

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’S FOURTH 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 fourth set of data requests to Rocky Mountain Power (“RMP” or “Rocky Mountain Power”).

- 4.1 For the states of Wyoming, Washington, Idaho, Utah and Oregon please provide the number of QFs that commenced operation, by year, for the time period 2000 to the present, whether it was a small or large QF as defined in each state, the contract term of the contract, and the maximum contract term available as established by state regulatory commission order.
- 4.2 For any QF contract that RMP negotiates, that is large QFs, what is the average cost RMP incurs in carrying out the negotiations from start to close? Please provide all workpapers.
- 4.3 Is it RMP policy that any renewing QF in Wyoming is eligible to receive capacity payments regardless of whether RMP is resource deficient or sufficient? Please separately explain and identify RMP treatment for small and large QFs.
- 4.4 Please refer to Direct Testimony of Mark P. Tourangeau page 9 lines 6 through 12. Please provide all analysis available to PacifiCorp related to the economic benefit for Wyoming due to new generation “related construction jobs, permanent jobs, and tax revenues.”
- 4.5 Please refer to Direct Testimony of Mark P. Tourangeau page 9 lines 6 through 12. Does RMP agree that the economic benefits for Wyoming from QF projects should be considered when determining QF rates? If no, why is it notable that non-Wyoming QF projects produce less economic benefit than Wyoming QF projects?
- 4.6 Please refer to the Direct Testimony of Mark P. Tourangeau at table 1. For QFs in operation, what percentage have 2019 rates that include avoided capacity costs? If RMP

declines to provide such data, please provide the contract rate paid to each QF in 2019, and the workpapers originally used to generate the 2019 rates for each QF.

- 4.7 Please refer to the Direct Testimony of Daniel J. MacNeil page 14 lines 8 through 10. Was the referenced generation included as a deferrable resource in the calculation of any Wyoming QF rates? If no why not? If yes, please provide the related workpapers.
- 4.8 Please refer to the Direct Testimony of Daniel J. MacNeil page 14 lines 18 to 20. Were the referenced PPAs included as deferrable resources in the calculation of any Wyoming QF rates? If no why not? If yes, please provide the related workpapers.
- 4.9 Please refer to the Direct Testimony of Daniel J. MacNeil page 14 lines 18 to 20. Please provide the rates and other terms of the referenced PPAs.
- 4.10 Please refer to the PacifiCorp 2017 IRP Table 9.1.
 - a. Was the wind repowering in action item 1a included as a deferrable resource in the calculation of any Wyoming QF rates? If no, why not? If yes, please provide the dates that the resource was considered a deferrable resource and provide the related workpapers calculating the avoided capacity costs.
 - b. Was the wind generation associated with action item 1b included as a deferrable resource in the calculation of any Wyoming QF rates? If no, why not? If yes, please provide the dates that the resource was considered a deferrable resource and provide the related workpapers calculating the avoided capacity costs.
- 4.11 Please refer to the PacifiCorp 2015 IRP Update Table 6.1.
 - a. Was the Naughton Unit 3 conversion associated with action item 4a included as a deferrable resource in the calculation of any Wyoming QF rates? If no, why not? If yes, please provide the dates that the resource was considered a deferrable resource and provide the related workpapers calculating the avoided capacity costs.
 - b. Was the SCR installation for Bridger 1 and 2 discussed in action item 5d ever included as part of a preferred portfolio for a PacifiCorp IRP or IPR update? If yes, please identify such IRPs.
 - c. Was the SCR installation for Bridger 1 and 2 discussed in action item 5d included as a deferrable resource in the calculation of any Wyoming QF rates? If no, why not? If yes, please provide the dates that the resource was considered a deferrable resource and provide the related workpapers calculating the avoided capacity costs.
- 4.12 Please refer to the PacifiCorp 2013 IRP Table 9.1.
 - a. Was the baghouse and low NOx burner for Hunter Unit 1 in action item 8b included as a deferrable resource in the calculation of any Wyoming QF rates? If no, why

not? If yes, please provide the dates that the resource was considered a deferrable resource and provide the related workpapers calculating the avoided capacity costs.

- b. Were the SCRs for Jim Bridger Units 3 and 4 in action item 8c included as a deferrable resource in the calculation of any Wyoming QF rates? If no, why not? If yes, please provide the dates that the resource was considered a deferrable resource and provide the related workpapers calculating the avoided capacity costs.

4.13 Please refer to the PacifiCorp 2011 IRP Table 9.1.

- a. Was the wind generation referenced in action item 1 included as a deferrable resource in the calculation of any Wyoming QF rates? If no why not? If yes, please provide the dates that the resource was considered a deferrable resource and provide the related workpapers calculating the avoided capacity costs.
- b. Was the CCCT referenced in action item 2 included as a deferrable resource in the calculation of any Wyoming QF rates? If no why not? If yes, please provide the dates that the resource was considered a deferrable resource and provide the related workpapers calculating the avoided capacity costs.

4.14 Please refer to the PacifiCorp 2011 IRP page 259 Action Item 1. Was any of the 348 MW of acquired wind included as a deferrable resource in the calculation of any Wyoming QF rates? If no why not? If yes, please provide the dates that the resource was considered a deferrable resource and provide the related workpapers calculating the avoided capacity costs.

4.15 Please identify the net plant investment PacifiCorp has made at new or existing generation facilities and at new or existing transmission facilities that transferred to plan-in-service from January 1, 2010 to present.

4.16 Please identify the net plant investment PacifiCorp expects to make at new or existing generation facilities and at new or existing transmission facilities that would transferred to plan-in-service from present to December 31, 2024.

4.17 Please provide PacifiCorp's current 10-year business plan and related workpapers.

4.18 Please provide PacifiCorp's net non-firm market purchases in MW during the annual system peak for each year from 2009 to present.

4.19 Please provide PacifiCorp's net firm short term non-QF market purchases in MW during the annual system peak for each year from 2009 to present.

4.20 Please provide PacifiCorp's net firm long term non-QF market purchases in MW during the annual system peak for each year from 2009 to present.

4.21 Please identify each capacity resource acquired by PacifiCorp from 2009 to present, including PPAs. Please provide the resource capacity, contribution to annual peak, the

resource type, the date acquired, the date energy was first received, and the dates that the resource was considered a deferrable resource by PacifiCorp for the purpose of setting Wyoming QF purchase rates.

- 4.22 Please refer to the Direct Testimony of Mark P. Tourangeau, page 15 lines 1 through 4.
- a. Please provide all numeric analysis performed by PacifiCorp comparing the risk of seven-year QF contracts with the risk of 20-year QF contracts.
 - b. Please provide all non-numeric analysis performed by PacifiCorp comparing the risk of seven-year QF contracts with the risk of 20 year QF contracts.
 - c. Does PacifiCorp believe that an eight-year term would also reduce “the overall risks associated with the Company entering into long-term, fixed-price PPAs with QFs”? If yes, why did PacifiCorp propose a seven-year term rather than an eight-year term? If no, why not?
 - d. Does PacifiCorp have any basis, other than reduced risk, for recommending a maximum contract length of seven years? If yes, please provide reference to testimony identifying such basis.
- 4.23 Please refer to the Direct Testimony of Mark P. Tourangeau, page 2 lines 15 to 17. If PacifiCorp executes a seven-year QF PPA, does PacifiCorp intend to model such PPA as capacity resource in future IRPs? If yes, will PacifiCorp only include such resources as capacity resources during the duration of the term of the PPA?
- 4.24 Please refer to the Direct Testimony of Daniel J. MacNeil, page 17 lines 5 through 7. Does PacifiCorp’s PDDRR method for Schedule 37 also model an addition of a 50 MW QF? If yes, please refer to the Direct Testimony of Mark P. Tourangeau, page 3, lines 8 through 13 and explain why the Schedule 37 pricing switches at 10 MW rather than 50 MW.

Respectfully submitted this 28th day of March, 2019.

BAILEY | STOCK | HARMON | COTTAM | LOPEZ LLP



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CERTIFICATE OF SERVICE

I hereby certify that, on this 28th day of March, 2019 the foregoing document was served via electronic mail, addressed to the following:

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