

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 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.

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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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