrades.
16. Please provide all evidentiary support for the premise that upgrades to the transmission network caused by qualifying facility interconnections provide no system benefits.
17. Referring to Joint Utilities/100 (Vail-Bremer-Foster-Larson-Ellsworth) at 8-9, identify the engineering or modeling methodologies the utility would deem acceptable to demonstrate that a QF-funded Network Upgrade results in quantifiable system-wide benefits to the utility's transmission system and/or distribution network.
18. How does PacifiCorp account for forecast new loads and/or load growth when conducting interconnection studies for new generation? Is the treatment the same for ERIS as for NRIS studies?
19. Regarding PacifiCorp's Ochoco to Corral transmission line and associated upgrades to PacifiCorp's system and substations, and Pacificorp's load service in the Prineville area, please provide:
 - a. Where PacifiCorp identified the need for the upgrades (e.g., load growth, interconnection request, transmission request, or other),
 - b. How the upgrades were funded (e.g., utility funded, queue number funded, other),
 - c. The existing load and forecast load upon which PacifiCorp relied in justifying the upgrade, including the MVa rating of the loads that triggered the upgrades, including the dates of the associated load interconnection

- requests, the load initial and current projected on-line dates, and the status of each load service,
- d. The cost of the upgrades,
 - e. How the upgrades were funded (e.g., utility funded, queue number funded, other),
 - f. Whether the upgrade were included in rate base or whether PacifiCorp intends to include it in rate base,
 - g. If the upgrades were included in rate base, the rate of return earned on the upgrades,
 - h. Describe how Pacificorp serves its load in the Prineville area, including to what extent Pacificorp relies on contiguous transmission from other areas of the Pacificorp system.
 - i. Confirm whether the Prineville service area and Bend and Redmond service areas are electrically contiguous for Pacificorp, and what the transfer capacity is within Pacificorp's system in the area, as well as what the transfer capacity and monthly average and peak energy service from BPA at each point of service from BPA in the area, including Pilot Butte and Ponderosa substation.
 - j. Describe what long term rights Pacificorp has on the California-Oregon Intertie (aka the COI aka the AC Intertie) and how Pacificorp uses these rights and other short term procurement via the COI to serve Prineville area load.
 - k. Provide a comparison for the Prineville area between when interconnections and loads were requested, including comparative timing, along with the available avoided cost rates at the time of each request.
 - l. Provide a summary of the power contract rates for facilities constructed or contracted to be constructed in the Prineville area, whether those facilities were ER or NR, what the likely network upgrades would have been for any ER facility that was (or is being) constructed if it had been required to be NR instead. Compare the PPA prices for these facilities at the time of contracting with the avoided cost rates available to the QFs which sought interconnections and PPAs in this area.
 - m. Please provide Pacificorp's analysis based on the information in (k) and (l) as to whether the prospective QFs in its interconnection queue and/or otherwise seeking PPAs from Pacificorp would have likely been economically viable based on these numbers were such facilities allowed ER interconnections and been allowed refundability of network upgrades. How does this compare to the number of actual facilities for which interconnection was requested in the Prineville area system (i.e. on lines directly connected to Ponderosa substation)? Please provide a total of all calculated revenues which would have been associated with any facilities which would have reasonably been likely to be economically viable per prior question; please make such calculations based on estimated facility energy production that would have resulted during the term of the resultant PPA using avoided cost pricing that would have been available at the time.

- n. Provide copies of all correspondence, load service studies, upgrades requested, and upgrades implemented, including associated cost estimates and who paid for those upgrades, associated with PacifiCorp's service of the Prineville actual and prospective loads, particularly at Ponderosa substation, including a summary of all related lobbying efforts, contacts with BPA executive management, and contact with other elected officials, including the governor's office, Senator Merkely, Senator Widen, and Congressman Walden, and any related requests made for support or action by these officials related to load service in the Prineville area and the justifications for these requests. Please summarize the comparative timing of these upgrades relative to the PacifiCorp load queue requests and loads in service, associated capacities, and a comparison of any differences in how generation interconnection studies for the area treated load requests with respect to power flow studies and justification of network upgrades related to service of these load requests, whether such upgrades were performed by PacifiCorp or BPA.

20. In its December 24, 2014, filing in FERC Docket Nos. ER15-741-000 & -001, the docket referenced in PacifiCorp's response to OPUC Information Request No. 6, PacifiCorp states that: "on the one hand, PURPA requires a utility to purchase QF power and make firm transmission arrangements (e.g., DNR status) to deliver it, even if the QF has chosen to site in a constrained area. On the other hand, Commission open access policy and precedent do not appear to support the granting of new DNRs until sufficient ATC is available to meet the request. . . this appears to put the utility in the position of having to construct network upgrades in order to accommodate the PURPA-required QF firm transmission service, even if the utility would not have otherwise constructed those upgrades – certainly not for load service, reliability or because they were cost-justified."

Identify all instances in which PacifiCorp constructed network upgrades in Oregon to accommodate PURPA-required QF firm transmission service that the utility would not have otherwise constructed for load service, reliability, or because the network upgrades were not cost-justified or would not have provided benefits to the transmission system. Identify all instances in which PacifiCorp would have constructed such upgrades but for the OPUC policy of requiring QFs to pay for all network upgrades with no transmission credits or other recovery of costs.

21. Please provide an itemized summary table of all network upgrades constructed by PacifiCorp since 2010 in Oregon and planned for construction in Oregon (or cost allocation to Oregon ratepayers), including the upgrades' associated costs (initial estimate and final actual cost), whether currently rate-based (or planned for future rate-basing approval), project justification(s), nominal capacity, amount of associated load and generation directly supported by the specific incremental upgrade (total and \$/MW), ratio of maximum service capacity to directly supported actual, in-service generation or load, and the average cost per MW of

capacity per ratepayer. Identify explicitly where excess capacity was built in anticipation of future use (not immediate direct use), itemizing comparatively for those justified by loads, by generators, and by QFs.

22. In its December 24, 2014, filing in FERC Docket Nos. ER15-741-000 & -001, the docket referenced in PacifiCorp's response to OPUC Information Request No. 6, PacifiCorp states that: "on the one hand, PURPA requires a utility to purchase QF power and make firm transmission arrangements (e.g., DNR status) to deliver it, even if the QF has chosen to site in a constrained area. On the other hand, Commission open access policy and precedent do not appear to support the granting of new DNRs until sufficient ATC is available to meet the request. . . this appears to put the utility in the position of having to construct network upgrades in order to accommodate the PURPA-required QF firm transmission service, even if the utility would not have otherwise constructed those upgrades – certainly not for load service, reliability or because they were cost-justified."

Identify all constrained portions of the PacifiCorp transmission system in Oregon in which PacifiCorp would be required to construct network upgrades to accommodate a QF interconnection and for which such network upgrades would not otherwise be constructed by PacifiCorp to accommodate load growth, to improve system reliability, or to meet planned transmission expansions.

23. Referring to PacifiCorp's response to OPUC Data Request No. 6, identify all instances in which a QF's network upgrade costs were rolled into PacifiCorp's transmission rate base causing a "violation of [PURPA's] customer indifference requirements." Identify all instances in which rolled-in network upgrade costs would have caused such a violation of PURPA's customer indifference requirements but for PacifiCorp's requirement that the QF obtain NR interconnection service.
24. Referring to Joint Utilities/100 (Vail-Bremer-Foster-Larson-Ellsworth) at 30-31, please provide the following for each transmission service request received from January 1, 2014 until present:
- a. Queue Number,
 - b. Project name,
 - c. Date of transmission service request,
 - d. Transmission service request status,
 - e. Nameplate capacity,
 - f. Project location (county and state),
 - g. Generation technology type (wind, solar, etc),
 - h. Type of transmission service,
 - i. Point of receipt and point of delivery,
 - j. Any transmission service request studies not publicly available online,
 - k. The transmission service agreement, if one was executed,
 - l. The in-service date, if operating, or scheduled commercial operation date if not,

- m. Whether the output from the generator is delivered to PacifiCorp's retail load,
 - n. Whether the generator is a qualifying facility,
 - o. Whether the generator is on-system or off system,
 - p. Whether the generator is interconnected using ERIS or NRIS,
 - q. Regarding network upgrade costs:
 - 1. Estimated network upgrade costs in any transmission service studies,
 - 2. Final network upgrade costs assigned to the request,
 - 3. Whether the network upgrades were ultimately constructed or are under construction,
25. Identify all instances in which PacifiCorp provides firm transmission service, including either Network Interconnection Transmission Service or Point-to-Point Transmission service, to generators interconnected using ERIS.
26. For each State in which PacifiCorp operates, please:
- a. Describe which set of procedures PacifiCorp uses to interconnect qualifying facilities that propose to sell 100% of their net output to PacifiCorp,
 - b. Describe which set of procedures PacifiCorp uses to interconnect qualifying facilities that propose to sell less than 100% of their net output to PacifiCorp,
 - c. Indicate for (a) and (b) whether QFs have the option to select ERIS or NRIS,
 - d. Indicate for (a) and (b) whether QFs receive refunds for the cost of network upgrades,
 - e. Describe the cost allocation and refund policy for network upgrades; compare these policies based on whether the QF interconnected as a FERC or state-jurisdictional interconnection?
 - f. How would these answers differ if a prospective otherwise equivalent generator proposed interconnection but it did not seek to sell 100% of its output under a mandatory purchase contract to Pacificorp? For example, in each situation, if the potential QF were a 40 MW solar-only facility that was eligible for certification as a QF.
27. Indicate whether Pacificorp believes it is obligated to purchase power from a QF in the following circumstances:
- a. If it is interconnected via a FERC jurisdictional interconnection? If such interconnection is ER? If NR?

- b. Is that answer different if the QF was off-system or on-system?
 - c. If the QF only proposes to sell one hour per year to the QF?
 - d. If the QF proposes to sell all of its output except 1 day per year?
 - e. If the QF proposes solely to sell PacifiCorp power seasonally?
 - f. If the QF sells some of its other output to another utility?
28. What interconnection rules, tariff or policies does PacifiCorp use to process an interconnection request from a QF that intends to sell its power to PacifiCorp as delivered—i.e., not pursuant to a contract or other legally enforceable obligation to sell over a specified term—including in the case where the QF might deliver some output to a different buyer?
29. Is it PacifiCorp's position that the current system of siting non-QF renewable generation on PacifiCorp's transmission and distribution system is efficient for interconnection customers and potential customers in the market?
30. Is it PacifiCorp's position that the utility has no obligation to provide for an efficient process for identifying lower-cost sites for renewable generators on PacifiCorp's transmission and distribution system?
31. PacifiCorp's 2020 RFP does not consider the cost of Network Upgrades in scoring proposed projects for selecting winners of the RFP
- a. How does PacifiCorp's 2020 RFP ensure efficient siting of generation if network upgrades are not considered?
 - b. Does PacifiCorp expect that ratepayers will bear the cost of all the network upgrades associated with those selections?
 - c. Are PacifiCorp's ratepayers able to receive tax credit benefits for the interconnection and network upgrade costs associated with the RFP shortlist and (if finally selected and constructed) winners?
 - d. How does the average cost, after tax benefits are accounted for, to ratepayers compare for a dollar of interconnection or network upgrade cost, as compared to a non-interconnection (i.e. tax credit eligible) construction cost of a wind facility? For a solar facility?
 - e. What is the total projected interconnection and network upgrade costs that PacifiCorp anticipates ratepayers will ultimately pay for its RFP initial short list, final short list, and final RFP winners? Please provide per project and summarized estimates. To the extent precise numbers are not known, please provide best available estimate, likely range, and maximum and minimum values.

- f. Please also provide these network upgrades and interconnection costs converted to cents per kWh across (a) the applicable PPA power purchase term and (b) across a 15 year power purchase term (as is available in Oregon to a QF).
 - g. How will these interconnection and network upgrades be financed, including the timing of any direct payments by Pacificorp and when Pacificorp's ratepayers will begin bearing associated costs.
 - h. Will Pacificorp or the applicable generation own or have the benefit of any surplus interconnection or transmission capacity not directly and immediately used by the RFP projects should the generation facility be constructed? How much capacity? What is the actual and proportional cost of that excess capacity relative the direct need of the applicable generator. Will the ratepayer pay for that additional capacity; if so, when?
32. Has PacifiCorp constructed any network upgrades that provided capacity beyond that which was required to serve network load? How were the costs of those upgrades recovered?
33. How does PacifiCorp determine whether a network upgrade provides quantifiable system-wide benefits? Has PacifiCorp constructed any network upgrades recovered via retail rates that did not provide system-wide benefits?
34. Are there any constrained paths on PacifiCorp's network that would benefit from locating additional generation?
35. Can PacifiCorp explain how the standard for recovery of network upgrade costs from retail customers for PacifiCorp planned and constructed network upgrades is the same as the standard PacifiCorp would wish to impose on QFs requesting interconnection and reimbursement for network upgrades?
36. Are there any areas of PacifiCorp's system where additional generation would provide benefits to PacifiCorp wholesale or retail customers?
37. Please describe network upgrades PacifiCorp constructed during the period of years 2000-2010. How were the costs of those network upgrades recovered? How were the benefits of those network upgrades determined? Were those "deliverability-driven" network upgrades? How was the deliverability analysis performed?
38. Is there capacity created by PacifiCorp network upgrades included in retail rates that is not being fully utilized? Is this a result of the nature of lumped network capacity upgrades?
39. Has PacifiCorp constructed any network upgrades that were driven by the need to provide deliverability to California or Canada? How were those upgrades paid for? How were the costs of those upgrades recovered? Are there any areas where

additional generation could have been sited that would have offset or eliminated the need for those network upgrades?

40. Will the Northwest Energy Imbalance Market (EIM) change the way PacifiCorp's transmission system is utilized? Will additional benefits accrue to PacifiCorp retail customers as a result of the EIM? Should the existence of this market influence the cost recovery mechanisms for future network upgrades?
41. How do siting decisions for PacifiCorp-owned generation resources address cost recovery for associated network upgrades and how does that differ from what the Joint Utilities are advocating for QFs? How does PacifiCorp conclude that one approach promotes efficient siting decisions while the other does not?
42. Can PacifiCorp explain how network upgrades associated with PacifiCorp's remote generation facilities only benefit PacifiCorp customers and provide no quantifiable benefit to other transmission customers or support for the reliability of the transmission grid as a whole?
43. Commission Staff have expressed a concern that avoided interconnection costs may not be adequately captured in utilities' current avoided cost calculations. Please explain how system-wide benefits of non- PacifiCorp owned generation to the transmission network are included in PacifiCorp 's current avoided costs.
44. The Joint Utilities argue there is no factual basis for presuming that system upgrades benefit all users of the system. Is PacifiCorp's position that there should be a presumption that system upgrades only benefit a single user of the system? Doesn't this run counter to the presumption that the Western Interconnection operates as a single synchronized grid that provides reliability and resiliency benefits for all users?
45. Grid resilience is the ability to avoid or withstand grid stress events without suffering operational compromise or to adapt to and compensate for the resultant strains so as to minimize compromise via graceful degradation. It is in large part about what does not happen to the grid or electricity
46. PacifiCorp is a member of Northern Grid which is a transmission planning association formed to facilitate regional transmission planning across the Pacific Northwest and Intermountain West and provide the region with a forum to discuss common planning assumptions, identify regional upgrade projects, eliminate duplicative administrative processes, and facilitate compliance with FERC cost allocation requirements. Please explain how PacifiCorp perceives common interests and shared benefits derived from coordination with other NW transmission entities and also holds the view that upgrades to that transmission network as a result of distributed resource additions only benefit the owner of the generation resource.

47. Please explain how PacifiCorp 's avoided costs rates would change if the proxy resource used for calculating the avoided costs were located in an area outside of BPA's balancing authority area and outside of PacifiCorp's balancing authority area.

January 6, 2021

Via Electronic Mail

Donald Light
Portland General Electric Company
121 SW Salmon St, 1WTC1301
Portland OR 97204
Donald.light@pgn.com

Lisa Rackner and Jordan Schoonover
McDowell Rackner Gibson PC
419 SW 11th Avenue, Suite 400
Portland, OR 97205
dockets@mrg-law.com

Re: In the Matter of PULBIC UTILITY COMMISSION OF OREGON, Investigation into the Treatment of Network Upgrade Costs for Qualifying Facilities
Docket No. UM 2032

Dear Donald, Lisa and Jordan:

Please find NewSun Energy LLC's ("NewSun") first set of data requests to Portland General Electric ("PGE") in this proceeding. PGE has fourteen days to response to these data requests, or by January 20, 2021.

Please do not hesitate to contact me with any questions.

Sincerely,

NewSun Energy LLC

/s/ Marie Barlow

Marie Barlow
In-House Counsel, Policy & Regulatory Affairs

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 2032**

In the matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into the Treatment of
Network Upgrade Costs for Qualifying
Facilities

**NEWSUN ENERGY LLC'S
FIRST SET OF DATA REQUESTS
TO PGE**

Dated: January 6, 2021

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

"Documents" include 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 include 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. "PGE" refers to Portland General Electric Company or any officer, director, or employee of Portland General Electric Company, or any affiliated company.
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 to bring within the scope of this discovery any information or documents that might otherwise be considered 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 to bring within the scope of this discovery request any information or documents that might otherwise be considered beyond their scope.

II. INSTRUCTIONS:

1. These requests call for all information, which includes information contained in documents relating to the subject matter of the Data Request, and information known or available to you.
2. Where a Data Request has several 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 which subdivision, part, or portion of the Data Request it directly relates to.

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, why you cannot answer the Data Request in full, and 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 its 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 your 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 NewSun to discuss the problem and determine if the request can be modified to pose less difficulty in responding before filing an answer objecting to the specific information requested.
15. To the extent the Company objects to any of these requests, please contact NewSun to determine if the request can be modified to produce a less objectionable request.

III. FIRST SET OF DATA REQUESTS:

1. Please provide Shaun Foster's resume or CV.
 - a. Please list all cases in which Shaun Foster appeared as a witness in the last 10 years.
 - b. Please provide copies of all testimony prepared by Shaun Foster in the last 10 years.
2. Please provide Sean Larsen's resume or CV.
 - a. Please list all cases in which Sean Larsen appeared as a witness in the last 10 years.
 - b. Please provide copies of all testimony prepared by Sean Larsen in the last 10 years.
3. Please provide Robert Macfarlane's resume or CV.
 - a. Refer to Joint Utilities/200, Wilding-Macfarlane-Williams/2, lines 10-12. Please provide copies of all testimony prepared by Robert Macfarlane in the referenced proceedings.
4. Please list all PGE employees that at any point prior to becoming employed by PGE have been employed by the Oregon Public Utility Commission. For each employee listed, please:
 - a. Provide the employee's resume or CV,
 - b. Indicate the employee's job responsibilities while employed by the Oregon Public Utility Commission,

- c. List each docket in which that employee took an active part on behalf of the Oregon Public Utility Commission,
 - d. Indicate the employee's job responsibilities while employed by PGE,
 - e. List each docket in which that employee took an active part on behalf PGE,
 - f. Provide copies of all testimony prepared by that employee while employed by PGE.
5. Please list all consultants, independent contractors, or other non- PGE employees that have been retained by PGE in any capacity and that at any point prior to being retained by PGE have been employed by the Oregon Public Utility Commission. For each individual listed, please:
 - a. Provide the individual's resume or CV,
 - b. Indicate the individual's job responsibilities while employed by the Oregon Public Utility Commission,
 - c. List each docket in which that individual took an active part on behalf of the Oregon Public Utility Commission,
 - d. Indicate the individual's responsibilities while retained by PGE,
 - e. List each docket in which that individual took an active part on behalf PGE,
 - f. Provide copies of all testimony prepared by that individual while retained by PGE.
6. Please list all power purchase agreements under which PGE purchases power including:
 - a. Project name,
 - b. Nameplate capacity,
 - c. Term of power purchases,
 - d. Whether the purchase agreement was entered into pursuant to PURPA, an RFP, a bi-lateral agreement, or other,
 - e. Whether the facility is certified as a qualifying facility under PURPA,
 - f. Under what interconnection rules/process the facility was interconnected,
 - g. Whether the facility interconnected as ERIS or NRIS,
 - h. The cost of network upgrades funded under the interconnection agreement,
 - i. Whether the generator is eligible to receive refunds for its network upgrades funded under the interconnection agreement,
 - j. The type of transmission service,
 - k. The entity that submitted the transmission service request,
 - l. The cost of network upgrades funded under the transmission service request.
7. For each qualifying facility that has requested a power purchase agreement (PPA) with PGE from January 1, 2014 until present please provide the following:

- a. Project name,
 - b. Date of PPA request,
 - c. Nameplate capacity,
 - d. Project location (county and state),
 - e. Generation technology type (wind, solar, etc),
 - f. Interconnecting utility,
 - g. The power purchase agreement, if one was executed,
 - h. The developer or developers that requested or negotiated the power purchase agreement,
 - i. The in-service date, if operating, or scheduled commercial operation date if not,
8. For each generator that has submitted an interconnection application to PGE from January 1, 2014 until present please provide the following:
- a. Queue Number,
 - b. Project name,
 - c. Date of interconnection request,
 - d. Interconnection request status,
 - e. Nameplate capacity,
 - f. Project location (county and state),
 - g. Generation technology type (wind, solar, etc),
 - h. Whether the project requested interconnection as a QF selling 100% of its net output to PGE (at initial application or at any point during the interconnection process) and whether it switched from this QF status to non-QF status, and the date it switched (or vice-versa, if it first requested interconnection as a non-QF and later switched to QF),
 - i. Any interconnection studies not publicly available online, including any prior studies which have been superseded by the studies that are posted on the website,
 - j. The interconnection agreement, if one was executed,
 - k. The developer or developers that submitted the interconnection application,
 - l. The in-service date, if operating, or scheduled commercial operation date if not,
 - m. Regarding NR and ER interconnection service:
 1. Which service type was requested at initial application,
 2. Which service type was studied in each of the Feasibility, System Impact, and Facilities studies,
 3. Which service type the project ultimately interconnected under,
 - n. Regarding network upgrade costs (identified in ER or NR or both):
 1. Estimated network upgrade costs in each of the Feasibility, System Impact, and Facilities studies,
 2. Final network upgrade costs assigned to the generator,

3. Whether the network upgrades were ultimately constructed or are under construction,
 - o. Provide a comparative table for all interconnection requests showing the key features of ER/NR (initial and final), interconnection and network upgrade costs (initial and final), withdrawal status, GIA execution, operational status, and QF status.
 - p. Summarize the comparative outcomes of ER interconnection vs NR interconnection applications as relates interconnection and generator outcomes for projects in the following GIR size ranges: 0-10, 11-20, 21-40, 41-60, 61-80. Indicate withdrawal rates and summary numbers, interconnection agreements signed, and average final interconnection costs including network upgrades.
9. For each network upgrade constructed since January 1, 2014, please provide:
 - a. The cost of the network upgrade,
 - b. Where PGE first identified the need for the network upgrade (e.g., load growth, interconnection request, transmission request, integrated resource plan, or other),
 - c. How the network upgrade was funded (e.g., utility funded, queue number funded, other),
 - d. Whether the network upgrade was included in rate base or whether PGE intends to include it in rate base,
 - e. If the network upgrade was included in rate base, the rate of return earned on the network upgrade,
 - f. The incremental transmission operations resulting from the network upgrade (e.g., increased throughput, increased load serving capability, enhanced reliability, improved transfer capability within the existing system, relief of existing congestion on the transmission system, or others),
 - g. The net increase or decrease in transmission customer rates that resulted from the network upgrade,
10. Please list all QF-funded network upgrades that did not result in any benefit to the transmission system, such benefits to include, but not be limited to, increased load serving capability, enhanced reliability, improved transfer capability within the existing system, or relief of existing congestion on the transmission system?
11. Please list all QF interconnections that resulted in lower transmission rates from Bonneville Power Administration (BPA) for Network Integration Transmission (NT) Service by reducing network load on the hour of the BPA Monthly Transmission System Peak Load?
12. Does PGE add to rate base the costs of network upgrades paid for by qualifying facilities? Does PGE add to rate base the costs of network

upgrades paid for or financed by non-QF generators who interconnect to PGE's system?

13. Referring to Joint Utilities/200 (Wilding-Macfarlane-Williams) at 11, please identify all upgrades on the utility's system in Oregon that were required solely to provide adequate transmission capacity for the interconnecting QF.
14. In its response to NIPPC Information Request No. 30, PGE states that imposing Network Upgrade costs on QFs is necessary to prevent the total cost of the QF, including energy, capacity, and interconnection costs, from exceeding the utility's avoided costs. Identify all examples in which an interconnecting QF would have been paid more than the utility's avoided costs if had not been required to pay for Network Upgrades.
15. Please provide all evidentiary support for the premise that upgrades to the transmission network caused by qualifying facility interconnections provide no system benefits.
16. Referring to Joint Utilities/100 (Vail-Bremer-Foster-Larson-Ellsworth) at 8-9, identify the engineering or modeling methodologies the utility would deem acceptable to demonstrate that a QF-funded Network Upgrade results in quantifiable system-wide benefits to the utility's transmission system and/or distribution network.
17. How does PGE account for forecast new loads and/or load growth when conducting interconnection studies for new generation? Is the treatment the same for ERIS as for NRIS studies?
18. Please provide an itemized summary table of all network upgrades constructed by PGE since 2010 in Oregon and planned for construction in Oregon (or cost allocation to Oregon ratepayers), including the upgrades' associated costs (initial estimate and final actual cost), whether currently rate-based (or planned for future rate-basing approval), project justification(s), nominal capacity, amount of associated load and generation directly supported by the specific incremental upgrade (total and \$/MW), ratio of maximum service capacity to directly supported actual, in-service generation or load, and the average cost per MW of capacity per ratepayer. Identify explicitly where excess capacity was built in anticipation of future use (not immediate direct use), itemizing comparatively for those justified by loads, by generators, and by QFs.
19. Referring to Joint Utilities/100 (Vail-Bremer-Foster-Larson-Ellsworth) at 30-31, please provide the following for each transmission service request received from January 1, 2014 until present:
 - a. Queue Number,

- b. Project name,
 - c. Date of transmission service request,
 - d. Transmission service request status,
 - e. Nameplate capacity,
 - f. Project location (county and state),
 - g. Generation technology type (wind, solar, etc),
 - h. Type of transmission service,
 - i. Point of receipt and point of delivery,
 - j. Any transmission service request studies not publicly available online,
 - k. The transmission service agreement, if one was executed,
 - l. The in-service date, if operating, or scheduled commercial operation date if not,
 - m. Whether the output from the generator is delivered to PGE's retail load,
 - n. Whether the generator is a qualifying facility,
 - o. Whether the generator is on-system or off system,
 - p. Whether the generator is interconnected using ERIS or NRIS,
 - q. Regarding network upgrade costs:
 - 1. Estimated network upgrade costs in any transmission service studies,
 - 2. Final network upgrade costs assigned to the request,
 - 3. Whether the network upgrades were ultimately constructed or are under construction,
20. Identify all instances in which PGE provides firm transmission service, including either Network Interconnection Transmission Service or Point-to-Point Transmission service, to generators interconnected using ERIS.
21. For each State in which PGE operates, please:
- a. Describe which set of procedures PGE uses to interconnect qualifying facilities that propose to sell 100% of their net output to PGE,
 - b. Describe which set of procedures PGE uses to interconnect qualifying facilities that propose to sell less than 100% of their net output to PGE,
 - c. Indicate for (a) and (b) whether QFs have the option to select ERIS or NRIS,
 - d. Indicate for (a) and (b) whether QFs receive refunds for the cost of network upgrades,
 - e. Describe the cost allocation and refund policy for network upgrades; compare these policies based on whether the QF interconnected as a FERC or state-jurisdictional interconnection?
 - f. How would these answers differ if a prospective otherwise equivalent generator proposed interconnection but it did not seek to sell 100% of its

output under a mandatory purchase contract to PGE? For example, in each situation, if the potential QF were a 40 MW solar-only facility that was eligible for certification as a QF.

22. Indicate whether PGE believes it is obligated to purchase power from a QF in the following circumstances:
 - g. If it is interconnected via a FERC jurisdictional interconnection? If such interconnection is ER? If NR?
 - h. Is that answer different if the QF was off-system or on-system?
 - i. If the QF only proposes to sell one hour per year to the QF?
 - j. If the QF proposes to sell all of its output except 1 day per year?
 - k. If the QF proposes solely to sell PGE power seasonally?
 - l. If the QF sells some of its other output to another utility?
23. What interconnection rules, tariff or policies does PGE use to process an interconnection request from a QF that intends to sell its power to PGE as delivered—i.e., not pursuant to a contract or other legally enforceable obligation to sell over a specified term—including in the case where the QF might deliver some output to a different buyer?
24. Is it PGE's position that the current system of siting non-QF renewable generation on PGE's transmission and distribution system is efficient for interconnection customers and potential customers in the market?
25. Is it PGE's position that the utility has no obligation to provide for an efficient process for identifying lower-cost sites for renewable generators on PGE's transmission and distribution system?
26. Has PGE constructed any network upgrades that provided capacity beyond that which was required to serve network load? How were the costs of those upgrades recovered?
27. How does PGE determine whether a network upgrade provides quantifiable system-wide benefits? Has PGE constructed any network upgrades recovered via retail rates that did not provide system-wide benefits?
28. Did construction of additional generating resources at Port Westward avoid any network upgrade costs associated with a constrained transmission path? Did construction of additional generating resources at

Port Westward create the need for any network upgrades on PGE's system?

29. Did the interconnection of Carty create the need for network upgrades? What upgrades were required? Who paid for those upgrades? How does the cost of Carty including the cost of any necessary network upgrades compare to PGE's avoided cost?
30. Did the interconnection of Wheatridge create the need for network upgrades? What upgrades were required? Who paid for those upgrades? How does the cost of Carty including the cost of any necessary network upgrades compare to PGE's avoided cost?
31. Are there any constrained paths on PGE's network that would benefit from locating additional generation?
32. Can PGE explain how the standard for recovery of network upgrade costs from retail customers for PGE planned and constructed network upgrades is the same as the standard PGE would wish to impose on QFs requesting interconnection and reimbursement for network upgrades?
33. Are there any areas of PGE's system where additional generation would provide benefits to PGE wholesale or retail customers?
34. Please describe network upgrades PGE constructed during the period of years 2000-2010. How were the costs of those network upgrades recovered? How were the benefits of those network upgrades determined? Were those "deliverability-driven" network upgrades? How was the deliverability analysis performed?
35. Is there capacity created by PGE network upgrades included in retail rates that is not being fully utilized? Is this a result of the nature of lumped network capacity upgrades?
36. Has PGE constructed any network upgrades that were driven by the need to provide deliverability to California or Canada? How were those upgrades paid for? How were the costs of those upgrades recovered? Are there any areas where additional generation could have been sited that would have offset or eliminated the need for those network upgrades?
37. Will the Northwest Energy Imbalance Market (EIM) change the way PGE's transmission system is utilized? Will additional benefits accrue to PGE retail customers as a result of the EIM? Should the existence of this

market influence the cost recovery mechanisms for future network upgrades?

38. Please describe the deliverability analysis that was performed for Carty and Wheatridge. Was it assumed that the full output of those generating resources would be delivered to PGE load during all hours of operation?
39. How do siting decisions for PGE-owned generation resources address cost recovery for associated network upgrades and how does that differ from what the Joint Utilities are advocating for QFs? How does PGE conclude that one approach promotes efficient siting decisions while the other does not?
40. Can PGE explain how network upgrades associated with PGE's remote generation facilities only benefit PGE customers and provide no quantifiable benefit to other transmission customers or support for the reliability of the transmission grid as a whole?
41. Commission Staff have expressed a concern that avoided interconnection costs may not be adequately captured in utilities' current avoided cost calculations. Please explain how system-wide benefits of non-PGE owned generation to the transmission network are included in PGE's current avoided costs.
42. The Joint Utilities argue there is no factual basis for presuming that system upgrades benefit all users of the system. Is PGE's position that there should be a presumption that system upgrades only benefit a single user of the system? Doesn't this run counter to the presumption that the Western Interconnection operates as a single synchronized grid that provides reliability and resiliency benefits for all users?
43. Grid resilience is the ability to avoid or withstand grid stress events without suffering operational compromise or to adapt to and compensate for the resultant strains so as to minimize compromise via graceful degradation. It is in large part about what does not happen to the grid or electricity
44. PGE is a member of Northern Grid which is a transmission planning association formed to facilitate regional transmission planning across the Pacific Northwest and Intermountain West and provide the region with a forum to discuss common planning assumptions, identify regional upgrade projects, eliminate duplicative administrative processes, and facilitate compliance with FERC cost allocation requirements. Please explain how

PGE perceives common interests and shared benefits derived from coordination with other NW transmission entities and also holds the view that upgrades to that transmission network as a result of distributed resource additions only benefit the owner of the generation resource.

45. Please explain how PGE's avoided costs rates would change if the proxy resource used for calculating the avoided costs were located in an area outside of BPA's balancing authority area and outside of PGE's balancing authority area.
46. PGE has noted a QF interconnected directly to a PGE-owned transmission line in Central Oregon. Please explain how the investment for this line is being recovered and why the cost recovery mechanism for the original transmission line should differ from the recovery mechanism for subsequent upgrades. Please explain how the beneficiaries of the original transmission line would not realize any benefit from subsequent upgrades to that line.



January 7, 2021

Via Electronic Mail

Adam Lowney
McDowell, Rackner & Gibson PC
419 SW 11th Avenue, Suite 400
Portland, OR 97205
dockets@mcd-law.com
adam@mrg-law.com

Donovan E. Walker
Idaho Power Company
PO Box 70
Boise, ID 83707-0070
dockets@idahopower.com

Re: In the Matter of PULBIC UTILITY COMMISSION OF OREGON, Investigation into the Treatment of Network Upgrade Costs for Qualifying Facilities
Docket No. UM 2032

Dear Adam, Donovan:

Please find NewSun Energy LLC's ("NewSun") Corrected first set of data requests to Idaho Power Company ("Idaho Power") in this proceeding. Idaho Power has fourteen days to response to these data requests, or by January 20, 2021.

Please do not hesitate to contact me with any questions.

Sincerely,

NewSun Energy LLC

/s/ Marie Barlow

Marie Barlow
In-House Counsel, Policy & Regulatory Affairs

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2032

In the matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into the Treatment of
Network Upgrade Costs for Qualifying
Facilities

**NEWSUN ENERGY LLC'S
AMENDED FIRST SET OF DATA
REQUESTS TO IDAHO POWER**

Dated: January 6, 2021

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

"Documents" include 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 include 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. "Idaho Power" refers to Idaho Power Company or any officer, director, or employee of Idaho Power Company, or any affiliated company.
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 to bring within the scope of this discovery any information or documents that might otherwise be considered 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 to bring within the scope of this discovery request any information or documents that might otherwise be considered beyond their scope.

II. INSTRUCTIONS:

1. These requests call for all information, which includes information contained in documents relating to the subject matter of the Data Request, and information known or available to you.
2. Where a Data Request has several 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 which subdivision, part, or portion of the Data Request it directly relates to.
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, why you cannot answer the Data Request in full, and 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 its 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 your 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 NewSun to discuss the problem and determine if the request can be modified to pose less difficulty in responding before filing an answer objecting to the specific information requested.
15. To the extent the Company objects to any of these requests, please contact NewSun to determine if the request can be modified to produce a less objectionable request.

III. FIRST SET OF DATA REQUESTS:

1. Please provide Jared Ellsworth's resume or CV.
 - a. Please list all cases in which Jared Ellsworth appeared as a witness in the last 10 years.
 - b. Please provide copies of all testimony prepared by Jared Ellsworth in the last 10 years.
2. Please provide Allison Williams's resume or CV.
 - a. Please list all cases in which Allison Williams appeared as a witness in the last 10 years.
 - b. Please provide copies of all testimony prepared by Allison Williams in the last 10 years.
3. Please list all Idaho Power employees that at any point prior to becoming employed by Idaho Power have been employed by the Oregon Public Utility Commission. For each employee listed, please:
 - a. Provide the employee's resume or CV,
 - b. Indicate the employee's job responsibilities while employed by the Oregon Public Utility Commission,
 - c. List each docket in which that employee took an active part on behalf of the Oregon Public Utility Commission,
 - d. Indicate the employee's job responsibilities while employed by Idaho Power,
 - e. List each docket in which that employee took an active part on behalf Idaho Power,
 - f. Provide copies of all testimony prepared by that employee while employed by Idaho Power.
4. Please list all consultants, independent contractors, or other non-Idaho Power employees that have been retained by Idaho Power in any capacity and that at any point prior to being retained by Idaho Power have been employed by the Oregon Public Utility Commission. For each individual listed, please:

- a. Provide the individual's resume or CV,
 - b. Indicate the individual's job responsibilities while employed by the Oregon Public Utility Commission,
 - c. List each docket in which that individual took an active part on behalf of the Oregon Public Utility Commission,
 - d. Indicate the individual's responsibilities while retained by Idaho Power,
 - e. List each docket in which that individual took an active part on behalf Idaho Power,
 - f. Provide copies of all testimony prepared by that individual while retained by Idaho Power.
5. Please list all power purchase agreements under which Idaho Power purchases power including:
- a. Project name,
 - b. Nameplate capacity,
 - c. Term of power purchases,
 - d. Whether the purchase agreement was entered into pursuant to PURPA, an RFP, a bi-lateral agreement, or other,
 - e. Whether the facility is certified as a qualifying facility under PURPA,
 - f. Under what interconnection rules/process the facility was interconnected,
 - g. Whether the facility interconnected as ERIS or NRIS,
 - h. The cost of network upgrades funded under the interconnection agreement,
 - i. Whether the generator is eligible to receive refunds for its network upgrades funded under the interconnection agreement,
 - j. The type of transmission service,
 - k. The entity that submitted the transmission service request,
 - l. The cost of network upgrades funded under the transmission service request.
6. For each qualifying facility that has requested a power purchase agreement (PPA) with Idaho Power from January 1, 2014 until present please provide the following:
- a. Project name,
 - b. Date of PPA request,
 - c. Nameplate capacity,
 - d. Project location (county and state),
 - e. Generation technology type (wind, solar, etc),
 - f. Interconnecting utility,
 - g. The power purchase agreement, if one was executed,
 - h. The developer or developers that requested or negotiated the power purchase agreement,
 - i. The in-service date, if operating, or scheduled commercial operation date if not,

7. For each generator that has submitted an interconnection application to Idaho Power from January 1, 2014 until present please provide the following:
 - a. Queue Number,
 - b. Project name,
 - c. Date of interconnection request,
 - d. Interconnection request status,
 - e. Nameplate capacity,
 - f. Project location (county and state),
 - g. Generation technology type (wind, solar, etc),
 - h. Whether the project requested interconnection as a QF selling 100% of its net output to Idaho Power (at initial application or at any point during the interconnection process) and whether it switched from this QF status to non-QF status, and the date it switched (or vice-versa, if it first requested interconnection as a non-QF and later switched to QF),
 - i. Any interconnection studies not publicly available online, including any prior studies which have been superseded by the studies that are posted on the website,
 - j. The interconnection agreement, if one was executed,
 - k. The developer or developers that submitted the interconnection application,
 - l. The in-service date, if operating, or scheduled commercial operation date if not,
 - m. Regarding NR and ER interconnection service:
 1. Which service type was requested at initial application,
 2. Which service type was studied in each of the Feasibility, System Impact, and Facilities studies,
 3. Which service type the project ultimately interconnected under,
 - n. Regarding network upgrade costs (identified in ER or NR or both):
 1. Estimated network upgrade costs in each of the Feasibility, System Impact, and Facilities studies,
 2. Final network upgrade costs assigned to the generator,
 3. Whether the network upgrades were ultimately constructed or are under construction,
 - o. Provide a comparative table for all interconnection requests showing the key features of ER/NR (initial and final), interconnection and network upgrade costs (initial and final), withdrawal status, GIA execution, operational status, and QF status.
 - p. Summarize the comparative outcomes of ER interconnection vs NR interconnection applications as relates interconnection and generator outcomes for projects in the following GIR size ranges: 0-10, 11-20, 21-40, 41-60, 61-80. Indicate withdrawal rates and summary numbers, interconnection agreements signed, and average final interconnection costs including network upgrades.

8. For each network upgrade constructed since January 1, 2014, please provide:
 - a. The cost of the network upgrade,
 - b. Where Idaho Power first identified the need for the network upgrade (e.g., load growth, interconnection request, transmission request, integrated resource plan, or other),
 - c. How the network upgrade was funded (e.g., utility funded, queue number funded, other),
 - d. Whether the network upgrade was included in rate base or whether Idaho Power intends to include it in rate base,
 - e. If the network upgrade was included in rate base, the rate of return earned on the network upgrade,
 - f. The incremental transmission operations resulting from the network upgrade (e.g., increased throughput, increased load serving capability, enhanced reliability, improved transfer capability within the existing system, relief of existing congestion on the transmission system, or others),
 - g. The net increase or decrease in transmission customer rates that resulted from the network upgrade,
9. Please list all QF-funded network upgrades that did not result in any benefit to the transmission system, such benefits to include, but not be limited to, increased load serving capability, enhanced reliability, improved transfer capability within the existing system, or relief of existing congestion on the transmission system?
10. Please list all QF interconnections that resulted in lower transmission rates from Bonneville Power Administration (BPA) for Network Integration Transmission (NT) Service by reducing network load on the hour of the BPA Monthly Transmission System Peak Load?
11. Does Idaho Power add to rate base the costs of network upgrades paid for by qualifying facilities? Does Idaho Power add to rate base the costs of network upgrades paid for or financed by non-QF generators who interconnect to Idaho Power's system?
12. Referring to Joint Utilities/200 (Wilding-Macfarlane-Williams) at 11, please identify all upgrades on the utility's system in Oregon that were required solely to provide adequate transmission capacity for the interconnecting QF.
13. In its response to NIPPC Information Request No. 30, Idaho Power states that imposing Network Upgrade costs on QFs is necessary to prevent the total cost of the QF, including energy, capacity, and interconnection costs, from exceeding the utility's avoided costs. Identify all examples in which an interconnecting QF would have been paid more than the utility's avoided costs if had not been required to pay for Network Upgrades.

14. Please provide all evidentiary support for the premise that upgrades to the transmission network caused by qualifying facility interconnections provide no system benefits.
15. Referring to Joint Utilities/100 (Vail-Bremer-Foster-Larson-Ellsworth) at 8-9, identify the engineering or modeling methodologies the utility would deem acceptable to demonstrate that a QF-funded Network Upgrade results in quantifiable system-wide benefits to the utility's transmission system and/or distribution network.
16. How does Idaho Power account for forecast new loads and/or load growth when conducting interconnection studies for new generation? Is the treatment the same for ERIS as for NRIS studies?
17. Please provide an itemized summary table of all network upgrades constructed by Idaho Power since 2010 in Oregon and planned for construction in Oregon (or cost allocation to Oregon ratepayers), including the upgrades' associated costs (initial estimate and final actual cost), whether currently rate-based (or planned for future rate-basing approval), project justification(s), nominal capacity, amount of associated load and generation directly supported by the specific incremental upgrade (total and \$/MW), ratio of maximum service capacity to directly supported actual, in-service generation or load, and the average cost per MW of capacity per ratepayer. Identify explicitly where excess capacity was built in anticipation of future use (not immediate direct use), itemizing comparatively for those justified by loads, by generators, and by QFs.
18. Referring to Joint Utilities/100 (Vail-Bremer-Foster-Larson-Ellsworth) at 30-31, please provide the following for each transmission service request received from January 1, 2014 until present:
 - a. Queue Number,
 - b. Project name,
 - c. Date of transmission service request,
 - d. Transmission service request status,
 - e. Nameplate capacity,
 - f. Project location (county and state),
 - g. Generation technology type (wind, solar, etc),
 - h. Type of transmission service,
 - i. Point of receipt and point of delivery,
 - j. Any transmission service request studies not publicly available online,
 - k. The transmission service agreement, if one was executed,
 - l. The in-service date, if operating, or scheduled commercial operation date if not,
 - m. Whether the output from the generator is delivered to Idaho Power's retail load,
 - n. Whether the generator is a qualifying facility,
 - o. Whether the generator is on-system or off system,

- p. Whether the generator is interconnected using ERIS or NRIS,
- q. Regarding network upgrade costs:
 - 1. Estimated network upgrade costs in any transmission service studies,
 - 2. Final network upgrade costs assigned to the request,
 - 3. Whether the network upgrades were ultimately constructed or are under construction,

19. Identify all instances in which Idaho Power provides firm transmission service, including either Network Interconnection Transmission Service or Point-to-Point Transmission service, to generators interconnected using ERIS.

20. For each State in which Idaho Power operates, please:

- a. Describe which set of procedures Idaho Power uses to interconnect qualifying facilities that propose to sell 100% of their net output to Idaho Power,
- b. Describe which set of procedures Idaho Power uses to interconnect qualifying facilities that propose to sell less than 100% of their net output to Idaho Power,
- c. Indicate for (a) and (b) whether QFs have the option to select ERIS or NRIS,
- d. Indicate for (a) and (b) whether QFs receive refunds for the cost of network upgrades,
- e. Describe the cost allocation and refund policy for network upgrades; compare these policies based on whether the QF interconnected as a FERC or state-jurisdictional interconnection?
- f. How would these answers differ if a prospective otherwise equivalent generator proposed interconnection but it did not seek to sell 100% of its output under a mandatory purchase contract to Idaho Power? For example, in each situation, if the potential QF were a 40 MW solar-only facility that was eligible for certification as a QF.

21. Indicate whether Idaho Power believes it is obligated to purchase power from a QF in the following circumstances:

- g. If it is interconnected via a FERC jurisdictional interconnection? If such interconnection is ER? If NR?
- h. Is that answer different if the QF was off-system or on-system?
- i. If the QF only proposes to sell one hour per year to the QF?

- j. If the QF proposes to sell all of its output except 1 day per year?
 - k. If the QF proposes solely to sell Idaho Power power seasonally?
 - l. If the QF sells some of its other output to another utility?
22. What interconnection rules, tariff or policies does Idaho Power use to process an interconnection request from a QF that intends to sell its power to Idaho Power as delivered—i.e., not pursuant to a contract or other legally enforceable obligation to sell over a specified term—including in the case where the QF might deliver some output to a different buyer?
23. Is it Idaho Power’s position that the current system of siting non-QF renewable generation on Idaho Power’s transmission and distribution system is efficient for interconnection customers and potential customers in the market?
24. Is it Idaho Power’s position that the utility has no obligation to provide for an efficient process for identifying lower-cost sites for renewable generators on Idaho Power’s transmission and distribution system?
25. Has Idaho Power constructed any network upgrades that provided capacity beyond that which was required to serve network load? How were the costs of those upgrades recovered?
26. How does Idaho Power determine whether a network upgrade provides quantifiable system-wide benefits? Has Idaho Power constructed any network upgrades recovered via retail rates that did not provide system-wide benefits?
27. Are there any constrained paths on Idaho Power’s network that would benefit from locating additional generation?
28. Can Idaho Power explain how the standard for recovery of network upgrade costs from retail customers for Idaho Power planned and constructed network upgrades is the same as the standard Idaho Power would wish to impose on QFs requesting interconnection and reimbursement for network upgrades?
29. Are there any areas of Idaho Power’s system where additional generation would provide benefits to Idaho Power wholesale or retail customers?
30. Please describe network upgrades Idaho Power constructed during the period of years 2000-2010. How were the costs of those network upgrades recovered? How were the benefits of those network upgrades determined? Were those “deliverability-driven” network upgrades? How was the deliverability analysis performed?
31. Is there capacity created by Idaho Power network upgrades included in retail rates that is not being fully utilized? Is this a result of the nature of lumped network capacity upgrades?

32. Has Idaho Power constructed any network upgrades that were driven by the need to provide deliverability to California or Canada? How were those upgrades paid for? How were the costs of those upgrades recovered? Are there any areas where additional generation could have been sited that would have offset or eliminated the need for those network upgrades?
33. Will the Northwest Energy Imbalance Market (EIM) change the way Idaho Power's transmission system is utilized? Will additional benefits accrue to Idaho Power retail customers as a result of the EIM? Should the existence of this market influence the cost recovery mechanisms for future network upgrades?
34. How do siting decisions for Idaho Power-owned generation resources address cost recovery for associated network upgrades and how does that differ from what the Joint Utilities are advocating for QFs? How does Idaho Power conclude that one approach promotes efficient siting decisions while the other does not?
35. Can Idaho Power explain how network upgrades associated with Idaho Power's remote generation facilities only benefit Idaho Power customers and provide no quantifiable benefit to other transmission customers or support for the reliability of the transmission grid as a whole?
36. Commission Staff have expressed a concern that avoided interconnection costs may not be adequately captured in utilities' current avoided cost calculations. Please explain how system-wide benefits of non- Idaho Power owned generation to the transmission network are included in Idaho Power 's current avoided costs.
37. The Joint Utilities argue there is no factual basis for presuming that system upgrades benefit all users of the system. Is Idaho Power's position that there should be a presumption that system upgrades only benefit a single user of the system? Doesn't this run counter to the presumption that the Western Interconnection operates as a single synchronized grid that provides reliability and resiliency benefits for all users?
38. Grid resilience is the ability to avoid or withstand grid stress events without suffering operational compromise or to adapt to and compensate for the resultant strains so as to minimize compromise via graceful degradation. It is in large part about what does not happen to the grid or electricity
39. Idaho Power is a member of Northern Grid which is a transmission planning association formed to facilitate regional transmission planning across the Pacific Northwest and Intermountain West and provide the region with a forum to discuss common planning assumptions, identify regional upgrade projects, eliminate duplicative administrative processes, and facilitate compliance with FERC cost allocation requirements. Please explain how Idaho Power perceives common interests and shared benefits derived from coordination with other NW transmission entities and also holds the view that upgrades to that transmission

network as a result of distributed resource additions only benefit the owner of the generation resource.

40. Please explain how Idaho Power 's avoided costs rates would change if the proxy resource used for calculating the avoided costs were located in an area outside of BPA's balancing authority area and outside of Idaho Power's balancing authority area.