ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

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Madison Galt
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RE: UT Docket No. 17-035-61
DPU 9th Set Data Request (1-3)

Please find enclosed Rocky Mountain Power's Responses to DPU 9th Set Data Requests 9.1-9.3.

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

Sincerely,

___/s/___
Jana Saba
Manager, Regulation

Enclosures
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DPU Data Request 9.1

Please provide an estimate of the amount of time required to compile the data after the historical year has ended that is needed to calculate the following ECR values:

(a) Avoided energy;

(b) Avoided generation capacity;

(c) Avoided transmission capacity; and

(d) Avoided distribution capacity.

Response to DPU Data Request 9.1

Please refer to the Company's response related to the availability of specific data below which are required inputs for the Company to calculate energy cost rate (ECR) values for (a) Avoided energy, (b) Avoided generation capacity, (c) Avoided transmission capacity, and (d) Avoided transmission capacity. In addition to the information provided below, the Company would require at least three weeks to compile the data once all the below listed input data is available.

(a) Calculating avoided energy value requires two inputs for each interval of the historical period: energy imbalance market prices and customer generation export volumes.

- Energy imbalance market (EIM) pricing is subject to correction, and under its current business practice, the California Independent System Operator (CAISO) publishes Recalculation Settlement Statements 70 business days after each trading day. This is equivalent to approximately 100 calendar days, or a bit over three calendar months. Posted EIM pricing results for individual intervals rarely change significantly, and once this window passes the aggregate impact of any changes is expected to be negligible.

- Customer generation export volumes are finalized approximately 60 days after the end of each month. To more easily account for changes in customer count, export volumes are typically reported as average export volumes (among the customers participating on each calendar day of the historical period), divided by the average installed customer generation capacity (again as of that day). This produces weighted-average exports for a single typical customer.

(b) Calculating avoided generation capacity value requires six inputs:

1. Generation capital cost,
2. Generation carrying charge,

3. Generation fixed operations and maintenance (O&M) cost,
4. Avoided line losses (cumulative losses from generation to the line transformer segment),
5. Generation capacity contribution, and
6. Export volume per kilowatt (kW) of installed capacity.

Generation inputs 1 through 4 above are not based on historical data, or are not expected to be updated annually. Generation input 5 (generation capacity contribution as approved by the Public Service Commission of Utah (UPSC)) is calculated as a function of hourly customer generation exports (discussed in the Company's response to subpart (a) above) and hourly actual Utah retail load, which is available approximately 60 days after the end of the historical period. Note: the most thorough review of historical hourly loads occurs during March (for the prior calendar year), and September (for the year ending June) as part of the Company's semi-annual reporting process. Generation input 6 (export volume per kW of installed capacity) is calculated by dividing average export volumes by the average installed customer generation capacity.

(c) Calculating avoided transmission capacity value requires four inputs:

1. Transmission rate,
2. Avoided line losses (cumulative losses from generation to the line transformer segment),
3. Transmission capacity contribution, and
4. Export volume per kW of installed capacity.

With regard to transmission input 1 (transmission rate), the Company updates its open access transmission tariff (OATT) transmission rates annually, effective June 1, in accordance with a Federal Energy Regulatory Commission (FERC) approved formula. The projected rates are subject to true-up based on actual costs and billing determinants. Both the projection and true-up are filed annually in May. For example, the Company recently filed its projection for 12 months starting June 1, 2021, and its true-up for calendar year 2020. Transmission input 2 (avoided line losses) are not expected to be updated annually. Under the UPSC's approved methodology, transmission inputs 3 (transmission capacity contribution) and 4 (export volume per kW of installed capacity) are identical to the comparable generation capacity inputs discussed in the Company's response to subpart (b) above.

(d) Calculating avoided distribution capacity value requires six inputs:

1. Distribution capital cost,
2. Distribution carrying charge,
3. Avoided line losses on the distribution system, calculated as the ratio of grossed up demand up to the line transformer segment to grossed up demand on the transmission system,

4. Distribution capacity contribution, and
5. Export volume per kilowatt of installed capacity.

Distribution inputs 1 through 3 are not based on historical data, or are not expected to be updated annually. Under the UPSC's approved methodology, distribution inputs 3 (avoided line losses), 4 (distribution capacity contribution), and 5 (export volume per kW of installed capacity) are identical to the comparable generation capacity inputs discussed in the Company's response to subpart (b) above.

DPU Data Request 9.2

How often does RMP revise its marginal cost study?

Response to DPU Data Request 9.2

Rocky Mountain Power's (RMP) Utah cost of service (COS) model is an embedded COS model. The Company therefore does not typically update a marginal COS study for Utah at any regular frequency. The Company prepared a marginal COS study in its recently completed general rate case (GRC), Docket No. 20-035-04, only because it was required to per the terms of a stipulation in the prior GRC, Docket No. 13-035-184.

DPU Data Request 9.3

How often does RMP revise its line loss study? When was the last line loss study completed?

Response to DPU Data Request 9.3

The Company does not update its line loss study on a particular or frequent interval period of time. Preparing a line loss study is a significant cross-departmental effort for the Company. The most recent line loss study was completed in spring 2020 and was based upon data from calendar year 2018. The prior study was completed in 2011 and was based upon data from calendar year 2009. Going forward, the Company anticipates that it will prepare a line loss study about every five years.