

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 EIGHTH 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 eighth 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 4, 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.

EIGHTH SET OF DATA REQUESTS

WIEC/TR 8-1: Please refer to the Direct Testimony of Mr. Mark Tourangeau page 12, line 20 through page 13, line 13.

- a. Please identify each of the Company's wind and solar generation units that are currently in rate base.
- b. What is the annual output in MWH of each of the generation units listed in response to (a) for each of the past four years, 2015-2018?
- c. For each year, 2015-2018, what is the number of hours that each unit listed in response to (a) above was curtailed by the Company for economic dispatch purposes?

WIEC/TR 8-2: Please refer to the Direct Testimony of Mr. Tourangeau page 11, lines 18-21. The Company is currently seeking a CPCN for replacement of its Foote Creek I wind facilities. Is the proposed CPCN for Foote Creek I the result of a competitive solicitation? If so, please describe the competitive solicitation and provide a copy of the Request For Proposals (or equivalent) that was issued.

Respectfully submitted this 25th day of March, 2019.

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**ATTORNEYS FOR WIEC AND TWO RIVERS
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CERTIFICATE OF SERVICE

I hereby certify that, on this 25th day of March, 2019 the **WYOMING INDUSTRIAL ENERGY CONSUMERS AND TWO RIVERS WIND, LLC'S EIGHTH 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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