

- b) identify training requirements, and conduct training for the work group. This should include:
 - i) the relationship of accounts in the EBA to the net power cost components in the Generation and Regulation Initiative Decision (“GRID”) model;
 - ii) the relationship to Federal Energy Regulatory Commission accounts (“FERC”) and how they are booked and reconciled, i.e., Account 151 Fuel Stock and account 501 Fuel.

- 4) The pilot program shall evaluate, at a minimum:
 - a) The sharing mechanism;
 - b) which net power cost components are controllable and which are uncontrollable and whether the sharing element should be eliminated from the uncontrollable costs in the EBA;
 - c) the effects of the EBA on the Company’s resource portfolio;
 - d) whether the EBA includes the appropriate net power cost components;
 - e) the effects of the EBA on the Company’s hedging decisions and level of market reliance on net power cost;
 - f) parties’ incremental costs to audit the balancing account;
 - g) unintended consequences resulting from the EBA; and,
 - h) monthly vs. annual accrual differences.

The Commission also directed items 1 through 3 to be filed for approval no later than 120 days from the date of the EBA Order. On June 29, 2011, the Division filed its draft preliminary report addressing these issues. However, the Division noted it was continuing to receive comments from other parties on the preliminary report and anticipated filing a final EBA Pilot Program Evaluation Plan after the resolution of certain issues set for rehearing in this matter. The issues set for rehearing were subsequently settled and approved in this matter on September 13, 2011, (“September Order”). Thereafter, the Division continued to delay filing a

final report because a number of parties raised certain issues in Docket No. 11-035-T10,¹ the Company's application for approval of Schedule 94, "EBA Pilot Program." The Division concluded this proceeding could have an impact on the content of the working group report. However, the Commission's Prehearing Order issued January 20, 2012, in Docket No. 11-035-T10, clarified the scope of that docket, so the Division received further input from interested parties in February 2012 and finalized the working group report.

Consequently, on March 1, 2012, the Division filed its "Report of the Division of Public Utilities EBA Pilot Program Evaluation Plan" ("Report") responding to items 1 through 3 of the EBA Order, noted above, as well as providing discussion of the requirements for addressing item 4.

The Division represents the following organizations participated in the working group and had the opportunity to provide input on the various drafts of the Division's Report: the Company, the Office of Consumer Services ("Office"), the Utah Association of Energy Users ("UAE"), the Utah Industrial Energy Consumers ("UIEC"), Western Resource Advocates ("WRA"), Utah Clean Energy ("UCE"), and Salt Lake Community Action Program ("SLCAP"). However, the Division states the report does not reflect a consensus of the working group. On March 8, 2012, the Commission issued a notice providing a schedule for comments to be received on the Division's Report. On March 22, 2012, the Company, the Office, and UIEC filed comments on the Report. On April 2, 2012, the Division filed a response to certain comments.

¹ See Docket No. 11-035-T10, "In the Matter of the Rocky Mountain Power Proposed Schedule 94, Energy Balancing Account (EBA) Pilot Program Tariff."

DIVISION'S REPORT

In the Report, the Division identifies what it considers to be the complete list of data, transactions, and other information the Company must file annually with each March 15 EBA filing. This information, according to the Division, represents what is needed to constitute a complete filing. The Division also identifies certain information as the monthly filing requirements for the Division's ongoing audit, review, tracking, and monitoring of the EBA.

The Division indicates the Company shall file the information related to the EBA in each future general rate case. For any stipulated settlement of NPC or rate spread and design, the Division argues EBA methodologies and values must be specifically called out. The Division indicates in each general rate case order the Commission will need to specify the methods and values involved with the EBA.

For the EBA Pilot Program Evaluation Plan, the Division proposes evaluating the following issues: auditing, monitoring, and assessing the EBA; EBA agreement or disagreement by the Division and interveners; net power cost variability; electric rate variability; effect on Company return on equity; Company plant and power usage and performance; and other issues. The Division will evaluate whether the Company and customers are better or worse off and lists various issues or criteria it will evaluate.

The Division does not identify training requirements for the EBA pilot program but requests the Company be available on an on-going basis to assist the Division and other parties with training as the need develops.

PARTY COMMENTS

It is the Company's position the Division's Report is in compliance with the Commission's directive and is a reasonable approach for monitoring and evaluating the impact of the EBA. The Company has no objections to the EBA reporting requirements proposed by the Division including the filing requirements for annual March 15 EBA proceedings. The Company references its response to Division data request 1.1 as the first comprehensive set of information that would be required on a monthly basis if the Division Report is accepted. The Company states this is the same information it provided for net power cost and wheeling revenue for the period from October through December 2011, in the Company's March 15, 2012, EBA rate application in Docket No. 12-035-67, which included confidential data.² The Company does not object to providing this information on a monthly basis, approximately 45 days after the reporting month, through the EBA pilot program.

The Company seeks clarification regarding the Commission's directive in the September Order for quarterly EBA reports. The Company contends the monthly filings made with the Division will more than adequately comply with the quarterly reporting requirement.

The Company also requests clarification regarding various statements included in the Division's Report pertaining to future general rate cases and certain performance evaluation criteria. It is unclear to the Company what specifically would be required to be included in future Company general rate case filings that is not already provided for in compliance with the Commission's requirements for filing a general rate case, including Rule 746-700-23 which

² See Docket No. 12-035-67, "In the Matter of the Application of Rocky Mountain Power to Increase Rates by \$29.3 Million or 1.7 Percent Through the Energy Balancing Account."

addresses net power cost. The Company believes the filing requirements for a general rate case are sufficient and there is no need to supplement such requirements with more detailed information specific to the EBA which will be provided in EBA reports and proceedings.

In the Report, the Division proposes to evaluate Company progress in smoothing variability of NPC, in addition to the effects the EBA will have on this issue, and to evaluate swings in the Company's rates. The Company disagrees with the expectation that implementing an EBA will result in a decrease in rate variability. It has been the Company's contention an EBA is required *due to* the variability of NPC and is needed to enable recovery of these costs.

The Company opposes the list of filing requirements proposed by UIEC in its March 22, 2012, comments in this proceeding. The Company questions how the specific items requested will assist parties in evaluating the accuracy of Company accounting for net power costs, compliance with the approved tariff, or the prudence of Company actions. Additionally, the Company argues the requests are too broad for a filing requirement, impose an unnecessary burden on the Company without enhancing parties' evaluations, and agrees with the Division, the information could be obtained through data requests.

In addition to the Division's recommended filing requirements as outlined in the Report, the Office proposes expanding the areas already identified by the Division by including the detailed filing requirement attached to the Wyoming Commission's ECAM Order issued in February, 2011.³

³ Wyoming Public Service Commission, Docket No. 20000-368-EA-10 [Record No. 12477], Attachment A – ECAM Minimum Filing Requirements.

The Office also argues the Division's evaluation plan, as outlined in the Report, should better describe the proposed baseline and performance metrics for evaluating plant performance under the EBA. Specifically, the Office contends the Division's evaluation plan does not identify specific baseline and performance measures for evaluating plant performance. The Office argues such performance measures could include plant availability and capacity factors, plant heat rates, plant outage rates, and plant maintenance levels.

In order to assess the impact the EBA has on resource planning, the Division states it will compare the integrated resource plan ("IRP") baseline "preferred portfolio" to post-EBA preferred portfolios in future IRPs. The Office suggests a better indicator of performance in this area is how the Company implements an acknowledged IRP action plan and responds to changing conditions rather than a static comparison of pre- and post-EBA preferred portfolios.

UIEC believes the public interest requires more disclosure and transparency than the Division's Report provides. UIEC contends the Division has failed to require sufficient information for making an adequate investigation into the underlying drivers of relevant costs in the determination of whether the costs were incurred prudently. UIEC also argues the Division must take a very active policing role going forward based on sufficient facts and data because limited incentives remain to control the Company's behavior. According to UIEC, this reality should incent the Division to require the most complete information possible.

UIEC expresses concern about the Division's claims of time and resource constraints with which to make the initial review. Based on this concern, UIEC argues more in-depth analysis and more stringent filing requirements are warranted in the initial review periods.

UIEC argues it is the Division's responsibility to ensure adequate measures are taken to minimize ratepayer risk.

UIEC asserts a number of its previous recommendations⁴ were not included in the Division's Report. UIEC recommends the following information be provided in both the monthly and annual reconciliation filings to enable regulators and interested parties to conduct a prudence review:

- Reports explaining the cause for any outages occurring within the period;
- Project-by-project megawatt hour comparisons of thermal and hydro planned outages to actual outages for the relevant period;
- "trade data" listed on page 6 of the Division's Report should be expanded to include a calculation of gains and losses for electric and natural gas swaps;
- GRID report level comparisons of actual eligible net power costs (fuel and purchased power costs) to budgeted costs in both dollars and megawatt hours for the applicable period;
- Hourly electric market prices corresponding to each buy/sell electricity transaction for the wholesale markets in which PacifiCorp transacts for the applicable period;
- Contract by contract comparisons of actual wheeling expenses to budgeted wheeling expenses for the applicable period; and
- Relevant economic analyses and internal communications recommending contracts during the applicable period with a term greater than one year that were executed.

Additionally, UIEC encourages the Commission also consider adopting the 26 items specified in UIEC's February 13, 2012, memorandum to the Division on UIEC's comments on the Division's "Final Draft" report on the EBA pilot program evaluation plan, which it attached to its comments in this proceeding.

⁴Note: UIEC also provided filed prior comments on the Division's February 3, 2012 "Final Draft" of its "EBA Pilot Program Evaluation Plan." These detailed comments are attached as "Exhibit A" of UIEC's March 22, 2012 Comments on the Report.

DIVISION RESPONSE TO PARTY COMMENTS

The Division responds to the Company's concern the Division's Report requests additional information beyond the current filing requirements of a general rate case. The Division indicates this does not necessarily mean there are additional items that need to be filed as part of general rate case filing requirements. Rather, the Division contends it may be determined additional requirements could be needed at some future point.

The Division argues its definition of "NPC variability" is different from the Company's. According to the Division, "NPC variability" means the differences in actual NPC from the baseline forecast included in rates. According to the Division, the very purpose of the EBA is to smooth out such variability. The Division references its testimony on this subject in this docket and reiterates its contention that it remains unconvinced that some of the costs faced by the Company could not be mitigated through measures such as natural gas storage, a more balanced and multifaceted hedging strategy, more owned generation capability, and improved forecasting. The Division continues to argue the Company should pursue these and other possible strategies to mitigate NPC variability.

The Division disagrees with the Office's recommendation to include the Wyoming filing requirements and contends such information can be obtained through data requests, as needed.

The Division responds to UIEC's concerns about prudence, particularly about UIEC's recommendations for additional required filing information and the evaluation of the prudence of transactions made during the Division's audits. The Division argues its audit will

likely require the analysis of many more documents than will be filed with an annual EBA application. The Division states it does not believe in burdening the Company with the filing of mandatory documents it may not need for the review of each annual EBA filing.

DISCUSSION, FINDINGS, AND CONCLUSIONS

We have fully considered the Division's Report, parties comments and the confidential worksheets filed by the Company in Docket No. 12-035-67, the first annual EBA application of the EBA pilot program. These confidential worksheets refer to the Division's recommended filing requirements in the Report. Given this input, and consistent with our EBA and September Orders in this docket, and with our May 1, 2012, order in Docket No. 11-035-T10, ("May Order") we provide the filing and reporting requirements per items 1 and 2 of our EBA Order, as an attachment ("Attachment") to this order. These filing requirements shall apply to all future annual EBA filings until modified.

The Attachment is developed from the Division's Report, the Company's worksheets provided in Docket No. 12-035-67, the Wyoming filing requirements noted by the Office, and from UIEC's comments. We decline at this point to include all of the data requested by UIEC, as much of this data can be obtained through data requests, and we find the filing requirements in the Attachment are a reasonable starting point for this pilot program. However, in response to UIEC's recommendations, we have added certain filing requirements for quantities, e.g., megawatt hours and fuel burned, associated with actual net power cost. We expect the filing requirements for this program may change when additional experience implementing the EBA is gained.

We accept the Division's evaluation plan as an addendum to item 3 of our EBA Order subject to the following guidance. We direct the Division to: 1) expand its evaluation of changes to integrated resource planning to include the issues identified by the Office; 2) work with the Office to develop baseline performance metrics for evaluation of plant performance under the EBA; and 3) include evaluation of a dynamic composite NPC allocator as discussed in our May Order. Finally, we take note of the Division's intent to examine Security Exchange Commission ("SEC") reports to evaluate the effect of Utah's EBA on the Company's earnings. We look forward to understanding how the Division will determine the Company's earned return in Utah from total company SEC financial reports. We understand the Company's earned return in Utah can be determined only through the Company's semi-annual results of operations reports. We remind the Division Utah ratepayers are not responsible for the earnings results PacifiCorp experiences in other jurisdictions. The pilot program evaluation plan items are summarized at a high level and included in the Attachment.

Regarding the Company's request for clarification of our September Order which requires the Company file certain information quarterly, we provide the following explanation. Our EBA Order required only annual EBA filings with the Commission, composed of monthly data. The EBA Order required the Company to provide monthly data to the Division to assist it in its ongoing audit and monitoring of the EBA; this was not a monthly filing requirement with the Commission. However, our September Order approved the use of a stipulated scalar to allocate total Company monthly net power cost to Utah, rather than the allocation factors

approved in Docket No. 02-035-04⁵ and required in our decision in the EBA Order. We approved this change subject to the filing of quarterly reports comparing the two calculations.

The Company understands the Division's Report to include the information contained in the quarterly filing requirement within the monthly filing requirement to the Division, and therefore the Company concludes the "monthly filings made with the DPU" should more than satisfy the quarterly filing requirement with the Commission. We note the Division first proposed the filing of monthly information with the Commission in its preliminary draft evaluation plan filed June 29, 2012, in this docket. Further, we note most parties refer to monthly "filings" in their comments on the Division's Report. It now appears no party objects to the Company filing this information with the Commission monthly. Therefore, we accept this change and incorporate it into the Attachment.

Regarding the Company's concerns of additional filing requirements in general rate cases, we concur with the Division, implementation of the EBA requires additional detail to be provided either in testimony or in the compliance NPC filing as described in our May Order; however, this does not present a new "filing requirement" for a general rate application to be considered a "complete" filing. Rather, it is information now necessary to determine the base Utah monthly net power cost and wheeling revenue approved in the general rate case. Prior to approval of an EBA, this type of detail was unnecessary for setting annual revenue requirement.

⁵ See Docket No. 02-035-04, "In the Matter of the Application of PacifiCorp for an Investigation of Inter-Jurisdictional Issues."

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ORDER

Now, therefore, it is hereby ordered that:

1. The Company shall file the information and data shown in the Attachment to this order in its annual EBA rate applications;
2. The Company shall file the monthly information as shown in the Attachment to this order approximately 45 days after the reporting month
3. The Division's evaluation plan is approved, subject to the guidance noted herein.

DATED at Salt Lake City, Utah, this 15th day of June, 2012.

/s/ Ted Boyer, Chairman

/s/ Ric Campbell, Commissioner

/s/ Ron Allen, Commissioner

Attest:

/s/ Gary L. Widerburg
Commission Secretary
D#227972

Notice of Opportunity for Agency Review or Rehearing

Pursuant to Utah Code Ann. §§ 63G-4-301 and 54-7-15, a party may seek agency review or rehearing of this order by filing a request for review or rehearing with the Commission within 30 days after the issuance of the order. Responses to a request for agency review or rehearing must be filed within 15 days of the filing of the request for review or rehearing. If the Commission fails to grant a request for review or rehearing within 20 days after the filing of a request for review or rehearing, it is deemed denied. Judicial review of the Commission's final agency action may be obtained by filing a Petition for Review with the Utah Supreme Court within 30 days after final agency action. Any Petition for Review must comply with the requirements of Utah Code Ann. §§ 63G-4-401, 63G-4-403, and the Utah Rules of Appellate Procedure.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 15th day of June, 2012, a true and correct copy of the foregoing REPORT AND ORDER ON EBA FILING REQUIREMENTS AND PILOT PROGRAM EVALUATION PLAN was served upon the following as indicated below:

By Electronic-Mail:

PacifiCorp

Data Request Response Center (datarequest@pacificorp.com)

Rocky Mountain Power

Mark C. Moench (mark.moench@pacificorp.com)

Yvonne R. Hogle (yvonne.hogle@pacificorp.com)

Dave Taylor (dave.taylor@pacificorp.com)

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By Hand-Delivery:

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Salt Lake City, Utah 84111

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Salt Lake City, Utah 84111

Administrative Assistant

ATTACHMENT

A. ANNUAL EBA FILING REQUIREMENTS

The following items 1 through 5 shall be provided in spreadsheet(s) format with all formulae intact and all spreadsheet cells in each item linked by formula or reference, as applicable, to the next spreadsheet to provide transparent understanding of the flow of data from items 1.a. through to the EBA deferral calculations in 5 and 6. Item 1 shall be filed by the Company in any rate proceeding where Base EBA costs are approved. If such case is litigated, this item shall be filed by the Company in the “Compliance NPC Filing” approved in Docket No. 11-035-T10.

1. Base Net Power Cost and Wheeling Revenue Information

a. Test Period total Company monthly net power cost study results in the format of the Company’s Confidential Attachment R746-700-23.C.1-1, tab labeled “NPC,” in Docket No. 10-035-124 (detail includes megawatt hours, fuel burned, burn rate, average fuel cost, peak capacity, capacity factor and mills per kilowatt hour). Test Period total Company monthly wheeling revenue (including quantities transmitted) in a format substantially similar to Exhibit B, page 2 of 2, of the Settlement Stipulation filed in Docket No. 10-035-124 or the Company’s Confidential Attachment EBA FR 5-1, tab entitled “Wheeling Revenue” in Docket No. 12-035-67.

b. Test period total Company monthly net power cost study results and wheeling revenue in 1.a. by cost classification, by name of the applicable inter-jurisdictional cost allocation factor approved in Docket No. 02-035-04, by Federal Energy Regulatory Commission (“FERC”) account number, any subaccount number and any applicable SAP account number in substantially the same format as the worksheet tabs entitled “(4.2) Base NPC by Cat”, and “(4.3) Base UTGRC11StlmtNPC” in the confidential workpapers to Exhibit RMP_(BSD-2) in Docket No. 12-035-67, and in the Company’s Confidential Attachment EBA FR 5-1, filed in Docket No. 12-035-67.

c. Test period total Company net power cost and wheeling revenue monthly detail in inter-jurisdictional cost allocation format substantially similar to Exhibit RMP_(SRM-2R) page 12.22 in Docket No. 10-035-124 or the worksheet tabs entitled “(4.1) UT Allocated Base NPC” and “(5.1) Wheeling Revenues”, in the confidential workpapers to Exhibit RMP_(BSD-2) in Docket No. 12-035-67, each line item by month, by FERC account number and the name of the applicable inter-jurisdictional cost allocation factor approved in Docket No. 02-035-04.

d. Test Period Allocation Factors: Test period total Company monthly peak demand and energy loads in megawatts and megawatt hours, by jurisdiction, showing the development of the system energy (SE), system capacity (SC) and system generation (SG) inter-jurisdictional

cost allocation factors per Docket No. 02-035-04 in a format substantially similar to Exhibit RMP_(SRM-2), page 1 of 1 in Docket No. 12-035-67 or Exhibit RMP_(SRM-2R), pages 11.16 through 11.18.

e. Test period Utah monthly net power cost and wheeling revenue detail in inter-jurisdictional cost allocation format (see format and detail references in 1.c. above).

f. Test period Utah monthly retail sales net of industrial customer pass-through energy sales in a format substantially similar to the Worksheet tab entitled "Energy Factor", line 132, in the Company's Attach 746-700-22 C.1, June 2012, file COS UT June 2012_Rolled In. xlsx filed by Craig Paice in Docket No. 10-035-124.

g. Composite net power cost allocation detail. See OCS Exhibit 1.1 page 1 of 2, in Docket No. 11-035-T10.

h. Test period billing determinants by rate schedule.

2. Actual Net Power Cost and Wheeling Revenue

a. Actual total Company monthly net power costs and wheeling revenues in substantially the same format as described in 1.a.

b. Actual total Company monthly net power costs and wheeling revenue in 2.a. by cost classification, by applicable inter-jurisdictional cost allocation factor approved in Docket No. 02-035-04, by FERC account number, any subaccount number and any applicable SAP account number in substantially the same format as the worksheet tabs entitled "(3.5) Actual NPC", "(3.4) Adjustments," "(3.3) Adj Actual NPC," and "(3.2) Adj Actual NPC by Cat" in the confidential workpapers to Exhibit RMP_(BSD-2) in Docket No. 12-035-67, and in the Company's Confidential Attachment EBA FR 5-1, also filed in Docket No. 12-035-67.

c. Actual total Company monthly net power cost and wheeling revenue detail in inter-jurisdictional cost allocation format [see Exhibit RMP_(SRM-2R) page 12.22 in Docket No. 10-035-124 or the worksheet tabs entitled "(3.1) UT Allocated Actual NPC" and "(5.1) Wheeling Revenues" in the workpapers to Exhibit RMP_(BSD-2) in Docket No. 12-035-67], each line item identified by the name of the applicable inter-jurisdictional cost allocation factor approved in Docket No. 02-035-04.

d. Actual Allocation Factors: Actual calendar year total Company monthly peak demand and energy loads in megawatts and megawatt hours, by jurisdiction, showing the development of the system energy (SE), system capacity (SC) and system generation (SG) inter-jurisdictional cost allocation factors per Docket No. 02-035-04 in a format substantially similar to the worksheets labeled "(6.1) Dec 2011 Actual Factors," in the workpapers to Exhibit RMP

(BSD-2) in Docket No. 12-035-67, or Exhibit RMP(SRM-2), page 1 of 1 in Docket No. 12-035-67, or Exhibit RMP_(SRM-2R), pages 11.16 through 11.18 in Docket Nos. 10-035-124 et al.

- e. Actual Utah net power cost and wheeling revenue monthly detail in inter-jurisdictional cost allocation format (see format references in 1.c. above).
- f. Actual Utah monthly retail sales in a format substantially similar to the worksheet tab entitled “(6.2) Utah Sales” in the workpapers to Exhibit RMP_(BSD-2) in Docket No. 12-035-67.
- g. Composite net power cost allocator detail. See OCS Exhibit 1.1 page 1 of 2, in Docket No. 11-035-T10.
- h. Actual billing determinants by rate schedule.

3. EBA Monthly Accrual Calculations

- a. Stipulated Scalar and Allocated Wheeling Revenue Accrual Method. Using, and linked to, the applicable data in 1 and 2 above, provide the monthly accruals for the deferral period per the equations contained in Schedule 94.
- b. Allocated Net Power Cost and Wheeling Revenue Accrual Method (for reporting purposes only, unless ordered otherwise). Using, and linked to, the applicable data in 1 and 2 above, provide the monthly accruals for the deferral period per the following equation:

$$Deferral_{Utah,month} = 0.70 \times \left(\frac{NPC_{Utah,month}^{actual}}{MWh_{Utah,month}^{actual}} - \frac{NPC_{Utah,month}^{base}}{MWh_{Utah,month}^{base}} \right) \times MWh_{Utah,month}^{actual}$$

Where:

NPC is net of wheeling revenue and MWh are Utah retail sales; and

an annual interest rate of 6 percent (0.5 percent per month) is applied to the average balance carried in the account each month as follows:

$$Balance_{current_month} = \left[Ending_Balance_{previous_month} + Deferral_{current_month} \right] + \left[\left(Ending_Balance_{previous_month} + (Deferral_{current_month} \times 0.5) \right) \times 0.005 \right]$$

- 4. Spread of the EBA balance in 3.a. to classes using information contained in 2.g.**
- 5. Credit or surcharge to each schedule based on the information contained in 2.h.**
- 6. Supporting Information**

a. The Hedging Collaborative Report filed semi-annually by the Company pursuant to the Division's "Report on the Collaborative Process to Discuss Appropriate Changes to PacifiCorp's Hedging Practices," filed in Docket No. 10-035-124, shall be updated to latest information.

b. Trade Data: List of electricity and natural gas trades that were settled during the EBA deferral period including both financial (i.e., swaps) and physical transactions. The information shall be in a format substantially similar to the Company's Confidential Attachments EBA FR 1-1 and 1-2 filed in Docket No. 12-035-67. 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
- x) Point of Delivery
- 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 impact of the outage. The information shall be in a format substantially similar to the Company's Confidential Attachment EBA FR 2 in Docket No. 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 megawatt hours, planned outage megawatt hours, and maintenance outage megawatt hours. The data shall be in a format substantially similar to

the Company's Confidential Attachment EBA FR3 filed in Docket No. 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 No. 12-035-67.

f. Relevant economic analyses and internal communications recommending contracts during the applicable period with a term greater than one year that were executed.

g. New or modified contracts for long-term purchases.

h. All short-term firm purchases.

i. A report on daily system balancing transactions for the Company over the EBA period.

j. Actual market electricity prices for the period for all energy trading markets in which the Company participated.

k. Summary of terms and price for all new or modified coal contracts.

l. Summary of terms and price for all new or modified natural gas contracts.

m. To the extent included in an EBA, all monthly California ISO service charges and fees.

n. Description of the principal drivers causing actual EBA net power cost and wheeling revenue to differ from the Base EBA net power cost and wheeling revenue.

B. MONTHLY FILING REQUIREMENTS FOR THE DIVISION'S ONGOING REVIEW, AUDITING AND MONITORING.

1. The Company shall file the information contained in 2.a. through 2.f., and 3.a. and 3.b. above, within approximately 45 days following the end of the reporting month. The Company shall request the opening of a docket each calendar year to record this information.

C. EBA PILOT PROGRAM EVALUATION PLAN

1. Data and information to be tracked and evaluations to be conducted during the pilot will include:

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- a. The sharing mechanism;
- b. which net power cost components are controllable and which are uncontrollable and whether the sharing element should be eliminated from the uncontrollable costs in the EBA;
- c. the effects of the EBA on the Company's resource portfolio;
- d. whether the EBA includes the appropriate net power cost components;
- e. the effects of the EBA on the Company's hedging decisions and level of market reliance on net power cost;
- f. parties' incremental costs to audit the balancing account;
- g. unintended consequences resulting from the EBA;
- h. monthly vs. annual accrual differences;
- i. Quantitative and qualitative assessments of the effect of EBA monitoring on Division staff and resources;
- j. The level of comprehension by the Division and interveners;
- k. The level of dispute among parties during the true-up process;
- l. Company progress in smoothing variability of net power cost in addition to the EBA;
- m. Changes in Company hedging and front office transactions;
- n. Swings in the Company's electricity rates;
- o. The Company's return on equity and changes to the Company's earned return in Utah;
- p. Changes to the Company's pre-EBA IRP preferred portfolio and implementation of the Company's IRP action plan;
- q. Changes to the Company's plant usage and performance;
- r. The implicit capacity price;

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- s. Revenue growth by measuring absolute differences between the base and actual net power cost to assess profitability;
- t. The accuracy of GRID in monthly versus annual forecasting: and,
- u. The quantitative differences and relative advantages of using a static or dynamic composite allocator for allocating EBA accruals to rate schedules.