

17-035-39 / Rocky Mountain Power
February 23, 2018
OCS Data Request 13.18

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Please provide the Company's projected rate of return on a total Company and on a Utah jurisdictional basis for 2018 and each subsequent year for which such projections have been made. If alternate projections have been prepared under different scenarios, then please provide each of the alternative projections and a description of each of the scenarios. Also please indicate the assumptions included in such projections with regards to the following:

- (a) Repowering projects at issue in this case;
- (b) New wind/new transmission projects at issue in Docket No. 17-035-40;
- (c) Timing of rate case proceedings in each jurisdiction and implementation date of new rates from such proceedings; and
- (d) Implementation of the proposed RTM

mechanism. Response to OCS Data Request 13.18

Assuming the request is related to the tax implications from the tax reform act passed in December 2017, the Company objects to the entire request on the basis that it seeks information that is not relevant to and is not reasonably calculated to lead to the discovery of admissible evidence in the proceeding. The Company further objects to the extent the request seeks information that is protected under the attorney-client privilege, the attorney work product doctrine or both. Without waiving the objection, the Company states as follows:

- (a) Because customers will receive all benefits from the repowering project, and will not incur any costs in accordance with the RTM cap and consistent with the Company's testimony in the case, the Company's rate of return will be unaffected as a result of the Company's proposal in this case.
- (b) See the Company's general objection above.
- (c) See the Company's general objection above.
- (d) See the Company's general objection and subsection (a) above.