16-035-01 / Rocky Mountain Power March 15, 2016 EBA Filing Requirement 6

EBA Filing Requirement 6

Supporting Information

- (a) The Hedging Collaborative Report filed semi-annually by the Company pursuant to Utah Division of Public Utilities' "Report on the Collaborative Process to Discuss Appropriate Changes to PacifiCorp's Hedging Practices", filed in Docket 10-035-124, shall be updated to latest information.
- (b) Trade Data: List of electricity and natural gas trades that were settled during the energy balancing account (EBA) deferral period including both financial (i.e., swaps) and physical transactions.

In accordance with the Settlement Stipulation in Docket 14-035-31, paragraph 9, EBA Filing Requirement 6 subpart (b) is amended as follows:

"The Company agrees to continue to provide in its quarterly EBA reports trade information consistent with EBA filing requirement 6(b). This information will be provided in the same format and detail as the Company's response to DPU data request 3.1 in Docket 14-035-31. The Company agrees to make its best efforts to provide the fourth quarter trade information in EBA filing requirement 6(b) annually, on February 15, but no later than March 1, prior to an annual EBA filing on March 15. When the fourth quarter information is provided, it will be provided in the same format and detail as DPU data request 3.1 in Docket 14-035-31 and include data for all four quarters. This information will be filed again with the Company's EBA application filing and will replace the current FR 6- 2, 6-3, 6-4 and 6-5 spreadsheets. The SAP reconciliations that are currently shown in the FR 6-2, 6-3, 6-4, 6-5 spreadsheets will also be provided in the annual EBA application filing".

At a minimum, the trade data will include the following:

- (i) Deal Number
- (ii) Instrument Type
- (iii) Buy / Sell
- (iv) Month
- (v) Year
- (vi) Delivery Start
- (vii) Delivery End
- (viii) Done Date
- (ix) Point of Receipt (POR)
- (x) Point of Delivery (POD)
- (xi) Fixed Price
- (xii) Floating Price

- (xiii) Index
- (xiv) Calculation of gains and losses for electric and natural gas swaps
- (xv) Counterparty
- (xvi) Description of actions taken, if any, to liquidate the instrument
- (c) Outage logs: The Company shall provide a list of all outages during the EBA period. This data will include the name of the plant where the outage occurred, the duration of the outage, and the megawatt-hour (MWh) impact of the outage. The information shall be in a format substantially similar to the Company's Confidential Attachment EBA FR 2 in Docket 12-035-67.
- (d) Plant performance data: The Company shall provide a report summarizing plant performance over the EBA deferral period. The detail will include each plant's capacity factor, equivalent forced outage rate, forced outage MWh, planned outage MWh, and maintenance outage MWh. The data shall be in a format substantially similar to the Company's Confidential Attachment EBA FR3 filed in Docket 12-035-67.
- (e) Generation logs: The Company shall provide hourly generation logs for all owned generation resources on the Company system during the EBA deferral period. The data shall be in a format substantially similar to the Company's Confidential Attachment EBA FR4 filed in Docket 12-035-67.
- (f) Please provide relevant economic analyses and internal communications recommending contracts during the applicable period with a term greater than one year that were executed.
- (g) Please provide new or modified contracts for long-term purchases.
- (h) Please provide all short-term firm (STF) purchases.
- (i) Please provide a report on daily system balancing transactions for the Company over the EBA period.
- (j) Please provide actual market electricity prices for the period for all energy trading markets in which the Company participated.
- (k) Please provide a summary of terms and price for all new or modified coal contracts.
- (l) Please provide a summary of terms and price for all new or modified natural gas contracts.
- (m)To the extent included in an EBA, please provide all monthly California Independent System Operator (CAISO) service charges and fees.

(n) Please provide a description of the principal drivers causing actual EBA net power cost (NPC) and wheeling revenue to differ from the base EBA NPC and wheeling revenue.

Response to EBA Filing Requirement 6

Note: the Deferral Period for the 2016 Energy Balancing Account (EBA) is January 1, 2015 through December 31, 2015 (2016 EBA).

- (a) Please refer to Confidential Attachment EBA FR 6 -1, which provides a copy of the Company's latest Semi-Annual Hedging Report, filed with the Public Service Commission of Utah (UPSC) on February 15, 2016 (Docket 16-035-08).
- (b) Please refer to Confidential Attachment EBA FR 6 -2, which provides power physical transactions that were settled during the EBA Deferral Period. There were no power financial transactions that were settled during the EBA Deferral Period. Please refer to Confidential Attachment EBA FR 6 -3, which provides natural gas physical transactions that were settled during the EBA Deferral Period. Please refer to Confidential Attachment EBA FR 6 -4, which provides natural gas financial transactions that were settled during the EBA Deferral Period. Please refer to Confidential Attachment EBA FR 6 -4, which provides natural gas financial transactions that were settled during the EBA Deferral Period. Please refer to Confidential Attachment EBA FR 6-5, which provides the trade data from Confidential Attachment EBA FR 6-2 through Confidential Attachment EBA FR 6-4 in the format agreed upon in the Settlement Stipulation in Docket 14-035-31.

With regard to subpart (b)(xvi) – transaction liquidation takes place through final settlement of a swap transaction or delivery and settlement of a physical transaction. The Company does not explicitly transact to liquidate a particular transaction in advance of settlement.

- (c) Please refer to Confidential Attachment EBA FR 6 -6, which provides outage information for the Company's owned hydroelectric, wind and thermal resources, relevant to the EBA Deferral Period. Notes: (1) thermal outage data includes North American Electric Reliability Corporation (NERC) Generating Availability Data System (GADS) information for each thermal outage, (2) hydro outage data includes NERC GADS information for units on which GADS reporting is required, and (3) wind resources are not currently required to submit NERC GADS information.
- (d) Please refer to Confidential Attachment EBA FR 6 -7, which provides plant performance information for the Company's owned hydroelectric, wind and thermal resources, relevant to the EBA Deferral Period.

- (e) Please refer to Confidential Attachment EBA FR 6 -8, which provides the hourly generation logs for the Company's owned hydroelectric, wind and thermal resources, relevant to the EBA Deferral Period.
- (f) There is one contract provided with the Company's response to subpart (g) below, which has a term greater than one year, for which economic evaluations were produced. The Company's economic evaluations are considered highly confidential and the Company requests special handling. Please contact Bob Lively at (801) 220-4052 to make arrangements for review. Note: qualifying facility (QF) power purchase agreements (PPA) do not require economic evaluations as QF PPAs are a must buy obligations.
- (g) Please refer to Confidential Attachment EBA FR 6 –9 and Attachment EBA FR 6 -10, which provides copies of new or modified long-term power purchase agreements (PPA) entered into, which commenced delivery in the EBA Deferral Period, and which were not previously included with the Company's previous year's EBA Filing Requirements.
- (h) For all short-term power purchases relevant to the EBA Deferral Period, please refer to the Company's response to subpart (b) above.
- (i) For all system balancing transactions relevant to the EBA Deferral Period, please refer to the Company's response to subpart (b) above.
- (j) Please refer to Attachment EBA FR 6 -11, which provides historical electricity prices relevant to the EBA Deferral Period.
- (k) Please refer to Confidential Attachment EBA FR 6 -12 which provides a summary of coal agreements relevant during the EBA Deferral Period.
- (1) For all physical natural gas and financial natural gas transactions relevant to the EBA Deferral Period, please refer to the Company's response to subpart (b) above.
- (m)Please refer to Confidential Attachment EBA FR 6 -13, which provides the California Independent System Operator (CAISO) service and wheeling fees relevant during the EBA Deferral Period.
- (n) <u>Net Power Costs</u> Please refer to the Direct Testimony of Company witness, Michael G. Wilding.

<u>Wheeling Revenues</u> - Non-firm (NF) wheeling revenue is lower for the period of January 2015 through December 2015 compared to the revenue forecast in the 2015 general rate case (GRC) due to lower capacity reserved

by customers during 2015, which was offset slightly by higher rates compared with the rates in the revenue forecast.

Actual short-term firm (STF) revenues increased approximately \$1.6 million primarily due to higher rates during 2015 compared with the base EBA period. Short-term revenues would have been even higher, but the overall volumes were down compared with the base EBA period.

Actual long-term firm (LTF) transmission wheeling revenue, including legacy contracts, is basically flat in comparison with the base EBA primarily due to higher network demand, lower LTF point-to-point (PTP),plus transmission rates lower than the assumption utilized in the base EBA.

Use of facility charges are lower than base EBA primarily due to timing as contracts converted from use of facility to LTF agreements.

Ancillary service revenues for 2015 increased compared to the base EBA primarily due to Schedule 5-Spinning Reserve and Schedule 6-Supplemental Reserve as the methodology for application of these services changed, which resulted in additional revenues compared with the base EBA.

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