

February 21, 2020

VIA ELECTRONIC FILING

Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Administrator

RE: **Docket No. 13-035-02**
*In the Matter of the Application of Rocky Mountain Power for Authority to Change its
Depreciation Rates*

On November 7, 2013, the Public Service Commission of Utah approved an all-party stipulation in Docket No. 13-035-02. Paragraph 30 of the Settlement Stipulation states:

The Stipulating Parties agree the Company will implement a reporting system to keep the Stipulating Parties and the Utah, Idaho and Wyoming Commissions informed regarding any matters likely to have implications regarding potential stranded costs of generating assets. The Company will propose a reporting method by no later than December 31, 2013.

Per this commitment, Rocky Mountain Power has submitted a letter containing the following information, if applicable, on or before March 1 of every year:

- 1) Any proposed early steam/gas/wind generation unit retirement
 - a. Plant name
 - b. Date placed in service
 - c. Current net book value
 - d. Original retirement date
 - e. Proposed early shutdown date
 - f. Reason for early shutdown
- 2) Major steam/gas/wind plant capital additions over \$100 million that impact the depreciation of the unit
 - a. Project name
 - b. Planned in-service date
 - c. Planned retirement date
 - d. Planned addition amount to plant in service
- 3) Any completed external studies regarding plant decommissioning which result in significant changes (a change of over 25 percent) to the amount previously projected in the last approved depreciation rates.
 - a. Plant site
 - b. Estimated costs

On September 11, 2018, Rocky Mountain Power filed Docket No. 18-035-36 with the Commission requesting authorization to change depreciation rates applicable to the Company's depreciable electric plant effective January 1, 2021 ("2018 Depreciation Study"). The Company's 2019 compliance report filed February 25, 2019 ("2019 Compliance Filing") in Docket No. 13-035-02 provided references to where the information listed above can be found in the 2018 Depreciation Study. As the 2018 Depreciation Study proceeding is still pending, many of the responses provided in the 2019 Compliance Filing are still applicable. Accordingly, the Company notes where new information is available from that which was previously provided in the 2019 Compliance Filing:

1) Any proposed early steam/gas/wind generation unit retirement

a. Steam

PacifiCorp plans to retire Cholla Unit 4 as of December 31, 2020. The Company will propose ratemaking treatment for the unrecovered plant balances and other closing costs for review and approval in its 2020 general rate case.

b. Gas

No change from the 2019 Compliance Filing

c. Wind

No change from the 2019 Compliance Filing

2) Major steam/gas/wind plant capital additions over \$100 million that impact the depreciation of the unit.

There are no major steam or gas plant capital additions responsive to this request.

3) Any completed external studies regarding plant decommissioning which result in significant changes (a change of over 25 percent) to the amount previously projected in the last approved depreciation rates.

In the 2018 Depreciation Study, the Company filed January 16, 2020 a contractor-assisted engineering study of decommission costs to estimate appropriate Decommissioning Cost reserve requirements for the Jim Bridger, Dave Johnston, Hunter, Huntington, Naughton, Wyodak, and Hayden coal-fueled resources.

Questions regarding may be directed to Jana Saba at (801) 220-2823.

Sincerely,



Joelle Steward

Vice President, Regulation

CERTIFICATE OF SERVICE

Docket No. 13-035-02

I hereby certify that on February 21, 2020, a true and correct copy of the foregoing was served by electronic mail to the following:

Utah Office of Consumer Services

Cheryl Murray cmurray@utah.gov

Division of Public Utilities

dpudatarequest@utah.gov

Rocky Mountain Power

Jana Saba jana.saba@pacificorp.com



Katie Savarin
Coordinator, Regulatory Operations