

Glen Canyon Solar Data Request 1.11

On page 16 of the Motion to Dismiss, you state that the use of your existing transmission rights to transmit energy purchased from Glen Canyon Solar may constitute “the potential interference with the Company’s contractual obligations to a third party under FERC-jurisdictional legacy transmission contracts.”

- (a) Please identify and describe in detail the nature of this “potential interference.”
- (b) Please state whether this “potential interference with the Company’s contractual obligations” is likely to be referenced or addressed in any manner in a system impact study performed in connection with either an interconnection request or a transmission service request relating to the Glen Canyon Solar projects and, if so, how any such system impact study is expected to reference or address this “potential interference.”
- (c) Please describe in detail whether this “potential interference” was reflected, recognized or addressed in any manner in the avoided cost pricing runs for the Glen Canyon Solar QF projects. If so, please describe in detail how it was reflected, recognized or addressed. If not, please explain in detail why it was not so reflected, recognized or addressed.

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- (a) Please refer to PacifiCorp’s Motion to Dismiss at pages 21-23 for a detailed explanation of this issue.
- (b) No. PacifiCorp energy supply management (ESM) has reserved sufficient transmission capacity to fulfill the referenced contractual obligations. To the extent an interconnection request or transmission service request required transmission capacity on the associated paths, it would be incremental to the existing reservations. Other customer existing contractual rights on the path would not be specifically referenced in a system impact study, but the contractual rights would be reflected in available transfer capability (ATC) information or references.
- (c) The Generation and Regulation Initiative Decision Tool (GRID) includes PacifiCorp ESM’s existing transmission reservations, and it includes a reduction in those rights to account for the referenced third-party obligations. However, the third-party obligations include optionality regarding permissible paths/delivery points that GRID is not capable of resolving. Instead, GRID reflects the entire third-party obligation as a reduction in transmission rights on a single path, which is assumed to reflect typical conditions. While the location of the Glen Canyon Solar qualifying facilities (QF) is on one of the paths allowed under the third-party obligations, it is not on the path reflected in GRID.