

**BEFORE THE PUBLIC SERVICE COMMISSION OF WYOMING**

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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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**WYOMING INDUSTRIAL ENERGY CONSUMERS, VK CLEAN ENERGY  
PARTNERS, LLP, AND TWO RIVERS WIND, LLC'S THIRD SET OF DATA  
REQUESTS TO ROCKY MOUNTAIN POWER**

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The Wyoming Industrial Energy Consumers (“WIEC”), VK Clean Energy Partners, LLP (“VK Clean Energy”), and Two Rivers Wind, LLC (“Two Rivers Wind”), by and through their undersigned counsel, Holland & Hart LLP, respectfully submit their third 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 March 14, 2019 unless an earlier date is specified by the Wyoming Public Service Commission or by agreement between WIEC, VK Clean Energy, 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.

### **THIRD SET OF DATA REQUESTS**

WIEC/VK/TR 3-1: Please provide the lowest, average, and maximum number of months that it has taken PacifiCorp to finalize a feasibility study under the Large Generator Interconnection Procedures, for completed feasibility study requests submitted:

- a. During calendar year 2015;
- b. During calendar year 2016;
- c. During calendar year 2017;
- d. During calendar year 2018; and
- e. During calendar year 2019.

For calendar years in which the completed feasibility study request was submitted to PacifiCorp, but for which the study has not yet been completed, please provide the estimated number of months for the completion of the study.

WIEC/VK/TR 3-2: Please provide the lowest, average, and maximum number of months that it has taken PacifiCorp to finalize a system impact study under the Large Generator Interconnection Procedures, for completed system impact study requests submitted:

- a. During calendar year 2015;
- b. During calendar year 2016;
- c. During calendar year 2017;
- d. During calendar year 2018; and
- e. During calendar year 2019.

For calendar years in which the completed system impact study request was submitted to PacifiCorp, but for which the study has not yet been completed, please provide the estimated number of months for the completion of the study.

WIEC/VK/TR 3-3: Please provide the lowest, average, and maximum number of months that it has taken PacifiCorp to finalize a facilities study under the Large Generator Interconnection Procedures, for completed facilities study requests submitted:

- a. During calendar year 2015;

- b. During calendar year 2016;
- c. During calendar year 2017;
- d. During calendar year 2018; and
- e. During calendar year 2019.

For calendar years in which the completed facilities study request was submitted to PacifiCorp, but for which the study has not yet been completed, please provide the estimated number of months for the completion of the study.

- WIEC/VK/TR 3-4: Beginning January 1, 2015 and continuing to the present, please identify the Qualifying Facility (“QF”) projects that have initiated the Wyoming Schedule 38 process and gone on to execute a power purchase agreement. For each project identified, please identify the capacity of the project, the resource or fuel type, and the number of months between the initiation of the Schedule 38 process and the date of the execution of the power purchase agreement. For purposes of this request, the QF’s first request for indicative pricing is the initiation of the Schedule 38 process.
- WIEC/VK/TR 3-5: Please provide copies of all documents that discuss RMP’s interpretation of, or application of, the Schedule 38 terms to Wyoming QFs.
- WIEC/VK/TR 3-6: To the extent not already provided in response to Request 3-5, please state under what circumstances RMP may refuse to provide indicative pricing pursuant to Section I.B.2 of Schedule 38.
- WIEC/VK/TR 3-7: Please refer to RMP’s Wyoming Schedule 38, at Section I.B.4. To the extent not already provided in response to Request 3-5, please state with specificity any “additional Project information” that RMP believes is “necessary for the preparation of a draft power purchase agreement” that is not already specifically identified in Section I.B.4. That is, please state with specificity RMP’s interpretation of this section of Schedule 38.
- WIEC/VK/TR 3-8: Please refer to RMP’s Wyoming Schedule 38, at Section I.B.4(f). To the extent not already provided in response to Request 3-5, please state with specificity what evidence QFs are generally required to provide to RMP in order to demonstrate to RMP’s satisfaction that “any necessary interconnection studies have been completed and assurance that the necessary interconnection arrangements are being made in accordance with Part II.”
- WIEC/VK/TR 3-9: Please state with specificity the differences between a Network Resource study conducted by PacifiCorp for a QF project and a non-QF project. Please explain the basis for any differences between the studies.

WIEC/VK/TR 3-10: Please state how RMP treats battery storage QFs for avoided cost pricing purposes. That is, does RMP provide battery storage QFs avoided cost pricing based on the type of fuel source used behind the battery storage? Or does RMP intend on pricing battery storage QFs as its own category of QF.

WIEC/VK/TR 3-11: Please refer to the Direct Testimony of Mr. Tourangeau page 7, Table 1, column entitled “QFs in Operation.” For the calendar year ending December 31, 2018, please provide the following for all renewable QFs that sold power to the Company during that time frame:

- a. Name of the QF;
- b. Location (State) of the QF;
- c. Year in which the then-applicable avoided cost rates were set;
- d. Capacity of the QF;
- e. Resource type (e.g., wind, solar) of the QF;
- f. Total kilowatt-hours purchased by the company from that QF;
- g. Average price paid by the Company to the QF (\$/MWh); and
- h. Total cost of the power purchased from the QF.

WIEC/VK/TR 3-12: Please refer to the Direct Testimony of Mr. Tourangeau page 7, Table 1, column entitled “QFs Under Contract not yet in Operation.” For each of the projects listed, please identify:

- a. Contract date;
- b. Location (State) of the QF;
- c. Contract period;
- d. Capacity of the QF;
- e. Resource type (e.g., wind, solar);
- f. Expected annual kilowatt-hours to be purchased by the Company; and
- g. Avoided cost price and term (\$/MWh).

WIEC/VK/TR 3-13: Please refer to the Direct Testimony of Mr. Tourangeau page 7, Table 1, column entitled “QFs in the Pricing Queue.” Based on this column:

- a. Please confirm that when Wyoming avoided costs are calculated under the current and proposed methods, none of the projects in this column are included in the calculation except for the specific QF seeking avoided cost pricing. If RMP does not confirm, please explain in detail why not.
- b. Have indicative prices been provided to any of the 24 Wyoming projects referenced in this column? If yes, please identify the most recent indicative price and term presented to each of the Wyoming projects that have received such pricing. For each project, please identify: (i) capacity of the QF, (ii) resource type, and (iii) expected annual kilowatt-hours to be purchased by the Company.
- c. For each of the Wyoming projects listed in this column that has received indicative prices, please indicate how many times the pricing has been updated.
- d. If Mr. Tourangeau's recommendations discussed on pages 31-35 of his Direct Testimony are adopted, would the new pricing, contract term, and contracting approach apply to each of the 24 Wyoming projects referenced in this column? For each project for which this recommendation would not apply, please explain the basis for this provision not applying.
- e. Have indicative prices been provided by any of the non-Wyoming projects referenced in this column? If yes, please identify the most recent indicative price and term presented to each of non-Wyoming projects that have received such pricing. For each project, identify: (i) capacity of the QF; (ii) location of the QF (State); (iii) resource type; and (iv) expected annual kilowatt-hours to be purchased by the Company.

WIEC/VK/TR 3-14: On p. 5, line 18 of his direct testimony, Mr. MacNeil describes the use of the IRP payment factor in developing the avoided fixed costs component of RMP's PDDRR method.

- a. Please provide the workpaper that derived the 7.106% IRP payment factor used in Mr. MacNeil's "336.2 – WY Sch 37 - 1--- Avoided Cost Study \_2018 09 28 W.xlsx" wind avoided cost workpaper.
- b. Please provide the workpaper that derived the 7.720% IRP payment factor used in Mr. MacNeil's "336.3 – WY Sch 37 - 1--- Avoided Cost Study \_2018 09 28 ST.xlsx." tracking solar avoided cost workpaper.
- c. Please provide the workpaper that derived the 7.720% IRP payment factor used in Mr. MacNeil's "336.4 – WY Sch 37 - 1--- Avoided Cost Study \_2018 09 28 SF.xlsx." fixed solar avoided cost workpaper.

WIEC/VK/TR 3-15: Please provide the workpaper that derived the 6.91% 2017 IRP Update discount rate used in Mr. MacNeil's workpapers.

Respectfully submitted this 4th day of March, 2019.

HOLLAND & HART LLP

By:   
Michelle Brandt King, #7-5073  
Abigail Briggerman, #7-5476  
Holland & Hart LLP  
6380 South Fiddlers Green Circle, Suite 500  
Greenwood Village, CO 80111  
Telephone: (303) 290-1600  
[mbking@hollandhart.com](mailto:mbking@hollandhart.com)  
[acbriggerman@hollandhart.com](mailto:acbriggerman@hollandhart.com)

**ATTORNEYS FOR WIEC, VK CLEAN  
ENERGY PARTNERS, LLP, AND TWO  
RIVERS WIND, LLC**

## CERTIFICATE OF SERVICE

I hereby certify that, on this 4th day of March, 2019 the **WYOMING INDUSTRIAL ENERGY CONSUMERS, VK CLEAN ENERGY PARTNERS, LLP, AND TWO RIVERS WIND, LLC'S THIRD 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](mailto:yvonne.hogle@pacificorp.com)  
[jacob.mcdermott@pacificorp.com](mailto:jacob.mcdermott@pacificorp.com)

Christopher Leger  
Wyoming Office of Consumer Advocate  
2515 Warren Avenue, Suite 304  
Cheyenne, WY 82002  
[Christopher.leger@wyo.gov](mailto:Christopher.leger@wyo.gov)

Crystal J. McDonough  
Callie Capraro  
McDonough Law LLC  
1635 Foxtrail Drive  
Loveland, CO 80538  
[crystal@mcdonoughlawllc.com](mailto:crystal@mcdonoughlawllc.com)  
[callie@mcdonoughlawllc.com](mailto:callie@mcdonoughlawllc.com)

Phillip J. Russell  
HATCH, JAMES & DODGE, P.C.  
10 West Broadway, Suite 400  
Salt Lake City, UT 84101  
[prussell@hjdllaw.com](mailto:prussell@hjdllaw.com)

Renewable Energy Coalition  
Attn: John Lowe  
P.O. Box 25576  
Portland, OR 97298  
[jravesanmarcos@yahoo.com](mailto:jravesanmarcos@yahoo.com)

Stacy Splittstoesser  
Wyoming Regulatory Affairs Manager  
Rocky Mountain Power  
315 West 27th Street  
Cheyenne, WY 82001  
[stacy.splittstoesser@pacificorp.com](mailto:stacy.splittstoesser@pacificorp.com)

Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232  
[datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

Michelle Brandt King  
Abigail C. Briggerman  
Holland & Hart LLP  
6380 South Fiddlers Green Circle  
Suite 500  
Greenwood Village, CO 80111  
[mbking@hollandhart.com](mailto:mbking@hollandhart.com)  
[acbriggerman@hollandhart.com](mailto:acbriggerman@hollandhart.com)  
[aclee@hollandhart.com](mailto: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](mailto:dale@performance-law.com)  
[ronnie@performance-law.com](mailto:ronnie@performance-law.com)

Irion A. Sanger  
Sanger Law, P.C.  
1117 SE 53rd Avenue  
Portland, OR 97215  
[irion@sanger-law.com](mailto:irion@sanger-law.com)  
[marie@sanger-law.com](mailto:marie@sanger-law.com)

s/ Gina Gargano-Amari