

BEFORE THE PUBLIC SERVICE COMMISSION OF WYOMING

IN THE MATTER OF THE APPLICATION
OF ROCKY MOUNTAIN POWER FOR A
MODIFICATION OF AVOIDED COST
METHODOLOGY AND REDUCED
CONTRACT TERM OF PURPA POWER
PURCHASE AGREEMENTS

DOCKET NO. 20000-545-ET-18
(Record No. 15133)

**WYOMING INDUSTRIAL ENERGY CONSUMERS, VK CLEAN ENERGY
PARTNERS, LLP, AND TWO RIVERS WIND, LLC'S SECOND SET OF DATA
REQUESTS TO ROCKY MOUNTAIN POWER**

The Wyoming Industrial Energy Consumers (“WIEC”), VK Clean Energy Partners, LLP (“VK Clean Energy”), and Two Rivers Wind, LLC (“Two Rivers Wind”), by and through their undersigned counsel, Holland & Hart LLP, respectfully submit their second set of data requests to Rocky Mountain Power, a division of PacifiCorp (“Company” or “RMP”). The following response date, definitions, and instructions apply to this set of data requests:

RESPONSE DATE

Please respond to these Data Requests within 10 calendar days, *i.e.*, by March 8, 2019, unless an earlier date is specified by the Wyoming Public Service Commission or by agreement between WIEC, VK Clean Energy, Two Rivers Wind, and Rocky Mountain Power.

DEFINITIONS AND INSTRUCTIONS

Please refer to the Definitions and Instructions included in WIEC, VK Clean Energy, and Two Rivers Wind’s First Set of Data Requests to Rocky Mountain Power in the above-captioned docket.

SECOND SET OF DATA REQUESTS

- WIEC/VK/TR 2-1: Please refer to the Direct Testimony of Mr. Paul H. Clements in Docket No. 20000-481-EA-15 at page 2, lines 12-16 wherein he testifies, “The Company currently has 403 megawatts (“MW”) of existing PURPA contracts in Wyoming (projects that are either online or projects that have executed contracts with future online dates) and 713 MW of proposed PURPA contracts in Wyoming (projects that have requested pricing but do not yet have executed contracts), together totaling 1,116 MW of nameplate capacity.” (footnote omitted).
- a. Referring to the 713 MW of proposed PURPA contracts in Wyoming identified, please account for their status. That is, please indicate the number of MW that is in service, in progress but not yet in service, or deactivated.
- WIEC/VK/TR 2-2: Please refer to the Direct Testimony of Mr. Paul H. Clements in Docket No. 20000-481-EA-15 at page 10, lines 16-17 wherein he testifies, “PacifiCorp currently manages 166 executed PURPA contracts totaling 2,151 MW of nameplate capacity across its six-state system.”
- a. Of the 2,151 MW of nameplate capacity, please break out the capacity by state.
 - b. Of the 2,151 MW of nameplate capacity, please indicate the amount of capacity that is no longer an active PURPA contract.
- WIEC/VK/TR 2-3: Please refer to the Direct Testimony of Mr. Mark P. Tourangeau at page 7, line 7 and Table 1. Please reconcile Mr. Tourangeau’s testimony that there is 3,756 MW of QF capacity in the pricing queue, with Table 1’s identification of 2,991 MW of QFs in the pricing queue.
- WIEC/VK/TR 2-4: Please refer to the Direct Testimony of Mr. Mark P. Tourangeau at Tables 1 and 2. Please identify all states included in “Other States.” In doing so, please confirm whether Mr. Tourangeau accounts for the Montana projects generally discussed starting a page 8 of his testimony in “Wyoming.”
- WIEC/VK/TR 2-5: Please refer to RMP’s 2017 IRP at Table 5.6 – Non-Owned Wind Resources. Of the projects identified as PPA projects, please indicate the contract term length of each PPA.
- WIEC/VK/TR 2-6: Please refer to RMP’s 2017 IRP at Table 5.7 – Non-Owned Solar Resources. Of the projects identified as PPA projects, please indicate the contract term length of each PPA.
- WIEC/VK/TR 2-7: Please identify the amount of total system-wide generating capacity on RMP’s system today.

- WIEC/VK/TR 2-8: Please refer to the Direct Testimony of Mr. Mark P. Tourangeau at page 12, lines 9-13. For the Cedar Springs III Wind Project, please identify the contract term length of the PPA, and all regulatory approvals RMP must obtain prior to purchasing power pursuant to the PPA. If RMP is exempt from or otherwise not required to obtain regulatory approvals, please explain for the exemption.
- WIEC/VK/TR 2-9: Please refer to the Direct Testimony of Mr. Mark P. Tourangeau at page 12, lines 14-17 wherein he testifies, “The process required for a QF to acquire a PPA with the Company can lead to QFs having significantly higher operational, price, and credit risks for the Company’s customers compared to resource decisions that are guided by the IRP and procured via competitive solicitations.” Please explain the basis for this statement, and in doing so please explain specifically how a QF’s acquisition of a PPA with RMP can impact “operational, price, and credit risks *for the Company’s customers.*” (emphasis added). Please provide all documentation supporting this statement.
- WIEC/VK/TR 2-10: Please refer to the Direct Testimony of Mr. Daniel J. MacNeil at page 15 line 16 to page 16 line 9 and including Figure 1, wherein he testifies, “As shown in Figure 1, avoided costs over the next few years are relatively low. Avoided costs rise significantly in 2028-2030, coincident with assumed retirements of Dave Johnston and Naughton coal plants, along with Jim Bridger unit 1.” Please explain the replacement resources assumed in this model after the retirement of Dave Johnston, Naughton, and Jim Bridger unit 1.

Respectfully submitted this 26th day of February, 2019.

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**ATTORNEYS FOR WIEC, VK CLEAN
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CERTIFICATE OF SERVICE

I hereby certify that, on this 26th day of February, 2019 the **WYOMING INDUSTRIAL ENERGY CONSUMERS, VK CLEAN ENERGY PARTNERS, LLP, AND TWO RIVERS WIND, LLC'S SECOND SET OF DATA REQUESTS TO ROCKY MOUNTAIN POWER** was served via electronic mail or U.S. Mail, addressed to the following:

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