

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)

**RENEWABLE ENERGY COALITION FIRST SET OF DATA REQUESTS TO
ROCKY MOUNTAIN POWER**

Renewable Energy Coalition (“REC”) by and through their undersigned counsel, Bailey | Stock | Harmon | Cottam | Lopez LLP, respectfully submit their first combined set of data requests to Rocky Mountain Power (“RMP” or “Rocky Mountain Power”). 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 11th, 2019, unless an earlier date is specified by the Wyoming Public Service Commission or by agreement between REC and RMP.

DEFINITIONS

1. “RMP,” “Rocky Mountain Power,” or “you” means the Applicant in this matter, Rocky Mountain Power; any merged or consolidated predecessor or predecessors in interest; parent(s), subsidiaries and affiliates, past and present; and the employees, officers, directors, agents, consultants, attorneys and all persons acting under contractual arrangement with or acting or purporting to act on behalf of RMP.
2. “Document” and “documentation” should be interpreted as broadly as possible, including all documents which have been created and/or which reside in any type of electronic format. Any document that is not exactly identical to another document for any reason (such as marginal notations or deletions) is considered a separate document.

3. "Person" or "entity" should be interpreted to denote, unless otherwise specified, any natural person, firm, corporation, association, group, individual or organization of any type whatsoever.
4. "PSC" or "Commission" means the Wyoming Public Service Commission.
5. Any request to "identify" or "provide" should be interpreted to mean:
 - a. With respect to a natural person, that person's full name, title, job description, and business and home address. Where the identification pertains to a past period, as to each person identified who is still in your employ, or the employment of the group with which such person is identified in response to any requests, provided, in addition, that person's title and job description as of the time of such past period. Where the person is no longer in your employ or the employment of the group with which such person is identified in response to any request, provide that person's affiliate, position, home and business address, if known, or if not known, such person's last known affiliation, position, home and business address, or portions thereof as may be known.
 - b. With respect to an entity other than a natural person, that entity's name, business, type of entity, present status and present or last known address.
 - c. With respect to a document, that document's title, date, author (and, if different, the signer), addresses, recipients, or other persons who assisted in the preparation, subject matter or general nature, and any amendments thereto, present location and custodian, whether or not such document is in the respondent's possession, custody or control and whether or not the document is claimed to be privileged. The final version and each draft of each document should be identified and produced separately. Each original and each non-identical copy (bearing marks or notations not found on the original) of each final version and draft of each document should be identified and produced separately.
 - d. With respect to a physical facility, the location of the facility, the intended purpose of the facility, the actual use of such facility, the operating dates of the facility, the installation date of the facility, the date utilization of the facility terminated if applicable, and whether the facility is subject to the jurisdiction of the Wyoming Public Service Commission, the Federal Energy Regulatory Commission, or any other regulatory body.
6. "Communication" should be interpreted to include, but not be limited to, all forms of communication, whether written, printed, oral, pictorial, electronic, or otherwise and by any means or type whatsoever.
7. "Relating To" or "Related To" means pertaining to, presenting, discussing, commenting on, analyzing, or mentioning in any way.

GENERAL INSTRUCTIONS

1. Where a request can be answered in whole or in part by reference to the response to a preceding or subsequent request, it is sufficient to so indicate by specifying the response to the preceding or subsequent request by number and specifying whether it is claimed that the response to the preceding or subsequent request is a full or partial response. If the latter, the response to the balance of the request shall be completed.
2. If various individuals are the authors of different responses to the data requests, please indicate the name of the author and his/her position within the Company. If the author is an expert or a consultant, please provide a current curriculum vitae for each such expert or consultant.
3. As to any requests consisting of a number of separate subparts, or related parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate request. Any objection to a request should clearly indicate to which part or portion of the request it is directed.
4. Responses to requests referring to documents shall include all documents relating to the time period specified in each request or in these instructions, whether prepared before, during or after that period.
5. If any document related to these data requests is not currently in the Company's possession but you know or believe such a document exists, please identify and indicate to the best of your ability its present or last known location or custodian.
6. Individual response of more than one page should be consecutively numbered.
7. If any document covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner:
 - a. the reasons for withholding;
 - b. date of the document;
 - c. name of each author or preparer;
 - d. name of each person who received the document; and
 - e. statement of facts constituting the basis for withholding the document.
8. If you assert that documents, records, or information responsive to any requests have been destroyed and are thus not available, state when and explain why any such document, record or information was destroyed, identify the person directing the destruction and identify all documents relevant to such destruction or explanation. If a claim is made that the destruction occurred pursuant to your document destruction program, identify and produce a copy of the guideline, policy, or company manual describing such document destruction program, and any correspondence or communication relating to the destruction of responsive documents, records or information.

9. If any of these requests are not answered on the ground that the material or information requested is confidential, privileged, or otherwise immune to discovery, set forth in detail the factual and legal basis which support your decision to withhold production.
10. Each document or written response shall designate the respective question (and subpart of the question) under which it is being produced.
11. Each document produced shall be an authentic original document or a true duplicate of an authentic original document.
12. Each of these requests shall be considered to be continuing and to require supplemental or amended answers as readily as information and knowledge is acquired.
13. If, in answering a request, you encounter any ambiguity in interpreting either the request or a definition or instruction applicable thereto, please secure a clarification by contacting undersigned counsel as soon as the ambiguity is known.
14. The term “and” and “or” should be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of each request any information or document which might otherwise be considered to be beyond its scope.
15. The singular form of a word should be interpreted as plural, and the plural form of a word should be interpreted as singular, whenever appropriate in order to bring within the scope of each request.

FIRST SET OF DATA REQUESTS

- REC 1-1: Please provide a copy of all responses to data requests submitted to you in this proceeding by any and all other parties, including the Wyoming Public Service Commission or its Staff.
- REC 1-2: Please provide copies of all workpapers that are used to develop, or which support your Testimony and Exhibits in this docket in native format with all cells and formulae intact. To the extent that such workpapers exist in paper form only, please provide paper copies to the undersigned.
- REC 1-3: Please provide complete copies of PacifiCorp’s responses to Renewable Energy Coalitions data requests in Oregon proceeding Docket No. UM 1802.
- REC 1-4: Please provide complete copies of PacifiCorp’s responses to Renewable Energy Coalition’s data requests in Utah proceeding Docket Nos. 17-035-T07 and 17-035-37.

- REC 1-5: Please provide complete copies of PacifiCorp's responses to Renewable Energy Coalitions data responses in Wyoming proceeding Docket No. 20000-532-EA-18.
- REC 1-6: Please explain whether the Wyoming wind resource can be deferred if Rocky Mountain Power acquires new Wyoming wind QFs.
- REC 1-7: Please explain whether the Wyoming wind resource can be deferred if Rocky Mountain Power acquires new Wyoming renewable hydro, solar or biomass QFs.
- REC 1-8: Please identify all states in which Rocky Mountain Power calculates a renewable avoided cost price stream.
- REC 1-9: Please identify all states in which Wyoming renewable energy certificates can be used to comply with the Renewable Portfolio Standards.
- REC 1-10: Please identify the different capacity factors for renewable resources located in its eastern balancing authority and the western balancing authority. Please explain the basis for those differences (technology type, geographic location, availability of transmission, etc.).
- REC 1-11: For each jurisdiction that PacifiCorp operates, please explain whether the QF or the Company retain the RECs from QF sales?
- REC 1-12: Please provide the current tariff or policy for each jurisdiction governing QF contract term periods, and method of determination of the avoided cost (both Schedule 37 and 38).
- REC 1-13: Please refer to Rocky Mountain Power's application at 8, which states: "Indeed, the term varies drastically even between the states in which the Company provides electric service..." Please identify the term in a) each state that the company provides electric service; and b) each state that the company is aware of that has an commission policy, rule or requirement regarding contract terms.
- REC 1-14: Since the Idaho Public Utilities Commission adopted two year contract terms for wind and solar resources, please identify the all QFs that have requested PPAs, including a) the date of their application; b) the name of each qualifying facility; c) the size of each qualifying facility; d) the type of resource of each qualifying facility; e) whether each qualifying facility entered into a power purchase agreement; and f) the date upon which each qualifying facility entered into a power purchase agreement.

- REC 1-15: For each month starting January 2010, please provide the following information regarding PacifiCorp's qualifying facility power purchase agreement queue(s): a) the total number qualifying facilities; b) the total number of nameplate megawatts; c) the name of each qualifying facility; d) the size of each qualifying facility; e) the type of resource of each qualifying facility; f) whether each qualifying facility entered into a power purchase agreement; and g) the date upon which each qualifying facility entered into a power purchase agreement.
- REC 1-16: Since 1990, please identify the percentage of QFs that signed PPAs that became operational and sold power to PacifiCorp. Please provide all supporting documentation, including but not limited to the name, size, resource technology, and state of the QFs.
- REC 1-17: Since 1990, please identify the percentage of QFs that requested PPAs that became operational and sold power to PacifiCorp. Please provide all supporting documentation, including but not limited to the name, size, resource technology, and state of the QFs.
- REC 1-18: For each year since 1990, list each QF PPAs that the company has entered into, please identify the name of the counter party, the date the PPA was finalized or entered into, the type of resource, the size of the project, the commercial operation date in the contract, whether the past and current contracts are standard or negotiated, the state and control area the project is located in, the status of the project (operating or not), the original start date, the original contract term, the number of times the QF has renewed its contract(s), the current contract term, and the date the project became commercially operational. Do not just list those QF PPAs that have or are selling power to PacifiCorp, but all the QFs that entered into a PPA with the company.
- REC 1-19: Since 2000, for each request for proposal issued by the Company for 50 MW or more of electricity, please: a) identify the number of years for the contract term in requested for power purchase agreement bids, and b) explain why PacifiCorp choose that particular contract term.
- REC 1-20: Please refer to Rocky Mountain Power's application at page 9, which states: "FERC has not spoken directly to the issue of setting an appropriate contract length, except for a few limited cases." Please identify all of the "limited cases."

- REC 1-21: Please refer to Rocky Mountain Power’s application at page 12, which states: “Mr. MacNeil describes how the current definitions no longer accurately captures the high and low price periods on the Company’s system.” Please explain over what period of time the current definitions accurately captured the high and low price periods on the Company’s system.
- REC 1-22: For each jurisdiction that PacifiCorp operates, please identify the policy, rules or requirements regarding the time from power purchase agreement execution and that the QF must become commercially operational, including any delay periods or options to extend the commercial operation date for a Schedule 37 and 38 QF.
- REC 1-23: For each jurisdiction that PacifiCorp operates, please identify the policy, rules or requirements regarding the Company’s the rights to update pricing any time prior to execution for a Schedule 37 and 38 QF.
- REC 1-24: For each jurisdiction that PacifiCorp operates, please identify the policy, rules or requirements regarding the when or if a Schedule 37 and 38 QF must provide project development security.
- REC 1-25: Please refer to Rocky Mountain Power’s application at page 9, which states: “These improvements to Schedule 38 will provide more information to prospective QFs, so they better understand the Company’s practices, and may help to eliminate some areas for potential dispute between QFs and the Company.” Please identify all actual disputes between QF and the Company that would have been eliminated with these “improvements”.
- REC 1-26: For each jurisdiction that PacifiCorp operates, please provide the Schedule 37 and 38 negotiation requirements, and explain whether the requirements for Schedule 37 and 38 are consistent with each other (and if not) please explain how they differ.
- REC 1-27: Please refer to Rocky Mountain Power’s proposed Schedule 37, which states: “These prices will be applied to Qualifying Facility resources over which the Commission has jurisdiction that enter into contracts with the Company until 10 megawatts of system resources are acquired. After the Company acquires those 10 megawatts of system resources, then the Company will provide prices to Qualifying Facility resources over 100 kilowatts as set forth in Schedule 38 until the Schedule 37 prices are updated and approved by the Commission.” Please explain what is meant

by 10 megawatts of system resources? Does this mean 10 megawatts of Wyoming QFs, QFs in all states, contracts in any states, etc.

- REC 1-28: For each jurisdiction that PacifiCorp operates, please explain whether there is a limit or cap on Schedule 37 contracts after which certain QFs will be provided prices in Schedule 38 until Schedule 37 prices are updated and approved by a state commission. If so, please provide the tariff and any order approving the tariff. If any such proposal has been rejected by a state commission, please provide the order.
- REC 1-29: Please refer to Rocky Mountain Power's proposed Schedule 38 I. B.2 and 4, which requires a QF to provide general project information to obtain an indicative pricing proposal, including "other information promptly and reasonably requested by the Company." Please provide examples of what other information PacifiCorp has asked for.
- REC 1-30: Please refer to Rocky Mountain Power's proposed Schedule 38 refers to timelines regarding providing indicative pricing to the QF, but Rocky Mountain Power proposes that the timelines apply to Schedule 37 requests, which are not provided indicative pricing. Please explain how Schedule 37 requests will be processed according to Schedule 38 when there is no indicative pricing.
- REC 1-31: Please refer to Rocky Mountain Power's proposed Schedule which states: "Prices and other terms and conditions in the power purchase agreement are not final and binding until the power purchase agreement is executed by both parties and accepted for filing by the Wyoming Public Service Commission." Is it PacifiCorp's position that a legally enforceable obligation that provides the QF with final and binding prices should not occur until after power purchase agreement is executed by both parties and accepted for filing by the Wyoming Public Service Commission?
- REC 1-32: Please refer to Rocky Mountain Power's proposed Schedule which states: "Prices and other terms and conditions in the power purchase agreement are not final and binding until the power purchase agreement is executed by both parties and accepted for filing by the Wyoming Public Service Commission." Is it PacifiCorp's position that a legally enforceable obligation that would provide the QF with final and binding prices should occur when the QF approves the final draft power purchase agreement?
- REC 1-33: Please identify all jurisdictions that PacifiCorp operates in that use the PDDRR methodology to set avoided cost rates, and explain all differences

between the methodologies between the states, and (if any) a copy of the most recent commission order approving its use. If PacifiCorp does not use the PDDRR methodology to set avoided cost rates in a jurisdiction that PacifiCorp operates in, please identify the methodology, provide an explanation of how it is used, provide an explanation of how it differs from the PDDRR, and (if any) a copy of the most recent commission order approving its use.

- REC 1-34: Since 1990, please identify PacifiCorp's IRP preferred portfolio, and PacifiCorp's resource acquisitions per year (for front office transactions and qualifying facility acquisition, total annual number are sufficient for the purposes of this response).
- REC 1-35: Please refer to page 8 of Daniel MacNeil's testimony. What resource will seasonal or irrigation hydroelectric) be eligible to defer in general?
- REC 1-36: Please refer to pages 9-10 of Daniel MacNeil's testimony, please identify the eastern control area and western control area peak load requirement months, and explain which months would be used to set qualifying facility rates in Wyoming.
- REC 1-37: Please refer to page 15 of Daniel MacNeil's testimony. Please provide similar examples for cogeneration, fixed solar, geothermal wind, hydroelectric, and seasonal/irrigation hydroelectric Wyoming qualifying facility.
- REC 1-38: Please refer to page 15 of Daniel MacNeil's testimony. Please provide similar examples for cogeneration, fixed solar, geothermal wind, hydroelectric, and seasonal/irrigation hydroelectric Wyoming qualifying facility, and provide the prices for each year for each resource (including the baseload, wind and solar tracking).
- REC 1-39: Please refer to page 15 of Daniel MacNeil's testimony. Please provide similar examples for Schedule 37 cogeneration, fixed solar, tracking solar, baseload, wind, geothermal wind, hydroelectric, and seasonal/irrigation hydroelectric Wyoming qualifying facility, and provide the prices for each year for each resource.
- REC 1-40: Please refer to page 16 of Daniel MacNeil's testimony. Please provide the same graph, with prices for cogeneration, fixed solar, geothermal wind, hydroelectric, and seasonal/irrigation hydroelectric Wyoming qualifying facilities.

- REC 1-41: Please refer to page 18 and 21-22 of Daniel MacNeil’s testimony. Please the same graphs and tables, with prices for seasonal/irrigation hydroelectric, if different from any of the identified resource methodologies.
- REC 1-42: Please refer to page 25, line 8 to page 26, line 8 of Daniel MacNeil’s testimony. Please provide similar questions and answers for Schedule 37.
- REC 1-43: Please refer to page 7 of Mark Tourangeau’s testimony, Table 1. Please provide a complete list of al the QFs, including the name, location, size, resource type, rate type (Schedule 37 or 38), whether the QF is operating under its original or a replacement contract, and whether the QF is operational, under contract but not yet in operation, or in the pricing queue.
- REC 1-44: Please refer to page 19 of Mark Tourangeau’s testimony, “This is almost 4,500 MW of contracted renewable capacity since 2015 with PPAs of 15 years or less.” Please list each of the PPAs/projects reference and the specific contract term.
- REC 1-45: Since 2010, please identify the number of projects per year per state that have submitted interconnection requests, the number that were withdrawn, the number that were issued feasibility studies, the number that were issued system impact studies, the number that were issued facilities studies, and the number that executed interconnection agreements.
- REC 1-46: All projects that have submitted interconnection requests to PacifiCorp within a calendar year can be considered a “Yearly Cohort”. For each Yearly Cohort since 2010, please identify the average time between each of these interconnection milestones: a) the interconnection request, b) the execution of the feasibility study agreement, c) the completion of the feasibility study, d) the execution of the system impact study agreement, e) the completion of the system impact study, f) the execution of the facilities study agreement, g) the completion of the facilities study, h) initial tender of the interconnection agreement, and i) the execution of the interconnection agreement.
- REC 1-47: Since 2010, please identify the number of feasibility study reports, system impact study reports, and facilities study reports issued per month.

REC 1-48: For each year since 2010, please indicate the number of technical personnel employed by PacifiCorp to perform interconnection studies and prepare reports.

REC 1-49: Since 2010, please describe any consulting or other outsourcing arrangements that PacifiCorp has used in order to perform interconnection studies and prepare reports.

Respectfully submitted this 28th day of February, 2018.

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CERTIFICATE OF SERVICE

I hereby certify that, on this 28th day of February, 2019 the foregoing document was served via electronic mail or U.S. Mail, addressed to the following:

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