

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 NON-CONFIDENTIAL TWELFTH SET OF DATA REQUESTS TO ROCKY
MOUNTAIN POWER**

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 non-confidential twelfth set of data requests to Rocky Mountain Power, a division of PacifiCorp (“Company” or “RMP”). 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 June 10, 2019 unless an earlier date is specified by the Wyoming Public Service Commission or by agreement between WIEC, Two Rivers Wind, and Rocky Mountain Power.

DEFINITIONS AND INSTRUCTIONS

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

NON-CONFIDENTIAL TWELFTH SET OF DATA REQUESTS

- WIEC/TR 12-1: Please refer to the Rebuttal Testimony of Mr. Tourangeau at page 13, lines 17-20, in which Mr. Tourangeau contends that long-term qualifying facility (“QF”) contracts generate \$0 forecasted economic benefits to customers.
- a. Is it also Mr. Tourangeau’s contention that the Company’s planned wind resource in 2030 (according to the 2017 Integrated Resource Plan Update) would provide \$0 in economic benefits to customers?
 - b. If the planned wind resource in 2030 would provide positive economic benefits to customers and it is displaced by a QF that is paid the avoided cost of the planned wind resource, please explain how the former would provide positive economic benefits to customers but the latter would not.
 - c. Is Mr. Tourangeau’s contention that long-term QF contracts generate \$0 forecasted economic benefits based on comparing the price paid to the QF to the cost of the energy and capacity avoided—and concluding that there are no savings relative to the cost of the energy and capacity avoided? Please confirm or deny that such a comparison does not take into account whether the capacity replaced by the QF would have itself provided economic benefits.
 - d. Please refer to Confidential Attachment WIEC-VK-TR 9.1, which provides revenue requirement information for the Energy Vision 2020 projects approved in Docket No. 20000-520-EA-17. Does RMP agree that the Cost/MWh shown on line 27 equals ██████/MWh on a levelized basis from 2021-2049 (using a 6.91% discount rate)? If not, please identify the levelized cost and provide the calculation.
 - e. Please confirm or deny that RMP contended that the Energy Vision 2020 projects it proposed in Docket No. 20000-520-EA-17 would provide between \$92 million and \$304 million in customer benefits in the medium gas scenarios. (See Corrected Second Supplemental Direct Testimony of Rick T. Link, at page 16.)
 - f. Does RMP agree that that the levelized value identified in response to subpart (d) is within ██████/MWh of the average 20-year indicative price provided to prospective Wyoming wind QFs? (See WIEC Exhibit 300.3). If RMP disagrees, please explain.
- WIEC/TR 12-2: Please refer to the Rebuttal Testimony of Mr. Tourangeau, at page 11, lines 9-13. Please identify each cost disallowance related to the procurement of non-QF generation resources that have occurred in Wyoming in the past ten years on the grounds that the procurement was imprudent.

WIEC/TR 12-3: Please refer to the Rebuttal Testimony of Mr. Tourangeau, at page 8, lines 11-16.

Please provide the workpapers supporting the calculation of the \$327,506 amount, in native format with all formulas intact. At a minimum, for each interval identify the:

- a. amount of energy available at a negative price;
- b. negative price;
- c. amount of negatively priced energy actually purchased by the Company;
- d. name of the resource decremented by the Company to effectuate the acquisition of the negatively priced energy; and
- e. avoided cost (cost multiplied by quantity) of the resource decremented by the Company to effectuate the acquisition of the negatively priced energy.

Respectfully submitted this 3rd day of June, 2019.

HOLLAND & HART LLP

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**ATTORNEYS FOR WIEC AND
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CERTIFICATE OF SERVICE

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

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