



## Re: Rocky Mountain Power's 2019 Avoided Cost Input Changes Quarterly Compliance

Docket No. 19-035-18 and Docket No. 20-035-T04

### HEARING

July 01, 2020



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1                   BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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3 In Re: Rocky Mountain                   )  
4 Power's 2019 Avoided Cost            )Docket No. 19-035-18 and  
5 Input Changes Quarterly             )Docket No. 20-035-T04  
6 Compliance Filing; and               )  
7 Rocky Mountain Power's             )Presiding Officer:  
8 Proposed Tariff Revisions to)Michael Hammer  
9 Electric Service Schedule            )  
10 No. 37, Avoided Cost                )  
11 Purchases from Qualifying          )  
12 Facilities.                            )

13                                   VIDEO CONFERENCED HEARING

14                                   Taken on Wednesday, July 1, 2020

15                                   at 9:00 A.M.

16                                   Public Service Commission of Utah

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1 July 1, 2020

9:00 A.M.

P R O C E E D I N G S

2

3 PRESIDING OFFICER HAMMER: Good morning,  
4 everyone. This is the time noticed for the hearing in  
5 the matter of Rocky Mountain Power 2019 avoided cost  
6 input changes quarterly compliance filing as Commission  
7 Docket 19-035-18.

8 My name is Mike Hammer. I am the Commission  
9 designated presiding officer for this docket. Let's go  
10 ahead and take appearances, please, beginning with Rocky  
11 Mountain Power.

12 MR. MCDERMOTT: Yes. This is Jacob  
13 McDermott, counsel for Rocky Mountain Power. With me on  
14 the phone today is Daniel MacNeil, our witness, and also  
15 Jana Saba and Joelle Steward.

16 PRESIDING OFFICER HAMMER: Thank you,  
17 Mr. McDermott.

18 Who do we have on the line for the Division  
19 of Public Utilities?

20 MR. JETTER: Hi, good morning. This is  
21 Justin Jetter, with Utah Attorney General's Office  
22 representing the Division of Utah Public Utilities, and  
23 Abbinasir Abdulle is on the phone, and I will introduce  
24 him later as the Division's witness. I'm not aware of  
25 any other Division employees that are on the phone but

1 there maybe.

2 MR. POWELL: Good morning, this is Artie  
3 Powell with the Division also.

4 PRESIDING OFFICER HAMMER: Anyone else from  
5 the Division?

6 Okay. The Office of Consumer Services?

7 MR. MOORE: Yes, this is Robert Moore with  
8 the AG's Office, representing the Office of Consumer  
9 Services. On the phone with me is Baila Vastay [sic], a  
10 utility analyst from the Office.

11 PRESIDING OFFICER HAMMER: Is there anyone  
12 else from the Office on the line?

13 Okay. And for Salt Lake City Corporation?

14 MR. HOLMAN: Hi, Mr. Hammer. My name is  
15 Hunter Holman. I'm with Utah Clean Energy, but for  
16 today, I will also be representing Christopher Thomas of  
17 Salt Lake City for purposes of introducing him as a  
18 witness. His attorney was unable to join today.

19 PRESIDING OFFICER HAMMER: All right. Any  
20 objection to that?

21 MR. MCDERMOTT: No objection from the  
22 company.

23 PRESIDING OFFICER HAMMER: Okay. I believe  
24 we have more individuals now on the line. I will go  
25 ahead and assume those will be interested parties here to

1 listen.

2           Is there anybody on the line who I haven't  
3 spoken with yet, that is a party or has some intention of  
4 needing to speak today? And if so, will you please  
5 introduce yourself?

6           MR. HUNTER: Yes, this is Hunter Holman with  
7 Utah Clean Energy. We filed testimony comments in the  
8 docket and Kate Bowman from Utah Clean Energy is also  
9 here on the line with us. And she is going to provide a  
10 summary of our comments and is available for questions,  
11 Neil Townsend with Energy Strategies should also be on  
12 the phone. Mr. Townsend contributed to UCE's comments  
13 and we may call him as a witness today as well.

14           PRESIDING OFFICER HAMMER: Okay. Anyone  
15 else?

16           All right. Are there any preliminary matters  
17 before we ask Rocky Mountain Power to call its first  
18 witness?

19           Hearing none, Mr. McDermott, please go ahead  
20 and call your first witness.

21           MR. MCDERMOTT: Rocky Mountain Power would  
22 like to call Daniel MacNeil to the stand or --

23           PRESIDING OFFICER HAMMER: To the telephonic  
24 stand, understood.

25           Mr. MacNeil, do you swear to tell the truth?

1 THE WITNESS: Yes.

2 PRESIDING OFFICER HAMMER: Okay. Go ahead.

3 DIRECT EXAMINATION

4 BY MR. MCDERMOTT:

5 Q. Hello, Mr. MacNeil, please -- yes,  
6 Mr. MacNeil, could you state and spell your name for the  
7 record and your title and business address?

8 A. My name is Daniel MacNeil, M-A-C capital N,  
9 E-I-L. I'm a resource and commercial strategy advisor  
10 for PacifiCorp, and my business address is 825 Northeast  
11 Multnomah Street, Portland, Oregon 97232.

12 Q. Thank you, Mr. MacNeil. Have you prepared a  
13 summary of your written comments in this -- or the  
14 company has written comments in this docket today?

15 A. Yes.

16 Q. Could you share that with us, please?

17 A. Sure. Good morning, Chairman LeVar,  
18 Commissioner Clark and Commissioner Allen, my testimony  
19 provides support for the avoided cost methodology  
20 applicable to qualifying facilities, or QFs, under Utah  
21 Schedule 37 and 38, and in particular, the company's  
22 proposed nonroutine change applicable to wind QFs.

23 My pre-filed direct testimony focuses on two  
24 areas. First, how the company's 2019 integrated resource  
25 plan, or IRP, is reflected in the approved Proxy/Partial



1 Displacement Differential Revenue Requirement, or PDDRR,  
2 methodology used to determine QF avoided costs. And the  
3 second, the company's proposed nonroutine methodology  
4 change related to the assumed resource deferral for Utah  
5 wind QFs.

6           The PDDRR methodology includes two  
7 components. The first, avoided fixed costs are  
8 calculated based on a proxy resource that a QF is assumed  
9 to displace. And second, avoided energy costs are  
10 calculated using the Generation and Regulation Initiative  
11 Decision Tools model, or GRID, which is also used to set  
12 net power costs in rate cases.

13           Two scenarios were prepared. The first has  
14 existing resources, planned resources from the most  
15 recent IRP preferred portfolio, as well as signed and  
16 prior-queued potential QFs. The second run is the same  
17 as the first, with two exceptions.

18           The operating characteristics of the proposed  
19 QF project are added with its energy dispatched at zero  
20 cost and the capacity of the displaced IRP resource is  
21 reduced by an amount equal to the capacity contribution  
22 of the QF project. The difference in costs between the  
23 two runs is the avoided energy cost.

24           The 2019 IRP includes a wide variety of  
25 resources over the next ten years, including wind and

1 solar resources at a number of locations, simple cycle  
2 combustion turbines, and batteries. Resources become  
3 part of the IRP preferred portfolio because they support  
4 an optimized balance of cost and risk for the portfolio  
5 as a whole, relative to the other resource options  
6 evaluated in the IRP that the company could pursue  
7 instead.

8 Under the approved methodology, a renewable  
9 resource defers the next cost-effective resource of the  
10 same type in the preferred portfolio. The amount of the  
11 IRP resource deferred is based on equivalent capacity  
12 contributions. The capacity contribution is intended to  
13 represent how much a specific resource contributes to  
14 reliable system operation.

15 The 2019 IRP incorporated capacity  
16 contribution values specific to each resource type and  
17 location, rather than generic east and west values by  
18 resource type used in prior IRPs. The 2019 IRP also  
19 recognized that capacity contribution varies with wind  
20 and solar penetration, and indeed with the overall  
21 composition of the overall portfolio.

22 The 2019 IRP compensated for the effects of  
23 portfolio composition on reliability by assessing the  
24 resources and requirements in top portfolios over each  
25 hour of the study period. The adoption of like-for-like

1 resource deferral likewise recognized that a single  
2 capacity contribution number does not fully describe a  
3 resource's contribution to a reliable portfolio.

4           Parties have questioned whether a solar QF  
5 should be considered the same type as a combined solar  
6 and storage resource in the 2019 IRP preferred portfolio.  
7 That is one of the assumptions that we made so far.  
8 There are no stand-alone solar resources in the 2019 IRP  
9 preferred portfolio, primarily because investment tax  
10 credits for storage is part of the solar facility provide  
11 a significant cost savings relative to standalone  
12 solar -- or stand-alone storage resources.

13           While storage represents the majority of the  
14 capacity contribution of combined solar and storage  
15 resources in the 2019 IRP, the solar component still  
16 provides roughly one third of the total. Reducing the  
17 solar generation from the IRP preferred portfolio also  
18 increases avoided energy costs in the hours when a solar  
19 QF generates.

20           As a result, deferral of combined solar  
21 storage is preferable to deferral of a thermal resource  
22 without any solar characteristics. In fact, preferable  
23 is more operable and produces a more economic result and  
24 higher avoided cost.

25           This conclusion is consist with the PDDRR

1 methodology as currently approved and has been applied  
2 both ways, as solar QFs that include battery storage have  
3 previously been assumed to defer stand-alone solar  
4 resources in the IRP preferred portfolio.

5           Utah Clean Energy provided comments  
6 suggesting that the avoided costs of solar and storage  
7 resources would provide valuable information to  
8 developers. The cost assumptions for solar and storage  
9 resources, and indeed for all resource options evaluated,  
10 were part of 2019 IRP document, and the company also  
11 provides details on a the cost of preferred proxy -- or  
12 deferred proxy resources in its quarterly avoided costs  
13 compliance filing.

14           If the QF provides energy, capacity and  
15 dispatch flexibility equivalent to the deferrable solar  
16 with storage resource located in the same area from the  
17 2019 IRP preferred portfolio, that QF's avoided cost  
18 would be equal to that resource's cost. The same concept  
19 of resource equivalent also forms the basis for the  
20 company's proposed nonroutine change to the resource  
21 deferral for wind QFs.

22           Like-for-like renewable resource deferral was  
23 approved because of the importance of the alignment  
24 between the operating characteristics of a QF and the  
25 resources that it is assumed to defer. Under the

1 company's proposal, standard wind QF rates are calculated  
2 based on an assumed Utah QF resource with the same  
3 generation profile as the Utah wind resource it defers  
4 from the IRP preferred portfolio. As a result, the QF  
5 and the deferred resource are as alike as possible.

6           The company's April 9, 2020 supplemental  
7 filing presented avoided cost calculations for a Utah  
8 wind resource based on three different sources: a  
9 Wyoming wind resource and transition, a Utah wind  
10 resource, and a resource mix produced by the IRP models  
11 that includes deferral of energy efficiency, a simple  
12 cycle combustion turbine, and battery.

13           The Wyoming wind and transmission deferral  
14 under the current methodology produced a significantly  
15 higher avoided cost result than the other two versions.  
16 Even if the Utah wind resource was expected to produce  
17 system benefits equivalent to that from the current  
18 approved methodology, which is not likely given the IRP  
19 model results, it would be prudent for the company to  
20 acquire a wind resource at cost so that customers can  
21 receive those system benefits at the lowest available  
22 cost. Paying a Utah wind QF a price that is  
23 significantly higher than the company's expected cost for  
24 equivalent energy and capacity is contrary to the PURPA  
25 statute.

1           In conclusion, I recommend that the  
2 Commission approve the nonroutine methodology change  
3 applicable to wind resources requesting prices under  
4 Schedule 38 and approve the filed Schedule 37 tariff  
5 rates for wind resources that also incorporate that  
6 change.

7           The deferral of Utah wind resources has been  
8 shown to reasonably approximate the results produced by  
9 the IRP models, is consistent with resource options and  
10 costs available for selection in the 2019 IRP, and as a  
11 result is more consistent with the customer indifference  
12 standard than the current implementation of the PDDRR  
13 methodology for Utah wind QFs.

14           Thank you.

15           Q.    Thank you, Mr. MacNeil.

16           MR. MCDERMOTT:   The company has no further  
17 questions for Mr. MacNeil at this time, and I would like  
18 to make him available for cross-examination and/or  
19 questions from the Commission.

20           PRESIDING OFFICER HAMMER:   Thank you.

21           Mr. Jetter, any questions?

22           MR. JETTER:   Sorry, I was on mute there.   I  
23 have no questions.   Thank you.

24           PRESIDING OFFICER HAMMER:   Mr. Moore?

25           MR. MOORE:   No questions, thank you.

1 PRESIDING OFFICER HAMMER: Mr. Holman?

2 MR. HOLMAN: I have a few questions for  
3 Mr. MacNeil, if I could.

4 PRESIDING OFFICER HAMMER: Of course.

5 MR. HOLMAN: Great. Thank you, Mr. Hammer.

6 CROSS-EXAMINATION

7 BY MR. HOLMAN:

8 Q. Good morning, Mr. MacNeil. I have a few  
9 questions for you related to benefits associated with  
10 transmission projects that you referenced in your  
11 testimony from April 9th.

12 So I guess I will start out by asking, kind  
13 of, a groundwork question. In the 2017 avoided cost  
14 order, the Commission agreed with Rocky Mountain Power  
15 that there were certain benefits associated with  
16 transmission projects that should be consider when  
17 calculated avoided costs.

18 And those -- they specifically listed three:  
19 incremental transfer, capability reduced line losses, and  
20 reduced transmission system derates?

21 Mr. MacNeil, are you generally familiar with  
22 these transmission-related benefits?

23 A. Yes.

24 Q. Okay. And would you say that the Gateway  
25 South Transmission project, if it were to be built, would

1 generate these three benefits for PacifiCorp's  
2 transmission system?

3 A. I'm aware of what was represented in the 2019  
4 IRP, and in the 2019 IRP, there was transfer capability,  
5 but there was not model -- any change to line losses or  
6 transmission system derates.

7 So I do not know specifically what those  
8 values would be, but I do know this: That they were not  
9 modeled in the IRP.

10 Q. In your experience, understanding that we  
11 don't have specific values for those other two, would you  
12 anticipate that those other two benefits would be present  
13 if you were to -- that?

14 A. I do not have that much electrical  
15 engineering experience to answer that question.

16 Q. Okay. If the -- I guess I'll just maybe, if  
17 I could, move to a hypothetical. I mean, if they were  
18 present, should you have considered them in the avoided  
19 cost analysis that you provided for this case?

20 A. So generally, we travel to align with the  
21 2019 IRP, and had the IRP included those benefits, then  
22 we would have represented them in the avoided costs.

23 Q. Okay. So in your April 9th testimony, you  
24 mentioned that you discussed a scenario that you refer to  
25 as the wind defer Wyoming scenario, which as I understand



1 it is the scenario where Utah wind QFs are allowed to  
2 defer the 2024 Wyoming wind and the Gateway South  
3 Transmission project; is that correct?

4 A. Yes.

5 Q. Okay. And in your discussion of that wind  
6 deferred Wyoming project, you say that the cost of the  
7 deferred wind resource is net of production tax credits  
8 of the first ten years, and you also net Gateway South  
9 Transmission past with a grid model; is that fair to say?

10 A. Yes.

11 Q. Okay. So you are netting some benefits from  
12 that avoided cost associated with Gateway South  
13 Transmission past, and based on your testimony earlier,  
14 is it fair to say that that's only considered the  
15 incremental transfer capability because that's what the  
16 IRP showed; is that right?

17 A. Yes.

18 Q. Okay. Thank you, Mr. MacNeil. I think  
19 that's all my questions.

20 MR. HOLMAN: Thank you, Mr. Hammer.

21 PRESIDING OFFICER HAMMER: Mr. McDermott, any  
22 redirect? Mr. McDermott, do you have any additional or  
23 redirect questions for your witness?

24 MR. MCDERMOTT: I apologize, I was on mute.  
25 I don't have any additional questions on redirect for the

1 witness at this time. Thank you.

2 PRESIDING OFFICER HAMMER: Thank you. And no  
3 other witnesses?

4 MR. MCDERMOTT: No other witnesses for the  
5 company. Thank you.

6 PRESIDING OFFICER HAMMER: Mr. Jetter, will  
7 you please call your first witness?

8 MR. JETTER: Yes. The Division would like to  
9 call and have sworn in Abbinasir Abdulle.

10 PRESIDING OFFICER HAMMER: Mr. Abbinasir  
11 Abdulle, do you swear to tell the truth? Yes, sir, do  
12 you swear to tell the truth? Thank you.

13 THE WITNESS: Yes, I do.

14 PRESIDING OFFICER HAMMER: Go ahead,  
15 Mr. Jetter.

16 DIRECT EXAMINATION

17 BY MR. JETTER:

18 Q. Good morning. Would you please state your  
19 name and occupation for the record?

20 A. My name is Abbinasir Abdulle. I'm an  
21 employee of the Division of Public Utilities, and the  
22 Division is here in the Wells building.

23 And for the reporter, let me spell my name  
24 for you. My first name, A-B-B-I-N-A-S-I-R, last name,  
25 A-B-D-U-L-L-E.

1 Q. Thank you. And have you had an opportunity  
2 to review the filings in the two dockets that we are here  
3 today --

4 A. Yes, I did.

5 Q. -- for? And did you read and cause to be  
6 filed with the Commission comments from the Division of  
7 Public Utilities dated May 28, 2020, and reply comments  
8 dated June 25, 2020?

9 A. Yes, I did.

10 Q. And would you adopt both of those comments as  
11 part of your testimony today?

12 A. Yes, I would.

13 Q. Thank you.

14 MR. JETTER: I would like to make a motion at  
15 this time to enter the comments as reply comments of the  
16 Division that were previously identified in both dockets.

17 PRESIDING OFFICER HAMMER: They are admitted.

18 MR. JETTER: Thank you.

19 BY MR. JETTER:

20 Q. Mr. Abdulle, do you have a brief summary of  
21 the Division's position?

22 A. Yes, I do.

23 Q. Please, go ahead.

24 A. Good morning, Commissioners, in compliance  
25 with previous Commission orders, Rocky Mountain Power

1 filed its avoided cost quarterly report for the third  
2 quarter of 2019. This filing identified four routine and  
3 one nonroutine updates. The Division reviewed these  
4 updates and determined that the routine updates were  
5 appropriate. The nonroutine update involved Utah wind QF  
6 deferring the Utah wind proxy, which is a customer  
7 preference wind resource, instead of the Wyoming wind,  
8 which the next deferrable wind resource in the preferred  
9 portfolio.

10           The reason for this proposal is because of  
11 the high avoided cost associated with the deferral of  
12 Wyoming wind, which would result in ratepayers paying  
13 unnecessarily high avoided costs. The proposed  
14 nonroutine update would result in a reasonable avoided  
15 cost prices for wind resources, which is consistent with  
16 the standard of ratepayer indifference. Therefore, the  
17 Division recommends approval of the proposed nonroutine  
18 update.

19           The Division recognizes that this is a  
20 deviation from the current Commission approved method.  
21 However, one has to realize that a major part of the  
22 avoided cost associated with the deferral of Wyoming wind  
23 is related to the transmission resource which cannot be  
24 partially deferred or avoided. The Division believes  
25 that the inclusion of such unavoidable cost is

1 inconsistent with PURPA's definition of avoided cost.

2           The Division recognizes that the partial  
3 placement calculation is a reasonable method if the next  
4 generation resource needed is sufficiently distant in  
5 time that multiple QFs might reasonably be expected to  
6 displace the IRP selected resource before acquisition.  
7 Also, it assumes that system planning will account for  
8 the QF generation before the next resource is required.

9           In the recent case, in this current case, the  
10 QFs cannot be reasonably expected to fully avoid the next  
11 resource because of the large fixed cost associated with  
12 the transmission line and because of that, there is no  
13 sufficient time to adjust planning assumptions prior to  
14 making long-term commitments.

15           Finally, the Commission has questioned the  
16 prudence and necessity of the transmission resource under  
17 consideration in its IRP review. The Division believes  
18 that it would not be reasonable to base avoided cost  
19 calculations on a resource -- prudence has been  
20 questioned by the Commission and -- by the Commission on  
21 projected.

22           Rocky Mountain Power's proposal to use the  
23 most comparable deferrable resource that is similar in  
24 size and location is reasonable to set avoided cost  
25 pricing given the skepticism regarding the Gateway South

1 proposal. Therefore, the Division recommends the  
2 Commission to approve Rocky Mountain Power's proposed  
3 nonroutine update.

4 Another discussion item is Utah Clean  
5 Energy's proposed published prices for a solar QF paired  
6 with storage. The Division reviewed this proposal and  
7 believes that UCE did not provide enough evidence for the  
8 Division to judge the merits of this proposal.

9 Therefore, the Division recommends the  
10 Commission not to adopt this proposal in this docket. If  
11 the Commission intends to create an additional category  
12 of QF pricing to include battery or any other energy  
13 storage, the Division recommends that the Commission open  
14 a docket where a proper analysis can be performed.

15 Finally, the Division recommends that its  
16 recommendation on the -- yes, the Division recommended  
17 about the nonroutine updates be extended to 2019 Q4 and  
18 Schedule 37 wind prices.

19 And that conclude my summary.

20 Q. Thank you. I would like to ask you briefly a  
21 couple of clarifying questions.

22 With respect to the Gateway South  
23 Transmission project and the action plan resulting from  
24 the 2019 IRP, is it a correct statement that the  
25 Commission has questioned the necessity of -- or the

1 choice of the Gateway South Transmission project, but  
2 that it -- the Commission hasn't made a determination  
3 either way on that project versus alternatives?

4 A. That's true.

5 Q. Okay. Thank you.

6 MR. JETTER: That concludes my questions.  
7 Thank you. Mr. Abbinasir Abdulle is available for  
8 Commission questions or cross-examination.

9 PRESIDING OFFICER HAMMER: Mr. McDermott?

10 MR. MCDERMOTT: The company has no questions.  
11 Thank you.

12 PRESIDING OFFICER HAMMER: Mr. Moore?

13 MR. MOORE: The OCS has no questions. Thank  
14 you.

15 PRESIDING OFFICER HAMMER: Mr. Holman?

16 MR. HOLMAN: I have no questions. Thank you.

17 PRESIDING OFFICER HAMMER: All right. Thank  
18 you, Mr. Abdulle.

19 Mr. Jetter, do you have any other witnesses?

20 MR. JETTER: The Division has no further  
21 witnesses or -- nothing further to present at the hearing  
22 today. Thank you.

23 PRESIDING OFFICER HAMMER: Thank you.

24 Mr. Moore?

25 MR. MOORE: Yes. The Office has only filed

1 reply comments in this docket, and these comments are  
2 legal in nature. Accordingly, we will not be calling a  
3 witness to adopt these comments as testimony. We do ask  
4 the Commission as is necessary to enter the comments into  
5 the record as legal argument. Mr. Baila Vastay, a  
6 utility analyst with the OCS, is available to answer  
7 questions regarding policy from the Commission and other  
8 parties related to the OCS reply comments.

9 That's all we have at the present moment.

10 PRESIDING OFFICER HAMMER: Mr. McDermott, do  
11 you have any objection to that approach?

12 MR. MCDERMOTT: No objection at all.  
13 Mr. Moore reached out to me before the hearing and I  
14 think I indicated to him that we had no objection, and we  
15 would have no questions for Mr. Vastay.

16 PRESIDING OFFICER HAMMER: Mr. Jetter?

17 MR. JETTER: I have -- I would have no  
18 questions.

19 PRESIDING OFFICER HAMMER: Mr. Holman?

20 MR. HOLMAN: I have no objections, and I have  
21 no questions for Mr. Vastay.

22 PRESIDING OFFICER HAMMER: All right. Thank  
23 you.

24 I suppose then we will turn to you,  
25 Mr. Holman, and ask for you to call your first witness.



1 MR. HOLMAN: Sure. Mr. Hammer, do you have  
2 any preference with whether I go with Salt Lake City or  
3 Utah Clean Energy first?

4 PRESIDING OFFICER HAMMER: No, but it would  
5 be helpful for the record if you specify on whose behalf  
6 the party is testifying.

7 MR. HOLMAN: Okay. And I will call the  
8 witnesses on behalf of Utah Clean Energy first. So I'll  
9 call Kate Bowman as a witness.

10 MS. BOWMAN: Good morning.

11 PRESIDING OFFICER HAMMER: Ms. Bowman -- Ms.  
12 Bowman, do you swear to tell the truth?

13 THE WITNESS: I do.

14 PRESIDING OFFICER HAMMER: Go ahead,  
15 Mr. Holman.

16 MR. HOLMAN: Thank you, Mr. Hammer.

17 DIRECT EXAMINATION

18 BY MR. HOLMAN:

19 Q. Ms. Bowman, please state your name, employer  
20 and title for the record.

21 A. My name is Kate Bowman. My employer is Utah  
22 Clean Energy, and I'm a renewable energy program manager.

23 Q. Did you draft and submit comments on behalf  
24 of Utah Clean Energy on May 28, 2020, on this docket?

25 A. Yes, I did.

1 Q. Would you like to make any changes or  
2 corrections to these comments at this time?

3 A. No, I would not.

4 Q. Do you adopt these pre-filed comments as your  
5 testimony here today?

6 A. Yes, I do.

7 MR. HOLMAN: Mr. Hammer, I move to admit  
8 Ms. Bowman's May 28, 2020 comments into the record.

9 PRESIDING OFFICER HAMMER: They are admitted.

10 BY MR. HOLMAN:

11 Q. All right. Ms. Bowman, have you prepared a  
12 statement for us today?

13 A. Yes, I have.

14 Q. Please present that statement.

15 A. Thank you. Good morning, and thank you for  
16 the opportunity to provide comments related to the  
17 company's third quarter 2019 proposed changes to avoided  
18 cost methodology.

19 The purpose of our comments is to support the  
20 development of fair avoided cost rates for qualifying  
21 facility projects. In order for ratepayers to be  
22 indifferent, the avoided cost prices should not be higher  
23 than the incremental costs of energy or capacity that the  
24 utility would otherwise generate or purchase to satisfy a  
25 load.

1           Avoided cost prices that are less than the  
2 incremental cost of energy or capacity that the utility  
3 generate or purchase are discriminatory against QFs, but  
4 could be harmful to ratepayers. Qualifying facilities  
5 add diversity the energy mix and mitigate risk for  
6 customers.

7           For example, customers are not responsible  
8 when qualifying facilities projects go over budget, and  
9 customers incur lower costs and risks when they pay for  
10 real levelized pricing that covers only the first 15  
11 years of a project's life.

12           To the extent that low avoided cost prices  
13 deter qualifying facilities from building projects,  
14 customers are missing out on benefits that QFs would  
15 provide.

16           Our comments address the need to determine a  
17 fair avoided cost price for QF cost projects,  
18 specifically Utah wind projects and the need to continue  
19 providing transparent, illustrative pricing for like QF  
20 resources under Schedule 37 to avoid burdening smaller QF  
21 projects with unreasonable the business costs.

22           Rocky Mountain Power's 2019 third quarter  
23 Schedule 38 compliance filing proposes a nonroutine  
24 update to the Proxy and Partial Differential Revenue  
25 Requirement method for determining avoided cost pricing

1 for wind QFs.

2           Instead of assuming the displacement of the  
3 next wind resource identified in the 2019 IRP least-cost,  
4 least-risk portfolio, Rocky Mountain Power has proposed  
5 to determine the avoided cost pricing for Utah wind QFs  
6 using a 2023 customer preference wind resource.

7           Utah Clean Energy opposes this nonroutine  
8 change. First and most importantly, Rocky Mountain Power  
9 asserts that the cost of the next wind resource in the  
10 2019 IRP, the 2024 Wyoming wind and associated  
11 transmission, do not accurately represent its avoided  
12 cost.

13           Yet these resources were collected as part of  
14 the least-cost, least-risk portfolio based on Rocky  
15 Mountain Power's own cost projections and reflect the  
16 cost that Rocky Mountain Power will seek to recover for  
17 ratepayers if and when the 2024 Wyoming resources are  
18 dealt.

19           Rocky Mountain Power also argues against use  
20 of the transmission cost associated with the 2024 Wyoming  
21 wind resources to determine avoided cost pricing for the  
22 same reasons Rocky Mountain Power presented in Docket  
23 17-035-37.

24           In that docket, the Commission reaffirmed  
25 that "when PacifiCorp seeks approval of a renewable

1 resource under the approved RFP process that appears as  
2 part of the IRP preferred portfolio, we find that  
3 renewable QF with similar operational characteristics is  
4 capable of partially deferring or displacing that  
5 resource until a final Public Service Commission  
6 determination is made concerning the resource."

7           Although there is no guarantee that any of  
8 the resources from the IRP will ultimately be built, the  
9 IRP is the most robust and accurate planning tool  
10 available to identify deferrable resources for the  
11 purposes of determining avoided cost.

12           I recognize the that Commission did not  
13 acknowledge the 2019 IRP action plan, which includes the  
14 2024 Wyoming wind and transmission. However, Rocky  
15 Mountain Power has not announced that it intends to  
16 cancel plans to pursue these resources or announce an  
17 alternative plan to satisfy its transmission requirement,  
18 and the Commission has not made a final determination  
19 that 2024 Wyoming wind and transmission will not be  
20 built.

21           Until Rocky Mountain Power identifies an  
22 alternative plan or the Commission make a final  
23 determination regarding this resource, the costs of the  
24 2024 Wyoming wind and transmission represent the actual  
25 costs ratepayers can be expected to incur and, therefore,

1 should be the basis for determining avoided costs for  
2 like resources.

3           In a previous order on this issue, the  
4 Commission also find that the potential benefits  
5 associated with transmission upgrades should be  
6 considered in avoided cost pricing. Utah Clean Energy's  
7 proposal is that the Commission uphold its previous  
8 ruling on this matter and find that the avoided cost  
9 price for wind be based on the 2024 Wyoming wind and  
10 transmission, discounted to account for loss benefit.

11           If, for any reason, the 2024 wind and  
12 transmission projects are not use to calculate the  
13 avoided cost of wind in Utah, then the Utah customer  
14 preference resource is a more accurate proxy compared to  
15 the next available wind resource in the IRP, which is the  
16 2030 wind resource.

17           If the Wyoming and wind transmission resource  
18 were removed from 2019 IRP, modeling would likely  
19 identify an alternative wind resource during the action  
20 plan period, well before the next planned wind resource  
21 in 2030. Simply moving to the next wind resource in the  
22 IRP without rerunning the models to find the next best  
23 preferred portfolio would be the equivalent of using an  
24 IRP portfolio that leaves almost 2,000 megawatts of load  
25 unsatisfied.

1           If Rocky Mountain Power announces its intent  
2 to abandon the 2024 Wyoming wind resource, and until  
3 modeling identifies a replacement, then Rocky Mountain  
4 Power's proposal to use the customer preference Utah wind  
5 resource for avoided cost pricing is a more accurate  
6 proxy for the purposes of determine avoided cost pricing  
7 than use of the 2030 wind resource.

8           Our comments also address the need to update  
9 published pricing for Schedule 37 resources to comply  
10 with the Commission approved methodology of like-for-like  
11 resource deferral. Battery storage resources have become  
12 more attractive options for utilities as their costs have  
13 fallen, and the 2019 IRP identified battery storage  
14 resources as part of the least-cost, least-risk portfolio  
15 for the first time.

16           The flexibility benefits of battery storage  
17 paired with renewable resources are significant enough  
18 that the 2019 IRP preferred portfolio pairs all planned  
19 solar resources with storage, and so there is no specific  
20 proxy resource for standalone solar in the 2019 IRP.

21           In the 2019 third quarter compliance report,  
22 the company has begun to use storage and solar resources  
23 as the proxy for standalone QFs to satisfy a like-for-lie  
24 resource requirement approved by the Commission in Docket  
25 17-035-37.

1           Like many utilities, Rocky Mountain Power has  
2 found that solar and storage is a value in its future  
3 energy portfolio. The company has continually asserted  
4 that avoided cost pricing for a QF should be determined  
5 based on deferral of a resource of the same type and that  
6 the resource type is intended to reflect the operational  
7 characteristics of that resource.

8           Given that the avoided cost pricing for QFs  
9 will be determined using a solar and storage proxy  
10 resource, there is a need to update published pricing to  
11 include a like solar and storage resource with similar  
12 corresponding operating characteristics.

13           Current published avoided cost pricing  
14 distinguishes between fixed and tracking solar, but the  
15 operating characteristics of solar paired with storage  
16 are different from those of standalone storage, and  
17 potentially more different than the operating  
18 characteristics of fixed solar compared to tracking  
19 solar.

20           In the case of a smaller project, developers  
21 will not be willing to incur the significant  
22 administrative costs associated with the requesting  
23 indicative pricing or speculating as to what a price of  
24 the solar and storage might look like based on cost  
25 details on IRP documents.



1           A published price for solar and storage sends  
2 a signal to QF developers about the relative value of  
3 this type of resource and the benefits of improved  
4 flexibility to enable a reliable and flexible grid. It  
5 is unreasonable to use solar and storage as a like proxy  
6 resource for solar QFs for the purpose of deferral, while  
7 simultaneously denying solar and storage projects the  
8 transparency of a published avoided cost price.

9           I acknowledge the different configurations  
10 and dispatch profiles for solar and storage resources are  
11 possible, introducing complexity to the determination of  
12 a published avoided cost price for these resources.

13 However, published prices are always an imprecise but  
14 illustrative estimate of the value of the QF resource.

15           Published prices for smaller Schedule 37  
16 resources strike a balance between precision and  
17 transparency that enables market participation for  
18 smaller projects without incurring unreasonable business  
19 costs.

20           As a starting point, I recommend that the  
21 company provide avoided cost pricing for a solar and  
22 storage project whose dispatch profile reasonably  
23 correlates with the next solar and storage resource  
24 identified in the 2019 IRP preferred portfolio.

25           Thank you once again for the opportunity to

1 comment in this proceeding and your consideration of  
2 comments and recommendations.

3 That concludes my statement.

4 Q. Thank you, Ms. Bowman.

5 MR. HOLMAN: Mr. Hammer, Ms. Bowman is  
6 available for cross-examination and questions from you.

7 PRESIDING OFFICER HAMMER: Mr. McDermott?

8 MR. MCDERMOTT: Yes, I have a few questions.

9 CROSS-EXAMINATION

10 BY MR. MCDERMOTT:

11 Q. Good morning, Ms. Bowman. To start with,  
12 let's talk a little bit about alternative -- just a  
13 hypothetical to discuss some alternative options the  
14 utility might explore in the future.

15 Imagine for me that a utility has a  
16 20-megawatt resource need, and it has two equally  
17 credible options. So all else is equal. They are in a  
18 similar geographic area. Let's say Southern Utah. And  
19 then two 20-megawatt solar resources. One of the  
20 resources, it can procure through a PPA with the  
21 developer for \$50 a megawatt hour. The other resource,  
22 it can acquire for \$100 a megawatt hour.

23 Would it be reasonable for the utility, for  
24 the company, to select the \$100 megawatt hour resource?

25 A. I think it would ultimately depend on

1 characteristics of the resource beyond what you've  
2 described in scope, and I also would like to -- Utah  
3 Clean Energy also has -- I think that is a question I'd  
4 prefer to refer to Mr. Townsend.

5 Q. Okay. But, again, you mention that it  
6 depends on the characteristics of the resource, and this  
7 is just a basic question, general utility, for the  
8 regulatory policy.

9 All else is equal to resources. They are in  
10 the same geographic area. Let's even imagine they could  
11 interconnect at the exact same point of the system. One  
12 is \$50 a megawatt hour, one is \$100 a megawatt hour.

13 Is it more reasonable for the company to  
14 select the \$100 megawatt hour resource or the \$50  
15 megawatt hour resource, again, all else equal?

16 A. I mean, once again, I think, you know, the  
17 \$100 megawatt hour resource is obviously much more  
18 specific. You mentioned the \$50 megawatt hour resource  
19 is a PPA, and I would describe details as the kind of  
20 cost --

21 Q. The \$100 megawatt hour resource is a similar  
22 PPA with a developer or solar project, same  
23 characteristics, generally, as the other project, it  
24 could be right next to each other, all else is equal.

25 Ms. Bowman? Did we lose Ms. Bowman?

1                   PRESIDING OFFICER HAMMER: Ms. Bowman, are  
2 you on the line?

3                   MR. HOLMAN: This is Mr. Holman, I'll send  
4 her a text message and see if she got dropped off.

5                   PRESIDING OFFICER HAMMER: Okay. Let's give  
6 her one minute.

7                   THE WITNESS: Hi, this is Kate. I'm sorry,  
8 my phone dropped the call and I talked to myself for a  
9 minute.

10 BY MR. MCDERMOTT:

11                 Q. Okay. Where did we leave off? Should I  
12 repeat my question?

13                 A. I'm not sure how much you heard of my  
14 response, so if you'd like to repeat your last question.

15                 Q. None of your response. Sure.

16                 A. Okay.

17                 Q. I'm happy to restate it for you. So, again,  
18 the scenario and the hypothetical is, the company has a  
19 resource for a 20-megawatt of capacity and associated  
20 energy. There are two, equal in all respects and  
21 characteristics, solar resources located in Southern  
22 Utah.

23                         Imagine they're interconnecting at the same  
24 point in the company's system, and, you know, from a  
25 technology perspective, everything else is equal. One is

1 at a cost under a PPA with a developer for \$50 a megawatt  
2 hour and the other is \$100 a megawatt hour from the other  
3 developer.

4           Would it be reasonable for the company to  
5 select the \$100 megawatt hour resource considering all  
6 else is equal as I described?

7           A.    Given the two resources that you described  
8 and assuming all else is equal, it would be more  
9 reasonable for the company to select the 50 megawatt hour  
10 resource.

11           Q.    Okay. Thank you. And you described some of  
12 the benefits of a PURPA resource related to the fixed  
13 price contract nature of a QF arrangement.

14                   Are most of those features also available  
15 under a PPA with the developer outside of PURPA?

16           A.    Those features could be available under a  
17 PPA.

18           Q.    Okay. Thank you. And just a question  
19 on -- you talked about the modeling and the deferability  
20 of Gateway South with respect to the company's wind  
21 proposal.

22                   Are you reasonably familiar with the  
23 company's IRP process and its planning process with  
24 respect to that?

25           A.    I'm familiar at a high level with the IRP

1 planning process.

2 Q. Isn't it true that unlike the PDDRR  
3 methodology, if the company -- if the company ran its IRP  
4 models, including a wind resource in Utah, it would -- it  
5 would not select Gateway South, if there was a  
6 deferred -- a deferrable resource there?

7 Maybe I can be --

8 A. Can you repeat the question? It was hard to  
9 follow.

10 Q. Yes. Would the IRP models produce the same  
11 outcome as that -- for a wind resource in Utah as that  
12 produced by the PDDRR methodology, if we used our IRP  
13 tools?

14 A. As I understand it, the IRP tools are  
15 designed to come up with a preferred portfolio that uses  
16 the utility overall capacity and energy leads, and so  
17 it's hard to predict, you know, in a hypothetical what  
18 the IRP might come up with, what the IRP models -- it's  
19 hard for me to predict what the IRP models would do in  
20 response to sort of a specific change.

21 Q. Do you know whether the IRP models could only  
22 select all of Gateway South or none of Gateway South?

23 A. As I understand it, there was -- and  
24 Mr. MacNeil's referenced in his testimony, some  
25 opportunities to evaluate whether the IRPs would have

1 selected a portion of Gateway South, if that were  
2 available. But realistically, the company stated that it  
3 doesn't make sense to build a portion of Gateway South.

4 Q. So that's -- the IRP models would not  
5 realistically select or would realistically select only  
6 all of Gateway South or none of it; is that what you are  
7 saying?

8 A. I think what I'm saying is that I understand  
9 that the company, for practical reasons, doesn't plan to  
10 build all of Gateway South or other -- or some of Gateway  
11 South. I know the company has ran evaluations to  
12 determine whether it would theoretically make sense to  
13 build some portion of Gateway South.

14 I'm not sure if it's correct to say that that  
15 was run as part of the IRP modeling or not.

16 Q. Okay. Thank you. Let's move on.

17 So you discussed UCE's recommendation for a  
18 standard QF pricing under Schedule 37 for solar plus  
19 storage and wanted that pricing to be based on the  
20 company's IRP modeling for solar plus storage and the  
21 pricing for energy and capacity that result from that; is  
22 that correct?

23 A. Yes.

24 Q. And you would agree with me, wouldn't you,  
25 that in the context of non-PURPA contracting for solar

1 plus storage, the company clearly has flexibility with  
2 how it can dispatch and require dispatch of a storage  
3 resource in that context; is that -- is that correct?

4 A. In the connection of a solar and storage  
5 resource that the company procures outside of PURPA?

6 Q. Correct.

7 A. Did I state that correctly?

8 Q. That's correct.

9 A. I understand that that would be -- affirm to  
10 be -- you know, depending on whether the company owned  
11 that resource or purchased it through a PPA arrangement,  
12 that would -- either the company would have control over  
13 the dispatch or it would be a negotiated term of the  
14 contract.

15 Q. And you agree with me that one of the prime  
16 values of storage its dispatchability in hours where  
17 there's the greatest need or the energy that it would  
18 produce has the highest value?

19 A. Yes.

20 Q. And you -- would you also agree with me that  
21 under PURPA, the company has limitations on its ability  
22 to curtail QF resources?

23 A. Yes.

24 Q. Okay. And just one last question for you,  
25 Ms. Bowman. So you agree with me that under PURPA, the



1 company is not obligated to pay for a QF any more than it  
2 would otherwise pay for a similar amount of energy and  
3 capacity from a similarly situated resource, wouldn't  
4 you?

5 A. Yes.

6 Q. No further questions. Thank you.

7 PRESIDING OFFICER HAMMER: Mr. Jetter?

8 MR. JETTER: I have no questions. Thank you.

9 PRESIDING OFFICER HAMMER: Mr. Moore?

10 MR. MOORE: No questions, thank you.

11 PRESIDING OFFICER HAMMER: Mr. Holman, do you  
12 have any redirect?

13 MR. HOLMAN: I do have one question for  
14 redirect.

15 REDIRECT EXAMINATION

16 BY MR. HOLMAN:

17 Q. Ms. Bowman, Mr. McDermott just asked you  
18 right there at the end a question about whether QF  
19 had -- the company's ability to dispatch QF is limited  
20 because of their QF nature.

21 Is that a term that could be negotiated in  
22 the actual QF contract between the QF developer and the  
23 company that's stated somewhat malleable or is it, in  
24 your experience, defined by statute?

25 A. As I as I understand it, in the case of, for

1 example, a -- a storage resource is different from a  
2 solar resource, in that a storage solar resource does  
3 have, you know, a defined generation profile that, you  
4 know, would not need to be -- has a defined generation  
5 profile. But a storage resource, I would think that by  
6 the nature of it being dispatchable, is something that  
7 would be clearly defined in a contract term.

8 Q. Thank you, Ms. Bowman. That's all my  
9 questions.

10 PRESIDING OFFICER HAMMER: All right.  
11 Mr. Holman, do you have another witness you'd like to  
12 call?

13 And thank you, Ms. Bowman.

14 THE WITNESS: Thank you.

15 MR. HOLMAN: Thank you, Mr. Hammer. I do not  
16 have another witness for Utah Clean Energy.

17 If it's okay with you, at this time I'll move  
18 on to Salt Lake City.

19 PRESIDING OFFICER HAMMER: That's fine.

20 MR. HOLMAN: All right. Then I call  
21 Christopher Thomas with Salt Lake City.

22 MR. THOMAS: Good morning.

23 PRESIDING OFFICER HAMMER: Mr. Thomas, do you  
24 swear to tell the truth?

25 THE WITNESS: Yes, I do.

1 PRESIDING OFFICER HAMMER: Go ahead.

2 MR. HOLMAN: All right.

3 DIRECT EXAMINATION

4 BY MR. HOLMAN:

5 Q. Good morning, Mr. Thomas. Please state your  
6 name, employer and title for the record.

7 A. Yes. My name is Christopher Thomas, I work  
8 for Salt Lake City Corporation, and my title is senior  
9 energy and climate program manager.

10 Q. All right. Did you draft and submit reply  
11 comments on behalf of Salt Lake City Corporation on June  
12 25, 2020, in this docket?

13 A. Yes, I did.

14 Q. Would you like to make any changes or  
15 corrections to these comments at this time?

16 A. No, I do not.

17 Q. Do you adopt these pre-filed reply comments  
18 as your testimony here today?

19 A. Yes, I do.

20 Q. Okay.

21 MR. HOLMAN: Mr. Hammer, I move to admit  
22 Mr. Thomas' June 25, 2020 reply comments into the record,  
23 please.

24 PRESIDING OFFICER HAMMER: They're admitted.

25 MR. HOLMAN: Great.

1 BY MR. HOLMAN:

2 Q. Mr. Thomas, have you prepared a statement for  
3 us today?

4 A. Yes, I have.

5 Q. Great. Please proceed.

6 A. Thank you for the opportunity to provide  
7 comments on this matter.

8 Salt Lake City Corporation set a target to  
9 source at least 50 percent of our energy from renewable  
10 sources. We tried to meet that target primarily through  
11 three avenues: Building on-site renewable generation,  
12 enrolling meters and Rocky Mountain Power subscriber  
13 solar program, and pursuing a large customer preference  
14 project under Schedule 34.

15 The avoided cost methodology under discussion  
16 in this proceeding is increasingly being used as a  
17 foundation for valuing these other types of renewable  
18 energy resources. For this reason, Salt Lake City  
19 Corporation has an interest in the avoided cost  
20 methodology under discussion today.

21 Hopefully, these comments provide a unique  
22 perspective to these deliberations from a city government  
23 and a large electric customer interested in procuring  
24 renewable energy. This perspective leads us to believe  
25 that it may not make sense to use a customer preference

1 project as a basis for calculating the Utah wind  
2 qualifying facility avoided costs, as Rocky Mountain  
3 Power and other stakeholders have suggested.

4           Salt Lake City Corporation is grateful to be  
5 pursuing a large preference project in collaboration with  
6 Rocky Mountain Power and five other customers under  
7 Schedule 34, as we pursue our 50 percent renewable energy  
8 targets. Even if another similarly-sized renewable  
9 energy qualifying facility were to be built, it would not  
10 defer or displace Salt Lake City's desire to pursue this  
11 Schedule 34 resource.

12           As a side note, the subject renewable energy  
13 resource under negotiation by Salt Lake Corporation and  
14 other customers is not a wind resource, so the Utah wind  
15 QF avoided cost price under discussion today does not  
16 impact Salt Lake City's Schedule 34 procurement.

17           Regarding the issue of publishing a solar  
18 plus storage avoided cost price under Schedule 37, Salt  
19 Lake City Corporation would be interested to see this  
20 price. Rocky Mountain Power's 2019 Integrated Resource  
21 Plan demonstrated that solar plus storage provides  
22 significant system value over and above stand alone  
23 solar.

24           Publishing an avoided cost price under  
25 Schedule 37 that reflect this value could motivate future

1 Schedule 34 customers to pursue storage plus storage  
2 projects to bring more value to the overall electric  
3 system. Given that solar plus storage can be configured  
4 a myriad ways, Salt Lake City Corporation would be happy  
5 to collaborate with the Commission, Rocky Mountain Power,  
6 and other stakeholders, to determine reasonable  
7 parameters for the purpose of calculating a storage plus  
8 storage avoided cost price under Schedule 37.

9 In conclusion, Salt Lake City Corporation  
10 recommends the Commission uphold standard practice and  
11 base the Utah wind QF avoided cost price on the next cost  
12 effective resource rather than the customer preference  
13 resource. Further, we support the inclusion of a solar  
14 plus storage QF avoided cost price in Schedule 37.

15 Thank you for the opportunity, and this  
16 concludes my statement.

17 Q. Thank you, Mr. Thomas.

18 MR. HOLMAN: Mr. Hammer, Mr. Thomas is  
19 available for questions.

20 PRESIDING OFFICER HAMMER: Mr. McDermott?  
21 Mr. McDermott, do you have any questions?

22 MR. MCDERMOTT: Sorry, I was on mute again.  
23 Yes, I have just a few questions for Mr. Thomas.

24 CROSS-EXAMINATION

25 BY MR. THOMAS:

1 Q. Good morning, Mr. Thomas.

2 So Salt Lake City is a large energy consumer  
3 for the company; is that correct?

4 A. Yes. Good morning, Mr. McDermott. And yes,  
5 that is correct.

6 Q. And Salt Lake City has an interest in both  
7 renewable energy and achieving and meeting its energy  
8 need at the lowest reasonable cost; is that also correct?

9 A. Yes, that is correct, that both the renewable  
10 content and the cost both matter.

11 Q. Okay. And I just have a hypothetical, so  
12 bear with me for a second to ask you.

13 Let's imagine that Salt Lake City is  
14 procuring additional energy through its Schedule 34  
15 contract with Rocky Mountain Power. It wants additional  
16 10 megawatts -- 10 megawatts of a resource, and there are  
17 two available resources. They are similarly situated in  
18 almost every way, the exact same interconnection  
19 characteristics, the same output profile. All else is  
20 equal, but one is \$50 a megawatt hour and the other is  
21 \$100 a megawatt hour, both PPAs with the developer.

22 Which resource would Salt Lake City select  
23 during these circumstances?

24 A. Well, assuming that the projects were  
25 identical in every way, I would say Salt Lake City would

1 likely be to opt for the cheaper source.

2 Q. Okay. And almost the same hypothetical, but  
3 in this case, the company is procuring resources for all  
4 of its energy consumers, including Salt Lake City.

5 Would Salt Lake City, yet again, prefer that  
6 the company select a cheaper resource?

7 A. As long as they are the same in every  
8 respect, I would -- I would say yes.

9 Q. Okay. And you made some comments with regard  
10 to energy storage and adopted some comments with regard  
11 to energy storage plus solar in your testimony; is that  
12 accurate?

13 A. Yes, that's correct.

14 Q. And you talked about the value that storage  
15 can offer to the RMP system and its customers; is that  
16 also correct?

17 A. Yes, that is correct.

18 Q. Are you familiar enough with storage to  
19 affirm for me that the value in storage comes with its  
20 dispatch flexibility?

21 A. That is my understanding, yes.

22 Q. And would you agree with me that the pricing  
23 for solar plus storage should be based on the same  
24 dispatch characteristics if it were offered under  
25 Schedule 37?



1           A.    I have a clarifying question.  I'm not sure,  
2 when you say the same characteristics, the same as --

3           Q.    I'm sorry, I didn't give you the comparative.

4                    So if Schedule 37 pricing included solar plus  
5 storage based on the company's IRP, that Schedule 37  
6 pricing should assume the same dispatch characteristics  
7 for that Schedule 37 QF; would you agree with that?

8           A.    I think that would be a reasonable course of  
9 action, yes.

10          Q.    And are you familiar with PURPA's must  
11 purchase requirement?

12          A.    Only at a very high level.  I am definitely  
13 not an expert on PURPA or qualifying facilities.

14          Q.    Do you know enough to agree with me that the  
15 company, or any utility purchasing from a QF, is  
16 not -- is legally prevented from requiring the QF to  
17 curtail its energy except in emergency circumstances?

18          A.    That is my understanding.

19          Q.    And in that context, do you have any concerns  
20 that the company would not be able to ensure that  
21 Schedule 37 resources, which take the published prices,  
22 would match the dispatch characteristics of the storage  
23 that the company modeled in its IRP?

24          A.    Given the significant additional value solar  
25 plus storage over solar alone, I think it would be

1 beneficial to all customers of Rocky Mountain Power to  
2 negotiate an arrangement by which the battery -- the  
3 storage component of the system could be dispatched in a  
4 way that provides optimum value.

5 Q. Do you understand that Schedule 37 prices are  
6 published prices and the company has no ability to modify  
7 those prices, so that if a storage resource, under  
8 Schedule 37, approached the company, the company would  
9 have to offer those prices regardless of what its PPA  
10 negotiations were?

11 A. I am not as familiar with -- I don't think  
12 I'm familiar enough with Schedule 37 contracts to be able  
13 to say that myself.

14 Q. But you would agree that because of the  
15 much -- must purchase requirement under PURPA, the  
16 company has limited ability to force a QF to dispatch on  
17 a particular schedule?

18 A. I -- again, I'm not familiar enough with the  
19 relevant PURPA requirements to know whether -- to know  
20 how much flexibility that the utility has in that regard.

21 Q. Okay. That's fair. And I have no further  
22 questions for you, Mr. Thomas. Thank you.

23 A. Thank you.

24 PRESIDING OFFICER HAMMER: Mr. Jetter, do you  
25 have any questions?

1 MR. JETTER: I do not have any questions,  
2 thank you.

3 PRESIDING OFFICER HAMMER: Mr. Moore?

4 MR. MOORE: Thank you, no questions.

5 PRESIDING OFFICER HAMMER: All right.

6 Mr. Holman, do you have any other witnesses?

7 MR. HOLMAN: I have no other witnesses,  
8 Mr. Hammer. Thank you.

9 PRESIDING OFFICER HAMMER: Thank you.

10 Thank you, Mr. Thomas, for testifying.

11 Before we adjourn, let me just go through and  
12 ask each party's counsel whether there's anything else  
13 they would like to address before we adjourn.

14 So I will start with you Mr. McDermott, is  
15 there anything else for us today?

16 MR. MCDERMOTT: I don't believe so. Thank  
17 you, Mr. Hammer.

18 PRESIDING OFFICER HAMMER: Mr. Jetter?

19 MR. JETTER: Nothing further from the  
20 Division.

21 PRESIDING OFFICER HAMMER: Mr. Moore?

22 MR. MOORE: Nothing further, thank you.

23 PRESIDING OFFICER HAMMER: And Mr. Holman?

24 MR. HOLMAN: Nothing further for UCE, and I  
25 don't believe anything further from Salt Lake City, thank

1 you.

2                   PRESIDING OFFICER HAMMER: Great. The  
3 Commission thanks all the parties and their counsel for  
4 their participation, as well as their witness, and have a  
5 good day. We are adjourned.

6                   (The hearing was concluded at 10:10 A.M.)

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REPORTER'S CERTIFICATE

State of Utah                    )  
                                          )  
County of Salt Lake        )

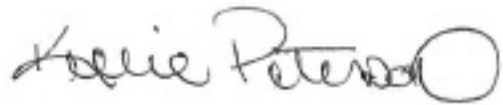
I hereby certify that the witnesses in the foregoing hearing were duly sworn to testify to the truth, the whole truth, and nothing but the truth in the within-entitled cause;

That said hearing was taken at the time and place herein named;

That the testimony of said witnesses were reported by me in stenotype and thereafter transcribed into typewritten form.

I further certify that I am not of kin or otherwise associated with any of the parties of said cause of action and that I am not interested in the events thereof.

IN WITNESS WHEREOF, I set my hand this 9th day of July, 2020.



Kellie Peterson, RPR

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