

UAE Exhibit COS 4.1

**Office Responses to Data Requests
Referenced in the
Rebuttal Testimony of
Justin Bieber**

20-035-04

OCS Response to UAE Data Requests 1.1

1.1 Request:

Refer to the Direct Testimony of Ron Nelson, lines 545-547 with respect to the Sub-functionalization of primary and secondary distribution equipment, in which Mr. Nelson states that “[b]ecause RMP did not meet its burden to demonstrate the split of secondary and primary distribution, I include the 10 percent adjustment as a sensitivity within my recommended model.”

- a. Does Mr. Nelson have evidence that indicates that this 10 percent sensitivity adjustment results in a more accurate representation of RMP’s distribution facilities?
 - i. If yes, please provide the relevant analyses.

1.1 Response:

Mr. Nelson’s analysis suggests that the data utilized by RMP is unclear and potentially inaccurate. Because the integrity of RMP’s data is questionable, Mr. Nelson did not have data available to calculate an alternative to RMP’s proposed sub-functionalization.

20-035-04

OCS Response to UAE Data Requests 1.2

1.2 Response:

Refer to the Direct Testimony of Ron Nelson, lines 686-691 with respect to the demand and energy weightings to classify production plant, in which Mr. Nelson states that “[t]he 40/60 split better balances the demand and energy related characteristics of RMP’s current and future system. For example, RMP has significant hydro and renewable generations that are not appropriately considered 75 percent demand related. Even RMP’s baseload plants, such as coal facilities, would be inappropriate to classify at the 75 percent demand related level. The 40/60 split better reflects cost causation and is, therefore, more reasonable.”

- a. Please provide all analyses of RMP’s generation portfolio that Mr. Nelson relied upon to support his claim.

1.2 Response:

Mr. Nelson’s analysis relied upon his qualitative analysis of production related information within the ECOSS. Mr. Nelson also provided detailed descriptions of how the power system is changing at the bulk system level. In general, these changes are resulting in production assets becoming more heavily energy related. No quantitative analysis was conducted, as indicated on lines 743-746. For additional information, See *generally* Nelson Direct at lines 209-1010.