

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 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

By: 
Michelle Brandt King, #7-5473

Abigail Briggerman, #7-5476

Hannah M. Oakes, *pro hac vice*

Holland & Hart LLP

6380 South Fiddlers Green Circle, Suite 500

Greenwood Village, CO 80111

Telephone: (303) 290-1600

mbking@hollandhart.com

acbriggerman@hollandhart.com

hmoakes@hollandhart.com

**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:

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
jacob.mcdermott@pacificorp.com

Christopher Leger
Wyoming Office of Consumer Advocate
2515 Warren Avenue, Suite 304
Cheyenne, WY 82002
Christopher.leger@wyo.gov

Crystal J. McDonough
Callie Capraro
McDonough Law LLC
1635 Foxtrail Drive
Loveland, CO 80538
crystal@mcdonoughlawllc.com
callie@mcdonoughlawllc.com

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

Renewable Energy Coalition
Attn: John Lowe
P.O. Box 25576
Portland, OR 97298
jravenesanmarcos@yahoo.com

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

Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232
datarequest@pacificorp.com

Michelle Brandt King
Abigail C. Briggerman
Hannah M. Oakes
Holland & Hart LLP
6380 South Fiddlers Green Circle
Suite 500
Greenwood Village, CO 80111
mbking@hollandhart.com
acbriggerman@hollandhart.com
HMOakes@hollandhart.com
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
ronnie@performance-law.com

Wyoming Public Service Commission
2515 Warren Avenue, Suite 300
Cheyenne, WY 82002
steve.mink@wyo.gov
james.branscomb1@wyo.gov
kaeci.daniels1@wyo.gov
daney.brauchie@wyo.gov
angela.elliott@wyo.gov

Irion A. Sanger
Sanger Law, P.C.
1117 SE 53rd Avenue
Portland, OR 97215
irion@sanger-law.com
marie@sanger-law.com

12442470_1

s/ Gina Gargano-Amari