
BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

NOTICE OF INTENT TO FILE GENERAL RATE CASE

In the Matter of the Application of Rocky		Docket 10-035-124
Mountain Power for Authority to Increase		Division of Public Utilities
Its Retail Electric Utility Service Rates in		6 TH Set of Data Requests to
Utah and for Approval of Its Proposed		ROCKY MOUNTAIN POWER
Service Schedules and Electric Service		February 14, 2011
Regulations		

**Please send an electronic copy
and a paper copy of your Data
Response to:**

**Dennis Miller - Legal Assistant
Division of Public Utilities
Heber M. Wells Bldg - 4TH Flr
160 E 300 S - Box 146751
Salt Lake City UT 84114-6751**

**PLEASE E-MAIL YOUR DATA
RESPONSE TO DENNIS MILLER
dpudatarequest@utah.gov
dennismiller@utah.gov**

**Your Data Response is not considered received
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The following 25 questions refer to Mr. Scott Thornton's Testimony:

- 6.1 The Report of the Working Group ("WG Report") indicates that the Company planned to create a new sampling design.
- a. What has the Company done regarding developing this new sampling design?
 - b. Does anything in the sample data utilized in this case reflect any changes or enhancements to the sampling design used in the last rate case?
- 6.2 What was the basis on which the existing sample design was developed? This should include a list of the variables by which the samples were stratified.

- 6.3 How was the existing sample design developed to estimate loads at the time of monthly system peaks? (Direct testimony of Scott Thornton, lines 46)
- 6.4 Has the Company made any attempt to weather normalize the test year class load data from load research? If so, please specify what actions and or analyses have been taken to address this issue.
- 6.5 What percentage of load is metered and billed on the basis of calendar months?
- 6.6 Is there a significant difference in timing between sales data and calendar month data (i.e. is there much billing lag?)
- 6.7 Please provide summary data on the population ("sample frame") from which the current Load Research Sample was drawn, in machine-readable format. This should include monthly sales and numbers of customers for the Residential Class, Schedule 6, Schedule 10, and Schedule 23 customers. In Microsoft Excel format, with all formulas intact and readable. (Direct testimony of Scott Thornton, lines 48-52)
- 6.8 In the sample frame database, please include a variable to indicate whether a customer is one of the 170 residential customers, 108 Schedule 6 customers, 130 Schedule 10 customers, or 75 Schedule 23 customers randomly chosen to be included in the stratified sample. (Direct testimony of Scott Thornton, line 111-114)
- 6.9 How many times were the current samples re-drawn before forming the final stratified random samples? (Direct testimony of Scott Thornton, line 156)
- 6.10 Were there any data losses from the metered data in the Load Research Sample? If so, what period do these losses cover, and how do they influence the validity of the sample?
- 6.11 Were any adjustments or calibration applied to the raw interval data from the Load Research Sample, including adjustments for missing data? If so, please describe these adjustments.
- 6.12 Please provide the sum of the hourly load data by class and by strata from the existing stratified random samples that was used to estimate load data for this case, in a machine-readable format, preferably as one comma or tab-delimited file.

- 6.13 Please provide a table showing the base year monthly estimates of energy and peak load by class from the Load Research Sample and also the monthly billed energy for each class for the same period, **BEFORE** any adjustments to the raw data. Please provide in the form of an electronic machine-readable table showing class values by month. (Direct testimony of Scott Thornton, line 198)
- 6.14 Please provide an electronic machine-readable table showing actual daily and also normal weather data (degree day and effective degree day) for weather stations best representative of the Company's Utah territory, for the period May 2009 to August 2010.
- 6.15 Provide the loss factors that were applied to each class. (Thornton, line 201)
How were these loss factors calculated?
- 6.16 Please provide the sum of test year class loads from the Load Research Sample and the most recent forecast of class loads for the same period, including monthly energy and monthly peaks, in an electronic machine-readable table.
- 6.17 Please provide work papers and datasets, in machine-readable format showing all adjustments from the estimated historical base year energy and peak loads from Load Research to the forecast test year energy and peak loads, with all formulas intact and readable. (Direct testimony of Scott Thornton, lines 192-293 and lines 206)
- 6.18 Please include any datasets relevant to question 8 in a machine-readable format, including, but not limited to, estimates of average per customer hourly demand for each customer rate class for every hour of the base historical year, and loss factors by class. Microsoft Excel format if possible, with all formulas intact and readable. (Direct testimony of Scott Thornton, lines 196-203 and lines 208-217)
- 6.19 Please describe and provide any analyses, workpapers, reports or communications regarding the "further investigation" made of monthly deviations of more than 10%. (lines 221-222)
- 6.20 Please provide workpapers showing all adjustments to monthly class energy and peak data in months in which the monthly variance was below or equal to 10%. (Direct testimony of Scott Thornton, lines 223-228)

- 6.21 Specify and provide work papers and datasets, in machine-readable format, for the “necessary adjustments” made to classes where the sum of class loads in a given month differed from the forecast jurisdictional load estimate by more than 10 percent, with all formulas intact and readable. (Direct testimony of Scott Thornton, lines 219-223)
- 6.22 Please provide workpapers showing all other adjustments to monthly class energy and peak data in months in which the monthly variance was above 10%.
- 6.23 Given the amount of adjustments necessary to the load estimates resulting from the Load Research Sample, why has the Company not modified the samples for Rates 06, 0023, and 10 to achieve a precision level greater than 10%? (Direct testimony of Scott Thornton, lines 304-307)
- 6.24 Does the Company believe that adjustments in excess of 20% needed to align the Load Research based loads to forecast loads indicate problems with the Load Research data, the forecast data, or both?
- 6.25 Has the Company performed any regression or other analyses relating to irrigation use to either temperature or to monthly or annual rainfall? If so, please provide.
- 6.26 **Test period.** With respect to Mr. Steven R. McDougal’s Direct Testimony on p. 5 line 101, please identify the specific issues addressed in previous regulatory proceedings (other than those identified in lines 203-210) that the Company referenced herein.
- 6.27 **Test period.** With respect to Mr. Steven R. McDougal’s Direct Testimony on p. 6 lines 136-139, stated below:

Only a test period aligned with the rate effective period can sufficiently capture the rate-making impacts of growing customer load, the capital investment required to serve it, and the operation and maintenance (O&M) costs required to maintain system safety and reliability.

Is it the Company’s belief, based on the above, that any other test period other than a test period beginning on September 21, 2011 (when the rates go into effect) would be insufficient? If so, please explain. If not, please explain the relevance of this statement.

- 6.28 **Test period.** With respect to Mr. Steven R. McDougal’s Direct Testimony on the impact of regulatory lag (pp. 8 – 9, lines 181-194), please answer if the Utah

Commission implements an ECAM, would this reduce the effect of regulatory lag described in testimony? Please explain.

- 6.29 **Test period.** In general, what is the first 12 months of the rate effective period for the Wyoming case?
- 6.30 **Test period.** Mr. Dickman states that the two main drivers in the Wyoming case are net power costs and capital investments (lines 107-108). Mr. McDougal states that the primary drivers of this case are capital investments and net power costs (p. 15, lines 345-348). Please explain why the primary drivers of both cases: net power costs and capital investments—result in different test periods being proposed in Utah and Wyoming with only a two-month time difference in the date of the respective filings.
- 6.31 **Test period.** Utah statutes allow the Company to forecast the test period up to 20 months beyond the filing date? Are there similar statutes or rules in Wyoming that govern forecasted test periods?
- 6.32 **Wheeling revenue.** Please provide itemized detail, with supporting documentation, the calculation of the wheeling revenues found on page 3.2 of Mr. McDougal's Direct Testimony.

DPU Requestor: Division (801) 530-6657

Dennis Miller - (801) 530-6657

cc: Service List