

**BEFORE THE PUBLIC SERVICE COMMISSION OF WYOMING**

<p>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</p>	<p>DOCKET NO. 20000-545-ET-18 (Record No. 15133)</p>
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**RENEWABLE ENERGY COALITION’S FIFTH 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 fifth set of data requests to Rocky Mountain Power (“RMP” or “Rocky Mountain Power”).

- 5.1 Please refer to the file “Copy of On-Off Peak Designation (1806 OFPC) CONF.xlsx” in “Attach REC 1.1-2 CONF.zip”.
  - a. Please provide the forward price curves over the same time period for each location RMP trades energy at.
  - b. Please provide the actual average prices from 1999 to present for each location RMP trades energy at.
  - c. Please provide all models and analysis used to generate the forward price curves provided in response to this request, and the forward price curve included in the referenced file.
- 5.2 Does RMP intend to use the on-off peak hours defined in the Direct Testimony of Daniel J. MacNeil, page 25 for any non-QF related filings in Wyoming? If yes, please identify such filings. If no, why not?
- 5.3 Is RMP aware of any other state commission that has uses non-standard on-peak and off-peak hours definition for setting QF rates? If yes please identify all such commissions.
- 5.4 Please provide the loads, market prices, and fuel prices used for each generating resource in the following analyses:
  - a. RMP’s most recent 10 year business plan;

- b. 2019 IRP;
  - c. 2017 IRP Update;
  - d. 2020 NVPC forecast;
  - e. 2019 NVPC forecast; and
  - f. GRID model results included in “Attach REC 1.1-2 CONF.
- 5.5 Please provide all workpapers used to forecast thermal generation fuel prices used as input to the GRID models calculating the proposed Schedule 37 rates.
- 5.6 Please provide the actual fuel cost per MWh by month from 2010 to present for each thermal resource included in the GRID model. If RMP declines to provide such data please provide NVPC workpapers necessary to perform such calculations.
- 5.7 Please refer to “2018 Actual NPC Report CONF.xlsx” provided in response to REC 1.34. For each long term firm purchase (Rows 32 to 52) please indicate if RMP received renewable energy certificates with the associated energy.
- 4.8 Please refer to the Direct Testimony of Daniel J. MacNeil page 10 lines 18-20. Please also refer to Table 6.1 of the PacifiCorp 2017 IRP. Please provide the results of PacifiCorp’s System Optimizer portfolio generation using RMP’s most recently evaluated base case assumptions. Please include revenue requirement, capacity expansion, loss of load, and all other normal System Optimizer outputs. If RMP declines to provide such data please provide remote access to RMP’s System Optimizer program, and all the tools, inputs, and manuals necessary to perform such analysis. Please include results separately for each of the following base case scenarios and equivalent resource type if the 2017 IRP resource type is out of date:
- a. No modifications;
  - b. With a 50 MW “Generic Geothermal PPA 90% CF” resource added as an existing resource;
  - c. With a 50 MW “3.3 MW turbine 43% CF WY” resource added as an existing resource;
  - d. With a 50 MW “PV Poly-Si Fixed Tilt 26.8% AC CF (1.35 MWdc/Mwac) UT” resource added as an existing resource;
  - e. With a 50 MW “PV Poly-Si Single Tracking 31.1% AC CF (1.25 MWdc/Mwac) UT” resource added as an existing resource;
  - f. With no QF resources included as existing or new resources;

- g. With the contingent load and PPAs referenced in the Direct Testimony of Daniel J. MacNeil page 14 lines 18 to 22; and
  - h. Without the contingent load and PPAs referenced in the Direct Testimony of Daniel J. MacNeil page 14 lines 18 to 22.
- 4.9 Please refer to the Direct Testimony of Daniel J. MacNeil page 14 lines 9 to 10. Please provide related contracts or other documentation demonstrating these resources are committed.
- 4.10 Please refer to the Direct Testimony of Daniel J. MacNeil page 14 lines 18 to 22.
- a. Please provide all contracts related to the referenced contingent load.
  - b. Could the contingent nature of this load be satisfied by new QF generation? If no, why not?
  - c. Did PacifiCorp conduct an RFP to secure the referenced PPAs through an RFP process? If yes please provide the referenced RFP. If no, why not?
  - d. Please provide all modeling performed by RMP to determine the long term system wide impacts of the additional load and the additional PPA on revenue requirement, system balancing costs, renewable integration costs, transmission constraints, and the impact on the economic value and risk of the 2017 IRP Update preferred portfolio.
  - e. Please provide the forecasted shape, monthly peak, and monthly energy of the referenced contingent load from 2019 to 2039.
  - f. Please provide the forecasted shape, contribution to monthly peak, and monthly energy of the referenced PPAs.

Respectfully submitted this 29th day of March, 2019.

BAILEY | STOCK | HARMON | COTTAM | LOPEZ LLP

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## CERTIFICATE OF SERVICE

I hereby certify that, on this 29th day of March, 2019 the foregoing document was served via electronic mail, addressed to the following:

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