13-035-115/Rocky Mountain Power August 1, 2013 DPU Data Request 1.3

## **DPU Data Request 1.3**

Please provide the documents and supporting analyses that the Company relied upon to make its representation in Section 2.1 of the contract between it and the wind QF wherein it states "In addition, for the purposes of inter-jurisdictional cost allocation, PacifiCorp represents that the costs of this Agreement do not exceed the costs PacifiCorp would have otherwise incurred acquiring resources in the market that are defined as "Comparable Resources" in Appendix A to the Inter-Jurisdictional Cost Allocation Revised Protocol."

Please include the dates that the analyses were prepared and include the names, titles, and locations of PacifiCorp personnel who prepared the documents and analyses.

## **Response to DPU Data Request 1.3**

The Company relied upon Public Service Commission of Utah (Commission) orders in Docket Nos. 03-035-14, 12-2557-01, and 12-035-100. In the December 20, 2012 Order on Motion to Stay Agency Action in Docket No. 12-035-100, the Commission stated the following:

Page 14-15: "Indeed, we do not find sufficient evidence on which to conclude the Market Proxy method is currently producing prices in excess of avoided cost."

Page 15: "Moreover, the data provide some assurance the Market Proxy method remains representative of actual costs of projects recently built in the region."

Page 16: "The data from RMP's 2013 IRP document provide additional confidence that current avoided costs for large wind projects are reasonably reflected by the current Market Proxy method."

Orders in the dockets referenced above are available on the Commission's website:

http://www.psc.state.ut.us/