

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)
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**RENEWABLE ENERGY COALITION THIRD 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 submits its third set of data requests to Rocky Mountain Power (“RMP” or “Rocky Mountain Power”).

- 3.1 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 and 2000 MW in the queue for Wyoming wind. Using all other assumptions that Rocky Mountain used in developing its recommended avoided costs, other than the size of the queue, please provide a new version of Table 2 on Page 15 of MacNeil Direct Testimony, with avoided costs displayed for each of the size of queues. How many MWs in the queue did Rocky Mountain use in deriving its Table 2 as provided in testimony?

- 3.2 For terms of whether resource deficiency or sufficiency, is that determination made for Pacific Power overall (both east and west), by operating divisions PacifiCorp and Rocky Mountain, or by state? Please describe and relate how this conforms with IRP and any other business planning activities as warranted.

- 3.3 Regarding the Direct Testimony of Daniel MacNeil, page 21, Table 3, please identify and explain the reasons for the results shown in the Table where the Updated Current and Proposed Method for the 20-Year avoided cost estimates are fairly similar for Wind but are much more different for both types of Solar. To what extent, if any, does the difference relate to the proposed changes to peak hours?

- 3.4 Referring to Page 2 of Direct Testimony of Mark P. Tourangeau, line 16. Please provide:
a) the wording within the proposed tariffs that state that the maximum term of avoided cost pricing is seven years. b) Are the contracts other than pricing of longer term than seven years or are the purchase contract in its entirety is seven years and new contracts are required for each seven year term assuming the QF seeks the maximum seven year term.

- 3.5 Do QF applicants with a renewable resource have a choice of renewable or non-renewable avoided cost prices?
- 3.6 Referring to Page 7 of Direct Testimony of Mark P. Tourangeau, Table 1, for the 1987 MW of QF noted in the table, if these QFs were not available to the Company generation system, for what calendar years 2019 going forward, would the Company be capacity or resource deficit? In responding to that question, for the 1987 MW, and using the IRP Capacity Contribution Values as shown on Page 8 of MacNeil, what was the “effective capacity MWs” the Company derived? For the contracts that the QFs are operating under, how many of the 1987 MWs have avoided costs based on capacity values--meaning the Company was resource deficient for which the QFs allowed for deferral of Company IRP identified resource needs?
- 3.7 Please refer to Direct Testimony of Daniel J. MacNeil page 10 lines 5 to 15. Please provide workpapers demonstrating how the referenced calculations were made.

Respectfully submitted this 26th day of March, 2019.

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CERTIFICATE OF SERVICE

I hereby certify that, on this 26th day of March, 2019 the foregoing document was served via electronic mail, addressed to the following:

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