

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain)
Power to Establish Export Credits for Customer)
Generated Electricity)

Docket No. 17-035-61
DPU EXHIBIT 2.0 R
Phase II

Rebuttal Testimony of
Abdinasir M. Abdulle, Ph.D.
Division of Public Utilities

July 15, 2020

1 **INTRODUCTION**

2 **Q. Please state your name, business address, and employment for the record.**

3 A. My name is Dr. Abdinasir M. Abdulle. My business address is Heber Wells Building –
4 4th Floor, 160 E. 300 South, Salt Lake City, Utah 84114. I am employed by the Utah
5 Division of Public Utilities (Division or DPU), Utah Department of Commerce, as a
6 Utility Technical Consultant.

7 **Q. On whose behalf are you testifying in this proceeding?**

8 A. I am testifying on behalf of the Division.

9 **Q. Are you the same Abdinasir M. Abdulle that filed Direct Testimony in this**
10 **proceeding?**

11 A. Yes, I am.

12 **SCOPE OF TESTIMONY**

13 **Q. What is the purpose of your testimony?**

14 A. The purpose of my testimony is to provide the Division’s analysis, findings, and
15 recommendations, to the Commission regarding the inputs Rocky Mountain Power
16 (RMP) used in the Partial Displacement Deferral Revenue Requirement (PDDRR)
17 method in this proceeding. In its Direct Testimony in this proceeding, the Division
18 provided its recommendation on the avoided cost method that RMP uses to determine its
19 Schedule 137 export credit rates for customer generated electricity.

20 Any issue that is not addressed in my testimony should not be construed as an acceptance
21 or rejection by the Division. My Rebuttal Testimony is based on the assumption that the

22 Commission will accept the Division recommendations as outlined in avoided cost
23 Docket Nos. 19-035-18 and 20-035-T04. If the Commission does not approve our
24 recommendations in those Dockets, the Division may amend its conclusions and
25 recommendations accordingly in this docket.

26 **Q. What inputs did RMP use in the PDDRR method?**

27 A. As I mentioned in my Direct Testimony, RMP used the inputs outlined in its avoided cost
28 input changes compliance filing filed on January 10, 2020, in Docket No. 19-035-18
29 (2019.Q3), which is still pending.

30 **Q. Please describe the inputs used in the 2019.Q3 avoided cost input change compliance**
31 **filing?**

32 A. In its filing of 2019.Q3, RMP made four routine updates and one non-routine update. The
33 routine updates included: 1) Updating the Official Forward Price Curve (OFPC) to prices
34 dated September 30, 2019 (1909 OFPC); 2) Updates to incorporate the 2019 IRP
35 assumptions; 3) Updating the queue of the signed contracts and the potential qualifying
36 facilities (QF); and 4) Updates that take into consideration the extension of the
37 Production Tax Credit (PTC). The non-routine update was the deferral of a Utah wind
38 resource, rather than a Wyoming wind resource, by a Utah wind QF.¹

39 **Q. What modifications did RMP made to the inputs in 2019.Q3 for the purpose of**
40 **determining export credit for customer generated electricity?**

¹ Docket Nos. 19-035-18 and 20-035-T04, RMP's Avoided Cost Input Changes Quarterly Compliance Filing – 2019.Q3 and 2019.Q4, DPU Comments-

41 A. RMP updated the market prices to that contained in the December 31, 2019 Official
42 Forward Price Curve (OFPC). It also updated the QF queue for changes to executed
43 contracts. The Division believes that these updates are appropriate.

44 **Q. What is your general assessment of the above listed input changes?²**

45 A. The non-routine updates pertains to wind QF and proxy resources and will not be
46 discussed here. The routine updates serve to update the basic model inputs to keep the
47 GRID model current. Of the four routine updates listed above, updating the OFPC, the
48 QF queue, and accounting for the extension of the Production Tax Credit (PTC) are
49 straight forward and the Division believes they are appropriate updates. The updates
50 associated with the 2019 IRP assumptions include capacity contribution, integration cost,
51 preferred portfolio, energy storage dispatch, and a modification to wind and solar
52 generation profiles. The Division believes that these assumptions are also reasonable.

53 **Q. What is your conclusion?**

54 A. The Division has participated in the proceedings of Docket Nos. 19-035-18 and 20-035-
55 T04 and submitted its comments supporting RMP's 2019.Q3 compliance filing. In that
56 proceeding the Division concluded that RMP's proposed updates were reasonable and
57 recommended approval. In this proceeding where the inputs contained in 2019.Q3
58 compliance filing were used, the Division believes that inputs used in the PDDRR
59 method are reasonable and should be approved.

² The discussion of the inputs used in the PDDRR model is based on DPU Comments in Docket Nos. 19-035-18 and 20-035-T04, RMP's Avoided Cost Input Changes Quarterly Compliance Filing – 2019.Q3 and 2019.Q4, dated May 28, 2020.

60 Therefore, as was indicated in my Direct Testimony, the Division concurs with RMP that
61 the same method used in the calculation of the avoided costs for Schedule 37, with some
62 adjustments for the avoided line losses at the primary level, should be used to determine
63 the value of the export credit.

64 **Q. Does this conclude your rebuttal testimony?**

65 **A. Yes.**