ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

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RE: UT Docket No. 17-035-61
OCS 3rd Set Data Request (1-5)

Please find enclosed Rocky Mountain Power's Responses to OCS 3rd Set Data Requests 3.1-3.5. Also provided is Attachment OCS 3.3.

If you have any questions, please call me at (801) 220-2823.

Sincerely,

___/s/___
Jana Saba
Manager, Regulation

Enclosures
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OCS Data Request 3.1

With regard to the Company's proposal to have any accumulated export credit balances expire for Schedule 137 customers during March of each year (October for Rate 10 irrigation customers), please provide the following:

(a) The economic rationale, including implicit price signals that the Company has relied on to develop this proposal.

(b) An explanation of why export credit balances that are based on the market value of exported energy, should not be provided to customers who provide export energy to the system.

Response to OCS Data Request 3.1

(a) Please refer to lines 153 through 162 of Mr. Meredith's direct testimony filed in this matter on February 3, 2020.

(b) Please refer to the Company's response to subpart (b) above.

OCS Data Request 3.2

With regard to the Company's proposed calculation of net exported energy on a real time basis (Meredith direct at page 5), please explain in detail how the real time measurements would actually be computed and recorded with the proposed registers.

Response to OCS Data Request 3.2

Please refer to lines 99 through 105 of Mr. Meredith's direct testimony filed in this matter on February 3, 2020. The meter's registers record all energy exported to the grid as well as all energy delivered to the customer. These total measurements would be used for billing.

OCS Data Request 3.3

With regard to Mr. Daniel J. MacNeil's testimony at page 7, please provide a detailed explanation of the reasoning for excluding any secondary losses in the calculation of the export credit avoided losses. Provide an example, including a distribution line drawing showing export energy injection into the grid and load withdrawal, to illustrate the Company's reasoning for excluding 100% of secondary losses (i.e., assume exported energy is injected at the secondary level and serves secondary load).

Response to OCS Data Request 3.3

When a customer being served at the secondary voltage level has on-site generation in excess of their load, that generation is transferred through the customer meter and up the service drop. To reach another secondary customer, the generation must at least pass across secondary voltage lines, back down a service drop, and through another customer's meter. Losses are incurred at each stage of this process. The losses across the exporting customer's service drop will be incremental to what would otherwise be required to serve another customer. The losses on another customer's service drop would be the same whether that power is sourced from exported customer generation or utility assets. Losses on secondary voltage lines could be higher or lower depending on the specific circumstances. Additional losses would be incurred to the extent generation must be converted from secondary to primary voltage by the line transformer or from primary to transmission voltage in the distribution substation.

Given that exported customer generation uses the secondary distribution system, it will incur losses on the secondary system, so the Company's proposal does not credit exported generation with avoided secondary losses. Please refer to Attachment OCS 3.3 which provides a diagram illustrating potential distribution system configurations.

OCS Data Request 3.4

The Company reports that its line loss study shows secondary losses of 9.322%. Does this include both secondary line and transformation losses, or is it only line losses?

Response to OCS Data Request 3.4

Yes, the referenced secondary losses of 9.322 percent include both secondary line and transformation losses.

OCS Data Request 3.5

For each proposed change to Schedule No. 136, please state whether the basis for this change was required under the terms of the NEM Settlement. For each change that the Company believes is required per the NEM Settlement, please provide a reference to the Settlement supporting the change. For each change that is not specifically required by the NEM Settlement, please provide the Company's support and/or rationale for the change.

Response to OCS Data Request 3.5

Please refer to the direct testimonies of Mr. Meredith and Mr. MacNeil filed in this matter on February 3, 2020 for the support and rationale for each difference between proposed Schedule 137 and current Schedule 136. The NEM Settlement did not specifically identify program/tariff features beyond the establishment of a "just and reasonable rate for export credits for customer generated electricity" to be applied to post-transition program customer generators.