

**Docket No. 20-035-01**

**OCS Exhibit No. 2.1SSR**

Compilation of Discovery (Data Request) Responses and  
Other Attachments Referenced in the  
Sur-Surrebuttal Testimony of Michele Beck (OCS 2SSR) on Behalf of  
The Office of Consumer Services

**REDACTED VERSION**

February 8, 2021

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Alex Ware &lt;aware@utah.gov&gt;

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**FW: Lake RCA: OCS 3.2**

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**Saba, Jana (PacifiCorp)** <Jana.Saba@pacificorp.com>  
To: Alex Ware <aware@utah.gov>, Phil Hayet <phayet@jkenn.com>

Sun, Aug 16, 2020 at 7:18 PM

Alex and Phil,

The RCA we contracted for is expected to be completed at the end of this month.

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Sent from [Workspace ONE Boxer](#)

On August 14, 2020 at 12:47:29 PM MDT, Alex Ware &lt;aware@utah.gov&gt; wrote:

**\*\* REMEMBER SAIL WHEN READING EMAIL \*\***

|  |  |
|--|--|
| <b>Sender</b>  | The sender of this email is <a href="mailto:aware@utah.gov">aware@utah.gov</a> using a friendly name of <a href="#">Alex Ware</a> .<br>Are you expecting the message? Is this different from the message sender displayed above? |
| <b>Attachments</b>   | Does this message contain attachments? <a href="#">No</a> If yes, are you expecting them?  |
| <b>Internet Tag</b>  | Messages from the Internet should have <b>[INTERNET]</b> added to the subject.   |
| <b>Links</b>   | Does this message contain links? <a href="#">Yes</a><br>Check links before clicking them or removing BLOCKED in the browser.   |
| <b>Cybersecurity risk assessment: <a href="#">Medium</a></b> |  |

Hi Jana-

See below for a question from one of our consultants. Could you look into this for us and provide a status update?

Thanks,  
Alex

----- Forwarded message -----

From: **Phil Hayet** <[phayet@jkenn.com](mailto:phayet@jkenn.com)>  
Date: Fri, Aug 14, 2020 at 12:11 PM  
Subject: FW: Lake RCA: OCS 3.2  
To: <[aware@utah.gov](mailto:aware@utah.gov)>  
Cc: <[randacf@aol.com](mailto:randacf@aol.com)>, Samuel Wyrobeck <[swyrobeck@jkenn.com](mailto:swyrobeck@jkenn.com)>

Alex,

OCS 3.2 requested root cause analyses for a set of outages including the Lake Side 2 outage that we have focused on. When we first submitted the DR some confidentiality issues arose that we had to deal with (Cheryl worked with Jana) and we eventually obtained the information we needed. However, we were also told that the Company was working on another root cause analysis report and that report was going to become available in August. Since it is now August, could you do us a favor and inquire with Jana to find out if it is available and if we can get it from the Company?

Thanks,  
Phil

Randy Falkenberg

2/8/2021

State of Utah Mail - FW: Lake RCA: OCS 3.2

Visit my Youtube Channel

BLOCKEDyoutube[.]com/channel/UC19616vtWS03nWD5zFEt5FwBLOCKED

[Quoted text hidden]



Alex Ware &lt;aware@utah.gov&gt;

---

**Fwd: FW: Lake RCA: OCS 3.2**

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**Saba, Jana (PacifiCorp)** <Jana.Saba@pacificorp.com>  
To: Alex Ware <aware@utah.gov>, Phil Hayet <phayet@jkenn.com>

Wed, Aug 19, 2020 at 10:36 AM

I just received updated timing on this. Although the company was hoping to have the RCA back from the third party contractor by the end of August, the RCA is still in process and is now scheduled to be completed the first part of October.

Thanks,

Jana

**From:** Saba, Jana (PacifiCorp)  
**Sent:** Sunday, August 16, 2020 7:18 PM  
**To:** Alex Ware <aware@utah.gov>; Phil Hayet <phayet@jkenn.com>  
**Subject:** Re: [INTERNET] Fwd: FW: Lake RCA: OCS 3.2

Alex and Phil,

The RCA we contracted for is expected to be completed at the end of this month.

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Date: Fri, Aug 14, 2020 at 12:11 PM

Subject: FW: Lake RCA: OCS 3.2

To: <[aware@utah.gov](mailto:aware@utah.gov)>

Cc: <[randacf@aol.com](mailto:randacf@aol.com)>, Samuel Wyrobeck <[swyrobeck@jkenn.com](mailto:swyrobeck@jkenn.com)>

Alex,

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Thanks,

Phil

Randy Falkenberg

Visit my Youtube Channel

BLOCKEDyoutube[.]com/channel/UC19616vtWS03nWD5zFEt5FwBLOCKED

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**Alex Ware**

*Utility Analyst*

**Office of Consumer Services**

*160 East 300 South, Ste 227*

*Salt Lake City, UT 84111*

*Phone: 801-530-6798*

*Email: [aware@utah.gov](mailto:aware@utah.gov)*

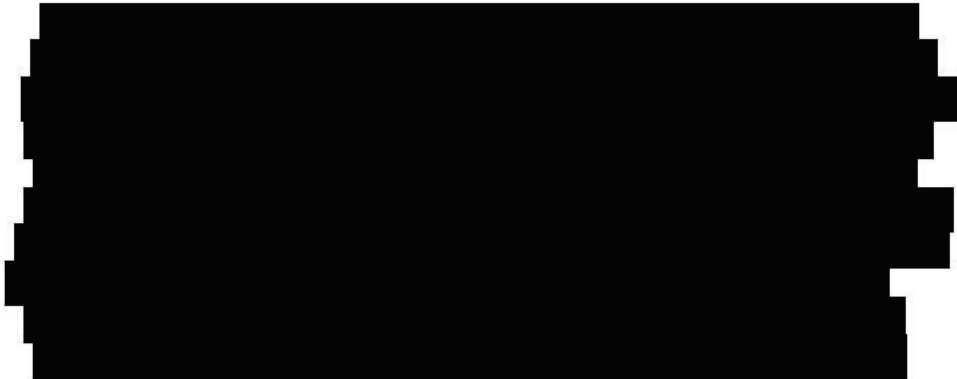
20-035-04 / Rocky Mountain Power  
June 18, 2020  
OCS Data Request 3.2

**OCS Data Request 3.2**

**CONFIDENTIAL REQUEST – Outages** - For the following outages listed in “UTGRC20w\_48mo\_Evts\_Backup\_2016-2019 CONF”, please provide:

- (a) All documents which discuss the root cause of the event and any corrective measures necessary.
- (b) Estimates for the cost of repairs, and actual costs for repairs.
- (c) Whether the Company received or attempted to receive re-imbursement from vendors (for warranties) or contractors related to these outages. If so, please provide the amounts and how those were treated for ratemaking purposes in the test year, GRID, or elsewhere.
- (d) The cost of replacement energy due to the outage, including the work papers for how this was calculated.
- (e) A brief description, in less technical terms, of what occurred to cause the outage event:

**[CONFIDENTIAL BEGINS]**



**[CONFIDENTIAL ENDS]**

**Confidential Response to OCS Data Request 3.2**

- (a) Please refer to Confidential Attachment OCS 3.2-1. Note: one root cause analysis (RCA) document is considered commercially sensitive and highly confidential. The Company requests special handling. Please contact Jana Saba at (801) 220-2823 to make arrangements for review.
- (b) Please refer to Confidential Attachment OCS 3.2-1.

(c) Please refer to Confidential Attachment OCS 3.2-1. **[CONFIDENTIAL BEGINS]**

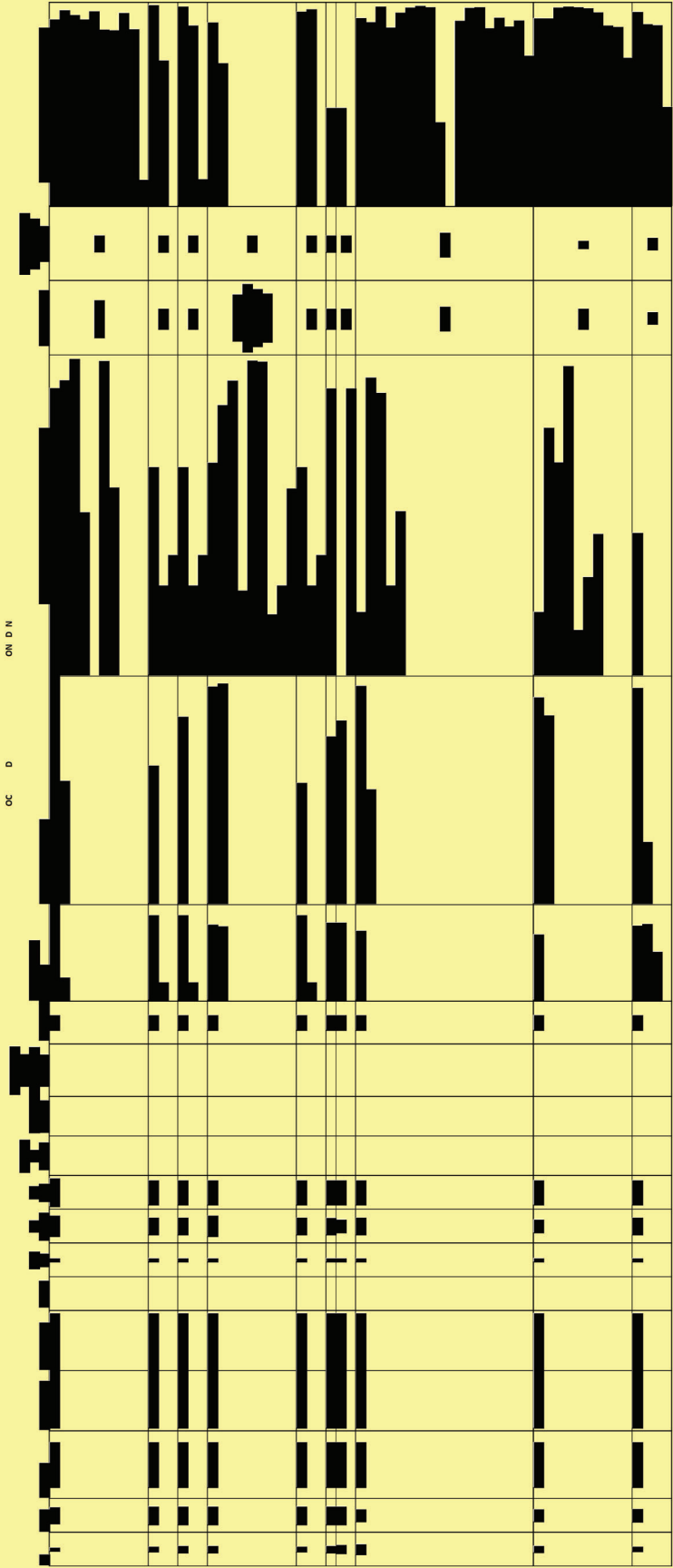
**[CONFIDENTIAL ENDS]**.

(d) Please refer to Confidential Attachment OCS 3.2-2

(e) Please refer to Confidential Attachment OCS 3.2-1.

Confidential information is provided subject to R746-1-601–605 of the Utah Public Service Commission Rules.





**OCS Data Request 2.1**

Please provide the new Root Cause Analysis for the outage at Lake Side 2 Unit 3, on August 18, 2019 when it becomes available.

**Response to OCS Data Request 2.1**

The third-party root cause analysis (RCA) is in process. The Company will provide a copy of the third-party RCA when it becomes available.

**OCS Data Request 2.1**

Please provide the new Root Cause Analysis for the outage at Lake Side 2 Unit 3, on August 18, 2019 when it becomes available.

**1<sup>st</sup> Supplemental Response to OCS Data Request 2.1**

Further to the Company's response to OCS Data Request 2.1 dated December 28, 2020, the Company provides as follows:

Please refer to Confidential Attachment OCA 2.1 1<sup>st</sup> Supplemental which provides a copy of the third party root cause analysis (RCA) report related to the Lake Side 2 outage. Note: the provided third party RCA report was conducted under attorney-client privilege; that privilege is hereby waived by the Company, but the RCA report remains proprietary / confidential information, subject to the confidentiality rules stated below.

Confidential information is provided subject to R746-1-601–605 of the Utah Public Service Commission Rules.

## OCS Data Request 4.8

### Outage at Lake Side 2 Unit 3 on August 18, 2019:

Please provide a timeline of all major activities that took place since the 1<sup>st</sup> RCA was completed and when the 2<sup>nd</sup> RCA was completed, including:

- (a) Explain all important activities that took place that led to the decision to conduct the second root cause analysis.
- (b) A timeline of the significant activities associated with performing the second RCA, including when steps were taken to hire the consultants, meetings/calls with the consultants, when their investigation began, the major events that occurred while conducting the RCA, when PacifiCorp received the first draft of the RCA, and when the final draft was completed.
- (c) In explaining the timeline please provide an accounting for what occurred on or around August 16<sup>th</sup> that led to the revised estimate of the report being completed at the end of August 2020. (See emails between PacifiCorp and the OCS below) This information was supplied in the recent General Rate Case.
- (d) In explaining the timeline please provide an accounting for what occurred on or around August 19<sup>th</sup> that led to the revised estimate of the report being completed at the first part of October 2020. (See emails below)
- (e) In explaining the timeline please provide an accounting for what occurred around the first part of October that led to further delays of the report. Note, after October 2020, RMP revised the completion date to be at the end of the year or just after the start of the year, but ultimately the 2<sup>nd</sup> RCA did not come out until the 15<sup>th</sup> of January.

From: Saba, Jana (PacifiCorp) <Jana.Saba@pacificorp.com>

Sent: Wednesday, August 19, 2020 12:37 PM

To: Alex Ware <aware@utah.gov>; Phil Hayet <phayet@jkenn.com>

Subject: Fwd: FW: Lake RCA: OCS 3.2

I just received updated timing on this. Although the company was hoping to have the RCA back from the third party contractor by the end of August, the RCA is still in process and is now scheduled to be completed the first part of October.

Thanks,

Jana

From: Saba, Jana (PacifiCorp)

Sent: Sunday, August 16, 2020 7:18 PM

To: Alex Ware <aware@utah.gov>; Phil Hayet <phayet@jkenn.com>

Subject: Re: [INTERNET] Fwd: FW: Lake RCA: OCS 3.2

Alex and Phil,

The RCA we contracted for is expected to be completed at the end of this month.

20-035-01 / Rocky Mountain Power  
January 28, 2021  
OCS Data Request 4.8

**Response to OCS Data Request 4.8**

Please refer to the Company's response to DPU Data Request 16.10.

**DPU Data Request 16.10**

**CONFIDENTIAL REQUEST** - Regarding the 2<sup>nd</sup> Lakeside RCA (2<sup>nd</sup> RCA) provided as Confidential Exhibit RMP\_(DMR-1S):

Report indicates **[CONFIDENTIAL BEGINS]**

**[CONFIDENTIAL ENDS]**. Please explain why the 2<sup>nd</sup> RCA took a considerable amount of time to be made available to stakeholders.

**Confidential Response to DPU Data Request 16.10**

The name of the contractor is not confidential. The Company hired Generator Consulting Specialists, Inc. (GCS) to consult on the Lake Side 2 Unit 3 outage on August 21, 2019. At that time, it was unknown whether Siemens would choose to conduct a root cause analysis (RCA), and the extent and scope of the RCA GCS would prepare was unknown. The extent and scope of the 2<sup>nd</sup> RCA that was ultimately performed continued to be developed after the Siemens RCA was finalized in December 2019.

**[CONFIDENTIAL BEGINS]**

**[CONFIDENTIAL ENDS]**

The Company was informed by GCS on December 7, 2020, that the lab had completed its analysis, and it received a first draft of the report on December 17, 2020. The report was ultimately finalized on January 15, 2021, the same day it was provided to parties in this proceeding.

Confidential information is provided subject to R746-1-601–605 of the Utah Public Service Commission Rules.

**OCS Data Request 4.17**

**Outage at Lake Side 2 Unit 3 on August 18, 2019:**

Lines 173 to 174 of Mr. Ralston's December 10, 2020 Response Testimony discuss the 2<sup>nd</sup> RCA and state "This report is expected to be completed by end of 2020 and the preliminary results indicate no different conclusions from the Siemens RCA." Concerning the 2<sup>nd</sup> RCA, please provide the following:

- (a) When was the 2<sup>nd</sup> RCA ordered and when did the selected contractor begin work on the 2<sup>nd</sup> RCA?
- (b) How often did RMP receive preliminary updates on the status of the 2<sup>nd</sup> RCA? Please provide dates.
- (c) When did RMP become aware of the final conclusions of the 2<sup>nd</sup> RCA?
- (d) Did RMP ask questions and provide feedback upon receiving preliminary updates on the 2<sup>nd</sup> RCA? If so, please indicate when this occurred.
- (e) Did RMP receive preliminary drafts of the 2<sup>nd</sup> RCA? If so, please indicate when this occurred.
- (f) If RMP received drafts, did RMP participate in the editing of the 2<sup>nd</sup> RCA?
- (g) After over a year of repeated and significant delays, why was the 2<sup>nd</sup> RCA completed on January 15, 2021 rather than at the end of 2020 as quoted above from Mr. Ralston's response testimony?

**Response to OCS Data Request 4.17**

- (a) Please refer to the Company's response to DPU Data Request 16.10.
- (b) The Company received periodic updates on the status of the 2<sup>nd</sup> root cause analysis (RCA), including an update on December 7, 2020, that the lab results had been returned to Generator Consultant Services, Inc. (GCS).
- (c) The Company received a draft of the 2<sup>nd</sup> RCA on December 17, 2020; the conclusions of the final 2<sup>nd</sup> RCA did not change from this draft.
- (d) The Company asked questions and provided feedback during the development of the strategy to conduct additional testing as part of the 2<sup>nd</sup> RCA. Other than this input, the Company's input during GCS's preparation of the 2<sup>nd</sup> RCA was limited to status updates about the timing of the lab analysis and the 2<sup>nd</sup> RCA.



- (e) The Company received a draft of the 2<sup>nd</sup> RCA on December 17, 2020, and exchanged several drafts with GCS before the 2<sup>nd</sup> RCA was finalized on January 15, 2021.
- (f) The Company asked clarifying questions and made stylistic and organizational edits to the drafts provided by GCS.
- (g) Please refer to the Company's response to DPU Data Request 16.10.

### **OCS Data Request 4.3**

#### **CONFIDENTIAL REQUEST - Outage at Lake Side 2 Unit 3 on August 18, 2019:**

If not already provided in RMP's response to DPU 16.3, please provide all written communication/documentation (letters, emails, reports, RCA drafts, invoices, etc) sent back and forth between PacifiCorp and Genmet LLC, and also between PacifiCorp and Generator Consulting Specialists, Inc. (GCS) since initiation of initial contact was made regarding the second RCA. If any other organizations were involved in the second RCA process, please provide all written correspondence sent back and forth between PacifiCorp and those organizations as well. It is important to provide all documentation including documentation that occurred after the root cause analysis was delivered through the present time related to the outage.

### **Response to OCS Data Request 4.3**

The identity of the contractor is not confidential.

The Company objects to this request to the extent the written communication is covered by the attorney work-product doctrine or the attorney-client privilege. Subject to and without waiving this objection, the Company produces non privileged responsive documents in Confidential Attachment OCS 4.3.

Confidential information is provided subject to R746-1-601–605 of the Utah Public Service Commission Rules.