

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 AND TWO RIVERS WIND,
LLC'S SEVENTH SET OF DATA REQUESTS TO ROCKY MOUNTAIN POWER**

The Wyoming Industrial Energy Consumers (“WIEC”) and Two Rivers Wind, LLC (“Two Rivers Wind”), by and through their undersigned counsel, Holland & Hart LLP, respectfully submit their seventh 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 April 1, 2019 unless an earlier date is specified by the Wyoming Public Service Commission or by agreement between WIEC, 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.

SEVENTH SET OF DATA REQUESTS


WIEC/VK/TR 7-1: Please refer to Schedule 38, at Sections I.B.4 and I.B.5. Does Rocky Mountain Power provide Qualifying Facilities with a draft power purchase

agreement more than 39 months prior to the expected commercial operation date of the project? Please explain the policy or practice.

WIEC/VK/TR 7-2: Please refer to Schedule 38, at Sections I.B.4 and I.B.5. Does Rocky Mountain Power provide Qualifying Facilities with a draft power purchase agreement prior to the completion of a Feasibility Study, System Impact Study, or Facility Study for the project? Please explain the policy or practice.

Respectfully submitted this 22nd day of March, 2019.

HOLLAND & HART LLP

By: 
Michelle Brandt King, #7-5073

Abigail Briggerman, #7-5476

Hannah M. Oakes, *pro hac vice*

Holland & Hart LLP

6380 South Fiddlers Green Circle, Suite 500

Greenwood Village, CO 80111

Telephone: (303) 290-1600

mbking@hollandhart.com

acbriggerman@hollandhart.com

hmoakes@hollandhart.com

**ATTORNEYS FOR WIEC, AND TWO
RIVERS WIND, LLC**

CERTIFICATE OF SERVICE

I hereby certify that, on this 22nd day of March, 2019 the **WYOMING INDUSTRIAL ENERGY CONSUMERS AND TWO RIVERS WIND, LLC'S SEVENTH SET OF DATA REQUESTS TO ROCKY MOUNTAIN POWER** was served via electronic mail or U.S. 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

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

Phillip J. Russell
HATCH, JAMES & DODGE, P.C.
10 West Broadway, Suite 400
Salt Lake City, UT 84101
prussell@hjdllaw.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

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

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

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

s/ Adele C. Lee