



1407 West North Temple, Suite 330
Salt Lake City, Utah 84111

November 27, 2019

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. 19-035-01
Docket No. 09-035-15 / Docket No. 12-035-67 / Docket No. 14-035-31
Q3 2019 Energy Balancing Account Report**

In compliance with the Public Service Commission of Utah's ("Commission") June 15, 2012 order on energy balancing account ("EBA") filing requirements in Docket No. 09-035-15 (as modified by stipulation and Commission order in Docket No. 12-035-67), Rocky Mountain Power hereby submits its quarterly Utah EBA report for the period January 1, 2019 through September 30, 2019 ("Q3 2019").

The report includes Exhibit 1 – the Commission ordered Dynamic Allocation Factor method and Reporting Requirement – Supporting Trade Data. In addition, work papers and supporting calculations are also provided. The data provided is in the format requested by the Division of Public Utilities ("DPU") and approved by the Commission in the above referenced dockets. Confidential information is provided subject to Public Service Commission of Utah ("UPSC") Rule 746-1-602 and 746-1-603.

Informal inquiries may be directed to Jana Saba at (801) 220-2823.

Sincerely,

A handwritten signature in blue ink that reads "Joelle Steward".

Joelle Steward
Vice President, Regulation

Enclosures

cc: Division of Public Utilities (DPU)

Utah
Energy Balancing Account (EBA)

Q3 2019

(January 1, 2019 through September 30, 2019)

**Quarterly Reporting Requirement Requesting
Supporting Trade Data**

EBA Quarterly Reporting Requirement

Supporting Trade Data: List of electricity and natural gas trades that were settled during the Energy Balancing Account (EBA) quarterly reporting period including both financial (i.e., swaps) and physical transactions. The information shall be in a format substantially similar to the Company's "Confidential Attachment EBA FR 1-1" and Confidential Attachment EBA FR 1-2" filed in Docket 12-035-67. At a minimum, the trade data will include the following:

- (i) Deal Number
- (ii) Instrument Type
- (iii) Buy / Sell
- (iv) Month
- (v) Year
- (vi) Delivery Start
- (vii) Delivery End
- (viii) Done Date
- (ix) Point of Receipt
- (x) Point of Delivery
- (xi) Fixed Price
- (xii) Floating Price
- (xiii) Index
- (xiv) Calculation of gains and losses for electric and natural gas swaps
- (xv) Counterparty
- (xvi) Description of actions taken, if any, to liquidate the instrument

In addition to this EBA Quarterly Reporting Requirement is to comply with the following commitment from the Stipulation / Order in Docket 14-035-31:

Stipulation Commitment 6 (paragraph 9)

*"The Company agrees to continue to provide in its quarterly EBA reports trade information consistent with EBA filing requirement 6(b). **This information will be provided in the same format and detail as the Company's response to DPU data request 3.1 in this case.** The Company agrees to make its best efforts to provide the fourth quarter trade information in EBA filing requirement 6(b) annually, on February 15, but no later than March 1, prior to an annual EBA filing on March 15. When the fourth quarter information is provided, it will be provided in the same format and detail as DPU data request 3.1 in this case and include data for all four quarters. This information will be filed again with the Company's EBA application filing and will replace the current FR 6-2, 6-3, 6-4 and 6-5 spreadsheets. The SAP reconciliations that are currently shown in the FR 6-2, 6-3, 6-4, 6-5 spreadsheets will also be provided in the annual EBA application filing".*

RMP EBA Deferral Period / Rocky Mountain Power
EBA Quarterly Reporting Requirement
Q3 2019 (January 2019 through September 2019)

Response to EBA Quarterly Reporting Requirement

Please refer to file “Reporting Requirement - UT EBA Q3 2019 CONF” which provides detail of all electricity and natural gas trades settled during the energy balancing account (EBA) quarterly reporting period including both financial and physical transactions in the agreed upon format per the Stipulation / Order in Docket 14-035-31. Note: there were no power financial transactions that settled in Q3 2019 (January 2019 through September 2019).

With regard to subpart (xvi) – transaction liquidation takes place through final settlement of a swap transaction or delivery and settlement of a physical transaction. The Company does not explicitly transact to liquidate a particular transaction in advance of settlement.

Confidential information is provided subject to Public Service Commission of Utah (UPSC) Rule 746-1-602 and 746-1-603.

Utah
Energy Balancing Account (EBA)

Q3 2019

(January 1, 2019 through September 30, 2019)

Quarterly Reporting Requirement
Confidential Supporting Trade Data

**THIS ATTACHMENT IS CONFIDENTIAL IN ITS
ENTIRETY AND IS PROVIDED UNDER SEPARATE
COVER**

Utah
Energy Balancing Account (EBA)

Q3 2019

(January 1, 2019 through September 30, 2019)

Confidential Exhibit 1 - Dynamic Allocation Factor

**THIS ATTACHMENT IS CONFIDENTIAL IN ITS
ENTIRETY AND IS PROVIDED UNDER SEPARATE
COVER**

CERTIFICATE OF SERVICE

I hereby certify that on November 27, 2019, a true and correct copy of the foregoing **Energy Balancing Account Report for Q3 2019** was served by electronic mail to the following:

Division of Public Utilities
dpudatarequest@utah.gov

A handwritten signature in black ink, appearing to be 'M. M. L.', written over a horizontal line.

Adviser, Regulatory Operations