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Attorneys for Rocky Mountain Power

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 WYOMING INDUSTRIAL ENERGY CONSUMERS AND TWO RIVERS WIND, LLC

COMES NOW, Rocky Mountain Power (the “Company”) and hereby serves its first set of data requests on the Wyoming Industrial Energy Consumers (“WIEC”) and Two Rivers Wind, LLC (“Two Rivers Wind”) 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 Referring to page 10, lines 6-13 of Kevin C. Higgin’s direct testimony in this matter, according to Mr. Higgin’s testimony, 840 megawatts (“MWs”) of new qualified facility (“QF”) capacity has come into operation or been signed to power purchase agreements (“PPA”) since 2014. According to the Company’s 2017 Integrated Resource Plan update, the total amount of installed capacity owned or under contract with PacifiCorp in Wyoming is ~4,000 MWs, and the Company’s annual coincident peak load in Wyoming forecasted for 2018 was 1,283 MWs.
 - a. How would you characterize additional renewable capacity that is 65% of the total forecasted coincident peak load for the state where the capacity and energy will be delivered, and is ~21% of the total existing generation in the state?
 - b. What increase in operating and contracted QFs would Mr. Higgins consider to be ‘deluge’?
- 1.2 Referring to page 19, lines 10-11 of Kevin C. Higgin’s direct testimony in this matter, under the Company’s Schedules 37 and 38 does a QF’s application for a PPA provide or require any analysis that shows the QF will provide any benefits to the Company’s customers?
- 1.3 Referring to page 21, lines 7-18 of Kevin C. Higgin’s direct testimony in this matter, if a QF’s costs to build their facility are materially higher than projected, or equipment fails and the QF has to make additional investments above their maintenance capital budget, and they therefore default on their financing due to not meeting their debt service requirements and are forced to abandon the project, will the energy and capacity that the Company has incorporated into its plans be no longer available?
 - a. If such energy and capacity is no longer available, who bears the replacement costs of that energy and capacity?
- 1.4 Referring to page 23, lines 10-11 of Kevin C. Higgin’s direct testimony in this matter:
 - a. How is ‘seldom’ defined with respect to the perceived need to curtail wind assets?

- b. Provide the number of hours in 2018 and 2017 that hourly real time prices ‘went negative’ in the California Independent System Operator’s energy imbalance market.
- 1.5 Referring to page 23, lines 17-21 of Kevin C. Higgin’s direct testimony in this matter:
 - a. Indicate where (page number(s) and line number(s)) in Mr. Tourangeau’s direct testimony the Company indicates the justification for the filing in this docket is to protect customers from higher marginal costs that result from the Public Utility Regulatory Policies Act (“PURPA”) must-take obligation.
- 1.6 Referring to pages 23-24, lines 20-3 of Kevin C. Higgin’s direct testimony in this matter, describe how a utility would use its discretion to curtail a QF.
 - a. Is Mr. Higgins suggesting that a utility would curtail a QF even if that QF’s marginal cost of energy is lower than other resources that are available, especially if those resources are utility-owned?
 - b. Are there protections available for the Company’s customers and QFs through the different state’s energy balancing accounts that would discourage the Company from this practice?
- 1.7 Please provide copies of all past and future data requests and data responses received by WIEC and Two Rivers Wind or sent by WIEC and Two Rivers Wind to any other party in this docket. Please include both formal and informal responses.
- 1.8 To the extent not already provided, provide workpapers (with all formulas intact) supporting all values, tables, and figures referenced within the testimony submitted by WIEC and Two Rivers Wind’s witness.
- 1.9 Do WIEC and Two Rivers Wind agree that the Company’s proposed Partial Displacement Differential Revenue Requirement (“PDDRR”) methodology is sufficient under all circumstances to determine the type and quantity of resources that will be considered deferrable for the purposes of QF pricing for all combinations of deferrable resources and QFs? If not, please identify what aspects are not sufficiently identified and provide examples illustrating how the type or quantity of resource deferral is uncertain.
- 1.10 Do WIEC and Two Rivers Wind support the Company’s proposed PDDRR methodology? If not, please explain how the type and quantity of resources will be considered deferrable for the purposes of QF pricing for all combinations of deferrable resources and QFs. At a minimum the deferrable and QF resource types should include baseload, solar, wind, and

seasonal hydro. Please provide examples illustrating the determination of the type and quantity of resource deferral.

- 1.11 Does Two Rivers Wind support modifications to the avoided cost methodology that will increase the avoided cost paid to QFs in Wyoming?
- 1.12 Does WIEC support modifications to the avoided cost methodology that will increase the avoided cost paid to QFs in Wyoming?

DATED this 3rd day of May, 2019.

Respectfully submitted,

ROCKY MOUNTAIN POWER

/s/ Jacob A. McDermott

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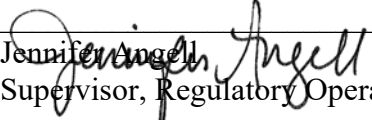
Attorney for Rocky Mountain Power

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 WYOMING INDUSTRIAL ENERGY CONSUMERS AND TWO RIVERS WIND, LLC** to the following service list:

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