EBA Additional Filing Requirement 15

Please provide an explanation of out-of-period adjustments: see "DPU Exhibit 1.5.0 SR" and "Confidential DPU Exhibit 1.5.1 SR" which are the Rocky Mountain Power (RMP) written response to DPU Data Request 5.1 and the Microsoft Excel attachment response DPU 5.1(1), Docket 12-035-67.

Response to EBA Additional Filing Requirement 15

Net Power Costs (NPC) Adjustments

The Company decreased actual NPC $12,088,609 to account for the following adjustments: (1) prior period adjustments, (2) coal cost adjustments, (3) removal of special contract curtailment buy-through, (4) Leaning Juniper revenue, (5) Black Cap Solar allocation, (6) Old Mill Solar power purchase agreement (PPA) allocation, (7) Pavant Solar III PPA, (8) Oregon Solar Incentive Plan (OSIP) resources allocation, (9) Utah Transition Program for Customer Generators (Transition Program), (10) Mead-Phoenix amortization, and (11) Schedule 32 Contract with University of Utah.

1. **Prior Period Adjustments**
   Prior period adjustments represent accounting transactions booked during the energy balancing account (EBA) deferral for the 12-month period from January 2019 through December 2019 (Deferral Period), but that are related to operating periods prior to the inception of the EBA in October 1, 2011. Prior period adjustment accounting entries increased actual NPC by $3,672,322 in the EBA Deferral Period. Please refer to Confidential Attachment EBA AFR 15-1, file "Adjustments_UT EBA CONF", tab "Prior Period Adjustments".

2. **Coal Cost Adjustments**
   Coal cost adjustments reduced actual NPC by $7,724,467. These adjustments are necessary to include 2019 liquidated damages accrued in 2019, removal of 2018 liquidated damages, and legal fees related to fines and citations. In addition, adjustments are made to coal inventory to reflect coal costs in the correct period. Please refer to the Company's response in EBA Additional Filing Requirement 14 which provides the calculation of coal cost adjustments included in the EBA Deferral Period.

3. **Removal of Special Contract Curtailment Buy-Through**
   The removal of special contract curtailment buy-through reduced actual NPC by $1,942,988. This adjustment is required to remove the effects of special contract customer elections to purchase market energy during curtailment events. Buy-through energy is a direct pass-through cost to special contract customers and is not included in NPC. Please refer to Confidential Attachment EBA AFR 15-1, file "Adjustments_UT EBA CONF", tab "Buy-Through". Please also refer to Customer-Specific Confidential Attachment EBA AFR

15-2 and Customer-Specific Confidential Attachment EBA AFR 15-3 which provide special contract buy-through customer-specific information.

Note: Customer-Specific Confidential Attachment EBA AFR 15-2 and Customer-Specific Confidential Attachment EBA AFR 15-3 contain customer-specific information and are considered business confidential. The Company requests special handling. This information is only being provided to Public Service Commission of Utah (UPSC) staff, the Division of Public Utilities (DPU), DPU's consultants, and the Office of Consumer Services (OCS). This information is provided subject to Utah Code 63G-2-305(2) and (3) to protect it from a Government Records Access and Management Act (GRAMA) request.

4. **Leaning Juniper Revenue**
In October 2013, the Company reached an agreement resulting in additional revenue for energy, renewable energy credits (REC), and production tax credits (PTC) related to the Leaning Juniper wind project. Actual revenue is booked in FERC Account 456. An adjustment is made to include $64,336 in revenue related to Leaning Juniper energy output for purposes of the EBA. Please refer to Confidential Attachment EBA AFR 15-1, file "Adjustments_UT EBA CONF", tab "Leaning Juniper".

5. **Black Cap Solar Allocation**
Black Cap Solar was procured to satisfy Oregon Revised Statute (ORS) 757.370 solar capacity standard. Therefore, the Black Cap Solar generation is situs assigned to Oregon and the energy is removed from NPC (i.e. marked to market (MtM)) for the purposes of the EBA. The Black Cap Solar adjustment increases NPC $107,707. Please refer to Confidential Attachment EBA AFR 15 -1, file "Black Cap_JAN-DEC19 CONF".

6. **Old Mill Solar Power Purchase Agreement (PPA) Allocation**
Old Mill Solar PPA was procured to satisfy ORS 757.370 solar capacity standard. Therefore, the Oregon Mill Solar generation is situs assigned to Oregon and the energy is removed from NPC (i.e. MtM) for the purposes of the EBA. The Old Mill Solar adjustment decreases NPC $476,165. Please refer to Confidential Attachment EBA AFR 15-1, file "Old Mill_JAN-DEC19 CONF".

7. **Pavant Solar III Power Purchase Agreement (PPA)**
The UPSC approved the "Subscriber Solar Program Rider – Optional" Tariff Schedule 73, effective March 28, 2016, which created a limited pilot program to enable Utah customers who choose to participate to purchase electricity from a specific solar resource, Pavant Solar III. For purposes of the EBA, Pavant Solar III generation costs are removed from NPC and separately compared to the generation charges paid by solar subscriber customers. The difference is either recovered from or credited back to customers through the

EBA. Removing actual generation costs from NPC results in the Pavant Solar III adjustment decreasing NPC $2,541,438. Please refer to Confidential Attachment EBA AFR 15-1, file "Adjustments_UT EBA CONF", tab "Pavant III Solar".

8. **Oregon Solar Incentive Plan (OSIP) Resources Allocation**
   OSIP is a solar pilot project in Oregon which enables Oregon customers to own solar panels and sell any excess energy to the Company at an agreed upon rate. The OSIP generation is situs assigned to Oregon and the energy is removed from NPC (i.e. MtM) for the purposes of the EBA. The OSIP adjustment decreases NPC $23,033. Please refer to Confidential Attachment EBA AFR 15-1, file "Adjustments_UT EBA CONF", tab "OSIP Resources".

9. **Utah Transition Program for Customer Generators (Transition Program)**
   The UPSC approved the Transition Program Tariff Schedule 136, effective November 15, 2017, which measures the difference between the electricity supplied by the Company and the electricity generated by an eligible customer-generator and fed back to the electric grid. The program enables eligible customers to offset part or all of their own electrical requirements with self-generation and receive export credits for energy fed back to the electric grid. The above market cost of the Transition Program is situs assigned to Utah. The Transition Program adjustment decreases NPC by $1,620,736. Please refer to Confidential Attachment EBA AFR 15-1, file "Adjustments_UT EBA CONF", tab "Transition Program".

10. **Mead-Phoenix Amortization**
    The amortization of Mead-Phoenix wheeling expense was updated to reflect the Cholla Unit 4 Oregon depreciation schedule. Therefore, the incremental increase in amortization expense associated with Mead-Phoenix is situs assigned to Oregon and removed from NPC for the purposes of the EBA. The Mead-Phoenix adjustment decreases NPC $146,480. Please refer to Confidential Attachment EBA AFR 15-1, file "Adjustments_UT EBA CONF", tab "Mead-Phoenix".

11. **Schedule 32 Contract with University of Utah**
    The UPSC approved the Schedule 32 Contract with University of Utah effective May 22, 2018 in Docket 18-035-08. This schedule is a unique retail service option that allows customers' to direct the Company to serve all or part of its electricity from a renewable energy facility. For purposes of the EBA, PPA costs for the purchase of this energy are removed from NPC. The Schedule 32 Contract adjustment reduces NPC by $1,328,994. Please refer to Confidential Attachment EBA AFR 15-1, file "Adjustments_UT EBA CONF", tab "Schedule 32 Contract".

Confidential information is provided subject to the Commission's confidentiality rules under R746-1-602 and R746-1-603.