

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)	
METHODOLOGY AND REDUCED TERM)	RECORD NO. 15133
OF PURPA POWER PURCHASE)	
AGREEMENTS)	

**ROCKY MOUNTAIN COALITION FOR RENEWABLE ENERGY’S SECOND SET OF
DATA REQUESTS TO ROCKY MOUNTAIN POWER**

The Rocky Mountain Coalition for Renewable Energy (“RMCRE”), by and through their undersigned counsel, respectfully submit their second set of data requests to Rocky Mountain Power (“RMP”):

- 2.1 Please refer to page 5 of the Direct Testimony of Daniel J. MacNeil in this docket. Please provide all PDDRR studies performed by PacifiCorp in 2017 and 2018.
- 2.2 Please refer to page 5 of the Direct Testimony of Daniel J. MacNeil in this docket. Please identify all FERC accounts for which expenses recorded in such accounts are included in the PDDRR studies.
- 2.3 Please refer to “336 - WY Sch 37 - 1--- Avoided Cost Study _2018 09 25 Thm.xlsx” sheet “Table 3 EV2020 Wind_2020” cells C55 through C63. Please provide workpapers supporting the values contained in these cells, and the equivalent values for all “Table 3” sheets.
- 2.4 Please refer to page 5 of the Direct Testimony of Daniel J. MacNeil at lines 15-16. Please provide all policies, procedures, manuals or documents relating to how employees’ time is recorded, billed, allocated or assigned to specific projects, FERC accounts, or cost centers.
- 2.5 Please refer to page 5 of the Direct Testimony of Daniel J. MacNeil at lines 15-16. Please identify all projects or cost centers that PacifiCorp employees recorded, billed, allocated or assigned time to.
- 2.6 Please refer to page 6 of the Direct Testimony of Daniel J. MacNeil at lines 1 through 4. Please identify all generation related expenses that are not included in the FERC accounts

associated with the PDDRR studies; and explain why these expenses are properly excluded from the PDDRR studies.

- 2.7 Please refer to Exhibit 1 to the Application in this docket (the clean version of the proposed changes to Schedule 37). On proposed Sheet No. 37-1 of that Exhibit, in the second paragraph under the header “Applicable,” there is a phrase including the text “...MW of average monthly capacity and associated.” Is this text of the revised tariff written as PacifiCorp intends? If not, please provide a correction. If yes, please clarify what the term “and associated” refers to.
- 2.8 Please refer to Exhibit 1 to the Application in this docket (the clean version of the proposed changes to Schedule 37). Proposed Sheets 37-4 and 37-5 of that Exhibit contain tables that appear to have duplicate lines. For example, the table on Proposed Sheet 37-4 contains information on Firm Power Time of Delivery for Base Load QF Firm Energy Prices by year, but the final year on that table (2032) is the same year as the first year of that table on that page. Similarly, Proposed Sheet 37-5 contains Firm Power Time of Delivery for Wind QF Firm Energy Prices by year, but the final year on that table (2019) is the same year as the first year of that table on that page.

Are these pages written as intended? If not, please provide a correction.

- 2.9 Please refer to the Direct Testimony of Mark P. Tourangeau at page 7 table 1. Please provide the number of facilities, the annual energy, capacity, and amounts paid per year by schedule for Schedule 37 and 38 for 2016, 2017, and 2018.
- 2.10 Please refer to the Direct Testimony of Daniel J. MacNeil at page 7, line 20 to page 8 line 1. Please provide an extract of PacifiCorp’s energy trading platform for all transactions made in 2016, 2017, and 2018.
- 2.11 Please refer to the Direct Testimony of Daniel J. MacNeil at page 7, line 20 to page 8, line 1. Please provide all tables and supporting workpapers for PacifiCorp’s most recent IRP in native format.
- 2.12 Please refer to the Direct Testimony of Daniel J. MacNeil at page 7, line 20 to page 8, line 1. Please provide a list of all non-QF power purchase agreements entered into by PacifiCorp from 2010 to present. Please include the MW and MWH size, total dollar expense by year, duration, and type of agreement.
- 2.13 Please provide PacifiCorp’s most recent load resource balance, adopted for PacifiCorp internal business planning purposes, for the years 2020 through 2050, or as many years as PacifiCorp projects, whichever is less. For this load resource balance, please provide the end of operation date for each of PacifiCorp’s coal-fired generation.

- 2.14 Assume that PacifiCorp executes a QF contract that does not provide capacity payments because the Company has surplus capacity. Further assume that the following year, sufficient plant capacity is unexpectedly retired such that PacifiCorp is capacity deficit. In that hypothetical, would PacifiCorp's contract with the QF allow for the QF to receive capacity payments given the change in circumstances? If not, why not?
- 2.15 What circumstances can PacifiCorp identify by which a QF not receiving capacity payments pursuant to a contract would have such contract prices revised to receive capacity payments?
- 2.16 Please provide, by year, beginning in 2010, a list of PacifiCorp owned generation added, the nominal and real levelized cost of each such generation resources, before and after application of any realized or projected tax credits, the year by year actual and future projected mWh generated by such resources, and MW useable capacity rating for such resources.
- 2.17 For each year, beginning in 2010 through 2019, please provide PacifiCorp's then projected date(s) by which PacifiCorp would have a capacity deficit and/or an energy deficit.
- 2.18 For each year, beginning in 2010 through 2019, please provide the projected date by which a QF, if contracted for with that year, would begin to be paid capacity payments.
- 2.19 Please refer to page 7 of the Direct Testimony of Mark P. Tourangeau at lines 1-9. Please provide a table that contains the following information, by state, for Oregon, Idaho, Utah and Wyoming: for any QF that has been classified as being in the queue, beginning in 2010, the date the QF was classified as being in the queue, the kW capacity of the QF, the expected annual MWH production of the QF; and as applicable, the date of contract execution, the date that energy deliveries to PacifiCorp commenced, the actual kW's produced by year, and actual MWHs produced.
- 2.20 Please refer to page 16 of the Direct Testimony of Daniel J. MacNeil at lines 6-8. Is this testimony saying that the risk is one-sided such that it is not possible that purchasing a 20-year QF contract today will allow PacifiCorp to avoid having to purchase a more expensive resource option in the future?
- 2.21 Please refer to page 4 of the Direct Testimony of Mark P. Tourangeau at lines 20-23. Are you aware of any occasions where, because of changing market conditions, PacifiCorp or any other utility has negotiated an agreement to cease or decrease the purchase obligations of any QF?
- 2.22 Please refer to Page 4 of the Direct Testimony of Mark P. Tourangeau at lines 14-23. Please compare and contrast the extent to which costs are recoverable in retail rates,

for years 11 through 20, for a resource with substantive fixed costs, with an original expected life of 20 years, in the following two instances:

- 2.22.1 a QF resource no longer is operational at the end of year 10
- 2.22.2 a utility-owned rate based resource is no longer operational at the end of year 10.
- 2.23 Please refer to page 6 of the Direct Testimony of Mark P. Tourangeau at lines 5-11. Is it PacifiCorp's position that customers are no longer obligated to pay for any remaining fixed cost of a utility-owned resource, when the resource fails to operate or is no longer economic?
- 2.24 Please refer to page 6 of the Direct Testimony of Mark P. Tourangeau at lines 5-11.
 - 2.24.1 Is it standard practice for PacifiCorp to make payments to a QF if a QF ceases to operate?
 - 2.24.2 If a QF is expected to produce 100,000 kWh but in fact produces 90,000 kWh, does PacifiCorp pay the QF for the expected 100,000 or for the actual 90,000 kWh. Please explain.
- 2.25 Please refer to pages 7-8 of the Direct Testimony of Mark P. Tourangeau at Table 1 and Table 2. Please break out the information in the row labeled "Other States" category by each individual state included in that category.
- 2.26 Please refer to page 8 of the Direct Testimony of Mark P. Tourangeau at lines 2-8.
 - 2.26.1 Please explain the rights or options that exist that allow QFs sited in Montana to obtain access to Wyoming avoided costs? For example, does PacifiCorp have any retail customers located in Montana?
 - 2.26.2 Alternatively, did the potential QFs provide any communications to PacifiCorp that implied they could not economically operate under Northwestern's avoided cost paradigm/environment?
- 2.27 Please refer to page 9 of the Direct Testimony of Mark P. Tourangeau, beginning at line 18. Is it Mr. Tourangeau's testimony that any longer-term power purchase contract and/or any generation resource addition since the 1990s was consistent with its at-the-time approved IRP?
- 2.28 Please refer to page 12 of the Direct Testimony of Mark P. Tourangeau at lines 14-19. Please explain the credit risk to customers caused by the QF obligation and how that is differentiated from the credit risk associated with a resource identified in an IRP.

- 2.29 Please refer to page 13 of the Direct Testimony of Mark P. Tourangeau at lines 1-13. Has the Company entered into any non-QF power purchase agreements that turned out to be out-of-the money? Please include in your response a discussion of the West Valley purchase and Cholla power purchase agreement.
- 2.30 Please refer to page 15 of the Direct Testimony of Mark P. Tourangeau, beginning at line 4. Please explain the benefits and drawbacks of the remedy to allow PacifiCorp to update its avoided cost assuming a MW threshold is reached for new QFs meeting the threshold with regards to commercial operation date?
- 2.31 Please refer to page 17 of the Direct Testimony of Mark P. Tourangeau at lines 13-21. Would PacifiCorp be willing to build and construct large generation projects if it were guaranteed prices for only the first seven years of the project similar to the prices proposed in this filing?
- 2.32 Please refer to Page 18 of the Direct Testimony of Mark P. Tourangeau at line 6-19 through Page 19, line 11.
- 2.32.1 What MW percentage of all projects listed are for contract terms of seven years or less?
- 2.32.2 What MW percentage of all projects listed are for contract terms of ten years or less?
- 2.32.3 What MW percentage of all projects listed was for newly constructed facilities?
- 2.32.4 What MW percentage of projects was located in Wyoming?
- 2.32.5 What was the total MW of renewable PPAs for contract terms greater than 15 years signed since 2015?
- 2.33 Please refer to page 19 of the Direct Testimony of Mark P. Tourangeau at lines 6-11. Please compare the current and projected power prices available in Carson County Texas (or Ercot) to the PacifiCorp current and proposed avoided costs for Wind. Provide a listing of all data sources utilized to provide your response.
- 2.34 Please refer to page 24 of the Direct Testimony of Mark P. Tourangeau at lines 12 - 18. Is the intent of PacifiCorp's seven-year proposal to place QFs on an even playing field with the Company? What is the intent or meaning of the term "even playing field"? Even with whom? Does this section of testimony apply to both small and large QFs? If so, please describe.
- 2.35 Please describe in general terms how the size of the queue in terms of MWs can affect the avoided cost determination. For example assume there are 25 MW, 50 MW, 250 MW,

1000 MW and 2000 MW in the queue for Wyoming wind. Using all other assumptions that Rocky Mountain Power used in developing its proposed changes to the avoided cost methodology, other than the size of the queue, provide a new version of Table 2 on Page 15 of the Direct Testimony of Daniel J. MacNeil, with avoided costs displayed for each of the size of queues.

2.35.1 How many MWs did Rocky Mountain Power assume were in the queue in deriving its Table 2 as provided in Mr. MacNeil's testimony?

2.36 For terms of whether generation resources are deficient or sufficient, is that determination made for PacifiCorp overall (both east and west), by operating divisions Pacific Power and Rocky Mountain, or by State? Please describe and relate how this conforms with the IRP and any other business planning activities as warranted.

2.37 Please refer to page 21 of the Direct Testimony of Daniel J. MacNeil, at Table 3. Please reference the data in columns labeled Updated Current Method and Proposed Method (20 year term).

2.37.1 Does Rocky Mountain Power agree that the proposed method results in a smaller change (on a percentage basis) for wind resources than for fixed solar or tracking solar?

2.37.2 If yes, please explain the reasons that the proposed method results in a smaller change for wind resources than for fixed solar or tracking solar. To what extent, if any, does the difference relate to the proposed changes to peak hours?

2.38 Please provide access to PacifiCorp's Generation and Regulation Initiative Decision Tool (GRID) and access to the GRID project(s) / scenario(s) relevant to this proceeding to the following Rocky Mountain Coalition for Renewable Energy (RMCRE) consultants:

Lance Kaufman
Aegis Insight
4801 W. Yale Avenue
Denver, CO 80219
Tel: 541-515-0380
Email: lance@aegisinsight.com

Marc Hellman
MH Energy Economics, LLC
2760 NW Eagle Eye Avenue
Salem, OR 97304
Tel: 503-290-4660
Email: drmarshallman@mhenergyeconomics.com

Please provide GRID and Partial Displacement Differential Revenue Requirement (PDDRR) work papers relevant to this proceeding.

Please provide your responses to the following:

Phillip J. Russell
HATCH, JAMES & DODGE, P.C.
10 West Broadway, Suite 400
Salt Lake City, Utah 84101
prussell@hjdllaw.com
Motion for Admission *pro hac vice* to be filed

Dale W. Cottam
Ronald J. Lopez
Bailey | Stock | Harmon | Cottam | Lopez LLP
80 East 1st Ave. | P.O. Box 850
Afton, WY 83110
dale@performance-law.com
ronnie@performance-law.com

This request includes a request for any responsive confidential or proprietary information. Each counsel and consultant for RMCRE who will be given access to confidential information has executed or will prior to such access execute a Nondisclosure Agreement under Exhibit A to the Protective Order entered in this docket, and the requested information will be treated in accordance with the terms of said rule and/or protective order.

Dated this 22nd day of March, 2019.



By:

Phillip J. Russell
HATCH, JAMES & DODGE, P.C.
10 W. Broadway, Suite 400
Salt Lake City, UT 84101
Phone: (801) 363-6363
prussell@hjdllaw.com



Dale W. Cottam
Ronald J. Lopez
Bailey | Stock | Harmon | Cottam | Lopez LLP
80 E. 1st Ave. | Box 850
Afton WY 83110
Phone: (307) 459-1120
dale@performance-law.com
ronnie@performance-law.com

***ATTORNEYS FOR ROCKY MOUNTAIN
COALITION FOR RENEWABLE ENERGY***

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of March, 2019, a true and correct copy of the ROCKY MOUNTAIN COALITION FOR RENEWABLE ENERGY'S SECOND SET OF DATA REQUESTS TO ROCKY MOUNTAIN POWER was sent via electronic mail addressed to the following:

Yvonne R. Hogle
Jacob A. McDermott
Assistant General Counsel
Rocky Mountain Power
1407 W. North Temple, Suite 320
Salt Lake City, UT 84116
yvonne.hogle@pacificorp.com
jacob.mcdermott@pacificorp.com

Christopher Leger
Wyoming Office of Consumer Advocate
2515 Warren Avenue, Suite 304
Cheyenne, WY 82002
Christopher.leger@wyo.gov

Irion A. Sanger
Sanger Law, P.C.
1117 SE 53rd Avenue
Portland, OR 97215
irion@sanger-law.com
marie@sanger-law.com

Crystal J. McDonough
Callie Capraro
McDonough Law LLC
1635 Foxtrail Drive
Loveland, CO 80538
crystal@mcdonoughlawllc.com
callie@mcdonoughlawllc.com

Michelle Brandt King
Abigail C. Briggerman
Holland & Hart LLP
6380 South Fiddlers Green Circle, Suite 500
Greenwood Village, CO 80111
mbking@hollandhart.com
acbriggerman@hollandhart.com
aclee@hollandhart.com

Renewable Energy Coalition
Attn: John Lowe
P.O. Box 25576
Portland, OR 97298
jravenesanmarcos@yahoo.com

Stacy Splittstoesser
Wyoming Regulatory Affairs Manager
Rocky Mountain Power
315 West 27th Street
Cheyenne, WY 82001
stacy.splittstoesser@pacificorp.com

Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232
datarequest@pacificorp.com


