

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, VK CLEAN ENERGY
PARTNERS, LLP, AND TWO RIVERS WIND, LLC'S FIRST SET OF DATA
REQUESTS TO THE OFFICE OF CONSUMER ADVOCATE**

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 first set of data requests to the Office of Consumer Advocate (“OCA”). 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 February 11, 2019, unless an earlier date is specified by the Wyoming Public Service Commission or by agreement between WIEC, VK Clean Energy, and Two Rivers Wind, and the OCA.

DEFINITIONS

1. “OCA,” “the Office of Consumer Advocate,” or “you” means the Office of Consumer Advocate; any merged or consolidated predecessor or predecessors in interest; parent(s), subsidiaries and affiliates, past and present; and the employees, officers, directors, agents, consultants, attorneys and all persons acting under contractual arrangement with or acting or purporting to act on behalf of OCA.
2. “RMP,” “Rocky Mountain Power,” or “Company” means Rocky Mountain Power; any merged or consolidated predecessor or predecessors in interest; parent(s), subsidiaries and affiliates, past and present; and the employees, officers, directors, agents, consultants, attorneys and all

persons acting under contractual arrangement with or acting or purporting to act on behalf of Rocky Mountain Power.

3. “Document” and “documentation” should be interpreted as broadly as possible, including all documents which have been created and/or which reside in any type of electronic format. Any document that is not exactly identical to another document for any reason (such as marginal notations or deletions) is considered a separate document.
4. “Person” or “entity” should be interpreted to denote, unless otherwise specified, any natural person, firm, corporation, association, group, individual or organization of any type whatsoever.
5. “PSC” or “Commission” means the Wyoming Public Service Commission.
6. Any request to “identify” or “provide” should be interpreted to mean:
 - a. With respect to a natural person, that person’s full name, title, job description, and business and home address. Where the identification pertains to a past period, as to each person identified who is still in your employ, or the employment of the group with which such person is identified in response to any requests, provided, in addition, that person’s title and job description as of the time of such past period. Where the person is no longer in your employ or the employment of the group with which such person is identified in response to any request, provide that person’s affiliate, position, home and business address, if known, or if not known, such person’s last known affiliation, position, home and business address, or portions thereof as may be known.
 - b. With respect to an entity other than a natural person, that entity’s name, business, type of entity, present status and present or last known address.
 - c. With respect to a document, that document’s title, date, author (and, if different, the signer), addresses, recipients, or other persons who assisted in the preparation, subject matter or general nature, and any amendments thereto, present location and custodian, whether or not such document is in the respondent’s possession, custody or control and whether or not the document is claimed to be privileged. The final version and each draft of each document should be identified and produced separately. Each original and each non-identical copy (bearing marks or notations not found on the original) of each final version and draft of each document should be identified and produced separately.
 - d. With respect to a physical facility, the location of the facility, the intended purpose of the facility, the actual use of such facility, the operating dates of the facility, the installation date of the facility, the date utilization of the facility terminated if applicable, and whether the facility is subject to the jurisdiction of the Wyoming Public Service Commission, the Federal Energy Regulatory Commission, or any other regulatory body.

7. "Communication" should be interpreted to include, but not be limited to, all forms of communication, whether written, printed, oral, pictorial, electronic, or otherwise and by any means or type whatsoever.
8. "Relating To" or "Related To" means pertaining to, presenting, discussing, commenting on, analyzing, or mentioning in any way.

GENERAL INSTRUCTIONS

1. Where a request can be answered in whole or in part by reference to the response to a preceding or subsequent request, it is sufficient to so indicate by specifying the response to the preceding or subsequent request by number and specifying whether it is claimed that the response to the preceding or subsequent request is a full or partial response. If the latter, the response to the balance of the request shall be completed.
2. If various individuals are the authors of different responses to the data requests, please indicate the name of the author and his/her position within the Company. If the author is an expert or a consultant, please provide a current curriculum vitae for each such expert or consultant.
3. As to any requests consisting of a number of separate subparts, or related parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate request. Any objection to a request should clearly indicate to which part or portion of the request it is directed.
4. Responses to requests referring to documents shall include all documents relating to the time period specified in each request or in these instructions, whether prepared before, during or after that period.
5. If any document related to these data requests is not currently in the Company's possession but you know or believe such a document exists, please identify and indicate to the best of your ability its present or last known location or custodian.
6. Individual response of more than one page should be consecutively numbered.
7. If any document covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner:
 - a. the reasons for withholding;
 - b. date of the document;
 - c. name of each author or preparer;
 - d. name of each person who received the document; and
 - e. statement of facts constituting the basis for withholding the document.

8. If you assert that documents, records, or information responsive to any requests have been destroyed and are thus not available, state when and explain why any such document, record or information was destroyed, identify the person directing the destruction and identify all documents relevant to such destruction or explanation. If a claim is made that the destruction occurred pursuant to your document destruction program, identify and produce a copy of the guideline, policy, or company manual describing such document destruction program, and any correspondence or communication relating to the destruction of responsive documents, records or information.
9. If any of these requests are not answered on the ground that the material or information requested is confidential, privileged, or otherwise immune to discovery, set forth in detail the factual and legal basis which support your decision to withhold production.
10. Each document or written response shall designate the respective question (and subpart of the question) under which it is being produced.
11. Each document produced shall be an authentic original document or a true duplicate of an authentic original document.
12. Each of these requests shall be considered to be continuing and to require supplemental or amended answers as readily as information and knowledge is acquired.
13. If, in answering a request, you encounter any ambiguity in interpreting either the request or a definition or instruction applicable thereto, please secure a clarification by contacting undersigned counsel as soon as the ambiguity is known.
14. The term “and” and “or” should be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of each request any information or document which might otherwise be considered to be beyond its scope.
15. The singular form of a word should be interpreted as plural, and the plural form of a word should be interpreted as singular, whenever appropriate in order to bring within the scope of each request.

FIRST SET OF DATA REQUESTS

- WIEC/VK/TR 1-1: Please provide a copy of all responses to data requests submitted to you in this proceeding by any and all other parties, including the Wyoming Public Service Commission or its Staff.
- WIEC/VK/TR 1-2: Please provide copies of all workpapers that are used to develop or which support your Testimony and Exhibits in this docket in native format with all cells and formulae intact. To the extent that such workpapers exist in paper form only, please provide paper copies to the undersigned.

Respectfully submitted this 30th day of January, 2018.

HOLLAND & HART LLP

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

CERTIFICATE OF SERVICE

I hereby certify that, on this 30th day of January, 2019 the **WYOMING INDUSTRIAL ENERGY CONSUMERS, VK CLEAN ENERGY PARTNERS, LLP, AND TWO RIVERS WIND, LLC'S FIRST SET OF DATA REQUESTS TO THE OFFICE OF CONSUMER ADVOCATE** was served via electronic mail or U.S. Mail, addressed to the following:

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s/ Adele C. Lee

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, VK CLEAN ENERGY
PARTNERS, LLP, AND TWO RIVERS WIND, LLC'S FIRST SET OF DATA
REQUESTS TO NORTHERN LARAMIE RANGE ALLIANCE**

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 first set of data requests to Northern Laramie Range Alliance (“NLRA”). 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 February 11, 2019, unless an earlier date is specified by the Wyoming Public Service Commission or by agreement between WIEC, VK Clean Energy, and Two Rivers Wind, and NLRA.

DEFINITIONS

1. “NLRA,” “Northern Laramie Range Alliance,” or “you” means Northern Laramie Range Alliance; any merged or consolidated predecessor or predecessors in interest; parent(s), subsidiaries and affiliates, past and present; and the employees, officers, directors, agents, consultants, attorneys and all persons acting under contractual arrangement with or acting or purporting to act on behalf of NLRA.
2. “RMP,” “Rocky Mountain Power,” or “Company” means Rocky Mountain Power; any merged or consolidated predecessor or predecessors in interest; parent(s), subsidiaries and affiliates, past and present; and the employees, officers, directors, agents, consultants, attorneys and all

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 - c. With respect to a document, that document’s title, date, author (and, if different, the signer), addresses, recipients, or other persons who assisted in the preparation, subject matter or general nature, and any amendments thereto, present location and custodian, whether or not such document is in the respondent’s possession, custody or control and whether or not the document is claimed to be privileged. The final version and each draft of each document should be identified and produced separately. Each original and each non-identical copy (bearing marks or notations not found on the original) of each final version and draft of each document should be identified and produced separately.
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FIRST SET OF DATA REQUESTS

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Respectfully submitted this 30th day of January, 2018.

HOLLAND & HART LLP

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

CERTIFICATE OF SERVICE

I hereby certify that, on this 30th day of January, 2019 the **WYOMING INDUSTRIAL ENERGY CONSUMERS, VK CLEAN ENERGY PARTNERS, LLP, AND TWO RIVERS WIND, LLC'S FIRST SET OF DATA REQUESTS TO NORTHERN LARAMIE RANGE ALLIANCE** was served via electronic mail or U.S. Mail, addressed to the following:

Yvonne R. Hogle
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s/ Adele C. Lee

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

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 first set of data requests to Rocky Mountain Coalition for Renewable Energy (“RMCRE”). 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 February 11, 2019, unless an earlier date is specified by the Wyoming Public Service Commission or by agreement between WIEC, VK Clean Energy, and Two Rivers Wind, and RMCRE.

DEFINITIONS

1. “RMCRE,” “Rocky Mountain Coalition for Renewable Energy,” or “you” means Rocky Mountain Coalition for Renewable Energy; any merged or consolidated predecessor or predecessors in interest; parent(s), subsidiaries and affiliates, past and present; and the employees, officers, directors, agents, consultants, attorneys and all persons acting under contractual arrangement with or acting or purporting to act on behalf of RMCRE.
2. “RMP,” “Rocky Mountain Power,” or “Company” means Rocky Mountain Power; any merged or consolidated predecessor or predecessors in interest; parent(s), subsidiaries and affiliates, past and present; and the employees, officers, directors, agents, consultants, attorneys and all

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 - b. With respect to an entity other than a natural person, that entity’s name, business, type of entity, present status and present or last known address.
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**ATTORNEYS FOR WIEC, VK CLEAN
ENERGY PARTNERS, LLP, AND TWO
RIVERS WIND, LLC**

CERTIFICATE OF SERVICE

I hereby certify that, on this 30th day of January, 2019 the **WYOMING INDUSTRIAL ENERGY CONSUMERS, VK CLEAN ENERGY PARTNERS, LLP, AND TWO RIVERS WIND, LLC'S FIRST SET OF DATA REQUESTS TO ROCKY MOUNTAIN COALITION FOR RENEWABLE ENERGY** was served via electronic mail or U.S. Mail, addressed to the following:

Yvonne R. Hogle
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s/ Adele C. Lee _____

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, VK CLEAN ENERGY
PARTNERS, LLP, AND TWO RIVERS WIND, LLC'S FIRST SET OF DATA
REQUESTS TO RENEWABLE ENERGY COALITION**

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 first set of data requests to Renewable Energy Coalition (“REC”). 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 February 11, 2019, unless an earlier date is specified by the Wyoming Public Service Commission or by agreement between WIEC, VK Clean Energy, and Two Rivers Wind, and REC.

DEFINITIONS

1. “REC,” “Renewable Energy Coalition,” or “you” means Renewable Energy Coalition; any merged or consolidated predecessor or predecessors in interest; parent(s), subsidiaries and affiliates, past and present; and the employees, officers, directors, agents, consultants, attorneys and all persons acting under contractual arrangement with or acting or purporting to act on behalf of RMCRE.
2. “RMP,” “Rocky Mountain Power,” or “Company” means Rocky Mountain Power; any merged or consolidated predecessor or predecessors in interest; parent(s), subsidiaries and affiliates, past and present; and the employees, officers, directors, agents, consultants, attorneys and all

persons acting under contractual arrangement with or acting or purporting to act on behalf of Rocky Mountain Power.

3. “Document” and “documentation” should be interpreted as broadly as possible, including all documents which have been created and/or which reside in any type of electronic format. Any document that is not exactly identical to another document for any reason (such as marginal notations or deletions) is considered a separate document.
4. “Person” or “entity” should be interpreted to denote, unless otherwise specified, any natural person, firm, corporation, association, group, individual or organization of any type whatsoever.
5. “PSC” or “Commission” means the Wyoming Public Service Commission.
6. Any request to “identify” or “provide” should be interpreted to mean:
 - a. With respect to a natural person, that person’s full name, title, job description, and business and home address. Where the identification pertains to a past period, as to each person identified who is still in your employ, or the employment of the group with which such person is identified in response to any requests, provided, in addition, that person’s title and job description as of the time of such past period. Where the person is no longer in your employ or the employment of the group with which such person is identified in response to any request, provide that person’s affiliate, position, home and business address, if known, or if not known, such person’s last known affiliation, position, home and business address, or portions thereof as may be known.
 - b. With respect to an entity other than a natural person, that entity’s name, business, type of entity, present status and present or last known address.
 - c. With respect to a document, that document’s title, date, author (and, if different, the signer), addresses, recipients, or other persons who assisted in the preparation, subject matter or general nature, and any amendments thereto, present location and custodian, whether or not such document is in the respondent’s possession, custody or control and whether or not the document is claimed to be privileged. The final version and each draft of each document should be identified and produced separately. Each original and each non-identical copy (bearing marks or notations not found on the original) of each final version and draft of each document should be identified and produced separately.
 - d. With respect to a physical facility, the location of the facility, the intended purpose of the facility, the actual use of such facility, the operating dates of the facility, the installation date of the facility, the date utilization of the facility terminated if applicable, and whether the facility is subject to the jurisdiction of the Wyoming Public Service Commission, the Federal Energy Regulatory Commission, or any other regulatory body.

7. "Communication" should be interpreted to include, but not be limited to, all forms of communication, whether written, printed, oral, pictorial, electronic, or otherwise and by any means or type whatsoever.
8. "Relating To" or "Related To" means pertaining to, presenting, discussing, commenting on, analyzing, or mentioning in any way.

GENERAL INSTRUCTIONS

1. Where a request can be answered in whole or in part by reference to the response to a preceding or subsequent request, it is sufficient to so indicate by specifying the response to the preceding or subsequent request by number and specifying whether it is claimed that the response to the preceding or subsequent request is a full or partial response. If the latter, the response to the balance of the request shall be completed.
2. If various individuals are the authors of different responses to the data requests, please indicate the name of the author and his/her position within the Company. If the author is an expert or a consultant, please provide a current curriculum vitae for each such expert or consultant.
3. As to any requests consisting of a number of separate subparts, or related parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate request. Any objection to a request should clearly indicate to which part or portion of the request it is directed.
4. Responses to requests referring to documents shall include all documents relating to the time period specified in each request or in these instructions, whether prepared before, during or after that period.
5. If any document related to these data requests is not currently in the Company's possession but you know or believe such a document exists, please identify and indicate to the best of your ability its present or last known location or custodian.
6. Individual response of more than one page should be consecutively numbered.
7. If any document covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner:
 - a. the reasons for withholding;
 - b. date of the document;
 - c. name of each author or preparer;
 - d. name of each person who received the document; and
 - e. statement of facts constituting the basis for withholding the document.

8. If you assert that documents, records, or information responsive to any requests have been destroyed and are thus not available, state when and explain why any such document, record or information was destroyed, identify the person directing the destruction and identify all documents relevant to such destruction or explanation. If a claim is made that the destruction occurred pursuant to your document destruction program, identify and produce a copy of the guideline, policy, or company manual describing such document destruction program, and any correspondence or communication relating to the destruction of responsive documents, records or information.
9. If any of these requests are not answered on the ground that the material or information requested is confidential, privileged, or otherwise immune to discovery, set forth in detail the factual and legal basis which support your decision to withhold production.
10. Each document or written response shall designate the respective question (and subpart of the question) under which it is being produced.
11. Each document produced shall be an authentic original document or a true duplicate of an authentic original document.
12. Each of these requests shall be considered to be continuing and to require supplemental or amended answers as readily as information and knowledge is acquired.
13. If, in answering a request, you encounter any ambiguity in interpreting either the request or a definition or instruction applicable thereto, please secure a clarification by contacting undersigned counsel as soon as the ambiguity is known.
14. The term “and” and “or” should be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of each request any information or document which might otherwise be considered to be beyond its scope.
15. The singular form of a word should be interpreted as plural, and the plural form of a word should be interpreted as singular, whenever appropriate in order to bring within the scope of each request.

FIRST SET OF DATA REQUESTS

- WIEC/VK/TR 1-1: Please provide a copy of all responses to data requests submitted to you in this proceeding by any and all other parties, including the Wyoming Public Service Commission or its Staff.
- WIEC/VK/TR 1-2: Please provide copies of all workpapers that are used to develop or which support your Testimony and Exhibits in this docket in native format with all cells and formulae intact. To the extent that such workpapers exist in paper form only, please provide paper copies to the undersigned.

Respectfully submitted this 30th day of January, 2018.

HOLLAND & HART LLP

By: 
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Abigail Briggerman, #7-5476
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**ATTORNEYS FOR WIEC, VK CLEAN
ENERGY PARTNERS, LLP, AND TWO
RIVERS WIND, LLC**

CERTIFICATE OF SERVICE

I hereby certify that, on this 30th day of January, 2019 the **WYOMING INDUSTRIAL ENERGY CONSUMERS, VK CLEAN ENERGY PARTNERS, LLP, AND TWO RIVERS WIND, LLC'S FIRST SET OF DATA REQUESTS TO RENEWABLE ENERGY COALITION** was served via electronic mail or U.S. Mail, addressed to the following:

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s/ Adele C. Lee

BEFORE THE PUBLIC SERVICE COMMISSION OF WYOMING

IN THE MATTER OF THE APPLICATION OF)
ROCKY MOUNTAIN POWER FOR A) DOCKET NO. 20000-545-ET-18
MODIFICATION OF AVOIDED COST) RECORD NO. 15133
METHODOLOGY AND REDUCED)
CONTRACT TERM OF PURPA POWER)
PURCHASE AGREEMENTS)

**OCA RESPONSE TO WIEC, VK CLEAN ENERGY PARTNERS LLP, AND TWO
RIVERS WIND LLC'S FIRST SET OF DISCOVERY REQUESTS**

Submitted: January 31, 2019

1.1 Please provide a copy of all responses to data requests submitted to you in this proceeding by any and all other parties, including the Wyoming Public Service Commission or its Staff.

Response: The OCA has not received any data requests from any other party to date. Going forward, the OCA will provide all responses.

1.2 Please provide copies of all workpapers that are used to develop or which support your Testimony and Exhibits in this docket in native format with all cells and formulae intact. To the extent that such workpapers exist in paper form only, please provide paper copies to the undersigned.

Response: The OCA has not filed any testimony nor developed any workpapers to date. Concurrent with the filing of any such testimony or exhibits, the OCA will provide all workpapers.

DATED this 31st day of January, 2019.

OFFICE OF CONSUMER ADVOCATE

A handwritten signature in black ink, appearing to read "Chris Leger", written over a horizontal line.

Christopher Leger, Counsel
Wyoming Bar # 6-3963
Wyoming Office of Consumer Advocate
2515 Warren Avenue, Suite 304
Cheyenne, WY 82002
(307) 777-5709
christopher.leger@wyo.gov

CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2019, I served the foregoing OCA RESPONSE TO WIEC, VK CLEAN ENERGY PARTNERS LLP, AND TWO RIVERS WIND LLC'S FIRST SET OF DISCOVERY REQUESTS by delivering copies thereof to the individuals/entities below, by the method(s) indicated:

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BEFORE THE PUBLIC SERVICE COMMISSION OF WYOMING

**IN THE MATTER OF THE APPLICATION)
OF ROCKY MOUNTAIN POWER FOR A) Docket No. 20000-545-ET-18
MODIFICATION OF AVOIDED COST) (Record No. 15133)
METHODOLOGY AND REDUCED)
CONTRACT TERM OF PURPA POWER)
PURCHASE AGREEMENTS)**

**ROCKY MOUNTAIN COALITION FOR RENEWABLE ENERGY'S RESPONSE TO
WIEC, VK CLEAN ENERGY PARTNERS LLP, AND TWO RIVERS WIND LLC'S
FIRST SET OF DISCOVERY REQUESTS**

Submitted: February 13, 2019

1.1 Please provide a copy of all responses to data requests submitted to you in this proceeding by any and all other parties, including the Wyoming Public Service Commission or its Staff.

Response: Rocky Mountain Coalition for Renewable Energy has not received any data requests from any other party to date. Going forward, Rocky Mountain Coalition for Renewable Energy will provide all responses.

1.2 Please provide copies of all workpapers that are used to develop, or which support your Testimony and Exhibits in this docket in native format with all cells and formulae intact. To the extent that such workpapers exist in paper form only, please provide paper copies to the undersigned.

Response: Rocky Mountain Coalition for Renewable Energy has not filed any testimony nor developed any workpapers to date. Concurrent with the filing of any such testimony or exhibits, Rocky Mountain Coalition for Renewable Energy will provide all workpapers.

DATED this 13th day of February 2019.

ROCKY MOUNTAIN ENERGY COALITION
FOR RENEWABLE ENERGY

By: 

Dale W. Cottam

Bailey | Stock | Harmon | Cottam | Lopez LLP

80 E. 1st Ave. | Box 850

Afton, WY 83110

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dale@performance-law.com

CERTIFICATE OF SERVICE

I hereby certify that on February _____, 2019, I served the foregoing ROCKY MOUNTAIN COALITION FOR RENEWABLE ENERGY'S RESPONSE TO WIEC, VK CLEAN ENERGY PARTNERS LLP, AND TWO RIVERS WIND LLC'S FIRST SET OF DISCOVERY REQUESTS by delivering copies thereof to the individuals/entities below, by the method(s) indicated:

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BEFORE THE PUBLIC SERVICE COMMISSION OF WYOMING

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**RENEWABLE ENERGY COALITION’S RESPONSE TO WIEC,
VK CLEAN ENERGY PARTNERS LLP, AND TWO RIVERS WIND LLC’S FIRST SET
OF DISCOVERY REQUESTS**

Submitted: February 13, 2019

1.1 Please provide a copy of all responses to data requests submitted to you in this proceeding by any and all other parties, including the Wyoming Public Service Commission or its Staff.

Response: Renewable Energy Coalition has not received any data requests from any other party to date. Going forward, Renewable Energy Coalition will provide all responses.

1.2 Please provide copies of all workpapers that are used to develop, or which support your Testimony and Exhibits in this docket in native format with all cells and formulae intact. To the extent that such workpapers exist in paper form only, please provide paper copies to the undersigned.

Response: Renewable Energy Coalition has not filed any testimony nor developed any workpapers to date. Concurrent with the filing of any such testimony or exhibits, Renewable Energy Coalition will provide all workpapers.

DATED this 13th day of February 2019.

RENEWABLE ENERGY COALITION

By: 

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CERTIFICATE OF SERVICE

I hereby certify that on February _____, 2019, I served the foregoing RENEWABLE ENERGY COALITION'S RESPONSE TO WIEC, VK CLEAN ENERGY PARTNERS LLP, AND TWO RIVERS WIND LLC'S FIRST SET OF DISCOVERY REQUESTS by delivering copies thereof to the individuals/entities below, by the method(s) indicated:

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BEFORE THE PUBLIC SERVICE COMMISSION OF WYOMING

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PURCHASE AGREEMENTS)

**NLRA RESPONSE TO WIEC, VK CLEAN ENERGY PARTNERS LLP, AND TWO
RIVERS WIND LLC'S FIRST SET OF DISCOVERY REQUESTS**

Submitted: February 13, 2019

1.1 Please provide a copy of all responses to data requests submitted to you in this proceeding by any and all other parties, including the Wyoming Public Service Commission or its Staff.

Response: NLRA has not received any data requests from any other party to date. Going forward, NLRA will provide all responses.

1.2 Please provide copies of all workpapers that are used to develop or which support your Testimony and Exhibits in this docket in native format with all cells and formulae intact. To the extent that such workpapers exist in paper form only, please provide paper copies to the undersigned.

Response: NLRA has not filed any testimony nor developed any workpapers to date. Concurrent with the filing of any such testimony or exhibits, NLRA will provide all workpapers.

DATED this 13th day of February, 2019.

Respectfully submitted,
McDonough Law LLC

/s/ Crystal J. McDonough
Crystal J. McDonough
WY State Bar #7-4927
McDonough Law LLC
1635 Foxtrail Dr.
Loveland, CO 80538
Attorney for NLRA

CERTIFICATE OF SERVICE

I hereby certify that on February 13, 2019, I served the foregoing NLRA RESPONSE TO WIEC, VK CLEAN ENERGY PARTNERS LLP, AND TWO RIVERS WIND LLC'S FIRST SET OF DISCOVERY REQUESTS by delivering copies thereof to the individuals/entities below, by the method(s) indicated:

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/s/ Deb Johnson

BEFORE THE PUBLIC SERVICE COMMISSION OF WYOMING

IN THE MATTER OF THE APPLICATION)	
OF ROCKY MOUNTAIN POWER FOR A)	
MODIFICATION OF AVOIDED COST)	DOCKET NO. 20000-545-EA-18
METHODOLOGY AND REDUCED)	(RECORD NO. 15133)
CONTRACT TERM OF PURPA POWER)	
PURCHASE AGREEMENTS)	

**NORTHERN LARAMIE RANGE ALLIANCE’S FIRST SET
OF DATA REQUESTS TO TWO RIVERS WIND, LLC**

Northern Laramie Range Alliance (“NLRA”), by and through their undersigned counsel, pursuant to applicable rules of procedure, submits the attached Data Requests to Two Rivers Wind, LLC. The following response date, definitions and instruction apply to the attached Data Requests:

RESPONSE DATE

1. Please respond to these Data Requests within 10 calendar days, by March 4, 2019.

DEFINITIONS

2. “Company”, “RMP”, “Applicant”, or “Rocky Mountain Power” shall mean Rocky Mountain Power; any merged or consolidated predecessor or predecessors in interest; parent(s), subsidiaries and affiliates, past and present; and the employees, officers, directors, agents, consultants, attorneys and all persons acting under contractual request only applies to one of the Applicants, please respond on behalf of that Applicant.
3. “Two Rivers”, “Two Rivers Wind”, or “you” means Two Rivers Wind, LLC; any merged or consolidated predecessor or predecessors in interest; parent(s), subsidiaries and affiliates, past and present; and the employees, officers, directors, agents, consultants, attorneys and all persons acting under contractual arrangement with or acting or purporting to act on behalf of Two Rivers Wind, LLC.
4. “Document” and “documentation” should be interpreted as broadly as possible to include, but not be limited to, the original or any copy, regardless of origin or location, of any book, pamphlet, periodical publication, letter, scrapbook, diary, calendar, canceled check, photograph, form, memorandum, schedule, tax return, telegram, telex, report, record, order or notice of governmental action of any kind, study, minutes, logs, graph, index, tape, disc, internal operating manual, data sheet or data processing card, or any other written, recorded, transcribed, punched, taped, filmed, graphic or retrievable matter or data of any

kind, however produced or reproduced, to which you have or have had access. This definition is intended to include, but not be limited to, all documents which have been created and/or which reside in any type of electronic format. Any document that is not exactly identical to another document for any reason, including, but not limited to, marginal notations or deletions, should be considered to be a separate document. As to any document related to the matters addressed herein that is not currently in your possession but that you know or believe such a document exists, you are requested to identify and indicate to the best of your ability its present or last known location or custodian.

5. "Person or Entity" should be interpreted to denote, unless otherwise specified, any natural person, firm, corporation, association, group, individual or organization of any type whatsoever.
6. "PSC" or Commission" means the Wyoming Public Service Commission.
7. Any request to "identify" or "provide" should be interpreted to mean:
 - a. With respect to a natural person, that person's full name, title, job description, and business and home address. Where the identification pertains to a past period, as to each person identified who is still in your employ, or the employment of the group with which such person is identified in response to any requests, provided, in addition, that person's title and job description as of the time of such past period. Where the person is no longer in your employ or the employment of the group with which such person is identified in response to any request, provide that person's affiliate, position, home and business address, if known, or if not known, such person's last known affiliation, position, home and business address, or portions thereof as may be known.
 - b. With respect to an entity other than a natural person, that entity's name, business, type of entity, present status and present or last known address.
 - c. With respect to a document, that document's title, date, author (and, if different, the signer), addresses, recipients, or other persons who assisted in the preparation, subject matter or general nature, and any amendments thereto, present location and custodian, whether or not such document is in the respondent's possession, custody or control and whether or not the document is claimed to be privileged. The final version and each draft of each document should be identified and produced separately. Each original and each non-identical copy (bearing marks or notations not found on the original) of each final version and draft of each document should be identified and produced separately.

- d. With respect to a physical facility, the location of the facility, the intended purpose of the facility, the actual use of such facility, the operating dates of the facility, the installation date of the facility, the date utilization of the facility terminated if applicable, and whether the facility is subject to the jurisdiction of the Federal Energy Regulatory Commission, the Wyoming Public Service Commission, or any other regulatory body.
8. "Communication" should be interpreted to include, but not be limited to, all forms of communication, whether written, printed, oral, pictorial, electronic or otherwise, including testimony or sworn statement, or any means or type whatsoever.
9. "Relating To" or "Related To" means pertaining to, presenting, discussing, commenting on, analyzing, or mentioning in any way.

GENERAL INSTRUCTIONS

10. Where a request can be answered in whole or in part by reference to the response to a preceding or subsequent request, it is sufficient to so indicate by specifying the response to the preceding or subsequent request by number and specifying whether it is claimed that the response to the preceding or subsequent request is a full or partial response. If the latter, the response to the balance of the request shall be completed.
11. If various individuals are the authors of different responses to the Data Requests, please indicate the name of the author and his/her position within the Company, or if he/she is an expert or a consultant, please provide a current curriculum vitae for each such expert of consultant.
12. As to any requests consisting of a number of separate subdivisions, or subparts, or related parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate request. Should objection to a request be interposed it should clearly indicate to which part or portion of the request it is directed.
13. For each document identified in a response which is computer generated, state separately (a) what types of data files or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (punch cards, tapes, etc.), (c) a description of the recordation system employed (including program descriptions, flow charts, etc.), and (d) the identity of the person or persons, during the designed period, who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and/or the programming to obtain such output.

14. Responses to requests referring to documents shall include all documents relating to the time period specified in each request or in these instructions, whether prepared before, during or after that period.
15. If any document related to these data requests is not currently in the Company's possession but you know or believe such a document exists, please identify and indicate to the best of your ability its present or last known location or custodian.
16. Individual response of more than one page should be stapled or bound, and each page consecutively numbered.
17. If any document covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner:
 - the reasons for withholding;
 - date of the document;
 - name of each author or preparer;
 - name of each person who received the document; and
 - statement of facts constituting the basis for withholding the document.
18. If you assert that documents, records, or information responsive to any requests have been destroyed and are thus not available, state when and explain why any such document, record or information was destroyed, identify the person directing the destruction and identify all documents relevant to such destruction or explanation. If a claim is made that the destruction occurred pursuant to your document destruction program, identify and produce a copy of the guideline, policy, or company manual describing such document destruction program, and any correspondence or communication relating to the destruction of responsive documents, records or information.
19. If any of these requests are not answered on the ground that the material or information requested is confidential, privileged or otherwise immune to discovery, set forth in detail the factual and legal basis which support your decision to withhold production. Please also state whether a protective order or protective conditions regarding disclosure would satisfy or resolve your concern.
20. Each document or written response shall designate the respective question (and subpart of the question) under which it is being produced.
21. Each document produced shall be an authentic original document or a true duplicate of an authentic original document.
22. Each of these requests shall be considered to be continuing and to require supplemental or amended answers as readily as information and knowledge is acquired.

23. If, in answering a request, you encounter any ambiguity in interpreting either the request or a definition or instruction applicable thereto, please secure a clarification by contacting undersigned counsel as soon as the ambiguity is known.
24. The term “and” and “or” should be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of each request any information or document which might otherwise be considered to be beyond its scope.
25. The singular form of a word should be interpreted as plural, and the plural form of a word should be interpreted as singular, whenever appropriate in order to bring within the scope of each request any information or document which might otherwise be considered to be beyond its scope.

FIRST SET OF DATA REQUESTS

- NLRA 1-1: Please provide complete copies of any and all past, present, and future data requests submitted to you by any party to this proceeding as well as the Wyoming Public Service Commission staff and your corresponding responses and supplemental responses to those data requests, unless previously provided. This is an ongoing request.
- NLRA 1-2: Please provide all copies, including confidential copies, of all versions of testimony, exhibits, and workpapers that are used to develop or which support your Testimony and Exhibits in this docket in native format with all cells and formulae intact. To the extent that such workpapers exist in paper form only, please provide copies to the undersigned. This is an ongoing request.

Dated this 22nd day of February, 2019.

Respectfully submitted,
McDonough Law LLC

/s/ Crystal J. McDonough
Crystal J. McDonough
WY State Bar #7-4927
McDonough Law LLC
1635 Foxtrail Dr.
Loveland, CO 80538
Attorney for NLRA

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of February, 2019, the foregoing **Northern Laramie Range Alliance's First Set of Data Requests to Two Rivers Wind, LLC** was sent via electronic mail addressed to the following:

Jacob A. McDermott
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/s/ Lorelei Knott

BEFORE THE PUBLIC SERVICE COMMISSION OF WYOMING

IN THE MATTER OF THE APPLICATION)	
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**NORTHERN LARAMIE RANGE ALLIANCE’S FIRST SET
OF DATA REQUESTS TO WYOMING INDUSTRIAL ENERGY CONSUMERS**

Northern Laramie Range Alliance (“NLRA”), by and through their undersigned counsel, pursuant to applicable rules of procedure, submits the attached Data Requests to Wyoming Industrial Energy Consumers. The following response date, definitions and instruction apply to the attached Data Requests:

RESPONSE DATE

1. Please respond to these Data Requests within 10 calendar days, by March 4, 2019.

DEFINITIONS

2. “Company”, “RMP”, “Applicant”, or “Rocky Mountain Power” shall mean Rocky Mountain Power; any merged or consolidated predecessor or predecessors in interest; parent(s), subsidiaries and affiliates, past and present; and the employees, officers, directors, agents, consultants, attorneys and all persons acting under contractual request only applies to one of the Applicants, please respond on behalf of that Applicant.
3. “WIEC”, or “you” means Wyoming Industrial Energy Consumers; any merged or consolidated predecessor or predecessors in interest; parent(s), subsidiaries and affiliates, past and present; and the employees, officers, directors, agents, consultants, attorneys and all persons acting under contractual arrangement with or acting or purporting to act on behalf of Wyoming Industrial Energy Consumers.
4. “Document” and “documentation” should be interpreted as broadly as possible to include, but not be limited to, the original or any copy, regardless of origin or location, of any book, pamphlet, periodical publication, letter, scrapbook, diary, calendar, canceled check, photograph, form, memorandum, schedule, tax return, telegram, telex, report, record, order or notice of governmental action of any kind, study, minutes, logs, graph, index, tape, disc, internal operating manual, data sheet or data processing card, or any other written,

recorded, transcribed, punched, taped, filmed, graphic or retrievable matter or data of any kind, however produced or reproduced, to which you have or have had access. This definition is intended to include, but not be limited to, all documents which have been created and/or which reside in any type of electronic format. Any document that is not exactly identical to another document for any reason, including, but not limited to, marginal notations or deletions, should be considered to be a separate document. As to any document related to the matters addressed herein that is not currently in your possession but that you know or believe such a document exists, you are requested to identify and indicate to the best of your ability its present or last known location or custodian.

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7. Any request to "identify" or "provide" should be interpreted to mean:
 - a. With respect to a natural person, that person's full name, title, job description, and business and home address. Where the identification pertains to a past period, as to each person identified who is still in your employ, or the employment of the group with which such person is identified in response to any requests, provided, in addition, that person's title and job description as of the time of such past period. Where the person is no longer in your employ or the employment of the group with which such person is identified in response to any request, provide that person's affiliate, position, home and business address, if known, or if not known, such person's last known affiliation, position, home and business address, or portions thereof as may be known.
 - b. With respect to an entity other than a natural person, that entity's name, business, type of entity, present status and present or last known address.
 - c. With respect to a document, that document's title, date, author (and, if different, the signer), addresses, recipients, or other persons who assisted in the preparation, subject matter or general nature, and any amendments thereto, present location and custodian, whether or not such document is in the respondent's possession, custody or control and whether or not the document is claimed to be privileged. The final version and each draft of each document should be identified and produced separately. Each original and each non-identical copy (bearing marks or notations not found on the original) of each final version and draft of each document should be identified and produced separately.

- d. With respect to a physical facility, the location of the facility, the intended purpose of the facility, the actual use of such facility, the operating dates of the facility, the installation date of the facility, the date utilization of the facility terminated if applicable, and whether the facility is subject to the jurisdiction of the Federal Energy Regulatory Commission, the Wyoming Public Service Commission, or any other regulatory body.
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11. If various individuals are the authors of different responses to the Data Requests, please indicate the name of the author and his/her position within the Company, or if he/she is an expert or a consultant, please provide a current curriculum vitae for each such expert of consultant.
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13. For each document identified in a response which is computer generated, state separately (a) what types of data files or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (punch cards, tapes, etc.), (c) a description of the recordation system employed (including program descriptions, flow charts, etc.), and (d) the identity of the person or persons, during the designed period, who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and/or the programming to obtain such output.

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17. If any document covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner:
 - the reasons for withholding;
 - date of the document;
 - name of each author or preparer;
 - name of each person who received the document; and
 - statement of facts constituting the basis for withholding the document.
18. If you assert that documents, records, or information responsive to any requests have been destroyed and are thus not available, state when and explain why any such document, record or information was destroyed, identify the person directing the destruction and identify all documents relevant to such destruction or explanation. If a claim is made that the destruction occurred pursuant to your document destruction program, identify and produce a copy of the guideline, policy, or company manual describing such document destruction program, and any correspondence or communication relating to the destruction of responsive documents, records or information.
19. If any of these requests are not answered on the ground that the material or information requested is confidential, privileged or otherwise immune to discovery, set forth in detail the factual and legal basis which support your decision to withhold production. Please also state whether a protective order or protective conditions regarding disclosure would satisfy or resolve your concern.
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FIRST SET OF DATA REQUESTS

- NLRA 1-1: Please provide complete copies of any and all past, present, and future data requests submitted to you by any party to this proceeding as well as the Wyoming Public Service Commission staff and your corresponding responses and supplemental responses to those data requests, unless previously provided. This is an ongoing request.
- NLRA 1-2: Please provide all copies, including confidential copies, of all versions of testimony, exhibits, and workpapers that are used to develop or which support your Testimony and Exhibits in this docket in native format with all cells and formulae intact. To the extent that such workpapers exist in paper form only, please provide copies to the undersigned. This is an ongoing request.

Dated this 22nd day of February, 2019.

Respectfully submitted,
McDonough Law LLC

/s/ Crystal J. McDonough
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WY State Bar #7-4927
McDonough Law LLC
1635 Foxtrail Dr.
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Attorney for NLRA

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of February, 2019, the foregoing **Northern Laramie Range Alliance's First Set of Data Requests to Wyoming Industrial Energy Consumers** was sent via electronic mail addressed to the following:

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Renewable Energy Coalition
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Phillip J. Russell
Hatch, James & Dodge, P.C.
10 West Broadway, Suite 400
Salt Lake City, UT 84101
prussell@hjdllaw.com

/s/ Lorelei Knott

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' RESPONSES TO NORTHERN
LARAMIE RANGE ALLIANCE'S FIRST SET OF DATA REQUESTS**

Wyoming Industrial Energy Consumers ("WIEC") provides the attached responses to Northern Laramie Range Alliance's ("NLRA") First Set of Data Requests to WIEC.

Respectfully submitted this 27th day of February, 2019.

HOLLAND & HART LLP

By: 

Michelle Brandt King, #7-5173

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

acbriggerman@hollandhart.com

ATTORNEYS FOR WIEC

NLRA 1.1: Please provide complete copies of any and all past, present, and future data requests submitted to you by any party to this proceeding as well as the Wyoming Public Service Commission staff and your corresponding responses and supplemental responses to those data requests, unless previously provided. This is an ongoing request.

RESPONSE:

To date, WIEC has not received any such requests but will supplement this response as appropriate going forward.

WIEC's Responses to NLRA's First Set of Data Requests
Docket No. 20000-545-ET-18

NLRA 1.2: Please provide all copies, including confidential copies, of all versions of testimony, exhibits, and workpapers that are used to develop or which support your Testimony and Exhibits in this docket in native format with all cells and formulae intact. To the extent that such workpapers exist in paper form only, please provide copies to the undersigned. This is an ongoing request.

RESPONSE:

WIEC has not prepared testimony or work papers in support of testimony to date but will provide these materials as appropriate going forward.

CERTIFICATE OF SERVICE

I hereby certify that, on this 27th day of February, 2019 the **WYOMING INDUSTRIAL ENERGY CONSUMERS' RESPONSES TO NORTHERN LARAMIE RANGE ALLIANCE'S FIRST SET OF DATA REQUESTS** was served via electronic mail or U.S. Mail, addressed to the following:

Yvonne R. Hogle
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Christopher Leger
Wyoming Office of Consumer Advocate
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Crystal J. McDonough
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s/ Gina Gargano-Amari

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)

**TWO RIVERS WIND, LLC'S RESPONSES TO NORTHERN LARAMIE RANGE
ALLIANCE'S FIRST SET OF DATA REQUESTS**

Two Rivers Wind, LLC ("Two Rivers Wind") provides the attached responses to Northern Laramie Range Alliance's ("NLRA") First Set of Data Requests to Two Rivers Wind.

Respectfully submitted this 27th day of February, 2019.

HOLLAND & HART LLP

By: 

Michelle Brandt King, #7-5173

Abigail Briggerman, #7-5476

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6380 South Fiddlers Green Circle, Suite 500

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ATTORNEYS FOR TWO RIVERS WIND, LLC

Two Rivers Wind Responses to NLRA's First Set of Data Requests
Docket No. 20000-545-ET-18

NLRA 1.1: Please provide complete copies of any and all past, present, and future data requests submitted to you by any party to this proceeding as well as the Wyoming Public Service Commission staff and your corresponding responses and supplemental responses to those data requests, unless previously provided. This is an ongoing request.

RESPONSE:

To date, Two Rivers Wind has not received any such requests but will supplement this response as appropriate going forward.

Two Rivers Wind Responses to NLRA's First Set of Data Requests
Docket No. 20000-545-ET-18

NLRA 1.2: Please provide all copies, including confidential copies, of all versions of testimony, exhibits, and workpapers that are used to develop or which support your Testimony and Exhibits in this docket in native format with all cells and formulae intact. To the extent that such workpapers exist in paper form only, please provide copies to the undersigned. This is an ongoing request.

RESPONSE:

Two Rivers Wind has not prepared testimony or work papers in support of testimony to date but will provide these materials as appropriate going forward.

CERTIFICATE OF SERVICE

I hereby certify that, on this 27th day of February, 2019 the **TWO RIVERS WIND, LLC'S RESPONSES TO NORTHERN LARAMIE RANGE ALLIANCE'S FIRST SET OF DATA REQUESTS** was served via electronic mail or U.S. Mail, addressed to the following:

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s/ Gina Gargano-Amari

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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**WYOMING INDUSTRIAL ENERGY CONSUMERS AND TWO RIVERS WIND,
LLC’S SECOND SET OF DATA REQUESTS TO RENEWABLE ENERGY
COALITION AND ROCKY MOUNTAIN COALITION FOR RENEWABLE
ENERGY**

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 second set of data requests to Renewable Energy Coalition (“REC”) and Rocky Mountain Coalition for Renewable Energy (“RMCRE”). The following response date, definitions, and instructions apply to this set of data requests:

RESPONSE DATE

Please respond to these Data Requests within 7 calendar days, *i.e.*, by May 10, 2019, unless an earlier date is specified by the Wyoming Public Service Commission or by agreement among WIEC, Two Rivers Wind, REC, and RMCRE.

DEFINITIONS AND INSTRUCTIONS

Please refer to the Definitions and Instructions included in WIEC and Two Rivers Wind’s First Sets of Data Requests to REC and RMCRE in the above-captioned docket.

SECOND SET OF DATA REQUESTS

WIEC/TR 2-1: Please provide, in Excel format with formulas intact, copies of all workpapers used to develop or which support your Direct Testimony, tables, and exhibits in this docket in native format with all cells and formulae intact. To the extent that such workpapers exist in paper form only, please provide paper copies to the undersigned.

WIEC/TR 2-2: Please refer to the Direct Testimony of Dr. Marc Hellman and Dr. Lance Kaufman, page 72, lines 14-15, which states: “This issue would be remedied by using correct prices because it is a mechanical problem with RMP’s model, not with the inputs to the model.”

Please confirm or deny that this sentence intended to state, “This issue would not be remedied by using correct prices because it is a mechanical problem with RMP’s model, not with the inputs to the model.”

Respectfully submitted this 3rd day of May, 2019.

HOLLAND & HART LLP

By: 
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**ATTORNEYS FOR WIEC AND
TWO RIVERS WIND, LLC**

CERTIFICATE OF SERVICE

I hereby certify that, on this 3rd day of May, 2019 the **WYOMING INDUSTRIAL ENERGY CONSUMERS AND TWO RIVERS WIND, LLC'S SECOND SET OF DATA REQUESTS TO RENEWABLE ENERGY COALITION AND ROCKY MOUNTAIN COALITION FOR RENEWABLE ENERGY** was served via electronic mail or U.S. Mail, addressed to the following:

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s/ Gina Gargano-Amari _____

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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**WYOMING INDUSTRIAL ENERGY CONSUMERS AND TWO RIVERS WIND,
LLC'S SECOND SET OF DATA REQUESTS TO NORTHERN LARAMIE RANGE
ALLIANCE**

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 second set of data requests to Northern Laramie Range Alliance (“NLRA”). The following response date, definitions, and instructions apply to this set of data requests:

RESPONSE DATE

Please respond to these Data Requests within 7 calendar days, *i.e.*, by May 10, 2019, unless an earlier date is specified by the Wyoming Public Service Commission or by agreement between WIEC and Two Rivers Wind, and NLRA.

DEFINITIONS AND INSTRUCTIONS

Please refer to the Definitions and Instructions included in WIEC, and Two Rivers Wind’s First Set of Data Requests to NLRA in the above-captioned docket.

SECOND SET OF DATA REQUESTS

WIEC/TR 2-1: Please refer to the Direct Testimony of Mr. Kenneth G. Lay at page 6, footnote 2. Please provide a copy of the referenced document.

- WIEC/TR 2-2: Please refer to the Direct Testimony of Mr. Kenneth G. Lay at page 8, lines 9-13. Please provide copies of all documents or analyses conducted or relied upon by Mr. Lay in support of this statement.
- WIEC/TR 2-3: Please refer to the Direct Testimony of Mr. Kenneth G. Lay at page 8, line 25 through page 9, line 2. Please provide copies of all documents or analyses conducted or relied upon by Mr. Lay in support of this statement.
- WIEC/TR 2-4: Please refer to the Direct Testimony of Mr. Kenneth G. Lay at page 9, lines 2-3. Please provide copies of all documents or analyses conducted or relied upon by Mr. Lay in support of this statement.
- WIEC/TR 2-5: Please refer to the Direct Testimony of Mr. Kenneth G. Lay at page 10, footnote 4. Please provide a copy of the referenced document.
- WIEC/TR 2-6: Please provide copies of all documents or analyses conducted, or relied upon by Mr. Lay, relating to the financing of Qualifying Facility projects with 1 year power purchase agreements.

Respectfully submitted this 3rd day of May, 2019.

HOLLAND & HART LLP

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**ATTORNEYS FOR WIEC AND
TWO RIVERS WIND, LLC**

CERTIFICATE OF SERVICE

I hereby certify that, on this 3rd day of May, 2019 the **WYOMING INDUSTRIAL ENERGY CONSUMERS AND TWO RIVERS WIND, LLC'S SECOND SET OF DATA REQUESTS TO NORTHERN LARAMIE RANGE ALLIANCE** was served via electronic mail or U.S. Mail, addressed to the following:

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