

October 15, 2018

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 Secretary

RE: Docket No. 17-035-40

Application for Approval of a Significant Energy Resource Decision and Voluntary Request for Approval of Resource Decision

Reply Comments Regarding Proposed Reporting System

Pursuant to the requirements of the Public Service Commission of Utah (“Commission”) in its June 22, 2018 order in the above-referenced docket (“Order”), PacifiCorp (“Company”) filed a proposed reporting system for information relating to its approved new wind and transmission projects on August 31, 2018. On September 4, 2018, the Commission issued a Notice of Filing and Comment Period (“Notice”). Consistent with the Notice, the Division of Public Utilities (“Division”), the Office of Consumer Services (“Office”), and Western Resource Advocates (“WRA”) submitted comments on the proposed reporting system on October 1, 2018. The Company submits its reply to the comments received by the interested parties.

Summary of Recommendations

The comments submitted by Division, the Office, and WRA each contained recommended changes to the Company’s proposed reporting system. The recommendations are listed below.

Division:

1. Duration of Report: The duration of all reports be four years ending 2020 to 2023. Headings on all reports indicating number of months reporting if less than 12 months.
2. Final Project Costs (i): Add final budget numbers, budget variances, date of completion, and used and useful date of each project and amount or time variances.
3. Final Project Costs (i): Separate the total project cost for each project into its components. Components to have total costs, budgets, budget variances, dates completed, and used and useful dates also provided.
4. Final Project Costs (i): If successive years have true up amounts for total project cost, such

cost will be added to prior reported balances and the new total at year end should agree with yearend accounting records. This would apply to the component breakout of costs as recommended by the Division.

5. Production Tax Credit (ii): For each project, add columns showing the total number of generators for each project, the projected tax credit for each project and the variance between actual and projected tax credits for each project.
6. Energy Benefit Report (iii): Add (Loss) to applicable headings.
7. Liquidated Damages Report (v): Add a date paid column and detailed explanation box or section.
8. Network Upgrades (vi): Provide each individual interconnection customer's costs per cost category that make up the total cost per category.
9. Wind O&M Costs (viii): For PacifiCorp Owned Projects, report break out each wind resource's total O&M costs for Schedule Maintenance, Unscheduled Maintenance and Operations.
10. RECs Report (ix): Add additional information to the REC Report as shown in the Division's Attachment I.
11. Other Requirements: Provide Utah jurisdictional allocation amounts for all reporting requirements/reports.

Office:

1. Duration of Report: The duration of the report be ten years to cover the entire time period during which PTCs will be applicable.
2. Liquidated Damages (i): Include the reference to liquidated damages in each annual report, even if they are not applicable for the reporting year.
3. Overall Report Format: Include Attachment A with intact formulae.

WRA:

1. RECs Report (ix): Include entities to who RECs were sold, whether any RECs were retired (instead of sold) and on whose behalf they were retired.

Company Response:

The Company agrees to all of the above recommendations except the following:

- Division's Recommendation #9. Wind O&M Costs (viii). The Company proposed providing the operations and maintenance expense information by project, with a total provided for each of the wind projects, Cedar Springs Build-Transfer Agreement ("BTA"), Ekola Flats and TB Flats. The Division requests that the Company provide the information broken out by scheduled maintenance, unscheduled maintenance and operations, stating this level of detail would be more informative. The Company will not have the information at this level of detail because the O&M work will be conducted under a single service contract, which cannot be readily separated in a meaningful way.
- Office's Recommendation #1. The Office recommends that the Company be required to file reports for ten years to align with the full period for which PTCs are expected. The Company believes that the four years proposed by the Division is adequate at this time, and requests the Commission defer the possibility of additional reporting until closer to the end of the four year reporting period.

In addition, the Company provides additional clarification for a few of the recommendations the Company is accepting.

Final Project Costs (i):

The Division recommends that the budget costs of the projects be provided and the report separate the total project costs into component costs including: AFUDC and contingency spend. In its Attachment I, the Division listed Component 1, Component 2, Component 3, AFUDC and Contingency Funds as the reporting categories. The Company updated the reference to the generic term "component costs" to be the components provided as follows and as reflected in Exhibit RMP___(CAT-5SS):

- Initial capital
- AFUDC
- Property Tax During CWIP
- Transaction Costs
- Construction Management Costs

In the Company's original reporting proposal, this item was identified as being non-confidential after the first report. Now that the project budget with additional detail will be provided in the report, this section will be confidential.

Production Tax Credit (ii):

The Division recommends adding the projected production tax credit per project to the report. The Company proposes to add two separate projections to the report, the final projections included in the pre-approval filing and the projections at the time of commercial operation. The report has been updated to contain a column for each projection.

RECs Report (ix)

The Company will provide the requested information as shown in the Division's Attachment I. The Company notes that the REC sales data will be reported based on when the revenue is recognized, per accounting standards. The timing of the generation and compliance data will be reported based on when the REC is generated. Also, WRA would like to see the requested

data to ensure there is no double counting of RECs. Although the Company is not opposed to providing the requested data, the Company notes that it uses the Western Renewable Energy Generation Information System (“WREGIS”) to track its REC generation along with sales and retirement for compliance. WREGIS ensures that RECs are not double counted.

Utah Jurisdictional Amounts

The Company will provide Utah-allocated amounts to the reporting requirements using the corresponding actual allocation factors as filed in the year-end results of operations reports.

Revised Reporting Template:

In the August 31, 2018 filing, the Company summarized its proposal for satisfying the reporting requirements in Table 1 and in the filing’s Attachment A. Both have been revised to incorporate the changes accepted by the Company as discussed above. The updated Table 1 is now referred to as Table 1.1 and is shown below. Changes from Table 1 are noted in red font.

Table 1.1 Proposed Reporting Requirements of the Combine Projects (Docket No. 17-035-40)				
Required Information	Start Date	Frequency	Duration	Confidentiality
(i) final project costs for each specific project	12 ME CY 2020, due 4/30/2021	annually	4 years	Confidential
(ii) realized PTC benefits	12 ME CY 2020, due 4/30/2021	annually	4 years	Non-confidential
(iii) realized energy benefits	12 ME CY 2020, due 4/30/2021	annually	4 years	Non-confidential
(iv) transmission costs of the Transmission Projects that are actually offset by revenues derived from wholesale transmission customers	12 ME CY 2020, due 4/30/2022	annually	4 years	Non-confidential
(v) payments for any damages, including liquidated damages	Included in annual reports, as applicable	annually	4 years	Confidential
(vi) contribution to the 230 kV Network Upgrades’ total cost from interconnection customers	12 ME CY 2020, due 4/30/2022	annually	4 years	Non-confidential
(vii) annual revenue requirement associated with the Aeolus to Bridger/Anticline Line and the incremental transmission revenue resulting from the construction of the line	12 ME CY 2020, due 4/30/2022	annually	4 years	Non-confidential
(viii) wind operations and maintenance costs associated with the Wind Projects that PacifiCorp owns	12 ME CY 2020, due 4/30/2021	annually	4 years	Non-confidential
(ix) realized value of RECs sold	12 ME CY 2020, due 4/30/2021	annually	4 years	Confidential

The updated Attachment A is now called Attachment A.1. To produce Attachment A.1, the Company used the Division’s Attachment I, which accompanied its comments and made four changes:

1. (i) Final Project Costs tab: the Company added the component categories consistent with Exhibit RMP___(CAT-5SS).
2. (ii) Production Tax Credits tab: the Company added “at preapproval filing” to the projection column and added an additional column for the projections at the time of commercial operation.
3. (viii) Wind O&M tab: the Company removed the references to scheduled and unscheduled

maintenance since that detail is not available.

4. (ix) RECs tab: the Company added a column for “Entity” to the first table as recommended by WRA.

The Company appreciates the Division, Office, and WRA review of the proposed reporting requirements and looks forward to working with parties and the Commission to ensure the report provides helpful and meaningful information.

Sincerely,



Joelle Steward
Vice President, Regulation

Docket No. 17-035-40

Attachment A.1

Proposed Reporting System for the Combined Projects

October 15, 2018

Final Project Cost
12 Months Ended December 31, 2020 - If amounts are less than 12 months then state number of months the amc

Project	Final Project Cost	Budget	Variance	Date Complete	Date Used and Used	Note
Cedar Springs (BIA)						
Component	-	-	-			
Component	-	-	-			
Component	-	-	-			
AFUDC	-	-	-			
Contingency Fun	-	-	-			
Total	-	-	-			Comparable to amount in Confidential Exhibit RMP_(RTL-1SS) ce
Ekola Flats						
Component	-	-	-			
Component	-	-	-			
Component	-	-	-			
AFUDC	-	-	-			
Contingency Fun	-	-	-			
Total	-	-	-			Comparable to amount in Confidential Exhibit RMP_(RTL-1SS) cell
TB Flats						
Component	-	-	-			
Component	-	-	-			
Component	-	-	-			
AFUDC	-	-	-			
Contingency Fun	-	-	-			
Total	-	-	-			Comparable to amount in Confidential Exhibit RMP_(RTL-1SS) cell
230kv Network Upgrade						
Component	-	-	-			
Component	-	-	-			
Component	-	-	-			
AFUDC	-	-	-			
Contingency Fun	-	-	-			
Total	-	-	-			Comparable to amount May 15, 2018 Surrebuttal Testimony of Rick A. Vail at page 3
Aeolus to Bridger/Anticline Linx						
Component	-	-	-			
Component	-	-	-			
Component	-	-	-			
AFUDC	-	-	-			
Contingency Fun	-	-	-			
Tote	-	-	-			Comparable to amount in Confidential Exhibit RMP_(RTL-1SS) cell

*The purchased power agreement portion of the Cedar Springs project would be reflected in the Energy Benefit

Final Project Cost
12 Months Ended December 31, 2021 - If amounts are less than 12 months then state number of months the amc

Project	Last Year Cost	True Up	New Tota	Date Complete	Date Used and Used	Note
Cedar Springs (BIA)						
Component	-	-	-			
Component	-	-	-			
Component	-	-	-			
AFUDC	-	-	-			
Contingency Fun	-	-	-			
Total	-	-	-			
Ekola Flats						
Component	-	-	-			
Component	-	-	-			
Component	-	-	-			
AFUDC	-	-	-			
Contingency Fun	-	-	-			
Total	-	-	-			
TB Flats						
Component	-	-	-			
Component	-	-	-			
Component	-	-	-			
AFUDC	-	-	-			
Contingency Fun	-	-	-			
Total	-	-	-			
230kv Network Upgrade						
Component	-	-	-			
Component	-	-	-			
Component	-	-	-			
AFUDC	-	-	-			
Contingency Fun	-	-	-			
Total	-	-	-			
Aeolus to Bridger/Anticline Linx						
Component	-	-	-			
Component	-	-	-			
Component	-	-	-			
AFUDC	-	-	-			
Contingency Fun	-	-	-			
Tote	-	-	-			

*The purchased power agreement portion of the Cedar Springs project would be reflected in the Energy Benefit

Final Project Cost

12 Months Ended December 31, 2022 - If amounts are less than 12 months then state number of months the amc

Project	Last Year Cost	True Up	New Total	Date Complete	Date Used and Useful	Note
Cedar Springs (BIA)						
Component	-	-	-			
Component	-	-	-			
Component	-	-	-			
AFUDC	-	-	-			
Contingency Fun	-	-	-			
Total	-	-	-			
Ekola Flats						
Component	-	-	-			
Component	-	-	-			
Component	-	-	-			
AFUDC	-	-	-			
Contingency Fun	-	-	-			
Total	-	-	-			
TB Flats						
Component	-	-	-			
Component	-	-	-			
Component	-	-	-			
AFUDC	-	-	-			
Contingency Fun	-	-	-			
Total	-	-	-			
230kv Network Upgrade						
Component	-	-	-			
Component	-	-	-			
Component	-	-	-			
AFUDC	-	-	-			
Contingency Fun	-	-	-			
Total	-	-	-			
Aeolus to Bridger/Anticline Line						
Component	-	-	-			
Component	-	-	-			
Component	-	-	-			
AFUDC	-	-	-			
Contingency Fun	-	-	-			
Total	-	-	-			

*The purchased power agreement portion of the Cedar Springs project would be reflected in the Energy Benefit

Final Project Cost

12 Months Ended December 31, 2023 - If amounts are less than 12 months then state number of months the amc

Project	Last Year Cost	True Up	New Total	Date Complete	Date Used and Useful	Note
Cedar Springs (BIA)						
Component	-	-	-			
Component	-	-	-			
Component	-	-	-			
AFUDC	-	-	-			
Contingency Fun	-	-	-			
Total	-	-	-			
Ekola Flats						
Component	-	-	-			
Component	-	-	-			
Component	-	-	-			
AFUDC	-	-	-			
Contingency Fun	-	-	-			
Total	-	-	-			
TB Flats						
Component	-	-	-			
Component	-	-	-			
Component	-	-	-			
AFUDC	-	-	-			
Contingency Fun	-	-	-			
Total	-	-	-			
230kv Network Upgrade						
Component	-	-	-			
Component	-	-	-			
Component	-	-	-			
AFUDC	-	-	-			
Contingency Fun	-	-	-			
Total	-	-	-			
Aeolus to Bridger/Anticline Line						
Component	-	-	-			
Component	-	-	-			
Component	-	-	-			
AFUDC	-	-	-			
Contingency Fun	-	-	-			
Total	-	-	-			

*The purchased power agreement portion of the Cedar Springs project would be reflected in the Energy Benefit

Production Tax Credit Benefits

12 Months Ended December 31, 2020 - If amounts are less than 12 months then state number of months the amounts cover

Project	Total number of Generators	KWh Generation	Expiration	Factor (inflated tax per unit)	Federal Income Tax Credit	Projected Tax Credit (at pre-approval filing)	Projected Tax Credit (at Commercial Operation)	Variance
Cedar Springs (BTA)	-	-	xx/xx/20xx	0.024	-	-	-	-
Ekola Flats	-	-	xx/xx/20xx	0.024	-	-	-	-
TB Flats	-	-	xx/xx/20xx	0.024	-	-	-	-
Total Federal Renewable Energy Tax Credit					-	-	-	-

Production Tax Credit Benefits

12 Months Ended December 31, 2021 - If amounts are less than 12 months then state number of months the amounts cover

Project	Total number of Generators	KWh Generation	Expiration	Factor (inflated tax per unit)	Federal Income Tax Credit	Projected Tax Credit (at pre-approval filing)	Projected Tax Credit (at Commercial Operation)	Variance
Cedar Springs (BTA)	-	-	xx/xx/20xx	0.024	-	-	-	-
Ekola Flats	-	-	xx/xx/20xx	0.024	-	-	-	-
TB Flats	-	-	xx/xx/20xx	0.024	-	-	-	-
Total Federal Renewable Energy Tax Credit					-	-	-	-

Production Tax Credit Benefits

12 Months Ended December 31, 2022 - If amounts are less than 12 months then state number of months the amounts cover

Project	Total number of Generators	KWh Generation	Expiration	Factor (inflated tax per unit)	Federal Income Tax Credit	Projected Tax Credit (at pre-approval filing)	Projected Tax Credit (at Commercial Operation)	Variance
Cedar Springs (BTA)	-	-	xx/xx/20xx	0.024	-	-	-	-
Ekola Flats	-	-	xx/xx/20xx	0.024	-	-	-	-
TB Flats	-	-	xx/xx/20xx	0.024	-	-	-	-
Total Federal Renewable Energy Tax Credit					-	-	-	-

Production Tax Credit Benefits

12 Months Ended December 31, 2023 - If amounts are less than 12 Months then state number of months the amounts cover

Project	Total number of Generators	KWh Generation	Expiration	Factor (inflated tax per unit)	Federal Income Tax Credit	Projected Tax Credit (at pre-approval filing)	Projected Tax Credit (at Commercial Operation)	Variance
Cedar Springs (BTA)	-	-	xx/xx/20xx	0.024	-	-	-	-
Ekola Flats	-	-	xx/xx/20xx	0.024	-	-	-	-
TB Flats	-	-	xx/xx/20xx	0.024	-	-	-	-
Total Federal Renewable Energy Tax Credit					-	-	-	-

Energy Benefits (NPC)

12 Months Ended December 31, 2020, 2021, 2022, and 2023 - If 2020 is less than 12 months note period covered by number of months

Cedar Springs (BTA)						Ekola Flats													
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
	Heavy Load Hour (HLH)			HLH Energy Benefits (Loss)	Light Load Hour (LLH)			LLH Energy Benefits (Loss)	Total Energy Benefits (Loss)		Heavy Load Hour (HLH)			HLH Energy Benefits (Loss)	Light Load Hour (LLH)			LLH Energy Benefits (Loss)	Total Energy Benefits (Loss)
	Incremental Generation (MWh)	Market Price (\$/MWh)	Integration Cost (\$/MWh)	(a) x ((b) - (c)) (\$1,000)	Incremental Generation (MWh)	LHL Monthly Market Price (\$/MWh)	Integration Cost (\$/MWh)	(e) x ((f) - (g)) (\$1,000)	(d) + (h) (\$1,000)		Incremental Generation (MWh)	Market Price (\$/MWh)	Integration Cost (\$/MWh)	(a) x ((b) - (c)) (\$1,000)	Incremental Generation (MWh)	LHL Monthly Market Price (\$/MWh)	Integration Cost (\$/MWh)	(e) x ((f) - (g)) (\$1,000)	(d) + (h) (\$1,000)
Nov-20				-				-	-					-				-	-
Dec-20				-				-	-					-				-	-
	12 Months Ended December 31, 2020				12 Months Ended December 31, 2020				-		12 Months Ended December 31, 2020				12 Months Ended December 31, 2020				-
Jan-21				-				-	-					-				-	-
Feb-21				-				-	-					-				-	-
Mar-21				-				-	-					-				-	-
Apr-21				-				-	-					-				-	-
May-21				-				-	-					-				-	-
Jun-21				-				-	-					-				-	-
Jul-21				-				-	-					-				-	-
Aug-21				-				-	-					-				-	-
Sep-21				-				-	-					-				-	-
Oct-21				-				-	-					-				-	-
Nov-21				-				-	-					-				-	-
Dec-21				-				-	-					-				-	-
	12 Months Ended December 31, 2021				12 Months Ended December 31, 2021				-		12 Months Ended December 31, 2021				12 Months Ended December 31, 2021				-
Jan-22				-				-	-					-				-	-
Feb-22				-				-	-					-				-	-
Mar-22				-				-	-					-				-	-
Apr-22				-				-	-					-				-	-
May-22				-				-	-					-				-	-
Jun-22				-				-	-					-				-	-
Jul-22				-				-	-					-				-	-
Aug-22				-				-	-					-				-	-
Sep-22				-				-	-					-				-	-
Oct-22				-				-	-					-				-	-
Nov-22				-				-	-					-				-	-
Dec-22				-				-	-					-				-	-
	12 Months Ended December 31, 2022				12 Months Ended December 31, 2022				-		12 Months Ended December 31, 2022				12 Months Ended December 31, 2022				-
Jan-23				-				-	-					-				-	-
Feb-23				-				-	-					-				-	-
Mar-23				-				-	-					-				-	-
Apr-23				-				-	-					-				-	-
May-23				-				-	-					-				-	-
Jun-23				-				-	-					-				-	-
Jul-23				-				-	-					-				-	-
Aug-23				-				-	-					-				-	-
Sep-23				-				-	-					-				-	-
Oct-23				-				-	-					-				-	-
Nov-23				-				-	-					-				-	-
Dec-23				-				-	-					-				-	-
	12 Months Ended December 31, 2023				12 Months Ended December 31, 2023				-		12 Months Ended December 31, 2023				12 Months Ended December 31, 2023				-

Incremental Generation = Wind Plant Generation MWh – Base Wind Plant Generation MWh
 NPC Incremental Savings = [Incremental Gen_{HLH} × (Monthly Market Price_{HLH} – Integration Costs)] + [Incremental Gen_{LLH} × (Monthly Market Price_{LLH} – Integration Costs)]
 Where:
 NPC Benefit = NPC Incremental Savings × EBA Sharing Band, if applicable

Incremental Generation = The increase in generation at the wind plants due to the Wind Projects
 Wind Plant Generation MWh = The wind plant generation associated with the Wind Projects
 Base Wind Plant Generation MWh = The wind plant generation associated with the Wind Projects that is included in base rates.
 Incremental Gen_{HLH} = The increase in generation at the wind plant due to the Wind Projects during heavy load hours
 Incremental Gen_{LLH} = The increase in generation at the wind plant due to Wind Projects during light load hours
 Monthly Market Price_{HLH} = Heavy load hour monthly market price
 Monthly Market Price_{LLH} = Light load hour monthly market price
 Integration Costs = Wind integration costs from the most recent IRP

TB Flats

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
	Incremental Generation (MWh)	HLH Monthly Market Price (\$/MWh)	Integration Cost (\$/MWh)	HLH Energy Benefits (Loss) (a) x ((b) - (c)) (\$1,000)	Incremental Generation (MWh)	LHL Monthly Market Price (\$/MWh)	Integration Cost (\$/MWh)	LLH Energy Benefits (Loss) (e) x ((f) - (g)) (\$1,000)	Total Energy Benefits (Loss) (d) + (h) (\$1,000)
Nov-20				-				-	-
Dec-20				-				-	-
	12 Months Ended December 31, 2020			-	12 Months Ended December 31, 2020			-	-
Jan-21				-				-	-
Feb-21				-				-	-
Mar-21				-				-	-
Apr-21				-				-	-
May-21				-				-	-
Jun-21				-				-	-
Jul-21				-				-	-
Aug-21				-				-	-
Sep-21				-				-	-
Oct-21				-				-	-
Nov-21				-				-	-
Dec-21				-				-	-
	12 Months Ended December 31, 2021			-	12 Months Ended December 31, 2021			-	-
Jan-22				-				-	-
Feb-22				-				-	-
Mar-22				-				-	-
Apr-22				-				-	-
May-22				-				-	-
Jun-22				-				-	-
Jul-22				-				-	-
Aug-22				-				-	-
Sep-22				-				-	-
Oct-22				-				-	-
Nov-22				-				-	-
Dec-22				-				-	-
	12 Months Ended December 31, 2022			-	12 Months Ended December 31, 2022			-	-
Jan-23				-				-	-
Feb-23				-				-	-
Mar-23				-				-	-
Apr-23				-				-	-
May-23				-				-	-
Jun-23				-				-	-
Jul-23				-				-	-
Aug-23				-				-	-
Sep-23				-				-	-
Oct-23				-				-	-
Nov-23				-				-	-
Dec-23				-				-	-
	12 Months Ended December 31, 2023			-	12 Months Ended December 31, 2023			-	-

Transmission Costs

12 Months Ended December 31, 2020 - If amounts are less than 12 months then state number of months the amounts cover

Line	Description/Source	Calculation	CY 2020
1	Annual Transmission Revenue Requirement Formula rate Appendix A, Line 169 (Net Zonal Revenue Req.)		-
2	12 CP Monthly Peak (MW): Formula rate Appendix A, Line 170		-
3	Rate (\$/MW-year)	[Line 1 / Line 2]	-
4	(\$/MW-month)	[Line 3 / 12]	-
5	Total PacifiCorp ESM Network Load volume plus Behind-The-Meter Formula rate Attachment 9b, cols. 'e' and 'Behind-the-Meter'		-
6	Total Revenue from PacifiCorp ESM Network Load	[Line 5 x Line 4]	-
7	As percent of all network and long-term point-to-point	[Line 6 / Line 1]	0.0%
8	PacifiCorp ESM long-term point-to-point volume: Formula rate Attachment 9b, column 'g1'		-
9	Loss rate: PacifiCorp OATT Schedule 10		0.00%
10	PacifiCorp ESM long-term point-to-point volume with losses:	[Line 8 x (1 + Line 9)]	-
11	Total Revenue from PacifiCorp ESM long-term point-to-point (with losses)	[Line 10 x Line 4]	-
12	As percent of all network and long-term point-to-point	[Line 11 / Line 1]	0.0%
13	ESM network and LT PTP as percent of total network and LT PT	[Line 7 + Line 12]	0.0%
14	Percentage of revenues from third party wholesale transmission customer:	[1 - Line 13]	0.0%

Adapted from the attachment included in PacifiCorp's response to data request DPU 11.6 in Docket No. 17-035-40. Formula rate references refer to the true-up.

Transmission Costs

12 Months Ended December 31, 2021 - If amounts are less than 12 months then state number of months the amounts cover

Line	Description/Source	Calculation	CY 2021
1	Annual Transmission Revenue Requirement Formula rate Appendix A, Line 169 (Net Zonal Revenue Req.)		-
2	12 CP Monthly Peak (MW): Formula rate Appendix A, Line 170		-
3	Rate (\$/MW-year)	[Line 1 / Line 2]	-
4	(\$/MW-month)	[Line 3 / 12]	-
5	Total PacifiCorp ESM Network Load volume plus Behind-The-Meter Formula rate Attachment 9b, cols. 'e' and 'Behind-the-Meter'		-
6	Total Revenue from PacifiCorp ESM Network Load	[Line 5 x Line 4]	-
7	As percent of all network and long-term point-to-point	[Line 6 / Line 1]	0.0%
8	PacifiCorp ESM long-term point-to-point volume: Formula rate Attachment 9b, column 'g1'		-
9	Loss rate: PacifiCorp OATT Schedule 10		0.00%
10	PacifiCorp ESM long-term point-to-point volume with losses:	[Line 8 x (1 + Line 9)]	-
11	Total Revenue from PacifiCorp ESM long-term point-to-point (with losses)	[Line 10 x Line 4]	-
12	As percent of all network and long-term point-to-point	[Line 11 / Line 1]	0.0%
13	ESM network and LT PTP as percent of total network and LT PT	[Line 7 + Line 12]	0.0%
14	Percentage of revenues from third party wholesale transmission customer:	[1 - Line 13]	0.0%

Transmission Costs

12 Months Ended December 31, 2022 - If amounts are less than 12 months then state number of months the amounts cover

Line	Description/Source	Calculation	CY 2022
1	Annual Transmission Revenue Requirement Formula rate Appendix A, Line 169 (Net Zonal Revenue Req.)		-
2	12 CP Monthly Peak (MW): Formula rate Appendix A, Line 170		-
3	Rate (\$/MW-year)	[Line 1 / Line 2]	-
4	(\$/MW-month)	[Line 3 / 12]	-
5	Total PacifiCorp ESM Network Load volume plus Behind-The-Meter Formula rate Attachment 9b, cols. 'e' and 'Behind-the-Meter'		-
6	Total Revenue from PacifiCorp ESM Network Load	[Line 5 x Line 4]	-
7	As percent of all network and long-term point-to-point	[Line 6 / Line 1]	0.0%
8	PacifiCorp ESM long-term point-to-point volume: Formula rate Attachment 9b, column 'g1'		-
9	Loss rate: PacifiCorp OATT Schedule 10		0.00%
10	PacifiCorp ESM long-term point-to-point volume with losses:	[Line 8 x (1 + Line 9)]	-
11	Total Revenue from PacifiCorp ESM long-term point-to-point (with losses)	[Line 10 x Line 4]	-
12	As percent of all network and long-term point-to-point	[Line 11 / Line 1]	0.0%
13	ESM network and LT PTP as percent of total network and LT PT	[Line 7 + Line 12]	0.0%
14	Percentage of revenues from third party wholesale transmission customer:	[1 - Line 13]	0.0%

Transmission Costs

12 Months Ended December 31, 2023 - If amounts are less than 12 months then state number of months the amounts cover

Line	Description/Source	Calculation	CY 2023
1	Annual Transmission Revenue Requirement Formula rate Appendix A, Line 169 (Net Zonal Revenue Req.)		-
2	12 CP Monthly Peak (MW): Formula rate Appendix A, Line 170		-
3	Rate (\$/MW-year)	[Line 1 / Line 2]	-
4	(\$/MW-month)	[Line 3 / 12]	-
5	Total PacifiCorp ESM Network Load volume plus Behind-The-Meter Formula rate Attachment 9b, cols. 'e' and 'Behind-the-Meter'		-
6	Total Revenue from PacifiCorp ESM Network Load	[Line 5 x Line 4]	-
7	As percent of all network and long-term point-to-point	[Line 6 / Line 1]	0.0%
8	PacifiCorp ESM long-term point-to-point volume: Formula rate Attachment 9b, column 'g1'		-
9	Loss rate: PacifiCorp OATT Schedule 10		0.00%
10	PacifiCorp ESM long-term point-to-point volume with losses:	[Line 8 x (1 + Line 9)]	-
11	Total Revenue from PacifiCorp ESM long-term point-to-point (with losses)	[Line 10 x Line 4]	-
12	As percent of all network and long-term point-to-point	[Line 11 / Line 1]	0.0%
13	ESM network and LT PTP as percent of total network and LT PT	[Line 7 + Line 12]	0.0%
14	Percentage of revenues from third party wholesale transmission customer:	[1 - Line 13]	0.0%

Liquidated Damages

12 Months Ended December 31, 2020 - If amounts are less than 12 months then state number of months the amounts cover

Resource	FERC Account	Liquidated Damages (\$)	Date Paid
TOTAL			
Detail Explanation			

In each year if there are multiple liquidated damages then each year would have multiple of the above. One for each liquidated damage

Liquidated Damages

12 Months Ended December 31, 2021 - If amounts are less than 12 months then state number of months the amounts cover

Resource	FERC Account	Liquidated Damages (\$)	Date Paid
TOTAL			
Detail Explanation			

Liquidated Damages

12 Months Ended December 31, 2022 - If amounts are less than 12 months then state number of months the amounts cover

Resource	FERC Account	Liquidated Damages (\$)	Date Paid
TOTAL			
Detail Explanation			

Liquidated Damages

12 Months Ended December 31, 2023 - If amounts are less than 12 months then state number of months the amounts cover

Resource	FERC Account	Liquidated Damages (\$)	Date Paid
TOTAL			
Detail Explanation			

230 kV Network Upgrades

12 Months Ended December 31, 2020 - if amounts are less than 12 months then state number of months the amounts cover

Project

	Customer X	Customer X¹	Customer X₂	Total
Material	\$ -	\$ -	\$ -	\$ -
Internal Labor	\$ -	\$ -	\$ -	\$ -
External Contract Services	\$ -	\$ -	\$ -	\$ -
Other	\$ -	\$ -	\$ -	\$ -
Capital Surcharge	\$ -	\$ -	\$ -	\$ -
AFUDC	\$ -	\$ -	\$ -	\$ -
TOTAL	\$ -	\$ -	\$ -	\$ -

230 kV Network Upgrades

12 Months Ended December 31, 2021 - if amounts are less than 12 months then state number of months the amounts cover

Project

	Customer X	Customer X¹	Customer X₂	Total
Material	\$ -	\$ -	\$ -	\$ -
Internal Labor	\$ -	\$ -	\$ -	\$ -
External Contract Services	\$ -	\$ -	\$ -	\$ -
Other	\$ -	\$ -	\$ -	\$ -
Capital Surcharge	\$ -	\$ -	\$ -	\$ -
AFUDC	\$ -	\$ -	\$ -	\$ -
TOTAL	\$ -	\$ -	\$ -	\$ -

230 kV Network Upgrades

12 Months Ended December 31, 2022 - if amounts are less than 12 months then state number of months the amounts cover

Project

	Customer X	Customer X¹	Customer X₂	Total
Material	\$ -	\$ -	\$ -	\$ -
Internal Labor	\$ -	\$ -	\$ -	\$ -
External Contract Services	\$ -	\$ -	\$ -	\$ -
Other	\$ -	\$ -	\$ -	\$ -
Capital Surcharge	\$ -	\$ -	\$ -	\$ -
AFUDC	\$ -	\$ -	\$ -	\$ -
TOTAL	\$ -	\$ -	\$ -	\$ -

230 kV Network Upgrades

12 Months Ended December 31, 2023 - if amounts are less than 12 months then state number of months the amounts cover

Project

	Customer X	Customer X¹	Customer X₂	Total
Material	\$ -	\$ -	\$ -	\$ -
Internal Labor	\$ -	\$ -	\$ -	\$ -
External Contract Services	\$ -	\$ -	\$ -	\$ -
Other	\$ -	\$ -	\$ -	\$ -
Capital Surcharge	\$ -	\$ -	\$ -	\$ -
AFUDC	\$ -	\$ -	\$ -	\$ -
TOTAL	\$ -	\$ -	\$ -	\$ -

Annual Revenue Requirement - Aeolus to Bridger/Anticline Line and Incremental Transmission Revenue
 12 Months Ended December 31, 2020, 2021, 2022, and 2023 - If 2020 is less than 12 months note period covered by number of months

Line No.	Reference	(a) (b) (c) (d)				(e) (f) (g) (h)				(i) (j) (k) (l)				(m) (n) (o) (p)				
		2020 Energy Gateway				2021 Energy Gateway				2022 Energy Gateway				2023 Energy Gateway				
		Total Company	Factor	Factor %	Utah Allocated	Total Company	Factor	Factor %	Utah Allocated	Total Company	Factor	Factor %	Utah Allocated	Total Company	Factor	Factor %	Utah Allocated	
\$-Thousands																		
Plant Revenue Requirement																		
1	Capital Investment	Footnote 1	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-	
2	Depreciation Reserve	Footnote 1	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-	
3	Accumulated DIT Balance	Footnote 1	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-	
4	Net Rate Base	sum of lines 1-3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
5	Pre-Tax Rate of Return	line 29	0.000%	-	0.000%	0.000%	-	0.000%	-	0.000%	-	0.000%	-	0.000%	-	0.000%	-	
6	Pre-Tax Return on Rate Base	line 4 * line 5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	Wholesale Wheeling Revenue	Footnote 2	-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-
8	Operation & Maintenance		-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-
9	Depreciation		-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-
10	Property Taxes	line 30 * prev. yr-end net plant	-	GPS	0.0000%	-	-	GPS	0.0000%	-	-	GPS	0.0000%	-	-	GPS	0.0000%	-
11	Wind Tax		-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-
12	Total Plant Revenue Requirement	sum of lines 6-11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Net Power Cost																		
13	NPC Incremental Savings		-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-
PTC Benefit																		
14	PTC Benefit		-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-	(88,062)	SG	0.0000%	-
15	PTC Benefit in Base Rates		-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-
16	Net PTC	sum of lines 14 and 15	-	-	-	-	-	-	-	-	-	-	-	(88,062)	-	-	-	
17	Gross- up for taxes	line 16 * (line 28 - 1)	-	-	-	-	-	-	-	-	-	-	-	88,062	-	-	-	
18	PTC Revenue Requirement	sum of lines 16 and 17	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Rev. Requirement	sum of lines 12, 13, 18	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Adjustment for EBA Pass-through																		
20	Wholesale Wheeling Revenue	line 7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
21	Percentage included in EBA (100%)	UT EBA Sharing %	-	-	100%	-	-	-	100%	-	-	-	-	100%	-	-	100%	
22	EBA Pass-through	line 20 * line 21	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
23	NPC Incremental Savings	line 13	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Percentage included in EBA (100%)	UT EBA Sharing %	-	-	100%	-	-	-	100%	-	-	-	-	100%	-	-	100%	
25	EBA Pass-through	line 23 * line 24	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
26	Rev. Reqt. after EBA Pass-through	line 19 - line 22 - line 25	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	Federal/State Combined Tax Rate		0.000%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
28	Net to Gross Bump up Factor = (1/(1-tax rate))		0.0000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
29	Pretax Return		0.000%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Property Tax Rate		0.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
31	Utah SG Factor		0.0000%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
32	Utah GPS Factor		0.0000%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

Footnotes:

- 1) Average Balances
- 2) Wholesale Wheeling Revenue = percentage of third-party transmission revenues from tab (iv) Transmission Costs, line 14 * Aeolus to Bridger/Anticline line revenue requirement

Wind O&M Costs for PacifiCorp Owned Projects

12 Months Ended December 31, 2020 - If amounts are less than 12 months then state number of months the amounts cover

Resource	Total O&M
Cedar Springs (BTA)	
Ekola Flats	
TB Flats	
TOTAL	

Wind O&M Costs for PacifiCorp Owned Projects

12 Months Ended December 31, 2021 - If amounts are less than 12 months then state number of months the amounts cover

Resource	Total O&M
Cedar Springs (BTA)	
Ekola Flats	
TB Flats	
TOTAL	

Wind O&M Costs for PacifiCorp Owned Projects

12 Months Ended December 31, 2022 - If amounts are less than 12 months then state number of months the amounts cover

Resource	Total O&M
Cedar Springs (BTA)	
Ekola Flats	
TB Flats	
TOTAL	

Wind O&M Costs for PacifiCorp Owned Projects

12 Months Ended December 31, 2023 - If amounts are less than 12 months then state number of months the amounts cover

Resource	Total O&M
Cedar Springs (BTA)	
Ekola Flats	
TB Flats	
TOTAL	

REC Revenue from Wind Projects

12 Months Ended December 31, 2020 - If amounts are less than 12 months then state number of months the amounts cover

Total Company						
Resource	# sold	Vintage	Price	Revenue	Entity	
Cedar Springs (BTA)						
Ekola Flats						
TB Flats						
TOTAL						

Total Company				
Resource	# generated	# Held For Compliance (CA/OR/WA RPS)	# Remaining	
Cedar Springs (BTA)				
Ekola Flats				
TB Flats				
TOTAL				

Utah allocated/allocated rate %

Resource	Revenue
Cedar Springs (BTA)	
Ekola Flats	
TB Flats	
TOTAL	

REC Revenue from Wind Projects

12 Months Ended December 31, 2021 - If amounts are less than 12 months then sate number of months the amounts cover

Total Company						
Resource	# sold	Vintage	Price	Revenue	Entity	
Cedar Springs (BTA)						
Ekola Flats						
TB Flats						
TOTAL						

Total Company				
Resource	# generated	# Held For Compliance (CA/OR/WA RPS)	# Remaining	
Cedar Springs (BTA)				
Ekola Flats				
TB Flats				
TOTAL				

Utah allocated/allocated rate %

Resource	Revenue
Cedar Springs (BTA)	
Ekola Flats	
TB Flats	
TOTAL	

REC Revenue from Wind Projects

12 Months Ended December 31, 2022 - If amounts are less than 12 months then sate number of months the amounts cover

Total Company						
Resource	# sold	Vintage	Price	Revenue	Entity	
Cedar Springs (BTA)						
Ekola Flats						
TB Flats						
TOTAL						

Total Company				
Resource	# generated	# Held For Compliance (CA/OR/WA RPS)	# Remaining	
Cedar Springs (BTA)				
Ekola Flats				
TB Flats				
TOTAL				

Utah allocated/allocated rate %

Resource	Revenue
Cedar Springs (BTA)	
Ekola Flats	
TB Flats	
TOTAL	

REC Revenue from Wind Projects
 12 Months Ended December 31, 2023 - If amounts are less than 12 months then state number of months the amounts cover

Total Company					
Resource	# sold	Vintage	Price	Revenue	Entity
Cedar Springs (BTA)					
Ekola Flats					
TB Flats					
TOTAL					

Total Company			
Resource	# generated	# Held For Compliance (CA/OR/WA RPS)	# Remaining
Cedar Springs (BTA)			
Ekola Flats			
TB Flats			
TOTAL			

Utah allocated/allocated rate %

Resource	Revenue
Cedar Springs (BTA)	
Ekola Flats	
TB Flats	
TOTAL	

CERTIFICATE OF SERVICE

Docket No. 17-035-40

I hereby certify that on October 15, 2018, 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

Michele Beck – mbeck@utah.gov

Division of Public Utilities

Erika Tedder – etedder@utah.gov

Consultants:

dpeaco@daymarkea.com

aafnan@daymarkea.com

jbower@daymarkea.com

Assistant Attorney General

Patricia Schmid – pschmid@agutah.gov

Justin Jetter – jjetter@agutah.gov

Robert Moore – rmoore@agutah.gov

Steven Snarr – stevensnarr@agutah.gov

Rocky Mountain Power

Jana Saba – jana.saba@pacificorp.com

Yvonne Hogle – yvonne.hogle@pacificorp.com

Jeff Richards – robert.richards@pacificorp.com

McDowell Rackner Gibson PC

Katherine McDowell – katherine@mrg-law.com

Adam Lowney – adam@mrg-law.com

Pacific Power

Sarah K. Link – sarah.link@pacificorp.com

Karen J. Kruse – karen.kruse@pacificorp.com

Utah Association of Energy Users

Hatch, James & Dodge, P.C.

Gary A. Dodge – gdodge@hjdllaw.com

Phillip J. Russell – prussell@hjdllaw.com

Nucor Steel-Utah

Stone Mattheis Xenopoulous & Brew, P.C.

Peter J. Mattheis – pjm@smxblaw.com

Eric J. Lacey – ejl@smxblaw.com

Cohne Kinghorn

Jeremy R. Cook – jcook@cohnekinghorn.com

Interwest Energy Alliance

Manning Curtis Bradshaw & Bednar PLLC

Mitch M. Longson – mlongson@mc2b.com

Tormoen Hickey LLC

Lisa Tormoen Hickey – lisahickey@newlawgroup.com

Utah Clean Energy

Kate Bowman – kate@utahcleanenergy.org

Hunter Holman – hunter@utahcleanenergy.org

Utah Industrial Energy Consumers

Parsons Behle & Latimer

William J. Evans – bevans@parsonsbehle.com

Vicki M. Baldwin – vbaldwin@parsonsbehle.com

Chad C. Baker – cbaker@parsonsbehle.com

Western Resource Advocates

Sophie Hayes – sophie.hayes@westernresources.org

Nancy Kelly – nkelly@westernresources.org

Penny Anderson – penny.anderson@westernresources.org

Steve Michel – steve.michel@westernresources.org



Katie Savarin
Coordinator, Regulatory Operations