



1407 West North Temple
Salt Lake City, Utah 84116

May 8, 2020

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Administrator

**Re: Docket 20-035-04
Application of Rocky Mountain Power for Authority to Increase its Retail Electric
Utility Service Rates in Utah and for Approval of its Proposed Electric Service
Schedules and Electric Service Regulations**

Rocky Mountain Power hereby submits for filing the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of Its Proposed Electric Service Schedules and Electric Service Regulations. Enclosed are the confidential and non-confidential electronic copies of the testimony, exhibits, and workpapers in the file formats in which they were created. Exhibits provided in pdf format were provided from a published report, document or authored outside the company. Also enclosed are the confidential and non-confidential electronic copies of the complete filing requirements.

Rocky Mountain Power respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

By E-mail (preferred): datarequest@pacificorp.com
jana.saba@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

Utah Public Service Commission

May 8, 2020

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

Sincerely,

A handwritten signature in blue ink that reads "Joelle Steward". The signature is written in a cursive style with a large initial "J".

Joelle Steward

Vice President, Regulation

cc: Service List

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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

Application of Rocky Mountain Power for Authority to) Increase its Retail Electric Utility Service Rates in Utah) and for Approval of its Proposed Electric Service) Schedules and Electric Service Regulations))))	DOCKET NO. 20-035-04
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APPLICATION FOR GENERAL RATE INCREASE

Rocky Mountain Power (“Rocky Mountain Power” or “Company”) hereby submits its application (“Application”) to the Public Service Commission of Utah (“Commission”) requesting approval of an increase in its retail electric utility service rates in Utah in the amount

of \$95.8 million, or 4.8 percent, and approval of its proposed electric service schedules and electric service regulations to become effective January 1, 2021. In accordance with the 240-day period provided under Utah Code Ann. § 54-7-12(3), the Commission must issue a decision by January 3, 2021. Rocky Mountain Power requests that the Commission issue a decision by no later than December 31, 2020, to allow for rates to be effective by January 1, 2021.

The requested increase in revenue requirement reflects a number of ratemaking measures that mitigate the revenue requirement increase, for which the Company is seeking approval. Further, the Company proposes to use the Tax Cut and Jobs Act (“TCJA”) tax credit to phase-in the increase. In support of the Application, Rocky Mountain Power states as follows:

1. PacifiCorp d/b/a Rocky Mountain Power, an Oregon corporation, provides electric service to retail customers as Rocky Mountain Power in the states of Wyoming, Utah, and Idaho, and as Pacific Power in the states of Oregon, California, and Washington.
2. Rocky Mountain Power is a public utility in the state of Utah and is subject to the Commission’s jurisdiction with respect to its prices and terms of electric service to retail customers in Utah. The Company serves approximately 948,000 customers in Utah and employs over 1,900 people in the state. Rocky Mountain Power’s principal place of business in Utah is 1407 West North Temple, Suite 310, Salt Lake City, Utah 84116.
3. Communications regarding this filing should be addressed to:

Jana Saba
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E-mail: jana.saba@pacificorp.com

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D. Matthew Moscon
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201 South Main Street, Suite 1100
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In addition, Rocky Mountain Power requests that all data requests regarding the Application be sent in Microsoft Word or plain text format to the following:

By email (preferred): datarequest@pacificorp.com
By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, Oregon 97232

Informal questions may be directed to Jana Saba, State Regulatory Affairs at (801) 220-2823.

REQUEST FOR AUTHORITY TO INCREASE RATES

4. The Application complies with the minimum filing standard and requirements established by the Commission for a general rate case filing in Utah Admin. Code R746-700-10 through R746-700-23. Attachment 1 to the Application lists each filing requirement identified in the regulations and the location of the responsive information, either in the testimony or within folders saved on the enclosed media devices. Attachment 2 identifies information required by other Company commitments or Commission orders, including the 2014 General Rate Case, Docket No. 13-035-184 (“2014 GRC”).

5. The Application includes elements necessary for Rocky Mountain Power to operate and maintain its system and to continue to provide safe, adequate and reliable service to its customers.

6. Pursuant to applicable Utah law and Commission rules, Rocky Mountain Power hereby requests authority to increase its retail rates in Utah by an amount of \$95.8 million.

7. The test period used in this case is the twelve months ending December 31, 2021 (“Test Period”). Rocky Mountain Power’s Test Period is based on the 12 month historical period ended December 31, 2019 (“Base Period”), forecasted to the 12 month period ending December 31, 2021, and an overall weighted cost of capital of 7.70 percent. The weighted

overall cost of capital is based on a return on equity (“ROE”) of 10.2 percent and common equity of 53.67 percent.

8. On January 17, 2020, the Company filed with the Commission a Notice of Intent to File a Rate Case and Request for Approval of Test Period. On March 6, 2020, the Commission granted the Company’s request and approved the proposed Test Period.

9. Rocky Mountain Power’s system-wide costs are allocated to Utah based on the recently approved 2020 PacifiCorp Inter-Jurisdictional Allocation Protocol (“2020 Protocol”).¹

10. Based on the Utah-allocated adjusted results of operations for the Test Period, the Company is far from achieving its proposed ROE of 10.2 percent. The Company forecasts that it could only achieved a ROE of 8.72 percent during the Test Period absent the requested increase in revenue.

11. The revenue increase for which approval is requested is based, in part, on a ROE of 10.2 percent as recommended by Ms. Ann E. Bulkley. Ms. Bulkley’s recommendation is based on her analysis, specifically described in her testimony, that an ROE of 10.2 percent reasonably balances the interests of customers and shareholders by enabling Rocky Mountain Power to maintain its financial integrity and therefore its ability to attract capital at reasonable terms and conditions under a variety of economic and financial market conditions. An overall

¹ *Application of Rocky Mountain Power for Approval of the 2020 Inter-Jurisdictional Cost Allocation Agreement*, Docket No. 19-035-42, Order Approving 2020 Protocol (Apr. 15, 2020).

price increase of \$95.8 million would be required to produce the 10.2 percent ROE under the 2020 Protocol.²

Primary Cost Drivers

12. The major revenue requirement components in this filing are the addition of major new capital investments and changes in depreciation rates. The Company expects that approximately \$4.9 billion in new capital projects, on a total-company basis, will be placed into service to serve Utah customers between January 1, 2020 and December 31, 2021. This includes investments in Rocky Mountain Power's Energy Vision 2020 Projects, approved by the Commission in Docket No. 17-035-39 and Docket No. 17-035-40, and additional investments in the repowering of Leaning Juniper and Foote Creek I, along with the Pryor Mountain Wind Project. Other capital investments include the installation of selective catalytic reduction retrofits on certain generating units, the conversion of Naughton Unit 3 to gas, and the Utah Advanced Meter Infrastructure, for a total 2021 Utah rate base of approximately \$7.8 billion.

13. Additionally, the Company filed an application to update depreciation rates with a proposed rate effective date of January 1, 2021 in Docket No. 18-035-36.³ On April 20, 2020, the Commission approved the stipulation filed by Rocky Mountain Power in Docket No. 18-

² *Application of Rocky Mountain Power for Approval of the 2020 Inter-Jurisdictional Cost Allocation Agreement*, Docket No. 19-035-42, Order Approving 2020 Protocol (Apr. 15, 2020).

³ *Application of Rocky Mountain Power for Authority to Change its Depreciation Rates Effective January 1, 2021*, Docket No. 18-035-36 (Sept. 11, 2018).

035-36 on March 19, 2020.⁴ This rate case incorporates the depreciation rates from that stipulation. The Company is also updating the estimated decommissioning costs for its coal-fueled generation facilities with the depreciation rates.

14. Net Power Costs (“NPC”) for the Test Period are \$1.421 billion on a total-company basis, \$619.2 million on a Utah-allocated basis. This represents a \$70 million, total-company, decrease in NPC compared to the Company’s 2014 GRC. The decrease is driven by lower coal fuel expense, lower purchase power expense, lower wheeling expense, and increasing zero-fuel cost renewable generation. The decrease is partially offset by a reduction in wholesale sales revenue and a small increase in gas fuel expense. The Company also requests approval of including a production tax credit (“PTC”) true-up in the Energy Balancing Account (“EBA”), as discussed in the testimony of Mr. David G. Webb.

15. The Company’s proposed revenue requirement includes approximately \$66.0 million in other rate mitigation efforts, including: (1) implementation of the settlement agreement in Docket No. 17-035-69 allowing for the use of the balance of the Sustainable Transportation and Energy Plan (“STEP”) regulatory liability account to buy-down the undepreciated plant balance of certain coal-fired generation units, reducing depreciation expense;⁵ (2) use of a portion of the deferred tax benefits associated with the TCJA to pay off certain regulatory assets and further depreciate the Dave Johnston plant balance, lowering on-

⁴ *Application of Rocky Mountain Power for Authority to Change its Depreciation Rates Effective January 1, 2021*, Docket No. 18-035-36, Report and Order (Apr. 20, 2020).

⁵ *Investigation of Revenue Requirement Impacts of the New Federal Tax Legislation Titled: “An act to provide for reconciliation pursuant to titles II and V of the concurrent resolution of the budget for fiscal year 2018”*, Docket No. 17-035-69 (Dec. 21, 2017).

going expense; and (3) creation of a regulatory asset to extend the recovery for Jim Bridger Units 1 and 2 depreciation expense until future STEP funds are accumulated. Rocky Mountain Power requests that the Commission approve these ratemaking measures.

16. Finally, the Company requests authority to use approximately \$66.5 million of the remaining TCJA tax benefit balance to phase-in the increase over three years. These mitigation measures are as described in the testimony of Ms. Joelle R. Steward.

Other Components

17. On December 27, 2019, the Company announced it would retire Cholla Unit 4 by December 31, 2020. The Company owns approximately 37 percent of the plant's common facilities and 100 percent of Unit 4, which was commissioned in 1981 with a generating capability of 395 MW. The Company requests approval for the creation of a regulatory asset for recovery of unrecovered costs after closure of Cholla Unit 4.

18. Rocky Mountain Power requests approval of a proposed Wildland Fire Mitigation Balancing Account. Utah House Bill 66⁶ provides for the deferral and collection of prudent capital investment costs and expenses to implement the Wildland Fire Protection Plan that is not included in the Company's rates. The Company proposes a mechanism to establish a base amount of capital costs and operations and maintenance expenses related to the Wildland Fire Mitigation Plan and will compute the incremental revenue requirement, which will allow for a Commission prudence review of capital costs and expenses in future rate proceedings.

⁶ HB 66, signed by Governor Herbert Mar. 28, 2020. See <https://le.utah.gov/~2020/bills/static/HB0066.html>.

19. The Company requests approval to update to certain customer service charges on Schedule 300, and a 50 cent bill credit for customers who opt out of receiving paper bills.

20. Rocky Mountain Power is also proposing a new design of the current Subscriber Solar Program. The Company's Subscriber Solar Program was originally approved in Docket No. 15-035-61.⁷ The redesigned program will be available to residential, small non-residential, and large non-residential customers through a revised Schedule No. 73, Subscriber Solar Program Rider – Optional.

RATE SPREAD

21. The Company is proposing to allocate the revenue increase to customer classes based upon the cost of service study included in the Application. The proposed rate spread is designed to reflect cost of service results while balancing the impact of the rate change across customer classes.

22. The table below summarizes the proposed rate schedule changes for each listed customer class.

Customer Class	Proposed Percentage Change from Rates In Effect on the date of Application
Residential	6.9%
General Service	
Schedule 6	3.9%
Schedule 8	3.9%
Schedule 9	4.9%
Schedule 23	1.9%
Irrigation	4.9%
Lighting Schedules	(21.4)%

⁷ In the Matter of the Application of Rocky Mountain Power for Approval of its Subscriber Solar Program, Docket No. 15-035-61, Tariff Approval Letter (Nov. 13, 2015).

RATE DESIGN

23. Rocky Mountain Power proposes to generally increase rate components on a uniform basis and to increase the Customer Charge for Schedules 6, 8, 9, 23, and irrigation customers to achieve the schedule changes in the rate categories set forth above.

24. To implement the proposed rate increase while reflecting cost causation, equity, economic efficiency, revenue adequacy, and minimizing customer impacts, the Company is requesting certain changes to its rate structures as well as some new tariffs offerings, which is described in the testimony of Mr. Robert M. Meredith.

25. For example, Rocky Mountain Power proposes to split the customer service charge into different prices for single family and multi-family residential customers. For multi-family customers, the Company proposes retaining the current price of \$6. For single family customers, the Company proposes increasing the customer service charge to \$10. The current customer service charge falls short of cost, and the increase allows the Company to better recover the fixed costs of customer service, billing, and local infrastructure. However, retaining the customer service charge at \$6 for multi-family customers recognizes that these customers tend to use less energy than customers living in single-family homes and that the fixed costs of serving customers in multi-family configurations can be lower than for single-family homes

26. The Company proposes to eliminate the minimum bill for residential customers, which is currently set at \$8.00 per month. Originally, a minimum charge was imposed to ensure that every customer provides a level of recovery for the Company's costs. However, with the

Company's proposed pricing level for the customer service charge, the minimum charge would no longer be necessary.

27. Rocky Mountain Power is also proposing to update rate design for residential and general service customers as described in Mr. Meredith's testimony.

28. For large non-residential customers, the Company is proposing several new pilot rate programs that will provide customers new options to better control their bills based on their ability to shape their usage to take advantage of low-cost periods. The details regarding the new pilot programs are described in Mr. Meredith's testimony.

29. With respect to lighting customers, the Company is also proposing a price re-design for street lighting customers and open Schedule 7 – Security Area Lighting to new service again on existing distribution poles only.

BILLING DETERMINANTS

30. The testimony of Mr. Meredith contains a summary of present and proposed prices along with the billing determinants used in preparing the pricing proposals in the case.

WITNESSES – PREFILED WRITTEN TESTIMONY

31. The Application and the requests made herein are supported by the prefiled written direct testimony and exhibits of the following witnesses, all of which are submitted as attachments to the Application:

- **Gary W. Hoogeveen**, President and Chief Executive Officer, Rocky Mountain Power, provides an overview of Rocky Mountain Power, its Utah service area, and

the strategies the Company is pursuing to provide its Utah customers with safe, reliable, and affordable electricity.

- **Joelle R. Steward**, Vice President, Regulation, Rocky Mountain Power, describes PacifiCorp's request in this proceeding in more detail and supports the Company's policy positions throughout the filing.
- **Nikki L. Kobliha**, Vice President, Chief Financial Officer and Treasurer, provides the Company's overall cost of capital recommendation, describes implementation of the effects of the Tax Cuts and Jobs Act consistent with recent Commission decisions, and supports the Company's projected pension costs.
- **Ann E. Bulkley**, economist and principal at Concentric Energy Advisors, provides a comparison of the Company's business and financial risk compared to peer utilities, recommends a cost of equity, and provides supporting analyses.
- **Rick T. Link**, Vice President of Resource Planning and Acquisition, provides the economic analyses of repowering Foote Creek I and Leaning Juniper wind facilities, the Pryor Mountain Wind Project, the retirement of Cholla Unit 4, and the conversion of Naughton Unit 3. Mr. Link also presents the Company's load forecast.
- **Timothy J. Hemstreet**, Managing Director of Renewable Energy Development, provides an update on the implementation and costs of the new wind and

repowering projects included in Energy Vision 2020, and an overview of the Foote Creek I and Leaning Juniper repowering projects.

- **Richard A. Vail**, Vice President of Transmission Services, discusses important transmission system upgrades that will be completed to serve customers and provides an update on the implementation and costs of the transmission projects included in Energy Vision 2020.
- **Robert Van Engelenhoven**, Director of Resource Development, provides the details on the development of the Pryor Mountain Wind Project, and an update on the conversion of Naughton Unit 3 to natural gas.
- **James C. Owen**, Director – Environmental, supports the installation of certain selective catalytic reduction retrofit projects.
- **Curtis B. Mansfield**, Vice President of Transmission and Distribution Operations, discusses wildfire risk and the Company’s wildfire mitigation efforts in Utah.
- **David G. Webb**, Manager of Net Power Costs, presents the Company’s proposed NPC for the test period.
- **Melissa S. Nottingham**, Manager of Customer Advocacy, proposes updates to certain customer service fees to reflect prices that are reasonable, fair, and cost-based.

- **Steven R. McDougal**, Director of Revenue Requirements, summarizes the overall test year revenue requirement, pro forma adjustments, and the rate base calculation methodology.
- **William J. Comeau**, Vice President of Customer Experience and Innovation, proposes a new Subscriber Solar program that creates more solar generation options for our customers and is better aligned with the tariff changes.
- **Robert M. Meredith**, Director of Pricing and Cost of Service, provides the Company's allocation and rate design, and discusses how the proposed tariff changes recover the proposed 2021 revenue requirement to achieve fair, just, and reasonable prices for customers.

WHEREFORE, by this Application, Rocky Mountain Power respectfully requests that the Commission:

1. Authorize an overall Utah revenue requirement of \$2.097 billion, an increase of \$95.8 million to current base rates, as described in this Application and supporting testimony and exhibits.
2. Approve the rate mitigation proposals incorporated into the Company's proposed revenue requirement.
3. Approve the refund of approximately \$66.5 million of deferred tax benefits from the TCJA to reduce the Company's proposed retail electric utility service rate by approximately \$44.3 million in 2021 and approximately \$22.2 million in 2022.

4. Approve as prudent the incremental additions to the Company's rate base.
5. Approve base EBA costs of \$1.421 billion on a total-Company basis and \$619.2 million on a Utah-allocated basis, included in overall revenue requirement, and a true-up of PTCs in the EBA.
6. Approve the creation of a regulatory asset for recovery of unrecovered costs after closure of Cholla Unit 4.
7. Approve the Company's proposed Wildland Fire Mitigation Balancing Account.
8. Approve the update to certain customer service charges on Schedule 300, and a proposal for a 50 cent bill credit for customers who opt out of receiving paper bills.
9. Authorize the Company's updated subscriber solar program.
10. Approve the rate design proposals recommended by the Company including, without limitation, the proposed residential customer service charge, updated rate design for residential and general service customers, and new pilot programs for large non-residential customers.
11. Approve the Company's proposed electric service schedules, to be effective January 1, 2021.

DATED this 8th day of May, 2020.

Respectfully submitted,

ROCKY MOUNTAIN POWER



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Attorneys for Rocky Mountain Power

Attachment 1

**R746 Public Service Commission
Sub-Sections R746-700-10 through R726-700-23
Provisions for Complete Filing of General Rate Case
Rocky Mountain Power Docket 20-035-04**

Reference ID	Topic	Requirement	Location in Filing
Test Period Information for a General Rate Case Application R746-700-10			
R746-700-10.A	Test Period First Identified in Application	Cases where the test period is first identified in the application.	Pursuant to the Order Approving Test Period issued by the Public Service Commission of Utah on March 6, 2020, the Commission approved the CY 2021 Test Period.
R746-700-10.A.1	Adjustment Information	The applicant will provide information which will demonstrate what adjustments are required to be made to the 12 months of actual, unadjusted results of operations data, including all regulated costs and revenues, contained in the most recent periodic reported results of operations submitted to the Commission, to arrive at the test period used by the applicant in its application, on both a Utah jurisdiction and total company basis. If the public utility does not submit periodic reported results of operations to the Commission, the applicant shall use the public utility's most recently audited 12-month period in lieu thereof as the base period upon which the test period used in the application is developed.	Please see Steven R. McDougal Exhibit RMP__ (SRM-3). This exhibit provides the necessary adjustments to be made to the twelve months ended December 2019 unadjusted results to arrive at the test period December 2021 on both a total company and Utah jurisdictional basis.
R746-700-10.A.1.a	Type of Adjustments	Adjustments to be demonstrated include, but are not limited to: normalization adjustments, annualization adjustments, accounting adjustments, adjustments to reflect prior Utah regulatory decisions and policies made by the Commission with respect to any item or matter (including those which are not supported or advocated by the applicant for use in the general rate case) contained in the application, and all further adjustments to arrive at the test period used by the applicant in the general rate case filing.	Please see Steven R. McDougal Exhibit RMP__ (SRM-3). This exhibit provides the necessary adjustments to be made to the twelve months ended December 2019 unadjusted results to arrive at the test period December 2021 on both a total company and Utah jurisdictional basis.
R746-700-10.A.1.b	Information on Test Period Selection	The applicant will provide information explaining why the test period used is the most appropriate for the case.	Pursuant to the Order Approving Test Period issued by the Public Service Commission of Utah on March 6, 2020, the Commission approved the CY 2021 Test Period.
R746-700-10.A.1.c	Summary Index	In addition to the information relating to each adjustment identified in compliance with R746-700-10.A.1.a, the applicant will also provide a summary index which identifies each adjustment or portion of an adjustment made in the filing material which can be used to locate where each adjustment or portion thereof is addressed, treated, applied, etc. in the application, testimony, exhibits and other documentation submitted. The summary index may be presented in testimony, as a table embedded in testimony, as an exhibit to testimony, or in any other manner so long as it is clearly identified.	Please see the Direct Testimony of Steven R. McDougal Exhibit RMP__ (SRM-2) for a summary index of each revenue requirement adjustment included in the test period. Also, in Exhibit RMP__ (SRM-3) the first page for each revenue requirement adjustment section 3 through 8 provides a summary adjustment index for that specific section.
R746-700-10.A.2	Alternative Period	If the test period used in the application is a future test period, in addition to the demonstration of adjustments to be made for the test period used by the applicant in the general rate case application, the applicant will make the same demonstration for the 12-month period ending on the last day of June or December, whichever is closest, following the filing date of the application if this alternative period does not have an end date beyond the test period used in the general rate case application.	Pursuant to the Order Approving Test Period issued by the Public Service Commission of Utah on March 6, 2020, the Commission approved the CY 2021 Test Period.
R746-700-10.B	Test Period Approved Prior to Filing	Cases where the test period is identified and approved prior to the filing of an application.	
R746-700-10.B.1	Test Period Approval Request	An applicant planning to file an application may first request Commission approval of a test period to be used prior to filing an application. The request to approve the proposed test period shall be accompanied by testimony and exhibits providing information supporting the proposed test period.	Pursuant to the Order Approving Test Period issued by the Public Service Commission of Utah on March 6, 2020, the Commission approved the Company's Test Period.
R746-700-10.B.2	Submit Application subsequent to Commission Approval	Subsequent to the Commission's approval of a test period, the applicant may then submit an application, using as the test period for the case the test period previously approved by the Commission and need not provide the alternative test period demonstration required by R746-700-10.A.2.	Pursuant to the Order Approving Test Period issued by the Public Service Commission of Utah on March 6, 2020, the Commission approved the Company's Test Period.

**R746 Public Service Commission
Sub-Sections R746-700-10 through R726-700-23
Provisions for Complete Filing of General Rate Case
Rocky Mountain Power Docket 20-035-04**

Reference ID	Topic	Requirement	Location in Filing
Information for a General Rate Case Application R746-700-20		The following information shall be provided with the application on a total company and Utah jurisdictional basis using the allocation methods used in the public utility's last general rate case proceeding or any allocation method subsequently approved by the Commission.	
R746-700-20	Index	Provide an index which identifies where in the application, testimony, exhibits, documents, information, data, etc., filed with the application the applicant has responded to and complied with the R746-700-20 requirements. The index may be presented in testimony, as a table embedded in testimony, as an exhibit to testimony, or in any other manner so long as it is clearly identified.	This information is provided in the table provided as Attachment 1 to the Application in this Docket.
R746-700-20.A	Historical Results of Operations Information		
R746-700-20.A.1	Unadjusted Results	Actual, unadjusted results of operations, including all regulated costs and revenues, for an historical 12-month period as contained in its last periodic reported results of operations filing submitted to the Commission.	This information is provided in folder 700-20-A.1.
R746-700-20.A.2	Adjusted Results	Adjusted results of operations for the same period.	Please refer to the Company's response to R746-700-20.A.1.
R746-700-20.A.3	Accounting Policy Changes	A description of any significant changes in accounting policies for the 24-month period prior to the historical period and any subsequent accounting changes through the date of the general rate case application and, if a forecasted test period is used, any future significant changes included in a future test period, along with their impact on the filing. Significant changes for this purpose are anything referenced or that would be referenced in footnotes of financial statements or auditor's reports.	This information is provided in R746-700-20-A.3.
R746-700-20.B	Non-Forecasted Test Period	If a non-forecasted test period is used in the application, the applicant shall provide information identifying and supporting each and every modification to the historical results of operations to arrive at the non-forecasted test period used in the general rate case application.	N/A
R746-700-20.C	Fully or Partial Forecasted Test Period	If a fully or partially forecasted test period is used in the application, which forecasted test period was not previously approved by the Commission for the general rate case application, the following forecasted test period information shall be provided (the format of the forecasted test period data shall be comparable to the historical results of operation information): (1-7)	N/A
R746-700-20.C.1	Revenues	Revenues, with details supporting the test period revenues including (as applicable): (a-f)	Mr. Robert M. Meredith's Exhibit RMP__(RMM-4) contains the revenues.
R746-700-20.C.1.a	Usage	Usage, per customer by customer class	Mr. Robert M. Meredith's Exhibit RMP__(RMM-4) contains information by rate schedule. Usage is displayed in Column (4). Customer count is shown in Column (3). Usage per customer is computed by dividing Column (4) by Column (3).
R746-700-20.C.1.b	Demand	Demand and energy usage	Mr. Robert M. Meredith's Exhibit RMP__(RMM-5) contains demand and energy usage.
R746-700-20.C.1.c	Assumptions	Assumptions used in the development of the revenue forecasts	The revenue forecasts rely on the sales forecast discussed in the testimony of Mr. Rick T. Link. Mr. Robert M. Meredith's Exhibit RMP__(RMM-5) utilized Mr. Links's sales forecast and developed the billing determinants that were used in computing the revenue forecasts.
R746-700-20.C.1.d	Billing Determinants	Billing determinants, by customer class, used to calculate the forecast test period revenues.	Mr. Robert M. Meredith's Exhibit RMP__(RMM-5) contains the billing determinants, by rate schedule class, used to calculate the forecast test period revenues.
R746-700-20.C.1.e	Charges	Charges, fees, and rates used in the forecast development	Mr. Robert M. Meredith's Exhibit RMP__(RMM-5) contains the charges, fees, and rates used in the forecast development.
R746-700-20.C.1.f	Contract Changes	Contract changes or other specific changes anticipated in the forecast.	For Contract 1 and Contract 2, the percentage rate change is set at the overall average increase of 4.8 percent for Utah customers. For Contract 3, no change is included. Mr. Robert M. Meredith's Exhibit RMP__(RMM-5) contains the detailed billing determinants, assumptions and the calculation of the forecast revenues for the three special contract customers.
R746-700-20.C.2	Operating Costs	Operating Costs, using the same cost categories as used in the base period used for compliance with R746-700-10.A, with details supporting the test period operating cost information, including: (a-b)	Please see Steven R. McDougal Exhibit RMP__(SRM-3).

R746 Public Service Commission
Sub-Sections R746-700-10 through R726-700-23
Provisions for Complete Filing of General Rate Case
Rocky Mountain Power Docket 20-035-04

Reference ID	Topic	Requirement	Location in Filing
R746-700-20.C.2.a	Forecasts Relying on Escalators	Forecasted costs relying on escalators or drivers will include the details of the base costs and the key drivers that impact the forecasted amount. If forecasted costs are not based on historical levels that have been inflated or escalated, the applicant shall provide supporting documents in the most detailed level available.	Please see the Direct Testimony of Steven R. McDougal and Exhibit RMP_(SRM-3) which includes the base costs and key drivers that impact the test period. The December 2021 forecasted amount is based on historical levels and has been normalized for the test period, the twelve months ending December 31, 2021.
R746-700-20.C.2.b	Rate of Inflation	The information will identify the index or rate of inflation applied to accounts, budget items or specific cost components that result in adjusted costs in the forecasted test period. Source documents supporting the index or rate of inflation applied will be identified and will be provided or made available.	Please refer to the response provided in folder R746-700-22.B.5.b.
R746-700-20.C.3	Labor Costs	Labor Costs shall be identified separately. The applicant will provide: (a-f)	
R746-700-20.C.3.a	Full Time Employees	The actual most recent number of full-time equivalent employees and, separately, the forecasted number of full-time equivalent employees for the forecasted period. The most recent number of actual contract labor employees and the forecasted number of contract labor employees for the test period will also be provided as available and separately identified. The most recent number of actual union labor employees and the forecasted number of union labor employees for the test period will also be provided as available and separately identified.	Please refer to the response provided in folder R746-700-20.C.3.a.
R746-700-20.C.3.b	Associated Costs Related to Full Time Employees	The associated costs related to the full time equivalent labor and contract labor levels. Direct employees, contract employees, union and nonunion employees will each be provided separately.	Please refer to the response provided in folder R746-700-20.C.3.b. Please also refer to Direct Testimony of Steven R. McDougal Exhibit RMP_(SRM-3) Page 4.2.2. Contractor labor is not readily identifiable because all third party vendor costs are booked to the same accounts. The attachment includes costs related to contract labor as well as non-labor services.
R746-700-20.C.3.c	Labor Costs in Forecast	Overtime costs, premiums, incentives, or other labor costs included in the forecast, with each provided separately. Union and nonunion costs shall be provided separately.	Please refer to the response provided in folder R746-700-20.C.3.b. Please also refer to Direct Testimony of Steven R. McDougal Exhibit RMP_(SRM-3) Page 4.2.2.
R746-700-20.C.3.d	Salary and Wage Increases	Any assumed salary and wage increases included in the projected labor costs will be identified. Any of the increases supported by a union contract will be so identified.	Please refer to the response provided in folder R746-700-22.D.24.
R746-700-20.C.3.e	Benefit Components	Pensions and benefits, overheads or other employee benefit costs that are included in the forecast period. Each of the separate employee benefit components will be separately identified (i.e., medical, dental, pensions, etc.) Any assumptions regarding projected increases in such costs caused by factors other than changes in full time employee levels will be identified and described, with supporting assumptions identified.	Please refer to the response provided in folder R746-700-20.C.3.e. Please also refer to Direct Testimony of Steven R. McDougal Exhibit RMP_(SRM-3), Page 4.2.7.
R746-700-20.C.3.f	Pension Expense	If projected increases in pension expense cause a material cost impact, at a minimum, the following information should be provided for one year prior to the historical period through the test period: service cost, interest cost, expected return on assets, net amortization and deferral, amortization of prior service cost, and total net periodic pension cost. The information shall also include for each of the 12-month periods the expected long-term rate of return on assets, discount rate, salary increase	Please see R746-400-20.C.3.f.
R746-700-20.C.4	Capital Expenditures or Additions	Capital Expenditures or additions. The applicant will provide capital expenditures detail, and changes affecting rate base, including: (a-e)	
R746-700-20.C.4.a	Details for Changes	The detail for the changes, beginning with the start of the historic period results of operation through the test period. The detail will include dollar amounts and in-service dates.	Please refer to Exhibit RMP_(SRM-3), Adjustment 8.6 (Pro Forma Plant Additions and Retirements). Please refer to the Adjustment 8.5 work papers provided in R746-700-22.B.4.
R746-700-20.C.4.b	Depreciation Expense and Reserve Calculation	The detailed calculation of depreciation expense and accumulated depreciation impacts as a result of the capital expenditures affecting rate base. For depreciation expense, the information will include the balances by plant account or function, depending on how the projection is done, to which the depreciation rates are being applied and the respective depreciation rates being used, by account or function, depending on how the projection is done.	Please refer to Exhibit RMP_(SRM-3), Adjustments 6.1 and 6.2 (Depreciation and Amortization Expense and Depreciation and Amortization Reserve). Please refer to the Adjustment 6.1 and 6.2 work papers provided in R746-700-22.B.4.
R746-700-20.C.4.c	Interdependencies	Interdependencies of capital expenditures to operation and maintenance items will be identified.	This information is provided in folder R746-700-20.C.4.c.

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Reference ID	Topic	Requirement	Location in Filing
R746-700-20.C.4.d	List of Capital Additions	A list will be provided of all major capital additions to rate base individually exceeding \$1,000,000 or 0.01% of total company net plant in service, whichever is greater for each year, beginning with the year prior to the historic periodic reported year through the test period. Projects under \$1,000,000 shall be grouped in aggregate utilizing the utility's usual plant categorizations. A brief description will be provided for each major capital addition in the list.	This information is provided in folder R746-700-20.C.4.d.
R746-700-20.C.4.d.i	Description	Threshold: exceeding 0.1% of total company net plant in service or \$5,000,000, whichever is greater, for an electrical corporation,	Please refer to Exhibit RMP__(SRM-3), Adjustment 8.6 (Pro Forma Plant Additions and Retirements).
R746-700-20.C.4.e	Retirements	Detailed calculation of plant retirements.	Please refer to the response provided in R746-700-22.B.4, specifically the rate base and retirement spread sheet work papers provided.
R746-700-20.C.5	Regulatory Adjustments	The applicant will provide details of all the regulatory adjustments required in the filing: (a-c)	
R746-700-20.C.5.a	Information	Information for recurring regulatory adjustments, such as amortizations, indicating compliance with past Commission orders for any item included in the filing.	This information is provided in folder R746-700-20.C.5.a.
R746-700-20.C.5.b	Reversing Adjustment	Separately, a reversing adjustment and the reasons for non-inclusion or departure from a Commission ordered practice or adjustments if the applicant does not wish to have them apply to the application.	This information is provided in folder R746-700-20.C.b.
R746-700-20.C.5.c	Disallowances	Unless already included in unadjusted results, regulatory adjustment information will include disallowances from prior orders, implementation of accounting orders approved by the Commission, or other adjustments necessary to make the forecasted test period data acceptable for ratemaking in Utah. Each of the regulatory adjustments will be supported by prefiled testimony or a detailed description contained within the schedules.	Please refer to the Direct Testimony of Steven R. McDougal and Exhibit RMP__(SRM-3), sections 3 through 8 which provide a brief statement of the purpose of each adjustment included in the test year filing. Please also refer to all other filed revenue requirement exhibits.
R746-700-20.C.6	Other Rate Base	Details of other rate base accounts shall be provided by the applicant. For other items of rate base, such as deferred debits, accumulated deferred income taxes, materials and supplies, miscellaneous rate base, customer advances, deferred credits, etc., the applicant shall provide information showing the 12-month period of the historical results of operations, and any changes, both debits and credits, to those amounts through the test period resulting in the projected amount included in the filing. The information shall provide descriptions of any adjustments and modifications made to the historical period amounts and assumptions included in the projections. For any accounts in which no change from the historical level is proposed, a description of why the amount is not forecasted to change shall be included.	The information is provided in folder R746-700-20.C.6.
R746-700-20.C.7	Taxes	Forecasting methods, calculations and key assumptions used to adjust historical tax information to projected costs and results will be provided on a tax item basis (i.e., income, FICA, property taxes, etc).	The information is provided in folder R746-700-20.C.7.
Cost of Service and Rate Design Information R746-700-21			
R746-700-21.A	Utah Class Cost of Service Study	Utah Class Cost of Service Study	
R746-700-21.A.1	Test Period Class COS Study	A Utah Class Cost of Service Study based on the test period with supporting documentation including the development of allocation factors.	A Utah class cost of service study and supporting data for the test period is provided in Mr. Robert M. Meredith's Exhibit RMP__(RMM-3)
R746-700-21.A.2.	New Customer Class	If a new customer class is proposed, the applicant shall either	No new customer class was proposed in this proceeding.
R746-700-21.A.2.a	COS with existing classes and proposed classes	include class cost of service studies; one which uses only existing customer classes and another with the newly proposed class included, or	No new customer class was proposed in this proceeding.
R746-700-21.A.2.b	Explanation why new class not included	explain why no cost of service study including the new customer class is included and how the new customer class is to be treated in setting rates in the case.	No new customer class was proposed in this proceeding.
R746-700-21.B	Rate Spread	Its proposal for spreading any Utah revenue requirement change among the rate schedules. This will include the dollar and percentage revenue requirement change for each rate schedule.	Mr. Robert M. Meredith's Exhibit RMP__(RMM-4) contains the requested information.

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Reference ID	Topic	Requirement	Location in Filing
R746-700-21.C	Actual and Forecast Billing Determinants	Its proposed rates for each rate component of each rate schedule and the billing determinants for the test period for all rate components used to calculate revenues necessary to recover the proposed revenue requirement. An exhibit will be provided showing the test period blocking based on adjusted actual and forecasted billing units in the development of the revenues for each rate schedule.	Mr. Robert M. Meredith's Exhibit RMP__(RMM-5) contains the requested information.
R746-700-21.D	Tariff Sheets for Proposed Changes	Its proposed tariff sheets for all tariff provisions for which it proposes changes	This information is provided in Exhibit RMP__(RMM-14).
R746-700-21.D.1	When Tariff Sheets not Required	An applicant need not include proposed tariff sheets for changes to tariff pages showing rates, charges, or fees if these proposed price changes are provided in a readily identifiable form elsewhere in the application.	Mr. Robert M. Meredith's Exhibit RMP__(RMM-5) contains the proposed price changes in a readily identifiable form.
Additional Information - Forecasted Test Period R746-700-22		Must also file the following information when using a forecast Test Period (if it is not already included in the application).	
R746-700-22	Index	Provide an index which identifies where in the application, testimony, exhibits, documents, information, data, etc., filed with the application the applicant has responded to and complied with the R746-700-22 requirements. The index may be presented in testimony, as a table embedded in testimony, as an exhibit to testimony, or in any other manner so long as it is clearly identified.	This information is provided in the table provided as Attachment 1 to the Application in this Docket.
R746-700-22.B	Revenue Requirement Information		
R746-700-22.B.1	Forecasted Test Period Data	A comparison of the Test Period data Results of Operations (RO) to the Base Year actual, unadjusted RO and adjusted RO on both a jurisdictional and total company basis. This is to be made available in a side-by-side comparison on a consistent basis by FERC Account.	Please refer to Attachment R746-700-22.B.1
R746-700-22.B.2	Operating and Capital Budgets	A comparison of the utility's operating budget and capital budget to the actual results for the Base Year, the prior Historical Year, and To Date on a total company basis. This comparison is to be at the most detailed level available and provide available explanation for material variances.	This information is provided in confidential folder R746-700-22.B.2.
R746-700-22.B.3	Labor Costs	A comparison of budgeted labor costs and number of full-time equivalents to the actual labor costs and full-time equivalents by year for the Base Year and the prior Historical Year on a total company basis. These shall show separately, to the degree available, the direct labor costs, premiums, incentives, benefits and overhead costs. These shall show contract labor costs separately from direct labor costs, and union labor costs separate from nonunion costs. The information shall provide available explanations for material variances.	This information is provided in folder R746-700-22.B.3.
R746-700-22.B.4	Workpapers	The information shall provide the forecast workpapers (including assumptions, spreadsheets and tests).	This information is provided in folder R746-700-22.B.4.
R746-700-22.B.5	Forecasted Data - Revenue Requirement		
R746-700-22.B.5.a	Forecasted Data - Revenue Requirement - Support	Support and explanations for forecasted values, including Base Year starting values, adjustments made to the Base Year values and key drivers that impact the forecasts, together with supporting documents.	Please refer to the Direct Testimony of Steven R. McDougal and Exhibit RMP__(SRM-3).
R746-700-22.B.5.b	Forecasted Data - Revenue Requirement - Indices	Indices, inflation rates and escalation factors used in preparing forecasts, including supporting source documents.	The escalation factors used in preparing the forecast are provided in Confidential Exhibit RMP__(SRM-4) and Exhibit RMP__(SRM-3), Tab 4, Page 4.11.8.
R746-700-22.B.5.c	Forecasted Data - Revenue Requirement - Workbook	A revenue requirement workbook that tracks all input data beginning with the Base Year through the Test Period. This will provide summarized revenue requirement sections of the jurisdictional allocation model for the Base Year, the Test Period and any intervening year. The workbook and summaries are to include, inter alia, billing determinants, rate base and capital structure, including dollar capitalization, for the specified Years.	The test period revenue requirement workbook is provided as Exhibit RMP__(SRM-3).
R746-700-22.B.5.d	Forecasted Data - Revenue Requirement - NPC	Complete net power cost calculations for any intervening year between the Base Year and Test Period.	The Public Service Commission of Utah's March 6, 2020 Order in Docket 20-035-04 approved the Company's forecast test period of the 12 months ending December 31, 2021. Therefore, consistent with Utah Administrative Code R746-700-10(B), the Company has not prepared the alternative test period demonstration for the intervening year.
R746-700-22.B.6	Models	Workable versions of Models utilized in determining or projecting rate case values, with formulae intact and source data included, along with available instructions and write-ups regarding use of the Model and written descriptions of the Model and its inputs.	The information is provided in folder R746-700-22.B.6.

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Reference ID	Topic	Requirement	Location in Filing
R746-700-22.C	Cost of Service Information		
R746-700-22.C.1	Forecasted Data - Class Cost of Service	Class cost of service data on a Utah allocated basis under all approved jurisdictional allocation methods for the Base Year and Test Period.	Please see Attachment R746-700-22.C.1.
R746-700-22.C.2	Forecasted Data - Rate Design	Test Period rate design data on a Utah allocated basis under all approved jurisdictional allocation methods used for reporting purposes.	Mr. Robert M. Meredith's Exhibit RMP__(RMM-5) contains the test period rate design data.
R746-700-22.D	Miscellaneous Information		
R746-700-22.D.1	Accounting - Changes	A detailed description of Material changes in accounting policies or procedures adopted by the utility since the prior general rate case or as anticipated through the end of the Test Period. This will include a detailed description of the impact of change in accounting policy or procedure on the Test Period and identify the basis of the change.	Please refer to the response provided in folder R746-700-22.D.1.
R746-700-22.D.2	Accounting - Write-offs	A detailed description of Material write-offs of assets and/or liabilities from the start of the Base Year To Date that affect Utah revenue requirement. For each material write-off, the following will be provided: (a-e)	Please refer to the response provided in folder R746-700-22.D.2.
R746-700-22.D.2.a	Accounting - Write-offs - Journal Entry	Copy of the journal entry recording the write-off	Please refer to the response provided in folder R746-700-22.D.2.
R746-700-22.D.2.b	Accounting - Write-offs - Description	Detailed description of the purpose of the write-off	Please refer to the response provided in folder R746-700-22.D.2.
R746-700-22.D.2.c	Accounting - Write-offs - Studies/Reports	Copies of studies, reports or analyses done in determining whether or not to write off the asset	Please refer to the response provided in folder R746-700-22.D.2.
R746-700-22.D.2.d	Accounting - Write-offs - Amount	Amount of the write-off and identification of the accounts charged on a total Company and a Utah jurisdictional basis	Please refer to the response provided in folder R746-700-22.D.2.
R746-700-22.D.2.e	Accounting - Write-offs - Amount in Test Period	Amount included in the projected Test Period for write-offs, if any, on a total Company and a Utah jurisdictional basis, by account.	Please refer to the response provided in folder R746-700-22.D.2.
R746-700-22.D.3	Affiliates - Organizational Charts	For the Base Year and Test Period and continuing To Date, the affiliates organization chart for the utility including a clear indication of affiliates, parent companies, divisions and subsidiaries indicating their regulatory status.	Please refer to the response provided in folder R746-700-22.D.3.
R746-700-22.D.4	Affiliates - Restructurings and Changes	A detailed description of corporate restructurings and changes in affiliate relationships since the filing of the prior general rate case and also describe changes in the corporate and affiliate relationships between the Base Year and the end of the Test Period reflected in the filing.	Please refer to the response provided in folder R746-700-22.D.4.
R746-700-22.D.5	Affiliates - Contracts	A copy of Material new or Materially modified contracts or agreements entered into since the filing of the prior general rate case, including attachments thereto, if relevant to the costs the utility seeks to recover from Utah ratepayers through Utah regulatory operations or costs allocated or directly charged to Utah regulated operations included in the general rate case application, between the utility and/or its parent company and affiliated companies for services and/or goods rendered between or among them. This is to include a list of active contracts unless already provided in the most recent Affiliate Interest Report.	Please refer to the response provided in folder R746-700-22.D.5 and confidential folder R746-700-22.D5.4
R746-700-22.D.6	Affiliates - Cost Allocation	A copy of cost allocation manuals and/or policies and procedures that set forth the detailed cost allocation methodology and/or pricing methodology used to charge costs between affiliates that have changed since the filing of the prior general rate case.	Please refer to the response provided in folder R746-700-22.D.6.
R746-700-22.D.7	Audit - Financial - Journal Entries	A copy of each adjusting journal entry made in response to the utility's independent auditors' final recommendations in their most recent audit of the utility. Supporting documentation will be included. The information will also identify and provide adjusting journal entries included in the independent auditors' final recommendations that were not accepted by or made by the utility, along with a description of why the adjustment was not accepted or made.	There were no exceptions or proposed audit adjustments suggested by PacifiCorp's external, independent auditor for the period ending December 31, 2019.
R746-700-22.D.8	Audit - Financial - Management Letters	A copy of management letters received from the utility's independent auditors or responses to those management letters for the Base Year, the prior Historical Year and the period To Date.	The Company's independent auditors have not issued management letters for any of the requested periods.
R746-700-22.D.9	Audit - Financial - Audit Workpapers	If access to audit workpapers is allowed by the utility's independent auditor, the utility will coordinate review of the financial audit workpapers for the most recent completed financial audit conducted by the utility's independent auditors at a mutually agreed upon location. If access to workpapers is not allowed by the independent auditor, the utility will coordinate the review of the most recent quarterly review conducted by the utility's independent external auditors prepared for the utility's board of directors.	Review of the audit work papers will be allowed by the Company and its independent auditor. The Company will coordinate the review of audit work papers for the year ended December 31, 2019, the most recently completed financial statement audit. Please contact Jana Saba at 801-220-2823 so that she may coordinate issuance and signing of the necessary letters and schedule the audit work paper review.

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Reference ID	Topic	Requirement	Location in Filing
R746-700-22.D.10	Audit - Internal	A listing of internal audits conducted by or for the utility or its parent company for the Base Year, the prior Historical Year and To Date if relevant to the costs the utility seeks to recover from Utah ratepayers through Utah regulatory operations or the costs allocated or directly charged to Utah regulated operations included in the general rate case application. Notice of Internal Audit reports completed during the pendency of the case will be provided upon completion to all parties participating in the case.	Please refer to the response provided in R746-700-22.D.10.
R746-700-22.D.11	Board of Directors - Meeting Minutes	The Board of Directors' meeting minutes for the Base Year, the prior Historical Year and To Date for the utility and the parent company if relevant to the costs the utility seeks to recover from Utah ratepayers through Utah regulatory operations or the costs allocated or directly charged to Utah regulated operations included in general rate case filings for the same period.	Minutes of Board of Directors Meetings are highly confidential. The Company will make the redacted minutes available for review at PacifiCorp's offices subject to the terms and conditions of the protective order in this proceeding and requests special handling arrangements. Please contact Jana Saba at (801) 220-2823 to discuss arrangements for review.
R746-700-22.D.12	Budget - Detailed Copies	Complete copies of detailed annual operating and capital budgets for the Base Year through the end of the Test Period.	PacifiCorp plans on a 10-year cycle, the most recent plan covering the fiscal periods of 2020 through 2029. The Company considers this information to be highly confidential. The Company will make the plan available for review at PacifiCorp's offices subject to the terms and conditions of the protective order in this proceeding and requests special handling arrangements. Please contact Jana Saba at (801) 220-2823 to discuss arrangements for review.
R746-700-22.D.13	Budget - Instructions	Copies of operating and capital budget instructions and directives provided to employees, including assumptions, directives, manuals, policies and procedures, timelines, and descriptions of budget procedures for the budget or forecast for the Test Period and To Date.	Please refer to the response provided in folder R746-700-22.D.13.
R746-700-22.D.14	Budget - Operating Plans	If available, copies of written operating plans that describe the utility's goals and objectives for the Base Year through the end of the Test Period.	Please refer to the response provided in confidential folder R746-700-22.D.14.
R746-700-22.D.15	Budget - Variance	A complete copy of quantitative and narrative monthly, quarterly and annual comparisons of operating and capital budgets to actual expenditures for the Base Year, the prior Historical Year, and for the period from the Base Year To Date.	This information is provided in confidential folder R746-700-22.B.2.
R746-700-22.D.16	Cost of Capital - Debt Expense - Forecast Financing	The currently forecasted financings for the next three years.	Please refer to the response provided in Confidential folder R746-700-22.D.16.
R746-700-22.D.17	Cost of Capital - Debt Expense - Monthly Balance	The monthly balance of short-term debt and monthly short-term debt cost rates, for the Base Year, the prior two Historical Years and To Date.	Please refer to the response provided in folder R746-700-22.D.17.
R746-700-22.D.18	Cost of Capital - Bond Rating	Copies of the most recent bond rating agencies reports on the Company.	Please refer to the response provided in folder R746-700-22.D.18.
R746-700-22.D.19	Employee Costs - Gross Payroll and Benefits	A breakdown of the total amount of gross payroll and employee benefit costs (by benefit type) for the Base Year, the prior Historical Year and through the end of the Test Period between amounts expensed and amounts capitalized and provide the percentage of payroll and employee benefits (by benefit type) charged to expense for each Year.	Please refer to the response provided in folder R746-700-22.D.19.
R746-700-22.D.20	Employee Costs - Overtime and Premium Pay	For the Base Year, the prior Historical Year, To Date and for the Test Period, the amount of overtime, the amount of premium pay, the amount of other salary/labor costs and the amount of incentive compensation in total and expensed for each.	Please refer to the response provided in folder R746-700-22.D.20.
R746-700-22.D.21	Employee Costs - Compensation and Benefit Studies	A list of compensation and benefit studies the utility has for the Base Year, the prior Historical Year and To Date and indicate which of the studies were used (if any) in projecting the compensation and employee benefit costs for the Test Period.	Please refer to the response provided in folder R746-700-22.D.21.
R746-700-22.D.22	Employee Costs - Employee Level - Description	Describe, in detail, Material employee reductions, employee severance plans, or early retirement programs conducted or anticipated by the utility during the Base Year, the prior Historical Year, and To Date and as projected through the end of the Test Period that are and are not reflected in the application. If anticipated, but not reflected in the application, explain why they are not included. This should provide information on major plans or programs beyond cost management efforts undertaken in the normal course of business. This should include, but not be limited to, a detailed description of the plan, number of employees offered or projected to be offered early retirement or severance, number of employees accepting or projected to accept early retirement or severance, projected cost savings and costs associated with the program. For costs incurred, identify the amounts, by FERC account, and the dates the entries were booked.	The Company has not made and has no plans to commence a material reduction in workforce, incur material severance or provide early retirement programs during the base year, prior historical year, or through the end of the test period.
R746-700-22.D.23	Employee Costs - Employee Level - List of Employees	Separate lists of the budgeted and the actual number of employees (where available), by month, for the Base Year, the prior Historical Year, the Test Period and To Date. If the labor force levels are other than full-time equivalent positions, provide a separate listing stated in terms of full-time equivalent positions.	Please refer to the response provided in R746-700-22.D.23.
R746-700-22.D.24	Employee Costs - Wages and Salaries Levels	The actual percentage of increases in salaries and wages for exempt, non-exempt and union employees for the Base Year, the prior Historical Year, Test Period and To Date.	Please refer to the response provided in folder R746-700-22.D.24.

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Reference ID	Topic	Requirement	Location in Filing
R746-700-22.D.25	Employee Costs - Incentive Plans	Complete copies of bonus programs or incentive award programs in effect for the utility for the Base Year, the prior Historical Year, the Test Period and To Date. Identify incentive and bonus program expenses incurred in the Base Year, the prior Historical Year, the Test Period and To Date and identify the amounts included in the Test Period. Identify the accounts charged. Identify incentive and bonus program expenses charged or allocated to the utility from affiliates or the parent company in the Base Year, the prior Historical Year, the Test Period and To Date.	Please refer to the response provided in folder R746-700-22.D.25.
R746-700-22.D.26	Employee Costs - Benefits	A listing of health and other benefits received by employees during the Base Year. Provide a detailed description of changes to employee benefits occurring subsequent to the Base Year To Date and anticipated future changes through the end of the Test Period that are reflected in the filing.	Please refer to the response provided in folder R746-700-22.D.26.
R746-700-22.D.27	Employee Costs - Pensions	The two most recent pension actuarial reports prepared for the utility.	Please refer to the response provided in confidential folder R746-700-22.D.27.
R746-700-22.D.28	Employee Costs - PBOP Actuarial Reports	Post Retirement Benefits Other Than Pensions (PBOP). The two most recent PBOP actuarial reports prepared for the utility.	Please refer to the response provided in confidential folder R746-700-22.D.28.
R746-700-22.D.29	Employee Costs - PBOP Assumptions	The list of assumptions used by the utility and its actuaries regarding the pension and PBOP costs for the Test Period that are included in the filing.	Please refer to the response provided in folder R746-700-22.D.29.
R746-700-22.D.30	OMAG Expenses - Contributions	For the Base Year and the Test Period, a list of contributions for charitable and political purposes, if any, included in accounts other than below the line. Indicate the amount of the expenditure, the recipient of the contribution, and the specific account in which the expense is included in the filing. Also identify for the Base Year and the Test Period the amounts of contributions for charitable and political purposes charged to the utility from affiliates in accounts other than below the line accounts.	Please refer to the response provided in folder R746-700-22.D.30.
R746-700-22.D.31	OMAG Expenses - Advertising	For the Base Year, the prior Historical Year and the Test Period the amount of advertising expense, by account, by type of advertising (i.e., informational, instructional, promotional).	Please refer to the response provided in folder R746-700-22.D.31.
R746-700-22.D.32	OMAG Expenses - Dues, Industry Associations	The Material amounts included in the Base Year, the prior Historical Year and the Test Period for above-the-line payments to industry associations. Identify the organization/association name and amounts, along with the account in which the costs are included in the filing. If any of the dues or other amounts paid to the organizations/associations go toward lobbying and public relations efforts and are recorded in above-the-line accounts, provide the associated amounts included in the above-the-line accounts whether Material in magnitude or not.	Please refer to the response provided in folder R746-700-22.D.32.
R746-700-22.D.33	OMAG Expenses - Outside Services Expense	An itemization of Material outside services expenses included in FERC account 923 for the Base Year, the prior Historical Year and the Test Period.	Please refer to the response provided in folder R746-700-22.D.33.
R746-700-22.D.34	OMAG Expenses - Injuries and Damages	The amount of injuries and damages expense for the Base Year, the prior Historical Year, the Test Period and To Date.	Please refer to the response provided in folder R746-700-22.D.34.
R746-700-22.D.35	OMAG Expenses - Insurance - Amount	The amount of insurance expense, by insurance type (i.e., property insurance, liability insurance, workers compensation, directors and officers liability insurance, etc.) for the Base Year, the prior Historical Year and the Test Period and identify the accounts the associated costs are included in.	Please refer to the response provided in folder R746-700-22.D.35.
R746-700-22.D.36	OMAG Expenses - Insurance - Self Insurance	For insurance coverage for which the utility is self-insured, a description of that self insurance, a description of how it is accounted for in the utility's books and records and a description of activity for the Base Year, the prior Historical Year and the Test Period.	Please refer to the response provided in folder R746-700-22.D.36.
R746-700-22.D.37	OMAG Expenses - Legal Settlements	A list of Material amounts included in the Base Year and the Test Period (on a direct charge basis, affiliate billing, or allocation) that are the result of the settlement of lawsuits or other legal action.	Please refer to the response provided in folder R746-700-22.D.37.
R746-700-22.D.38	OMAG Expenses - Uncollectible - Bad Debt Reserve	For the Base Year, the prior Historical Year and the Test Period the beginning bad debt reserve balance, the amount written off, the recoveries, the reserve adjustment, other charges or credits, and the ending reserve balance. For the same periods, provide the total amount of retail revenue from retail sales and total retail bad debt expense.	Please refer to the response provided in folder R746-700-22.D.38.
R746-700-22.D.39	OMAG Expenses - Uncollectible - Policies	A detailed description of changes in the utility's collection policies or write-off policies since the filing of the prior general rate case.	Please refer to the response provided in folder R746-700-22.D.39.
R746-700-22.D.40	OMAG Expenses - Cost Saving Programs	A list and detailed description of cost-saving or cost increasing programs and initiatives implemented during the Base Year, To Date, and included in the Test Period. This should provide information on major plans or programs beyond efforts undertaken in the normal course of business and having a Material impact.	Please refer to the response provided in folder R746-700-22.D.40.

**R746 Public Service Commission
Sub-Sections R746-700-10 through R726-700-23
Provisions for Complete Filing of General Rate Case
Rocky Mountain Power Docket 20-035-04**

Reference ID	Topic	Requirement	Location in Filing
R746-700-22.D.41	Financial - Strategic Plans	Copies of completed strategic plans and the most recent plan approved by the Board of Directors for the utility and the plan that was utilized at the time of and in the preparation of its application, if different.	PacifiCorp's 10-year financial plan is highly confidential. The Company will make the plan available for review at PacifiCorp's offices subject to the terms and conditions of the protective order in this proceeding. Please contact Jana Saba at 801-220-2823 to discuss arrangements for review.
R746-700-22.D.42	Penalties and Fines	A list of penalties and fines in the Base Year and the Test Period and indicate in which accounts the associated amounts are included.	There are no penalties or fines in the base period or the test period recorded above the line.
R746-700-22.D.43	Rate Base - Working Capital	A complete copy of the lead/lag study, with supporting workpapers, used to compute cash working capital for the utility's application.	Please refer to the response provided in folder R746-700-22.D.43.
R746-700-22.D.44	Reserve Accounts	Information on whether or not the utility maintains reserve accounts (e.g., an injuries and damages reserve account). If so, provide the monthly balances in reserve accounts for the Base Year, the prior Historical Year, the Test Period and To Date. This listing should include the monthly debits and credits to the reserve accounts. Also, provide the amount included in the Base Year and the projected Test Period expenses, by account, for building-up the reserve balances.	Please refer to the response provided in folder R746-700-22.D.44.
R746-700-22.D.45	Revenues - Regulated Retail Sales	Provide by customer class, by month, the number of customers, actual usage, and normalized usage for the Base Year, the prior Historical Year, the Test Period and To Date.	Please refer to the response provided in folder R746-700-22.D.45.
R746-700-22.D.46	Revenues - Other	Provide on a total company and a Utah jurisdictional basis, for the Base Year, the prior Historical Year, the Test Period and To Date the amount of other no regulated-retail-sales revenues by revenue type.	Please refer to the response provided in folder R746-700-22.D.46 and Exhibit RMP_(SRM-3)
R746-700-22.D.47	Sales of Property	For the Base Year, the prior Historical Year, the Test Period and To Date, information showing whether the utility sold property, in which the proceeds for a property, which alone, or for multiple properties, which in the aggregate, would be Material. If so, for each such sale identify the property sold; whether, when, and in what manner it was included in rate base; show details of how the gain or loss was calculated; indicate when the sale occurred; and explain how and whether the utility is treating such gain or loss in its application. For sales in which the proceeds would be Material, individually or in the aggregate, provide a list of any properties currently offered for sale and those projected to be offered for sale through the end of the Test Period. The property sales information may be limited to sales of property that had been or are included in Utah rates while in service.	Please refer to the response provided in folder R746-700-22.D.47.
R746-700-22.D.48	Taxes - Income - Correspondence IRS	A list of and provide copies or make available for review, subject to R746-100-16, an appropriate protective order, confidentiality agreement, or other confidentiality protective arrangement, depending on specific content, revenue ruling requests, IRS responses, and correspondence between the utility and the IRS since the filing of the prior rate case.	Please refer to the response provided in folder R746-700-22.D.48.
R746-700-22.D.49	Taxes - Income - Tax Returns	Provide copies or make available for review, subject to R746-100-16, an appropriate protective order, confidentiality agreement, or other confidentiality protective arrangement, copies of the most recent State and Federal income tax returns in which the utility participated.	Please refer to the response provided in folder R746-700-22.D.49.
R746-700-22.D.50	Taxes - Income - Tax Sharing Agreement	Provide a copy of the current tax sharing agreement in which the utility participates.	Please refer to the response provided in confidential folder R746-700-22.D.50.
Additional power costs information for a forecasted test period R746-700-23			
R746-700-23.A		An electrical corporation that has included power costs in a forecasted test period shall also file with the Commission the following information or documents relating to its power cost projections with a general rate case application. An applicant will provide an index which identifies where in the application, testimony, exhibits, documents, information, data, etc. filed with the application the applicant has responded to and complied with these R746-700-23 rule requirements. The index may be presented in testimony, as a table embedded in testimony, as an exhibit to testimony, or in any other manner so long as it is clearly identified. Contemporaneously with the filing of an application, an electrical corporation shall provide the following information and documents to the parties specified in R746-700-1.E.3, unless the information or document is already included in or with the application.	The index is found in this table, which is provided as Attachment 1 to the Application in this docket.

**R746 Public Service Commission
Sub-Sections R746-700-10 through R726-700-23
Provisions for Complete Filing of General Rate Case
Rocky Mountain Power Docket 20-035-04**

Reference ID	Topic	Requirement	Location in Filing
R746-700-23.B		All information should be provided or available electronically and, in the case of Excel spreadsheets, with all formulas intact including all hierarchy of linked spreadsheets. The term "PCM" herein refers to any power cost model used by the utility, or any subsequent enhancements to or replacements of the power cost model used in the utility's last prior general rate case. The term "workpapers" means the documents used to develop the inputs to the PCM. This may include such items such as contracts, emails, white papers, studies, utility computer programs, Excel spreadsheets, word process documents, pdf and text files, computer programs, or any other data or documents relied upon to support the cost details in the application. If the inputs used in the PCM were developed from a document, such as a contract, provide the contract with the PCM inputs highlighted.	
R746-700-23.C	Power Cost Modeling Data:	Power Cost Modeling Data:	
R746-700-23.C.1	Workpapers	Workpapers that show the source, calculations and details supporting the testimony, other exhibits and all PCM input data. The workpapers will include, at a minimum, copies of the net power cost report in Excel and the net power cost model database.	Please refer to the response provided in confidential folder R746-700-2.C.1.
R746-700-23.C.2	Time Periods	Identification of the time periods (Reference Period) used to determine input items (e.g., outage rates) in the PCM which are based upon an examination, average, etc. of a multi-year period.	Please refer to the response provided in folder R746-700-2.C.1.
R746-700-23.C.3	Actual Net Power Costs	Compilations of actual net power costs produced by the utility that were referenced in the testimony or exhibits, to the extent that actual power cost results are discussed or cited in the utility's testimony or exhibits.	The Company has not discussed or cited actual net power costs (NPC) in the testimony or exhibits to this general rate case (GRC) proceeding.
R746-700-23.C.4	Modeling Logic	A list and explanation of all modeling or logic changes or enhancements to the PCM that have been implemented since the last prior general rate case. This will include a statement of the direction and amount of change in net power costs resulting from each such change and documentation describing each Material change as well as PCM runs and workpapers quantifying the impacts of these changes.	Please refer to the response provided in folder R746-700-2.C.4.
R746-700-23.C.5	PCM Model	Access to or a copy of the PCM model used by the utility to compute power costs in the Test Period.	Please refer to the response provided in R746-700-22.b.6.
R746-700-23.C.6	Model Documentation	The latest documentation for the PCM..	Please refer to the response in folder R746-700-2.C.6 which provides the latest documentation for the net power cost model (PCM), the Generation and Regulation Initiative Decision Tool (GRID). Note: the "Internet Access Guide" is in the process of being updated. The Company will supplement this filing requirement response with the updated version as soon as it becomes available. This information is confidential and will be available to parties who request it and who have executed Exhibit A certifying that they agree to be bound by Utah PSC Rule 746-100-16.
R746-700-23.C.7	Topology	The current topology maps in the PCM along with an explanation for all the differences that have been made to the topology since the last prior general rate case and an explanation of why the changes were made. Include supporting documentation, such as contracts resulting in changes to the transfer capabilities used in the PCM.	Please refer to the response provided in confidential folder R746-700-2.C.7.
R746-700-23.C.8	Documents & Workpapers	All documents, workpapers, data or other information used by the utility in determining, setting, or calculating any PCM input, constraint, etc., including, but not limited to, where applicable:	Please refer to the response provided in confidential folder R746-700-2.C.8.
R746-700-23.C.8.a	Market Caps	market caps,	Please refer to Confidential Attachment R746-700-23.C.8 -1, specifically the file referenced below: "UTGRC20_Market Capacity MAR20 CONF.xlsx".
R746-700-23.C.8.b	Outages	outage rates (planned and unplanned) including all backup data showing each outage (planned or unplanned, etc.) and duration (planned or unplanned) considered in the Reference Period, including NERC cause code, type of event, duration, energy lost, etc.,	Please refer to Confidential Attachment R746-700-23.C.8 -1, specifically the files referenced below and files linked to those files: Forced outage rates: "UTGRC20_EOR CONF.xlsx" Planned outage rates: "UTGRC20_Planned Outages CONF.xlsx" Outage events: "UTGRC20w_48mo_Evts_Backup_2016-2019 CONF.xlsx"

**R746 Public Service Commission
Sub-Sections R746-700-10 through R726-700-23
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Reference ID	Topic	Requirement	Location in Filing
R746-700-23.C.8.c	Forward Price Curve	the date and a copy of any forward price curve used, showing monthly heavy load hour and light load hour,	Please refer to Confidential Attachment R746-700-23.C.8 -1, specifically the file referenced below: "UTGRC20w_Market Price Index (1912) CONF.xlsx"
R746-700-23.C.8.d	Short-term Firm Transactions	short-term firm transactions (including short-term firm indexed transactions and swaps), each transaction or contract will have a designation as to its purpose (i.e., trading, arbitrage or balancing.),	Please refer to Confidential Attachment R746-700-23.C.8 -1, specifically the files referenced below: "UTGRC20_STF (1912) MAR20 CONF (2020-2023).xlsx" and "UTGRC20w_Gas Swaps (1912) MAR20 CONF.xlsx."
R746-700-23.C.8.e	New Contracts	all contracts modeled in the PCM that were not included in or have been amended since the last prior general rate case, providing for each:	Please refer to the response provided in confidential folder R746-700-2.C.8.e.
R746-700-23.C.8.e(i)	Copy of Contracts	A copy of the contract (in pdf or electronic format, if available), and	Please refer to the response provided in confidential folder R746-700-2.C.8.e.
R746-700-23.C.8.e(ii)	Input Assumptions	input assumptions related to the contract,	Please refer to the response provided in confidential folder R746-700-2.C.8.e.
R746-700-23.C.8.f	Fuel Costs	all fuel cost inputs,	Please refer to the response provided in confidential folder R746-700-2.C.8.f.
R746-700-23.C.8.g	Heat Rate Curves	heat rate curves for each resource, including the derivation of the heat rate curves,	Please refer to the response provided in confidential folder R746-700-2.C.8.g.
R746-700-23.C.8.h	Changes in Capacity	identification of each instance in which the utility changed any maximum capacities, minimum up or down times or unit minimum capacities for thermal or hydro generators modeled in the PCM since the last prior general rate case,	Please refer to the response provided in folder R746-700-2.C.8.g.
R746-700-23.C.8.i	Load Adjustments	each load adjustment,	Please refer to Confidential Attachment R746-700-23.C.8 -1, specifically the files referenced below, and files linked to those files: Delivery Point: "UTGRC20_Delivery Points CONF.xlsx" Demand: "UTGRC20_Demand CONF.xlsx"
R746-700-23.C.8.j	QF Contracts	inputs for Qualifying Facility or QF contracts,	Please refer to Confidential Attachment R746-700-23.C.8 -1, specifically the files referenced below, and files linked to those files: Delivery Point: "UTGRC20_Delivery Points CONF.xlsx" Demand: "UTGRC20_Demand CONF.xlsx" Demand Charge: "UTGRC20_Demand Charge CONF.xlsx" Energy Charge: "UTGRC20_Energy Charge (1912) CONF.xlsx" Equivalent Outage Rate (EOR): "UTGRC20_EOR CONF.xlsx" Other Cost: "UTGRC20_OtherCost (1912) MAR20 CONF.xlsx" The Energy Charge calculations for the Sunnyside qualifying facility (QF) power purchase agreement (PPA) are highly confidential. The Company requests special handling. Please contact Jana Saba at (801) 220-2823 to make arrangements for review.

**R746 Public Service Commission
Sub-Sections R746-700-10 through R726-700-23
Provisions for Complete Filing of General Rate Case
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Reference ID	Topic	Requirement	Location in Filing
R746-700-23.C.8.k	Screens	screens applied to restrict uneconomic dispatch of resources,	Please refer to Confidential Attachment R746-700-23.C.8 -1, specifically the files referenced below, and files linked to those files: Gadsby: "UTGRC20s Screen - 1 GAD CONF.xlsx" Naughton 3 - Gas: "UTGRC20s Screen - 2 NTN3gas CONF.xlsx" Gadsby Peakers – Combustion Turbine (CT): "UTGRC20s Screen - 3 GADCT 3x1 CONF.xlsx" Currant Creek: "UTGRC20s Screen - 4 CC CONF.xlsx" Lake Side 1: "UTGRC20s Screen - 5 LS1 CONF.xlsx" Lake Side 2: "UTGRC20s Screen - 6 LS2 CONF.xlsx" Chehalis: "UTGRC20s Screen - 7 CHE CONF.xlsx" Hermiston 1: "UTGRC20s Screen - 8 HRM1 CONF.xlsx" Hermiston 2: "UTGRC20s Screen - 9 HRM2 CONF.xlsx"
R746-700-23.C.8.l	Start-up Fuel	start up fuel costs, start up O&M costs and any other form of start up costs modeled,	Please refer to Confidential Attachment R746-700-23.C.8 -1, specifically the file referenced below: "UTGRC20s_Startup Costs (1912) CONF.xlsx"
R746-700-23.C.8.m	Historical and Test Period Loss Factors	loss factor data used to develop the load forecast for the system and for each state for the most recent five calendar years and for the most recent five fiscal years; include a comparison of those loss factors to those that were used in developing loads for the PCM for the test period used in the case,	Please refer to the response provided in folder R746-700-2.C.8.m.
R746-700-23.C.8.n	System Losses used in Other Jurisdictions	the system level loss factors assumed in any PCM used in the most recent (or current) rate cases for any other jurisdiction in which the utility operates,	Please refer to the response provided in folder R746-700-2.C.8.n.
R746-700-23.C.8.o	Actual Generation	the actual generation of each coal, gas, hydro and wind generating unit modeled in the PCM for each month for the Reference Period,	Please refer to the response provided in confidential folder R746-700-2.C.8.p.
R746-700-23.C.8.p	Hourly Generation Logs	hourly generator logs for each wind, coal, gas and hydro unit modeled in the PCM for the Reference Period,	Please refer to the response provided in confidential folder R746-700-2.C.8.p.
R746-700-23.C.8.q	Schedule of Planned Outages	the schedule for each generation unit's planned and actual outages for the test period, the most recent calendar year and the next four calendar years,	Please refer to the response provided in confidential folder R746-700-2.C.8.q.
R746-700-23.C.8.r	Contract Hourly Logs	hourly logs for all contracts modeled in the PCM, showing actual data (hourly sales or purchases) for the Reference Period,	Please refer to the response provided in confidential folder R746-700-2.C.8.r.
R746-700-23.C.8.s	Details of Short-term and Non-firm Transmission	the details of Short Term Firm and Non-Firm transmission used by the utility during the Reference Period.	Please refer to Confidential Attachment R746-700-23.C.8, specifically the file referenced below for Short Term Firm and Non-Firm transmission transactions that the Company has entered into during the Reference Period (48-months ended December 31, 2019): "UTGRC20w_Short Term Transmission (2016-2019) CONF.xlsx"
R746-700-23.C.8.t	Description of Transmission Contracts	for each of the transmission contracts whose costs are included in the PCM, identify the purpose of the transaction, why it is used and useful in the test period, the amount of capacity or type of transmission service it provides, and where the capacity or service provided by this contract is modeled in the PCM,	Please refer to Confidential Attachment R746-700-23.C.8, specifically the tab entitled "Wheeling purpose" in the file referenced below: "UTGRC20w_Wheeling CONF.xlsx"
R746-700-23.C.8.u	Transmission Imbalance Transactions	data for the Reference Period or for the most recent four years available for all third party transmission imbalance transactions that have been included in Short Term Firm or secondary transactions during that period,	Please refer to the response provided in folder R746-700-2.C.8.u.
R746-700-23.C.8.v	Links and inputs for Short-term and Non-firm Transmission	any links and other inputs for Short Term Firm (including any related to SP 15) and Non-Firm transmission modeling used in the PCM,	Please refer to the Company's response to Filing Requirement R746-700-23-C.8.s.
R746-700-23.C.8.w	Hydro Outages	the hydro planned and unplanned outage rate,	For the hydro planned and unplanned outages rates used in the filing, please refer to Confidential Attachment R746-700-23.C.8, specifically the file referenced below: "UTGRC20w_Hydro Forced and Planned Outage (48 month Dec 2019)"

**R746 Public Service Commission
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Reference ID	Topic	Requirement	Location in Filing
R746-700-23.C.8.x	Ramping Adjustments	to the extent that the utility uses any ramping adjustment in its case, information describing and detailing all ramping adjustments made (including all ramping energy assumed to be lost for each outage event modeled in the ramping analysis).	Please refer to the response provided in confidential folder R746-700-2.C.8.x.
R746-700-23.C.8.y	Wind Integration	the costs of wind integration as modeled in the PCM, and	Please refer to the response provided in confidential folder R746-700-2.C.8.y.
R746-700-23.C.8.z	Hedging Contracts	hedging contracts, already in place and those assumed for forecasting purposes.	Please refer to Confidential Attachment R746-700-23.C.8, specifically the files referenced below: “UTGRC20_STF (1912) MAR20 CONF (2020-2023).xlsx” “UTGRC20w_Gas Swaps (1912) MAR20 CONF”

Attachment 2

List of Miscellaneous Commitments from Other Dockets
 Rocky Mountain Power Docket No. 20-035-04

Docket No.	Reference	Description	Location in Filing
13-035-184	June 25, 2014 Stipulation, Paragraph 40, part a	Workpapers for blanket capital additions greater than \$1m	Filing Requirement R746-700-22.B.4, 2. Rate Base Templates, "Tab 8PT - Rate Base Template UT GRC Dec21 .xlsx"
13-035-184	June 25, 2014 Stipulation, Paragraph 40, part b	Capital addition data base	Filing Requirement R746-700-22.B.4, 2. Rate Base Templates, "UT GRC Capital Database Jan 2020 to Dec 2021.xlsx"
13-035-184	June 25, 2014 Stipulation, Paragraph 43	Actuarial updates	Exhibit RMP (SRM-3), Pages 4.2.12 through 4.2.14
13-035-184	June 25, 2014 Stipulation, Paragraph 44	Marginal cost of service study	Exhibit RMP (RMM-15)
16-035-03	June 8, 2016 Correspondence Letter	Procurement Policy updates	Redline and clean copies are attached hereto

Procurement Policy

~~June 8, 2016~~ April 16, 2018, 2018

Section 1 Introduction

PacifiCorp's procurement policy provides for obtaining goods and services at the lowest evaluated cost, consistent with business objectives including, but not limited to, safety, service, technical performance, sustainability, and schedule requirements.

Section 2 Purchase of Goods and Services

PacifiCorp utilizes one or more competitive processes to obtain the best value for customers in the procurement of goods and services required for the provision of safe, cost effective, and reliable power. These processes rely on fair and open competition among qualified suppliers to provide the goods and services required to satisfy business requirements. These ensure that suppliers are treated fairly and equitably. The following requirements are in place to ensure that the company's procurement objective of obtaining the best value for the company is met:

- ▶ All purchases estimated to be \$5,000 or greater (total cost of item or service, i.e. inclusive of taxes and freight) per transaction or in aggregate during a month require consultation with procurement.
- ▶ Purchases in excess of ~~\$210,000~~ must be selected through a documented competitive solicitation process. The competitive solicitation requirements can be through informal means and will be satisfied when documented price quotes are ~~obtained-solicited~~ from at least ~~three~~ suppliers with deviations documented on a case by case basis.
- ▶ Purchases of \$50,000 or more require a formal, competitive solicitation process. This will typically involve issuing a Request for Proposal (RFP), where competitive proposals are solicited from ~~three~~ or more qualified suppliers. Pricing and other factors are evaluated on a best value basis utilizing predetermined evaluation criteria designed and weighted to determine best value. The formal, competitive solicitation process must be documented and controlled in accordance with established procedures. Competitive procedures involving requests for bids, qualifications and other contractor submittals may also be used where consistent with this Policy.

Section 3 Affiliated Company Purchases

Any potential affiliate transactions must be reviewed by general counsel and regulation prior to entering into any business transaction to ensure compliance with all affiliate filing requirements.

Section 4 Exceptions and Exclusions

4.1 Exceptions

When impossible or impractical, or when it otherwise can be demonstrated to be in the best interest of the company and its customers, a supplier may be awarded a contract on a non-competitive or sole source basis. This situation may arise when the professional or technical expertise of services is of such a unique nature, or the goods or services are not readily available in the open marketplace from other sources, such that one contractor or supplier is clearly and justifiably the only source. Following are the primary exceptions to the competitive bid policy:

▶ **Emergency conditions**

Emergency conditions are unscheduled, unforeseen, and unexpected situations when action must be taken to prevent adverse financial impact or impairment to customer service, to prevent injury, loss of life, or damage to capital assets. In these instances, a single contractor/supplier may be requested to provide the necessary goods or services.

▶ ~~**Technical standards**~~

~~To promote reliability and efficiency, the company has developed various technical standards that may be satisfied by only one supplier. There are instances in which only a specific supplier can provide needed goods and/or services.~~

▶ **Only known supplier**

Occasionally there are situations when only one supplier is known to provide the required goods or services. This generally results when the supplier has required proprietary or intellectual property rights built into the product or service. Professional services are especially subject to this qualification.

▶ **Customer requested**

An external customer may request that a certain supplier, manufacturer or contractor be utilized for projects that they are funding or for work required on the customer's property or right-of-way.

▶ **Business required**

There are other limited circumstances where a compelling business reason may require an exception.

4.2 Exclusions

The following are exclusions to this policy, procurement procedures and bidding requirements generally because of the uniqueness of the transaction.

- ▶ Commercial & trading (purchase/sale of power, ancillary and other services)**



- ▶ Customer services (CSS pass through payments, CSS refunds to customer, franchise and sales tax)
- ▶ Donations and contributions
- ▶ Facilities and real estate (easements, permits, leases/land payments, and right of way)**
- ▶ Fuel resources (coal and gas purchases, steam royalties, coal and gas transportation)**
- ▶ Government (federal, state, city and local taxes, PSC/PUC, FERC, low income)
- ▶ Joint ownership (purchases at jointly owned plants where PacifiCorp is not the plant operator)**
- ▶ Legal services (litigation, expert services, discovery services, outside legal counsel, registered agents)
- ▶ Lobbying
- ▶ Organization dues and memberships
- ▶ Payroll, benefits and staffing (payroll, 401k and pension funding, benefit plans and administration, employee travel and events, employment agreements)**
- ▶ Postage
- ▶ Risk (forensic investigations)
- ▶ Settlements (damage claims, other settlements)**
- ▶ State or federal mandated programs (Blue Stakes, One Call Center, Tribal requirements, hydro licensing, Energy Trust of Oregon)
- ▶ Subscriptions
- ▶ Treasury (Debt issuance, prospectus preparation)**
- ▶ Utilities (telephone, water, sewer, electricity, gas, garbage, cable, satellite)

**The company business unit responsible for the excluded item has a competitive or other commercially appropriate method to purchase these items in a least cost and/or least risk manner.

Procurement Policy

April 16, 2018

Section 1 Introduction

PacifiCorp's procurement policy provides for obtaining goods and services at the lowest evaluated cost, consistent with business objectives including, but not limited to, safety, service, technical performance, sustainability, and schedule requirements.

Section 2 Purchase of Goods and Services

PacifiCorp utilizes one or more competitive processes to obtain the best value for customers in the procurement of goods and services required for the provision of safe, cost effective, and reliable power. These processes rely on fair and open competition among qualified suppliers to provide the goods and services required to satisfy business requirements. These ensure that suppliers are treated fairly and equitably. The following requirements are in place to ensure that the company's procurement objective of obtaining the best value for the company is met:

- ▶ All purchases estimated to be \$5,000 or greater (total cost of item or service, i.e. inclusive of taxes and freight) per transaction or in aggregate during a month require consultation with procurement.
- ▶ Purchases in excess of \$10,000 must be selected through a documented competitive solicitation process. The competitive solicitation requirements can be through informal means and will be satisfied when documented price quotes are solicited from at least three suppliers with deviations documented on a case by case basis.
- ▶ Purchases of \$50,000 or more require a formal, competitive solicitation process. This will typically involve issuing a Request for Proposal (RFP), where competitive proposals are solicited from three or more qualified suppliers. Pricing and other factors are evaluated on a best value basis utilizing predetermined evaluation criteria designed and weighted to determine best value. The formal, competitive solicitation process must be documented and controlled in accordance with established procedures. Competitive procedures involving requests for bids, qualifications and other contractor submittals may also be used where consistent with this Policy.

Section 3 Affiliated Company Purchases

Any potential affiliate transactions must be reviewed by general counsel and regulation prior to entering into any business transaction to ensure compliance with all affiliate filing requirements.

Section 4 Exceptions and Exclusions

4.1 Exceptions

When impossible or impractical, or when it otherwise can be demonstrated to be in the best interest of the company and its customers, a supplier may be awarded a contract on a non-competitive or sole source basis. This situation may arise when the professional or technical expertise of services is of such a unique nature, or the goods or services are not readily available in the open marketplace from other sources, such that one contractor or supplier is clearly and justifiably the only source. Following are the primary exceptions to the competitive bid policy:

- ▶ **Emergency conditions**
Emergency conditions are unscheduled, unforeseen, and unexpected situations when action must be taken to prevent adverse financial impact or impairment to customer service, to prevent injury, loss of life, or damage to capital assets. In these instances, a single contractor/supplier may be requested to provide the necessary goods or services.
- ▶ **Only known supplier**
Occasionally there are situations when only one supplier is known to provide the required goods or services. This generally results when the supplier has required proprietary or intellectual property rights built into the product or service. Professional services are especially subject to this qualification.
- ▶ **Customer requested**
An external customer may request that a certain supplier, manufacturer or contractor be utilized for projects that they are funding or for work required on the customer's property or right-of-way.
- ▶ **Business required**
There are other limited circumstances where a compelling business reason may require an exception.

4.2 Exclusions

The following are exclusions to this policy, procurement procedures and bidding requirements generally because of the uniqueness of the transaction.

- ▶ Commercial & trading (purchase/sale of power, ancillary and other services)**
- ▶ Customer services (CSS pass through payments, CSS refunds to customer, franchise and sales tax)
- ▶ Donations and contributions
- ▶ Facilities and real estate (easements, permits, leases/land payments, and right of way)**



- ▶ Fuel resources (coal and gas purchases, steam royalties, coal and gas transportation)**
- ▶ Government (federal, state, city and local taxes, PSC/PUC, FERC, low income)
- ▶ Joint ownership (purchases at jointly owned plants where PacifiCorp is not the plant operator)**
- ▶ Legal services (litigation, expert services, discovery services, outside legal counsel, registered agents)
- ▶ Lobbying
- ▶ Organization dues and memberships
- ▶ Payroll, benefits and staffing (payroll, 401k and pension funding, benefit plans and administration, employee travel and events, employment agreements)**
- ▶ Postage
- ▶ Risk (forensic investigations)
- ▶ Settlements (damage claims, other settlements)**
- ▶ State or federal mandated programs (Blue Stakes, One Call Center, Tribal requirements, hydro licensing, Energy Trust of Oregon)
- ▶ Subscriptions
- ▶ Treasury (Debt issuance, prospectus preparation)**
- ▶ Utilities (telephone, water, sewer, electricity, gas, garbage, cable, satellite)

**The company business unit responsible for the excluded item has a competitive or other commercially appropriate method to purchase these items in a least cost and/or least risk manner.

CERTIFICATE OF SERVICE

Docket Nos. 20-035-04, 13-035-184

I hereby certify that on May 8, 2020, a true and correct copy of the foregoing was served by electronic mail and/or overnight delivery to the following:

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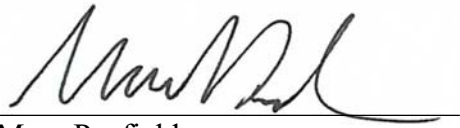
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A handwritten signature in black ink, appearing to read 'Mary Penfield', with a long horizontal flourish extending to the right.

Mary Penfield
Adviser, Regulatory Operations