

***UCE Exhibit 3.1 (DT) [COS + RD]
Docket No. 13-035-184***

Data request responses referenced in the [cost of service and rate design] Direct Testimony of Rick Gilliam on behalf of Utah Clean Energy in Docket No. 13-035-184.

13-035-184/Rocky Mountain Power
February 18, 2014
OCS Data Request 5.6

OCS Data Request 5.6

Please provide a Residential Schedule 1 Bill Frequency Analysis, annually and by month, for usage blocks ranging from 0 kWh/month continuing through usage at 5,000 kWh/month.

Response to OCS Data Request 5.6

Please refer to Attachment OCS 5.6 for monthly and annually bill frequency for Schedule 1 with the same format as provided in the past rate cases.

OCS Data Request 10.1

Refer to Kelcey A. Brown's (Ms. Brown's) Direct Testimony, page 2, lines 31-34. Please provide a copy of the RMP load forecast upon which the number of customers, kilowatt-hour sales at the meter, system loads and system peak loads at the system input level, and number of bills are based. Include the following:

- (a) Final report and documentation of all forecasting methodologies;
- (b) Electronic files that present monthly test year energy sales and number of customers by customer classification for each jurisdiction;
- (c) Computer/model outputs for each forecasting model developed for all jurisdictions;
- (d) Identification of all independent variables included in each forecast model and the data series for each independent variable for all jurisdictions;
- (e) All electronic files (spreadsheets and MetrixND files) created in association with development of the forecast for all jurisdictions.

Response to OCS Data Request 10.1

- (a) Please refer to the following attachments:
 - Attachment OCS 10.1-1 provides the forecast system coincident monthly peak by jurisdiction;
 - Attachment OCS 10.1-2 provides the forecast of monthly system loads at input by jurisdiction;
 - Attachment OCS 10.1-3 provides the forecast of monthly sales by customer class and jurisdiction; and
 - Attachment OCS 10.1-4 provides the forecast of monthly customers by customer class and jurisdiction.
- (b) Please refer to the Company's response to subpart (a) above.
- (c) Please refer to the MetrixND files provided with the Company's response to subpart (e) below.
- (d) Please refer to the description on the "Coef" sheet of each model provided with the Company's response to subpart (e) below.
- (e) Please refer to the following attachments:

- Attachment OCS 10.1-5 provides a copy of the Demand Side Management (DSM) reductions by customer class and jurisdiction;
- Confidential Attachment OCS 10.1-6 provides a copy of the IHS Global Insight forecasts that were used in this filing. The requested information is confidential and proprietary information of IHS Global Insight, and subject to copyright;
- Attachment OCS 10.1-7 provides a copy of the calculation of normal peak temperatures;
- Confidential Attachment OCS 10.1-8 provides a copy of the monthly MetrixND models for all jurisdictions; and
- Confidential Attachment OCS 10.1-9 provides a copy of the hourly MetrixND models for all jurisdictions.

Please refer to the Company's response to OCS Data Request 10.20; specifically Confidential Attachment OCS 10.20, which provides a copy of the Residential Statistically Adjusted End-Use (SAE) input sheets. Please also refer to the Company's response to Filing Requirement R746-700-23-C.8.m, which provides the calculation of line losses.

Confidential information is provided subject to Utah PSC Rule 746-100-16.

OCS Data Request 15.5

Please provide the following net metering data for the past three (3) years:

- (a) The total number of net metering customers;
- (b) The total generating capacity of facilities owned by net metering customers;
- (c) The total kWh used by net metering customers;
- (d) The total kWh fed back to RMP; and
- (e) The total kWh taken from RMP.

Response to OCS Data Request 15.5

- (a) Please refer to the Company's response to Sierra Club 1.5.
- (b) As of February 5, 2014, the total generating capacity of facilities owned by net metering customers is 16.561 megawatts of direct current (MW_{DC}).
- (c) RMP metering does not measure total kWh used by net metering customers. RMP metering measures kWh taken from RMP and kWh fed back to RMP.
- (d) Please refer to the information provided below:
 - 2011 - 1,379,010 kWh
 - 2012 - 2,590,632 kWh
 - 2013 - 4,284,294 kWh
- (e) Please refer to the information provided below:
 - 2011 - 30,096,510 kWh
 - 2012 - 54,172,023 kWh
 - 2013 - 67,545,119 kWh

UCE Data Request 2.15

Please identify the total number of net metering customers by rate schedule for calendar years 2010, 2011, 2012, 2013, the type of generating facility that is net metered and the capacity of each system in kW_{AC}.

Response to UCE Data Request 2.15

Net Metering Customers By Rate Schedule*						
	Rate Schedule	2010	2011	2012	2013	Grand Total
Schedule 1 Residential	08NETMT135	639	915	1,310	1,923	1,923
Schedule 6 General Service	08NMT06135	28	58	81	110	110
Schedule 8 Large General Service	08NMT08135	1	1	4	6	6
Schedule 10 Irrigation	08NMT10135	1	1	2	2	2
Schedule 23 Small General Service	08NMT23135	63	95	121	162	162
Schedule 6A General Service Time of Day	08NMT6A135	1	2	4	11	11
	Grand Total					2,214

Please see Attachment UCE 2.15 which shows the type of generating facility and the capacity for each system. Capacity is reported in kW_{DC} rather than kW_{AC}. The Company does not track facility capacity in kW_{AC}.

13-035-184/Rocky Mountain Power
April 15, 2014
UCE Data Request 2.19

UCE Data Request 2.19

Please define the term “regulatory compact” as Witness Walje uses the term on page 15, lines 333-334.

Response to UCE Data Request 2.19

As used by Mr. Walje the term “regulatory compact” means:

Customer Benefits and Obligations

Right to safe and reliable service

Non-discriminatory service

Efficient investment and operation

Rates set to prevent monopolistic level profits

Forego opportunity to choose supplier

Reliance on regulators, not market, to ensure quality service at reasonable prices

Recourse for poor customer service or failing to achieve the above

Utility Benefits and Obligations

Franchise to sell its products & services in a specified service territory

Obligation to sell to/serve all customers at prices set by regulators

Rates set to provide reasonable opportunity to cover operating expenses; fair and reasonable return, no guarantees.