

17-035-39 / Rocky Mountain Power
November 2, 2017
OCS Data Request 9.3

OCS Data Request 9.3

Refer to the Rebuttal Testimony of Rick T. Link, Table 4. Did the Company also prepare project by project analysis under any of the remaining eight price-policy scenarios identified in Tables 1 and 2 contained Mr. Link's rebuttal testimony? If no, explain why not. If yes, provide the results under the additional gas and CO₂ price-policy scenarios that were conducted.

Response to OCS Data Request 9.3

No, the Company did not perform the project-by-project analysis shown in the Rebuttal Testimony of Company witness, Rick T. Link for other price-policy scenarios beyond the medium natural gas, medium carbon dioxide (CO₂) scenario. This voluminous analysis was not conducted because the medium natural gas, medium CO₂ scenario is a reasonable scenario and deviations to that scenario would follow a similar trend in benefits as that shown in Table 1 and Table 2 of Mr. Link's rebuttal testimony. Please also refer to the Company's response to DPU Data Request 13.9.

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Refer to the Rebuttal Testimony of Rick T. Link, Table 7. This table was based on the medium natural gas and medium CO₂ price-policy assumptions. Please provide similar tables for the eight remaining gas and CO₂ price-policy scenarios that were considered in Tables 1 and 2 of Mr. Link's rebuttal testimony.

Response to OCS Data Request 9.5

The Company objects to this request on the basis that it is unduly burdensome, not reasonably calculated to lead to admissible evidence, and requiring development of a special study or information not maintained in the ordinary course of business. Without waiving these objections, the Company responds as follows:

See the Company's responses to OCS Data Requests 9.3 and 9.4.

OCS Data Request 9.6

Refer to the Rebuttal Testimony of Rick T. Link, Table 7. This table was based on the medium natural gas and medium CO2 price-policy assumptions and a corporate federal income tax rate of 25 percent.

- (a) Please identify all potential new federal corporate income tax rates for which the tax policy sensitivity analysis was performed by Mr. Link or under his direction or supervision and provide the results of such analysis.
- (b) Please provide a similar table showing the results if a corporate federal income tax rate of 20 percent is assumed.
- (c) Please provide similar tables showing the results for the eight remaining gas and CO2 price-policy scenarios that were considered in Tables 1 and 2 of Mr. Link's rebuttal testimony calculated utilizing an assumed corporate federal income tax rate of 20 percent.

Response to OCS Data Request 9.6

The Company objects to this request on the basis that it is unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and requiring development of a special study or information not maintained in the ordinary course of business. Without waiving these objections, the Company responds as follows:

- (a) No other tax policy sensitivity analyses were performed beyond the tax-policy sensitivity discussed in the rebuttal testimony of Company witness, Rick T. Link.
- (b) PacifiCorp has not performed this analysis.
- (c) PacifiCorp has not performed this analysis. Please refer to the Company's responses to OCS Data Request 9.3 and 9.4.