

EBA Filing Requirement 6

Supporting Information

- (a) The Hedging Collaborative Report filed semi-annually by the Company pursuant to Utah Division of Public Utilities’ “Report on the Collaborative Process to Discuss Appropriate Changes to PacifiCorp’s Hedging Practices”, filed in Docket 10-035-124, shall be updated to latest information.
- (b) Trade Data: List of electricity and natural gas trades that were settled during the energy balancing account (EBA) deferral period including both financial (i.e., swaps) and physical transactions.

In accordance with the Settlement Stipulation in Docket 14-035-31, paragraph 9, EBA Filing Requirement 6 subpart (b) is amended as follows:

“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 Docket 14-035-31. 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 Docket 14-035-31 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”.

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 (POR)
- (x) Point of Delivery (POD)
- (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
- (c) Outage Logs: a list of all outages during the EBA period. This data will include the name of the plant where the outage occurred, the duration of the outage, and the megawatt-hour (MWh) impact of the outage. The information shall be in a format substantially similar to Docket 12-035-67 Confidential Attachment EBA FR 2.
- (d) Plant performance data: a report summarizing plant performance over the EBA deferral period. The detail will include each plant's capacity factor (CF), equivalent forced outage rate (EFOR), forced outage (FO) MWh, planned outage (PO) MWh, and maintenance outage (MO) MWh. The data shall be in a format substantially similar to Docket 12-035-67 Confidential Attachment EBA FR3.
- (e) Generation logs: hourly generation logs for all owned generation resources on the Company system during the EBA deferral period. The data shall be in a format substantially similar to Docket 12-035-67 Confidential Attachment EBA FR4.
- (f) Please provide relevant economic analyses and internal communications recommending contracts during the applicable period with a term greater than one year that were executed.
- (g) Please provide new contracts or modified contracts for long-term purchases.
- (h) Please provide all short-term firm (STF) purchases.
- (i) Please provide a report on daily system balancing transactions for the Company over the EBA period.
- (j) Please provide actual market electricity prices for the period for all energy trading markets in which the Company participated.
- (k) Please provide a summary of terms and price for all new coal contracts or modified coal contracts.
- (l) Please provide a summary of terms and price for all new natural gas contracts or modified natural gas contracts.
- (m) To the extent included in an EBA, please provide all monthly California Independent System Operator (CAISO) service charges and fees.

- (n) Please provide a description of the principal drivers causing actual EBA net power cost (NPC) and wheeling revenue to differ from the base EBA NPC and wheeling revenue.

Response to EBA Filing Requirement 6 – CORRECTED SUBPART LABELLING

Further to the Company's response to EBA Filing Requirement 6 dated March 13, 2020, the Company has become aware that the subpart labelling in its original response to EBA Filing Requirement 6 were out of alignment. The Company has corrected the subpart labeling in this corrected response. All other aspects of the Company's original response and its associated attachments are correct and valid.

- (a) Please refer to Confidential Attachment EBA FR 6-1 which provides a copy of the Company's latest Semi-Annual Hedging Report, filed with the Public Service Commission of Utah (UPSC) on February 18, 2020 (Docket 20-035-08).
- (b) Please refer to Confidential Attachment EBA FR 6-2 which provides power physical transactions that were settled during the energy balancing account (EBA) Deferral Period. There were no power financial transactions that were settled during the EBA Deferral Period. Please refer to Confidential Attachment EBA FR 6-3 which provides natural gas physical transactions that were settled during the EBA Deferral Period. Please refer to Confidential Attachment EBA FR 6-4 which provides natural gas financial transactions that were settled during the EBA Deferral Period. Please refer to Confidential Attachment EBA FR 6-5 which provides the trade data from Confidential Attachment EBA FR 6-2 through Confidential Attachment EBA FR 6-4 in the format agreed upon in the Settlement Stipulation in Docket No. 14-035-31.

With regard to subpart (b)(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.

- (c) Please refer to Confidential Attachment EBA FR 6-6 which provides outage information for the Company's owned (1) thermal, (2) hydroelectric and (3) wind resources, relevant to the EBA Deferral Period. Notes: (1) thermal outage data – includes North American Electric Reliability Corporation (NERC) Generating Availability Data System (GADS) information for each thermal outage. The calculated lost megawatt-hours (MWh) included in the attachment incorporates the capacity factors included in rates for the respective units and time periods, (2) hydroelectric outage data – includes NERC GADS information for hydro units for which GADS reporting is required, and (3) wind outage data – provides NERC GADS information for wind projects for which GADS reporting is required. Note: wind outage data was significantly affected by repowering activities during 2019 and the

associated transition of the Supervisory Control and Data Acquisition (SCADA) system and the communication system. The company will supplement this response with a wind outage summary when it becomes available.

- (d) Please refer to Confidential Attachment EBA FR 6-7 which provides plant performance information for the Company's owned (1) thermal, (2) hydroelectric, and (3) wind resources, relevant to the EBA Deferral Period.
- (e) Please refer to Confidential Attachment EBA FR 6-8 which provides the hourly generation logs for the Company's owned (1) thermal, (2) hydroelectric, and (3) wind resources, relevant to the EBA Deferral Period.
- (f) Note: of the power purchase agreements (PPA) provided in the Company's response to subpart (g) below, qualifying facility (QF) PPAs do not require economic evaluations as QF PPAs are must buy obligations. Other than the provided QF PPAs, the Company provides the following information for one of the provided long-term contract arrangements relevant to the EBA Deferral Period:

Amor XI, LLC (Renewable Resource Contract - Schedule 32) – please refer to Public Service Commission of Utah (UPSC) Docket 18-035-08 which can be accessed at the website link provided below:

<https://psc.utah.gov/2018/03/26/docket-no-18-035-08/>

Please refer to Attachment EBA FR 6-9 which provides a copy of Utah Schedule 32 and a copy of UPSC's Order in Docket 18-035-08 dated May 22, 2018.

- (g) **[Was not identified as a subpart in the Company's original response]** Please refer to Confidential Attachment EBA FR 6-10 and Attachment EBA FR 6-11 which provides copies of new or modified long-term PPAs entered into, which commenced delivery in the EBA Deferral Period, and / or which were not previously included with the Company's previous years' EBA Filing Requirements (Docket 19-035-01).
- (h) **[Was incorrectly identified as (g) in the Company's original response]** For all short-term power purchases relevant to the EBA Deferral Period, please refer to the Company's response to subpart (b) above.
- (i) **[Was incorrectly identified as (h) in the Company's original response]** For all system balancing transactions relevant to the EBA Deferral Period, please refer to the Company's response to subpart (b) above.

- (j) [Was incorrectly identified as (i) in the Company's original response] Please refer to Attachment EBA FR 6-12 which provides historical electricity prices for calendar year 2019.
- (k) [Was incorrectly identified as (j) in the Company's original response] Please refer to Confidential Attachment EBA FR 6-13 which provides a summary of coal agreements relevant during the EBA Deferral Period.
- (l) [Was incorrectly identified as (k) in the Company's original response] For all physical natural gas and financial natural gas transactions relevant to the EBA Deferral Period, please refer to the Company's response to subpart (b) above.
- (m) [Was incorrectly identified as (l) in the Company's original response] Please refer to Confidential Attachment EBA FR 6-14 which provides the California Independent System Operator (CAISO) service and wheeling fees relevant during the EBA Deferral Period.
- (n) [Was incorrectly identified as (m) in the Company's original response] **Net Power Costs** – Please refer to the direct testimony of Company witness, David G. Webb.

Wheeling Revenues – Non-firm (NF) wheeling revenue is approximately \$1 million higher for January 2019 through December 2019 compared to the revenue forecast in the 2014 general rate case (GRC) due to higher capacity reserved by customers during 2019 and higher rates, compared with the volumes and rates in the revenue forecast.

Actual short-term firm (STF) revenues increased during 2019 compared with the base EBA period primarily due to higher rates and volumes.

Actual long-term firm (LTF) transmission wheeling revenue, including legacy contracts, is higher in comparison with the base EBA primarily due to higher LTF point-to-point (PTP), contract conversion from legacy to network service, plus slightly higher increase in network loads, plus transmission rates higher than the assumption utilized in the base EBA.

Ancillary service revenues for 2019 increased compared with the base EBA primarily due to higher volumes from additional capacity, contract conversions, and loads as noted above. In addition, the methodologies for application of services including Schedule 3 (Regulation Reserve), Schedule 3a (Generation Regulation Reserve), Schedule 5 (Spinning Reserve) and Schedule 6 (Supplemental Reserve) changed compared with the assumptions used in the base EBA as well as the applicable rates

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