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BEFORE THE WYOMING PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE APPLICATION OF)	
ROCKY MOUNTAIN POWER FOR)	DOCKET NO. 20000-545-ET-18
MODIFICATION OF AVOIDED COST)	
METHODOLOGY AND REDUCED)	(Record No. 15133)
CONTRACT TERM OF PURPA POWER)	
PURCHASE AGREEMENTS WITH)	
QUALIFYING FACILITIES)	

**ROCKY MOUNTAIN POWER’S FIRST SET OF DISCOVERY REQUESTS TO THE
RENEWABLE ENERGY COALITION**

COMES NOW, Rocky Mountain Power (the “Company”) and hereby serves its first set of data requests on the Renewable Energy Coalition (“REC”) regarding the above docketed matter, to be answered pursuant to Rules 33, 34, and 36 of the Wyoming Rules of Civil Procedure. Please respond to these data requests within seven (7) calendar days (by May 10, 2019).

DEFINITIONS AND INSTRUCTIONS

The following definitions and instructions apply to each of the requests for production set forth herein and are deemed to be incorporated therein.

(1) “**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 and is to be construed in its most comprehensive sense as contemplated by the Wyoming Rules of Civil Procedure.

(2) **“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.

(3) 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 Public Service Commission of Wyoming, or any other regulatory body.

(4) **“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.

(5) **“Relating To”** or **“Related To”** means pertaining to, presenting, discussing, commenting on, analyzing, or mentioning in any way.

(6) 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.

(7) 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.

DATA REQUESTS

- 1.1 Please provide copies of all past and future data requests and data responses received by REC or sent by the REC to any other party in this docket. Please include both formal and informal responses.
- 1.2 Please provide workpapers (with all formulas intact) supporting all values, tables, and figures referenced within the testimony submitted by each of the REC witnesses.
- 1.3 Refer to page 12, lines 271-276 of John Lowe's direct testimony in this matter, provide all REC or REC member's records, analysis, workpapers, or other information that demonstrates the costs of power purchase agreement ("PPA") negotiations.
 - a. From January 1, 2015 to the present, provide all REC, or REC member, records or other information demonstrating the time it has taken to negotiate PPAs with the Company.
 - b. From January 1, 2015 to the present, provide all REC, or REC member, records demonstrating the employee time devoted to negotiating PPAs with the Company.
- 1.4 Referring to page 12 & 13, lines 277-304 of John Lowe's direct testimony in this matter, is the timing of the Company's determination of resource sufficiency in its integrated resource plans ("IRP") fixed, or can it vary based on new data reflected in updates or subsequent IRPs?
 - a. Is the Company's capacity need as stated in its IRPs fixed, or can it vary based on new data in updates or subsequent IRPs?
 - b. Could load growth in the Company's service territories drive up resource insufficiency, and therefore advance the date of capacity need in PacifiCorp's IRPs?
 - c. Could new environmental regulations that force the earlier than anticipated closure of some of the Company's fossil generation drive up resource insufficiency, and therefore advance its current date of capacity need in the Company's IRPs?
 - d. If the answer is "yes" to b or c, or both, is it possible for the advanced sufficiency or capacity need date to be moved forward enough to provide qualifying facilities ("QF") an opportunity to receive payment for both energy and capacity over a seven year term?
- 1.5 Referring to page 15 lines 327-331, and page 20 lines 447-452 of John Lowes' direct testimony in this matter, is Mr. Lowe aware of the following Wyoming Public Service Commission ("Commission") case, Docket No. 20000-388-EA-11 (Record No. 12750)?

- a. Please identify the portion of the Company’s application or direct testimony in this matter where the Company requests or discusses a change to the over eight year-old determination by the Commission that renewable energy certificates produced by QFs be retained by the Company to be used for the benefit of its customers.
 - b. Does REC believe that Wyoming customers should be required to pay something extra for those customers’ right to truthfully claim that the energy purchased from a particular QF is “renewable energy,” given that PURPA generally requires that small power production facility QFs be renewable generation?
 - c. Assuming the Company’s Wyoming customers are currently receiving value from the renewable energy certificates produced by Wyoming QFs, economically speaking, will those customers be better off if the Commission reverses its longstanding determination that renewable energy certificates should remain bundled with the energy sold by QFs, or would those customers be worse off?
 - d. Is it possible to purchase renewable energy certificates that are bundled with energy through market purchases?
 - i Do any states require that renewable energy certificates be bundled with energy in-order to meet that state’s renewable portfolio standards, or similar renewable energy content requirements?
 - ii Assuming the answer to 1.3.d.i is “yes,” do utility or non-utility electricity suppliers ever make market purchases to meet some of those bundled energy and renewable energy certificate requirements?
- 1.6 Referring to page 17, lines 368-387 of John Lowe’s direct testimony in this matter, are Oregon and Wyoming similarly situated with respect to their economic and regulatory circumstances?
- a. At page 15 lines 327-331 of his testimony Mr. Lowe contends that the value of renewable energy certificates should be retained by QFs until they displace renewable capacity, correct?
 - i Mr. Lowe also states that retaining renewable energy certificates may help QFs obtain financing, is this because renewable energy certificates represent additional value beyond just the energy produced or capacity supplied by a QF?
 - b. In general terms, if given the option would a reasonable consumer elect to pay more for a product that provides them less in terms of value?
 - c. Is the Company’s renewable avoided cost pricing as determined under Oregon’s Schedule 37 higher or lower than the non-renewable avoided cost pricing? Please answer with respect to the pricing for each type of resource in those Oregon Schedule 37 prices.

- 1.7 Referring to pages 22 & 23, lines 498-500 of John Lowe’s direct testimony in this matter, when Mr. Lowe “drafted the original version of Schedule 37” what state was that tariff drafted for?
- a. When was the “original” version of Schedule 37 drafted?
 - b. When was the “original” version of Schedule 37 approved by the relevant state’s utility regulatory commission? Provide a citation to the order approving.
- 1.8 Referring to pages 4 & 5, lines 87-102 of Trent Reed’s direct testimony in this matter, how often do irrigation district’s revise their prices?
- a. Please list the principal reasons irrigation districts revise their prices.
 - b. If an irrigation district were compelled by federal law to take all the water offered from a third party source, even if that meant deferring investments in that districts own resources in order to accommodate that third party, how would that federal mandate impact the irrigation district’s customers and their pricing?
 - i Taking that same hypothetical regarding a federal mandate, how would that irrigation district’s customers and their pricing be affected if it were mandated to take the water from the third party at a fixed price over 20 years, and during those 20 years the cost to otherwise acquire water dropped substantially?
 - ii Taking that same hypothetical regarding a federal mandate, how would the irrigation district’s customers and their pricing be affected if the district were mandated to take water from the third party at a fixed price over 20 years, and during those 20 years the cost to acquire water dropped substantially, at the same time that the district’s customers demand for water dropped?

DATED this 3rd day of May, 2019.

Respectfully submitted,

ROCKY MOUNTAIN POWER

/s/ Jacob A. McDermott

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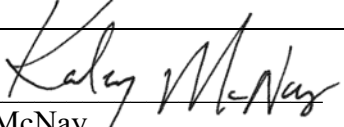
Attorney for Rocky Mountain Power

CERTIFICATE OF SERVICE

I hereby certify that on May 3, 2019, I caused to be served, via email a true and correct copy of Rocky Mountain Power's **FIRST SET OF DISCOVERY REQUESTS TO THE RENEWABLE ENERGY COALITION** to the following service list:

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