

BEFORE THE PUBLIC SERVICE COMMISSION OF WYOMING

IN THE MATTER OF THE APPLICATION OF)
ROCKY MOUNTAIN POWER FOR A) DOCKET NO. 20000-545-ET-18
MODIFICATION OF AVOIDED COST) RECORD NO. 15133
METHODOLOGY AND REDUCED)
CONTRACT TERM OF PURPA POWER)
PURCHASE AGREEMENTS)

OFFICE OF CONSUMER ADVOCATE'S SECOND SET OF DATA REQUESTS

Submitted: January 25, 2019

COMES NOW the Office of Consumer Advocate and hereby serves its second set of data requests regarding the above docketed general rate application of Rocky Mountain Power, to be answered pursuant to Rules 33, 34, and 36 of the Wyoming Rules of Civil Procedure. The responses are to be served upon and produced in care of **Christopher Leger, Counsel; Wyoming Office of Consumer Advocate; 2515 Warren Avenue, Suite 304; Cheyenne, WY 82002.**

Instructions and Definitions

1. Each discovery request calls for all information known by you and your attorneys, officers and agents, all information from sources under your control, and all information given to you by others. If any files are known to you but not within your control please identify the location of such files, the name by which such files may be requested and the custodian of the files.

2. "You" and "Your" means Rocky Mountain Power as well as its past and present agents, officers, directors, employees, servants, accountants, consultants, and other representatives, and every other person that acted for or on behalf of Rocky Mountain Power.

3. Whenever in the following discovery requests, any writing must be described or identified or produced, all writings in the possession or control of yourself and your representatives are included, and all such writings not produced shall be identified by date, author, addresses, title, subject, title of document (contract, invoice, work order, letter or other identifying designation), number and physical description. As to each such writing not produced, the address of the present location of such writing, and the name and address of the custodian thereof, are also requested.

4. The term "writing" is used herein in its broadest sense, and includes any

original reproduction or copy of any kind of writing or any documentary material, including, without limitations, papers, drafts, correspondence, e-mails, internal and external newsgroup postings, letters, memoranda, inter-office communications, notes, diaries, contract documents, drawings, photographs, film, videotapes, computer disks, computer tapes, computer printouts, plans, charts, models, permits, written ordinances, calendars, travel and expense records, surveys, ledgers, journals, instructions, agreements, canceled checks, vouchers, check stubs, plans, specifications, estimates, vouchers, permits, written ordinances, minutes of meetings, invoices, billings, checks, reports, studies, telegrams, telexes, cables, notes of telephone conversations, and notes of any oral communications, work papers, and any printout that can be made from information accessible by computer. "Writing" means any handwritten, typewritten, printed, recorded, transcribed, punched, taped, photocopied, photo-static, telexed, faxed, filmed, microfilmed, scanned, converted or otherwise prepared matter, including any of the above that are accessible by computer and that can be delivered, transmitted, reduced, reproduced, or otherwise rendered in or into tangible form.

5. If you contend that the production of any information accessible by computer is too burdensome, please describe the information that meets the substance of the request with sufficient specificity so that the request may be defined in some more limited manner, or so that the adjudication of the Commission with respect to the request can be sought.

6. With respect to each discovery request herein relating to oral communication, it is intended that each answer set forth the names, addresses, business positions and occupations of the persons involved in the said communications, and the names and addresses of any other persons present during said communications.

7. Whenever in the course of answering these discovery requests, information is called for which is other than within the personal knowledge of the person executing the answers hereto, you are requested, in addition to providing such information, to provide the name, address, telephone number, official capacity and job title of each person providing such information to you, or if the information is obtained from writing, to identify each such writing as described below.

8. Please take further notice that these written discovery requests are all continuing in nature, and you are requested to furnish amended or supplemental responses as additional information and/or documents become available.

9. Supplementation of responses is also requested for any new information which you receive that shows an original response to these discovery requests was incorrect when made, or although correct when made, is no longer true in light of such new information. The duty to supplement shall be continuing as to the above-described types of information, and supplementary responses are hereby requested to be served whenever such information is discovered or determined.

10. "Identify" when used with respect to a person, means to give the person's name, present or last known street and mailing address and business address and telephone and facsimile numbers, and the position together with the position, occupation, title, and business affiliation of the person at the time of his actions in connection with the

matters alleged in this action.

11. "Identify" when used with respect to person that is not an individual or a corporation or other form of business organization, means to state the legal and trade name of such person, corporation or business organization, the address of its principal place of business, its telephone and fax numbers, and the identity of all individuals who acted on its behalf in connection with the matters alleged in this action. Please also provide if the organization has additional or prior trade names, street and mailing addresses, telephone and fax numbers.

12. "Identify" when used with regard to a document or writing, means to give the type of document or writing (e.g., letter, memorandum, telegraph, chart, report, etc.), date, file and/or identifying symbol, to identify the author, its subject, title, length in pages, a physical description, address where located, each custodian of such document, and to state the substance of such document or produce same.

13. "Describe" when used with respect to a communication, act or conduct, means to give, state or identify the following:

a. The date of the communication, act or conduct, and the person or persons present;

b. If a communication, the words or substances of the communication, the person making each of the particular statements so listed, and the mode of the communication (e.g., in writing, telephone, in person);

c. If an act or conduct, the details of the act or conduct being described and what each participant in such act or conduct did; and

d. Any document evidencing or reflecting any communication, act or conduct described in response to, or called for by, the discovery request requesting you to describe the communication, act or conduct; and

e. The location or locations at which the communication, act or conduct took place.

14. "Person" is used in its broadest sense and includes, without limitation, any individual, corporation, partnership, joint venture, association, cooperative, limited liability company, trust, estate, governmental body, subdivision or agency, and any other business or governmental organization.

17. If any matter responsive to any of the following discovery requests is being withheld based on any claim of privilege, describe generally the matter withheld, state the privilege being relied upon, and identify all persons or entities that have or have had access to such matters.

18. If the answer to any discovery request is that you lack knowledge of the requested information, describe all efforts made by you to obtain the information necessary to answer the discovery request.

19. If an objection is made with regard to any information sought, state the nature of the objection and legal authority therefore. If objection is made with regard to

production of documents on grounds of attorney/client or work product privilege, identify as directed each document claimed to be so privileged.

20. If any discovery request calls for the production or provision of any document(s), please produce such document in response to the discovery request. **Where possible, the OCA would prefer responses in electronic format.**

DATA REQUESTS

Data Request 2.1: For each year from 2013 to 2018, please report and compute the annual percentage of completed QF projects with executed PPA's as a percent of the amount of QF's that requested pricing, on a total company basis, by state, by resource type, and MW size.

Data Request 2.2: For each year from 2013 to 2018, please report the average PPA length and average price for the Company's total portfolio of PPA's in the aggregate and by state.

Data Request 2.3: For each year from 2013 to 2018, please report the average PPA length and average price for each resource type in the Company's portfolio of PPA's in the aggregate and by state.

Data Request 2.4: Please provide an expanded version of Table 2 (Sched 38) as found on McNeil page 15, which includes the avoided costs for each year between year 7 to year 20.

Data Request 2.5: Please provide an expanded version of Table 3 (Sched 37) as found on McNeil page 21, which includes the avoided costs for each year between year 7 to year 20.

Data Request 2.6: Please confirm that Montana PSC Docket No. D2016.5.39. Order No. 7500c dated July 21, 2017, for 10 year contract length with five year price adjustment for QF's is no longer in effect (see Tourangeau page 8) and instead confirm that Montana PSC Docket No. D2016.5.39. Order No. 7500d, Reconsideration Order dated October 5, 2017, increases Montana's QF contract terms to 15 years with a fixed price for the term.

Data Request 2.7: Please account for the variance between the two different MW figures described as being in the pricing queue on page 7 of Mr. Tourneau's testimony. Line 7 states that there are 3756 MW in the pricing queue and Table 1 states there are 2991 MW in the pricing queue. Please discuss and explain.

Data Request 2.8: Please discuss how a 7-year contract term for QF PPA's aligns and coordinates with the Company's IRP preferred portfolio and action plan, which focuses heavily on the first 10 years of the 20 year plan.

Data Request 2.9: Please provide the Company's annual estimate since 2014 of any forgone EIM benefits it believes it did not obtain due to its PURPA must take obligation since the Company began EIM participation (2014). (See Tourangeau page 13).

Data Request 2.10: Please discuss and explain the main driver for the downward shift in avoided costs between 2020 and 2021 as evidenced in the tariff sheets filed with the application.

DATED: Friday, January 25, 2019

OFFICE OF CONSUMER ADVOCATE



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CERTIFICATE OF SERVICE

I hereby certify that on January 25, 2019, I served the foregoing Second Set of Data Requests by delivering copies thereof to the individuals/entities below, by the method(s) indicated:

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