

09-035-15/Rocky Mountain Power  
September 27, 2011  
DPU Data Request 14.1

**DPU Data Request 14.1**

NPC - The monthly NPC reports provided to the Division do not appear to match the NPC cost numbers in the semiannual report. See the example below.

	Dec-10			Monthly
	Semiannual			NPC Reports
	"B Tabs"	"Unadjusted NPC"	Type 1 Normalized	2010
Sales for Resale	501,563,210	492,522,473	492,522,473	442,034,360
Purchased Power	(380,007,678)	(416,825,351)	(433,328,102)	(391,334,119)
Wheeling	(136,854,649)	(136,854,649)	(136,854,649)	(135,369,090)
Fuel Expense	(1,083,006,206)	(1,064,612,593)	(1,064,612,593)	(1,065,276,437)
<b>TOTAL NPC</b>	<b>(1,098,305,323)</b>	<b>(1,125,770,120)</b>	<b>(1,142,272,870)</b>	<b>(1,149,945,286)</b>

- a. Should the NPC monthly report amounts tie to one of the semiannual columns above?
- b. Please explain why the monthly report amounts differ from the semiannual report.
- c. Please provide a reconciliation of the 2010 NPC from the monthly reports to the "Unadjusted NPC" column shown in the table above.
- d. Please indicate what type of "actuals" (B Tabs, Unadjusted NPC, Type 1 Normalized, Monthly NPC reports) the Company proposes to use in the EBA calculations and why.

**Response to DPU Data Request 14.1**

- a. No
- b. The monthly NPC report differs from the semiannual reports for three main reasons:
  1. Expenses and revenue related to purchases (FERC Account 555), sales (FERC Account 447), and wheeling (FERC Account 565) are tracked in the Company's TORIS database and follow the time periods when the transactions and generation occurred. Amounts are transferred to SAP in the subsequent month, causing a one month lag for purposes of reporting actual costs from SAP. The monthly NPC report relies on TORIS information, while the semiannual reports rely on information from SAP.
  2. In SAP, some FERC accounts related to net power costs also contain miscellaneous charges or credits that do not fit within the Company's definition of 'net power costs'.
  3. The monthly NPC report contains regulatory adjustments that are made outside of SAP. Net power cost accounts in SAP also include monthly estimates and exchanges that are not included in the monthly NPC report. The

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exchanges are the approximated values of the undelivered energy under the energy-only exchange contracts.

- c. Please refer to Attachment DPU 14.1c.
- d. The Company proposes to use actual NPC as reported in the monthly NPC report for the reasons outlined in part b above.

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### DPU Data Request 14.2

NPC - General rate cases as well as the semiannual report (Tab 5) include a “Pre-Post” spreadsheet where the net power costs from the GOLD report are split into categories which subsequently flow through to FERC accounts.

- a. Is the “PrePost” spreadsheet necessary for reporting actual net power costs?
- b. Is the actual NPC data (“B Tabs” column and “Unadjusted NPC” on page 5.1.1 of the December 2010 semiannual) simply queried from the Company’s SAP or other system?
- c. If the actual data is not simply queried, please explain and provide the workpapers showing how the actual NPC are into split into their respective FERC account and subaccount as shown in the “B Tabs” column and “Unadjusted NPC” on page 5.1.1 of the December 2010 semiannual report
- d. Do the “Existing Firm” line items on page 5.1.1 of the December 2010 semiannual report only exist for purposes of calculating the proforma (type 3) NPC?

### Response to DPU Data Request 14.2

- a. The PrePost spreadsheet is not necessary for reporting actual NPC on a total Company basis. However, in order to allocate actual NPC to Utah, more granular information than what is contained in the actual net power cost report is needed to differentiate purchases, sales, and wheeling that are allocated on an SE factor versus an SG factor.
- b. Yes. The “B Tabs” column is an extract from SAP of everything booked to FERC accounts 447, 501, 503, 547, 555, and 565. The “Unadjusted NPC” column is a subset of the “B Tabs” column, excluding the following FERC subaccounts that are not directly related to the net costs modeled in GRID: 501.0 Fuel consumed; 501.2 Fuel handling – coal; 501.3 Startup fuel – gas; 501.4 Fuel consumed – diesel; 501.45 Startup fuel – diesel; 501.5 Fuel consumed – res disp; 501.51 Ash and ash byproduct sales; 555.11, 555.12, and 555.133 BPA residential exchange; 447.1 On system wholesale sales; and 447.9 Transmission services. Please refer to the Company’s response to DPU Data Request 14.1, specifically Attachment DPU 14.1c, for reconciliation between what are booked into those accounts and what are included in the Unadjusted NPC.
- c. Please refer to the Company’s response to subpart b above.
- d. The “Existing Firm” lines have been used in the past to differentiate costs that may require unique inter-jurisdictional allocation. Under the Rolled In

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allocation method, it would not be necessary to identify costs related to items existing prior to the Utah Power/Pacific Power merger.