

May 1, 2020

To: Jana Saba, PacifiCorp

From: Utah Office of Consumer Services (OCS)

RE: Questions for the May 8, 2020 Technical Conference in Docket No. 19-035-18

Questions:

1. Please discuss in detail the major factors for the changes in capacity contributions for wind and solar in the table below (from previous filings to the current filing). Table 1 figures are from Lines 355 – 356 of Mr. MacNeil’s testimony. Contribution factors from previous filings are from 2018 & 2019 Schedule 37 filings in Utah.

Capacity Contribution	Previous Filings	Table 1 Current Filing
Wind	15.8%	17.9%
Fixed Solar	37.9%	4.3%
Tracking Solar	59.7%	9.9%
Gas	100.0%	100.0%

2. Refer to Table 2 from Mr. MacNeil’s testimony below.
 - a. Please discuss in detail the reasons for the differences between the price for a base load resource and the price for each of the other four resources (wind & solar). What are the major factors for each difference?
 - b. Please discuss why the very low solar prices are reasonable? How do these solar prices compare to market prices – i.e. could the Company purchase power from the market at such prices? Please explain.

Table 2: Schedule 37 Avoided Cost by Resource and Start Date

15 Year Nominal Levelized Prices @ 6.92% Discount Rate (\$/MWh)			
Resource	Start Date		
	2021	2022	2023
Base Load	\$29.14	\$31.47	\$34.02
Wind Deferr WY	\$57.73	\$65.19	\$73.20
Wind Deferr UT	\$30.07	\$33.26	\$36.62
Fixed-Tilt Solar	\$14.80	\$15.41	\$15.92
Tracking Solar	\$17.61	\$18.47	\$19.33

3. The Company proposes that a Utah wind QF would displace the customer preference Utah wind resource in the 2019 IRP Preferred Portfolio. Please discuss if it is actually possible for a wind QF to replace the customer preference resource – i.e. would the customer accept a wind QF as a replacement resource and would the contract with the customer allow for such a substitution?
4. Please explain why it is appropriate that a tracking solar QF would replace a solar/battery combination resource from the 2019 IRP.
5. It appears that the Company is proposing that if a QF displaces wind in Wyoming, the QF would also receive credit for displacing part of the GWS transmission line. Please explain how this additional credit would be calculated. Also, please explain why it is appropriated for a small QF resource to defer part of GWS when transmission investments are very lumpy – i.e. essentially you build all of it or none of it.