

OCS Data Request 12.5

Please provide a list of all known errors in the SO Model studies and GRID model analysis provided with the filing.

Response to OCS Data Request 12.5

Please refer to the Company's responses to OCS Data Requests 1.91, 1.133, 6.48 and 6.49 for the errors that have been identified for the GRID model analysis.

Please refer to the Company's response to OCS Data Requests 12.1 and 12.3 for errors that have been identified for the System Optimizer model (SO Model) studies.

OCS Data Request 12.1

Please refer to file PVRR_Tables_Final_JB3+4.xlsx, tab Mine Capital Adjustment, cells D75, which represents the “As Modeled” coal mining capital cost for all four Bridger units in the continued coal operation case. Review of other documents, Attachment OCS 1.64 1st Supplemental Attachment and Attachment OCS 1.64 does not appear to demonstrate the Bridger 3 and 4 coal mining capital costs were included in the gas operation revenue requirement. Instead only half (the portion associated with Units 1 and 2) were included as part of the fixed costs of Units 1 and 2 in the SO Model. If so, then it would appear the coal mining capital adjustment in cell D77 may be incorrect. Please indicate whether the Company agrees or not, and if not, explain where the total plant revenue requirement for Bridger coal (the amount shown in Cell D75) has been included. If the Company agrees that the costs are misstated please provide a correction to the figure in Cells D75, D76, D77 and other cells as needed.

Response to OCS Data Request 12.1

The data in the file PVRR_Tables_Final_JB3+4.xlsx, tab Mine Capital Adjustment, cell D75 contains the “As Modeled” mine capital costs for the Jim Bridger plant. These data are consistent with the inputs to the System Optimizer model (SO Model), which split the Jim Bridger plant costs among the four Jim Bridger units. The data provided with the Company’s response to OCS Data Request 1.64; specifically Confidential Attachment OCS 1.64, contains a proportionate share of the “As Modeled” mine capital costs for Jim Bridger Units 3 and 4. The proportionate share of mine capital costs are also included in the SO Model for Jim Bridger Units 1 and 2, but were not provided in the Company’s response to OCS Data Request 1.64. Note: OCS Data Request 1.64 only requested data for Jim Bridger Units 3 and 4.

The data in the file PVRR_Tables_Final_JB3+4.xlsx, tab Mine Capital Adjustments, cell D76 contain updated mine capital costs for the Jim Bridger plant in the case of gas conversion of both Jim Bridger Units 3 and 4. The adjustment in cell D77 calculates the change in mine capital costs in the case of gas conversion, and applies this change as an adjustment to the PVRR results shown in the gas conversion case within the tab Exhibit 3 – PVRR Tables. This application of the adjustment in cell D77 assumes that the “As Modeled” mine capital costs as input to the SO Model are equal to the “As Modeled” mine capital costs reported as an output from the SO Model. However, when the SO Model selects a gas conversion alternative for a given unit, it does not report the proportionate share of mine capital beginning in the year conversion occurs, and therefore, the assumption that mine capital input to the SO Model equals the mine capital output from the SO Model is not valid. As such, the adjustment in cell D77 is incorrect. Please refer to Confidential Attachment OCS 12.1 with corrected figures, applied by adding rows 76 and 79, with the revised adjustment shown in cell D79.

The effect of this revised adjustment is to increase the cost in the case of gas conversion at Jim Bridger Units 3 and 4, which improves the economics in favor of the selective catalytic reduction (SCR) investment by approximately \$105 million among all scenarios applied to the combined Jim Bridger Unit 3 and Unit 4 analysis. The revised adjustment was further applied to the PVRR(d) results shown in the tab Exhibit 3 – PVRR Tables in those cells highlighted red.

Confidential information is provided subject to Utah PSC Rule 746-100-16.

OCS Data Request 12.3

Please refer to Attachment WIEC 10.6 from the current Wyoming Bridger CPCN (Docket No. 20000-418-EA-12), cell G55, which represents fixed costs of Bridger Unit 4 included in the SO Model Gas Conversion case in 2016. This figure matches the value in Attachment OCS 1.64, Cell H30 of the Jim Bridger 4 tab. Please identify any costs included in the figure in Cell H30 which the Company agrees should not be included in the Bridger gas conversion cases.

Response to OCS Data Request 12.3

OCS references the Company's response to WIEC Data Request 10.6 in the Company's Wyoming proceeding (Docket No. 20000-418-EA-12) in this request. Note: the same request/response is OCS Data Request 8.6 in this proceeding.

Referring to the Company's response to OCS Data Request 1.64; specifically Confidential Attachment OCS 1.64 – the costs in cell H30 that should be removed from the gas conversion case include the 2016 real levelized capital costs associated with the selective catalytic reduction (SCR) and the 2016 O&M costs associated with the SCR. These costs total \$21.3 million in 2016 or \$16.2 million on a PVRR basis (2012\$).

Please refer to Confidential Attachment OCS 12.3, which combines adjustments made in Confidential Attachment OCS 12.1 with the revisions noted above.

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