

**Docket No. 20-035-04**

**OCS Exhibit No. 4.2D**

Compilation of Discovery (Data Request) Responses Referenced in the  
Direct Testimony of Philip Hayet (OCS 4D) on Behalf of  
The Office of Consumer Services

**PUBLIC AND REDACTED VERSION**

September 2, 2020

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20-035-04 / Rocky Mountain Power

June 18, 2020

OCS Data Request 3.1

### **OCS Data Request 3.1**

**Outages** - Please provide all outage data from January 1, 2014 to December 31, 2016 in the same format as provided in the MFR titled "UTGRC20w\_48mo\_Evts\_Backup\_2016-2019 CONF".

### **Response to OCS Data Request 3.1**

The Company objects to this request as overly burdensome and not likely to lead to admissible evidence in this proceeding. Notwithstanding the foregoing objection, the Company responds as follows:

Please refer to Confidential Attachment OCS 3.1 which provides CY 2014 and 2015 outage data. 2016 outage data is already included in file "UTGRC20w\_48mo\_Evts\_Backup\_2016-2019 CONF".

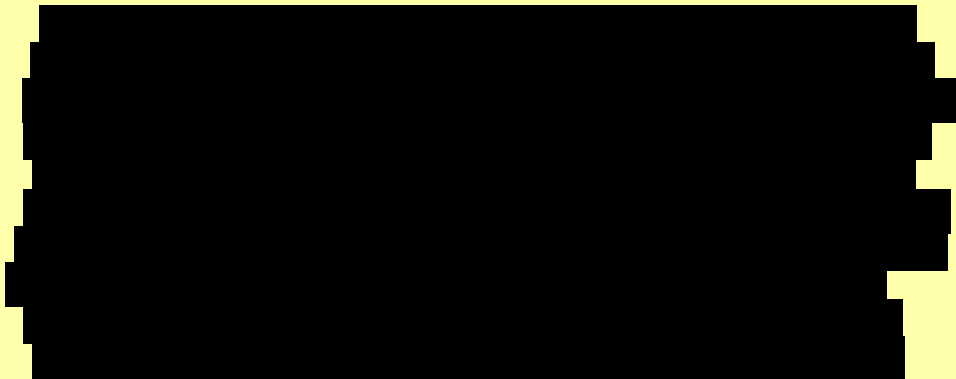
Confidential information is provided subject to R746-1-601–605 of the Utah Public Service Commission Rules.

**OCS Data Request 3.2**

**CONFIDENTIAL REQUEST – Outages** - For the following outages listed in “UTGRC20w\_48mo\_Evts\_Backup\_2016-2019 CONF”, please provide:

- (a) All documents which discuss the root cause of the event and any corrective measures necessary.
- (b) Estimates for the cost of repairs, and actual costs for repairs.
- (c) Whether the Company received or attempted to receive re-imbursement from vendors (for warranties) or contractors related to these outages. If so, please provide the amounts and how those were treated for ratemaking purposes in the test year, GRID, or elsewhere.
- (d) The cost of replacement energy due to the outage, including the work papers for how this was calculated.
- (e) A brief description, in less technical terms, of what occurred to cause the outage event:

**[CONFIDENTIAL BEGINS]**



**[CONFIDENTIAL ENDS]**

**Confidential Response to OCS Data Request 3.2**

- (a) Please refer to Confidential Attachment OCS 3.2-1. Note: one root cause analysis (RCA) document is considered commercially sensitive and highly confidential. The Company requests special handling. Please contact Jana Saba at (801) 220-2823 to make arrangements for review.
- (b) Please refer to Confidential Attachment OCS 3.2-1.

(c) Please refer to Confidential Attachment OCS 3.2-1. **[CONFIDENTIAL BEGINS]**

[REDACTED]

**[CONFIDENTIAL ENDS]**.

(d) Please refer to Confidential Attachment OCS 3.2-2

(e) Please refer to Confidential Attachment OCS 3.2-1.

Confidential information is provided subject to R746-1-601–605 of the Utah Public Service Commission Rules.

**OCS 3.2 – 1**

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**OCS 3.2 – 2**

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### **OCS Data Request 17.5**

Please provide an analysis showing the test year revenue requirements impact on Utah rates for each of the following:

- (a) The Leaning Juniper project repowering.
- (b) The Foote Creek project repowering.
- (c) The Pryor Mountain Project.
- (d) The costs related to repair of the Blundell Unit 2 long outage discussed at the July 10, Technical Conference.
- (e) The costs related to the repair of the Lake Side 2 Unit 3 long outage discussed at the July 10 Technical Conference.

Please include all elements of revenue requirements – return of an on investment, current and deferred taxes, O&M cost and Net Power Costs. If the Company objects to providing such a calculation, please provide OCS the data necessary to determine the test year Utah rate impacts.

### **Response to OCS Data Request 17.5**

- (a) Please refer to Confidential Attachment OCS 17.5-1.
- (b) Please refer to the Company's response to UAE Data Request 3.5.
- (c) Please refer to the Company's response to UAE Data Request 2.27
- (d) Please refer to Confidential Attachment OCS 17.5-2.
- (e) Please refer to Confidential Attachment OCS 17.5-3.

Note, the revenue requirement for subpart (a) through (c) do not include any net power costs (NPC) as these are zero-fuel cost resources. The benefits of these resources have been included in the overall NPC included in this general rate case (GRC).

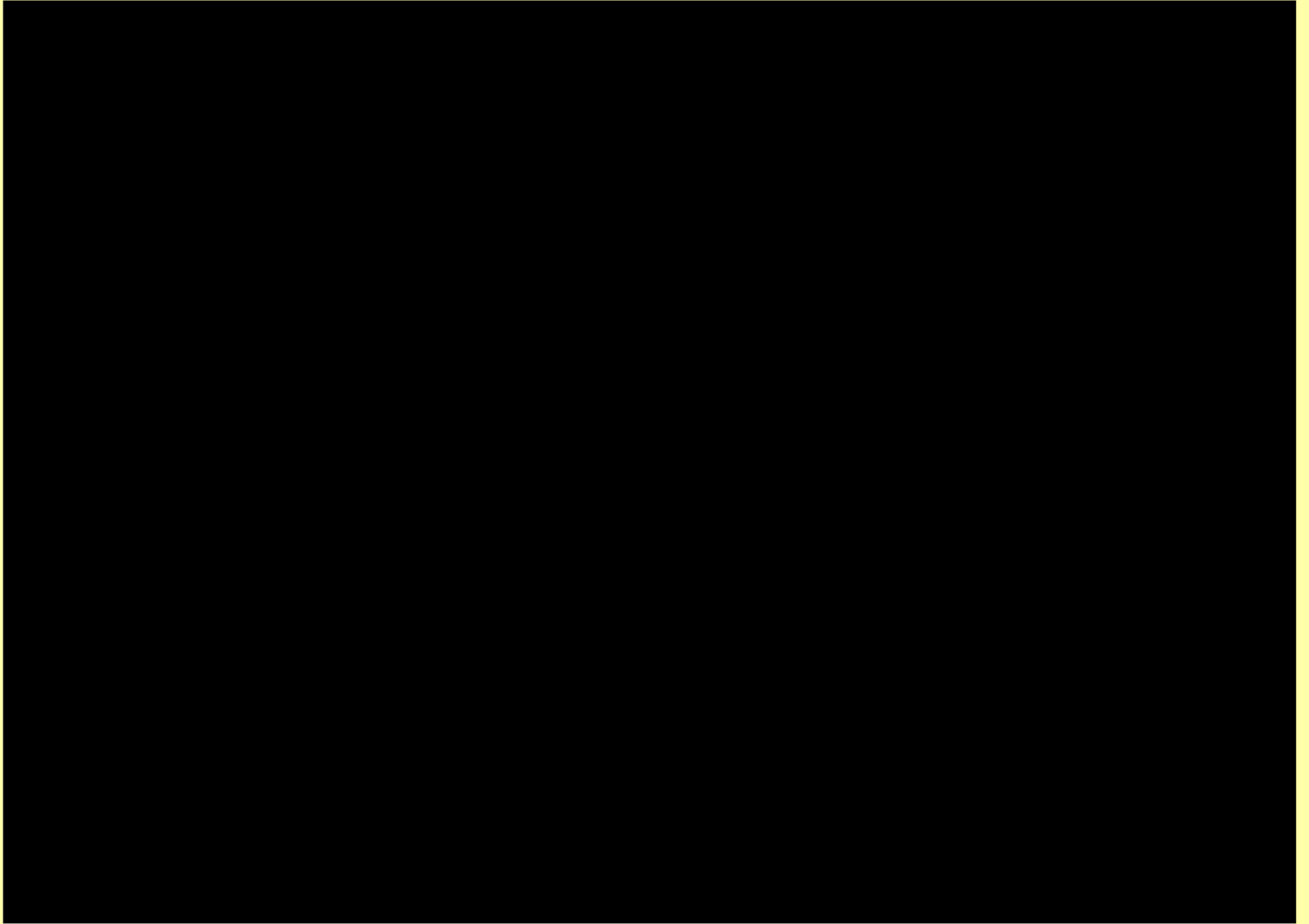
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**OCS Data Request 19.1**

**CONFIDENTIAL REQUEST** - Regarding the [CONFIDENTIAL BEGINS]  
[REDACTED] [CONFIDENTIAL ENDS], please  
identify the project scope and the total cost of repair of the outage.

**Confidential Response to OCS Data Request 19.1**

The project scope was to [CONFIDENTIAL BEGINS] [REDACTED]  
[REDACTED] [CONFIDENTIAL ENDS]. Total cost of repair was  
[CONFIDENTIAL BEGINS] [REDACTED] [CONFIDENTIAL ENDS].

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Service Commission Rules.

**OCS Data Request 19.2**

**CONFIDENTIAL REQUEST** - Regarding the **[CONFIDENTIAL BEGINS]**  
**[REDACTED]** **[CONFIDENTIAL ENDS]**.

- (a) Please identify the project scope and the total cost of repair of the outage.
- (b) Has the Company decided whether or not it is economic to repair the unit? Please provide any economic analysis conducted to support the Company's decision.
- (c) When does the Company expect the unit to be returned to service?

**Confidential Response to OCS Data Request 19.2**

- (a) The project scope is to **[CONFIDENTIAL BEGINS]** **[REDACTED]**  
**[REDACTED]** **[CONFIDENTIAL ENDS]**.  
Total costs, through June 30, 2020 are **[CONFIDENTIAL BEGINS]** **[REDACTED]**  
**[CONFIDENTIAL ENDS]**. Final project costs are still being determined.
- (b) Yes, the Company analyzed economically not returning the unit to service through 2023. The cost to the customer, or present value of revenue requirements (PVR) would have been **[CONFIDENTIAL BEGINS]** **[REDACTED]** **[CONFIDENTIAL ENDS]**. Whereas the PVR to proceed with the generator replacement was **[CONFIDENTIAL BEGINS]** **[REDACTED]** **[CONFIDENTIAL ENDS]**. Please refer to Confidential Attachment OCS 19.2
- (c) **[CONFIDENTIAL BEGINS]** **[REDACTED]**  
**[REDACTED]** **[CONFIDENTIAL ENDS]**.

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**UAE Data Request 2.27**

**Pryor Mountain.** The costs of the Pryor Mountain Project appear to be spread throughout the Jurisdictional Allocation Model and not separately identified in that model. Please separately identify each revenue requirement component (e.g., rate base, expense, PTCs, REC credits) associated with the Pryor Mountain in the Jurisdictional Allocation Model. In addition, please identify the location within PacifiCorp's work papers where the amounts for each of these revenue requirement items are located. Using each of the identified amounts, please provide the revenue requirement for the Pryor Mountain project included in the test period in Excel format with formulas intact.

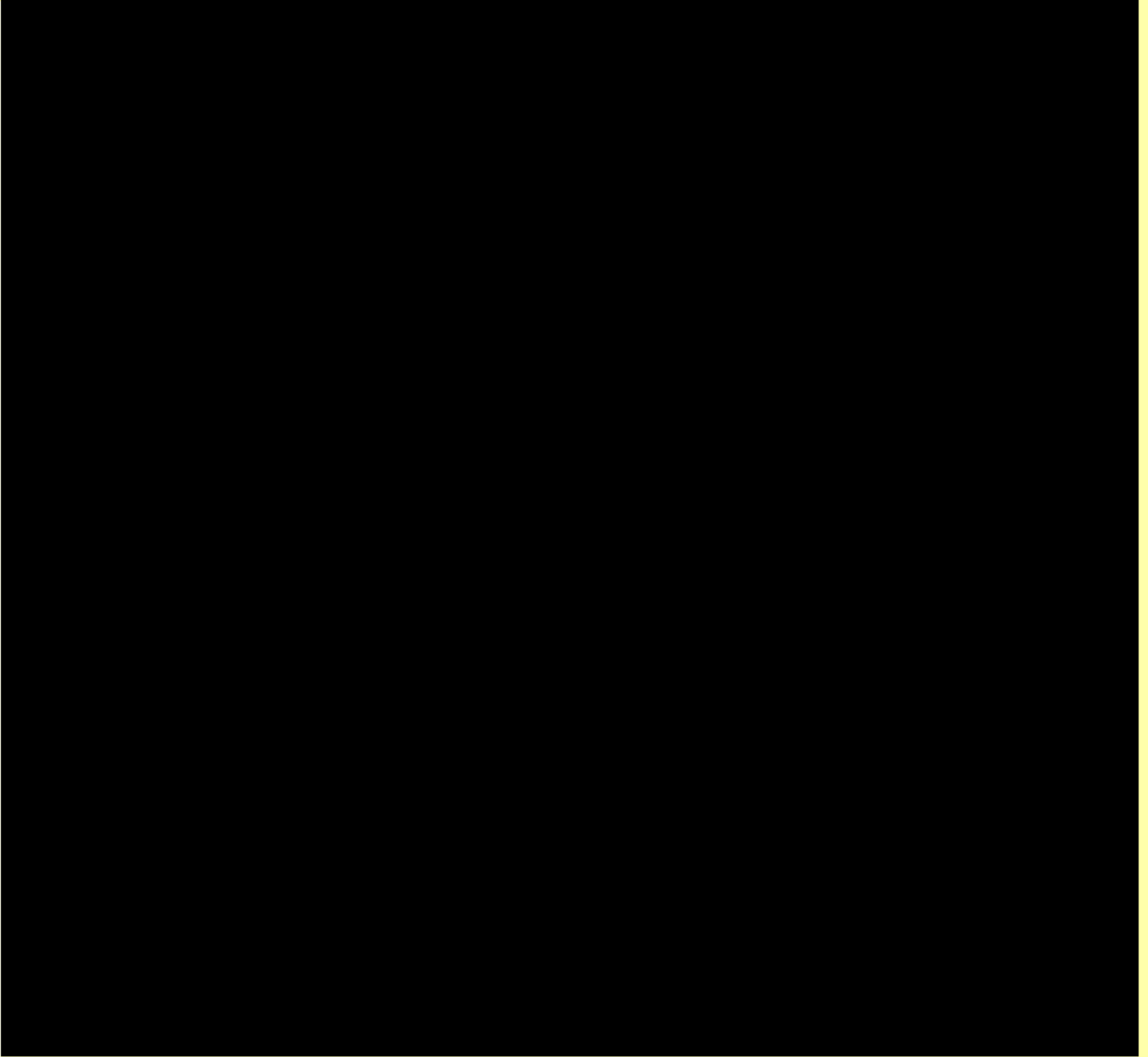
**Response to UAE Data Request 2.27**

Please refer to Confidential Attachment UAE 2.27 for the Pryor Mountain revenue requirement included in the test period.

Wind plant related net power costs (NPC) benefits are included as zero-cost resources in the NPC adjustment.

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### **UAE Data Request 3.5**

**Foote Creek I.** Please separately identify each revenue requirement component (e.g., rate base, expense, PTCs, REC revenue) associated with Foote Creek I repowering in the Jurisdictional Allocation Model. In addition, please identify the location within PacifiCorp's work papers where the amounts for each of these revenue requirement items are located. Using each of the identified amounts, please provide the revenue requirement for the Foote Creek I repowering project included in the test period in Excel format with formulas intact.

### **Response to UAE Data Request 3.5**

Please refer to the Confidential Attachment UAE 3.5 for the Foote Creek I repowering revenue requirement included in the test period.

Wind plant related net power costs (NPC) benefits are included as zero-cost resources in the NPC adjustment.

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