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Division of Public Utilities

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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

June 25, 2020

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Re: Docket No. 17-035-61 Phase Two, Application of Rocky Mountain Power to Establish Export Credits for Customer Generated Electricity, Division of Public Utilities response to Utah Clean Energy's Data Request Set 2.

Direct Testimony of Robert A. Davis

2.1 Regarding the direct testimony of Mr. Davis, lines 56 – 63: Why has Mr. Davis chosen to provide a snapshot of CAISO Locational Marginal Pricing from February 10, 2020, as opposed to a different date?

A: At the time Mr. Davis was preparing his direct testimony, he relied on RMP's responses to the Division's Data Request DPU 6.1-2 2nd and Division Data Request DPU 6.1-2 6th Supplemental that illustrated a peak load day on February 7, 2019. Mr. Davis randomly chose February 10, 2020 under the assumption that RMP might see a similar peak load

during that time in 2020. (Note that UCE has already been provided both data request responses from RMP).

2.2 Regarding Illustration 18, line 509:

2.2.1 Please describe what each colored bar in the illustration represents.

A: Please see attached DPU Exhibit 1.2, 17-035-61_DPU Exhibit 1.2_Davis Dir_PH II_S&P Global Market Pricing_3-3-20 that contains the legend for the hour ahead locational marginal pricing. The Division understands that the color bars represent the average locational marginal pricing over the month for each CAISO node beginning in February 2019 through February 2020.

2.2.2 Please describe how the Division used this illustration to conclude that “RMP’s proposed rates are aligned with the market.” (Lines 511 – 512)

A: The chart and under-lying data illustrates that the average locational marginal pricing across the western BA (CAISO) are generally less than \$50 a megawatt hour over the 2019 study period. The Division was interested in market pricing as a comparison to RMP’s proposal.

2.3 Mr. Davis notes that the raw Load Research Study contains missing data for some customers (lines 149 – 155):

2.3.1 How many occurrences of a customer ID with some missing data did the Division identify?

A: The Division has not compiled a comprehensive list of all missing data points. The information is equally available to UCE to review RMP’s provided data and identify each missing data point. In the Division’s experience, the occurrences of missing data were generally two or less meters in any given month and sometimes only on certain days and intervals.

2.3.2 How many occurrences of an interval with some missing data did the Division identify?

A: See response to 2.3.1.

2.3.3 What is the nameplate capacity of the customer IDs for which the Division identified missing data?

A: The Division did not track the missing nameplate capacity of the customer IDs.

2.3.4 In lines 158 – 160, Mr. Davis states “In the case where data appeared for deliveries and exports but not production, I removed the deliveries and exports, so delivery, export, and production data were valid for each customer.”

a. Please explain why the Division determined that removing deliveries and exports results in valid data.

A: Data from all three meters is necessary to calculate the full requirements for each customer. Therefore, delivery and export data without production data is incomplete. Where part of a data set for a customer was missing, the two alternatives are to estimate the missing data cells or to remove the available data for the customer for the time period. Given the large volume of data points available, the Division removed the otherwise available data on deliveries and exports where generation data was missing to keep its charts on an apples-to-apples comparison over the study period.

b. Has the Division investigated whether the data error is a result of missing production data versus erroneously reported export and delivery data? If so, what conclusions has the Division drawn?

A: To the best of Mr. Davis’s recollection, other than the data errors reported by RMP in its Utah Parties-LRS 1-2nd Supplemental, April 30, 2019 for the four meters that reported incorrectly in kVARs, the data was simply missing.

2.3.5 In lines 160 – 161, Mr. Davis states “I used the same technique when production data was available but no deliveries or exports.”

a. Please confirm the Division removed production data in the circumstances described above.

A: Yes.

b. Please explain why the Division chose to remove production data in these circumstances.

A: See response to 2.3.4(a).

c. Has the Division investigated whether the data error is a result of missing delivery and export data versus erroneous production data? If so, what conclusions has the Division drawn?

A: See response to 2.3.4(b).

2.4 In lines 186 – 188, Mr. Davis states “It is a reasonable assumption that additional variability has the potential to wear out certain distribution equipment at a faster rate than would

otherwise occur.” Is the Division aware of any documentation that this ‘wear and tear’ is occurring on RMP’s system?

A: No. Mr. Davis’s testimony at lines 188-192 and footnote 15 recommends further research on this topic:

“The Division cannot quantify how the variability impacts the system at this time but brings up the point as an issue needing further research to study how customer generation exports might affect the system and its reliability, and potentially result in a cost to all ratepayers at some point in time.” [Emphasis added]

Cc: Hunter Holman, UCE
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Service List