

PSC Technical Staff Questions for the July 10, 2020 Phase I Technical Conference
Docket No. 20-035-04

Q1) Please refer to RMP's June 2, 2020 supplemental filing of the Microsoft Excel version of Exhibit RMP_(RMM-3) related to Functional Factors Workpapers

A. Please refer to the 'GROSS PLANT' tab:

Observation: Line 3 of this tab indicates that amounts on this sheet are scaled (to the 000's); however, it appears that the 'Production Plant,' 'Transmission Plant,' and 'Distribution Plant' amounts, contained in cells D9 through D11, may not have been not scaled as indicated.

Please explain this apparent discrepancy, and any attendant impacts on the results of RMP's cost of service (COS) study, including the information on the COS summary table.

B. Please refer to the 'TOTAL FUNFAC' tab:

Observation: It appears RMP calculated the PT and PTD Allocation Factors on the basis of Normalized Test Period amounts, whereas the TD Allocation Factor appears to have been calculated using amounts from the December 2019 Unadjusted Results.

Please explain the apparent discrepancy, and any attendant impacts on the results of RMP's cost of service (COS) study, including the information on the COS summary table.

Q2) Please refer to the "FuncStudy" tab of the Excel Model 'COS UT GRC 2020' attached to Meredith's DIRECT testimony

A. Please refer Row 1672, labeled 'TOTAL GENERAL PLANT':

Observation: The formulae in cells S1672 through V1672, and again in cells X1672 through AB1672, appear to sum the Functionalized amounts (according to the 'Transmission' and 'Distribution' Functions, respectively), pertaining to GENERAL PLANT, and apportioned to the new Subfunction categories (*i.e.*, Demand-Variable; Demand-Fixed; Energy-Variable; and Energy-Fixed). However, formulae in Cells N1672 through Q1672 (under the 'Production' Function) do not appear to sum the Functionalized amounts according to their Subfunctions.

Please explain the inconsistent formulae (apparently allocation formulae) in Cells N1672 through Q1672, and, if necessary, describe the impact any revisions have on the results of the COS Study.

B. Please refer to Row 1886, labeled 'TOTAL RATE DRB ADDITIONS':

(The discrepancy described above in Q2A appears to be duplicated at Row 1886.)

Please explain the inconsistent formulae (apparently allocation formulae) in Cells N1886 through Q1886, and, if necessary, describe the impact any revisions have on the results of the COS Study.