

UAE Exhibit COS 2.1

**RMP's Responses to Data Requests
Referenced in the
Direct Testimony/Exhibits
of Justin Bieber**

UAE Data Request 8.1

Cost allocation – Class NCP. Please refer to Exhibit RMM-3, p. 7, which states:

“A piece of equipment, such as a power plant or a substation, used by many customers does not need to be large enough to meet the *sum of the individual customer peak demands (non-coincident or billing demands)*.” [Emphasis added.]

a. This statement seems to suggest that RMP considers class non-coincident (NCP) demand to be the sum of the individual peak demands of the customers in the class. Is this a correct interpretation of RMP’s definition? If not, please define “Class NCP” as used in RMP’s class cost of service study.

b. If the Response to subpart (a) is yes, does RMP acknowledge that its definition of Class NCP is different than that found in the Electric Utility Cost Allocation Manual published by NARUC, which on page 97 *distinguishes between* Class NCP and the summation of individual customer maximum demands as being two different measurements, with the former accounting for some diversity of load within the class? If RMP disagrees, please explain.

c. Does RMP agree that logically, irrespective of whether Class NCP is defined as equal to the sum of the individual customer peak demands in the class or whether it is defined to be the maximum demand of the class in the aggregate during a particular period (i.e., taking account of some class load diversity), the Class NCP can never be greater than the sum of the individual peak demands of the customers in the class? If RMP disagrees, please explain in detail.

Response to UAE Data Request 8.1

- a. Yes.
- b. The Company agrees that its nomenclature appears to be a little different than the Electric Utility Cost Allocation Manual. The Company has considered the diversified load of a class to be “Class Peaks” and has considered the sum of NCP or individual customer maximum demand for each customer within the class to be “Class NCP”.
- c. The Company agrees that Class Peaks can never be greater than the sum of individual customer maximum demand within the class.

UAE Data Request 8.2

Cost allocation – Class NCP. Please refer to Mr. Meredith’s workpaper called “COS UT GRC 2020.”

- a. Please refer to the Tab called “Dist. Factors,” line 257.
 - i. Are the entries in Columns C through N in this line intended to be equal to the sum of the individual maximum demands for Schedule 6 customers for each month of the test period? If not, please explain what these entries represent.
 - ii. The entries in this row are pasted values. Please provide the source workpaper that derives these entries in native format with formulas intact.
 - iii. Does RMP agree that the 15,576,842 kW entry shown in the workpaper called “UT Pricing Model GRC2020” in the “Blocking” tab at line 675, column D is the Schedule 6 – Composite billing determinant for the Facilities charge for the 2021 test period? If RMP disagrees, please explain.
 - iv. Please compare the 17,953,408 kW “Total NCP” entry in Column O (COS UT GRC 2020) to the 15,576,842 kW shown in “UT Pricing Model GRC2020” in the “Blocking” tab at line 675, Column D. Logically, how is it possible for the Schedule 6 Total NCP to be greater than the sum of the Schedule 6 Facility Charge billing demands? If one or both of these entries is in error, please provide the correct number(s).
 - v. Referring to the “UT Pricing Model GRC2020”, “Blocking” tab: shouldn’t lines 676 and 677 in Column D sum to the amount in line 675, column D? If not, please explain. If there is an error, please provide the correct amount(s).
- b. Please refer to the Tab called “Dist. Factors,” line 258.
 - i. Are the entries in Columns C through N in this line intended to be equal to the sum of the individual maximum demands for Schedule 8 customers for each month of the test period? If not, please explain what these entries represent.
 - ii. The entries in this row are pasted values. Please provide the source workpaper that derives these entries in native format with formulas intact.
 - iii. Does RMP agree that the 4,249,794 kW entry shown in the workpaper called “UT Pricing Model GRC2020” in the “Blocking” tab at line 1378, column D is the Schedule 8 – Composite billing determinant for the Facilities charge for the 2021 test period? If RMP disagrees, please explain.
 - iv. Please compare the 4,664,701 “Total NCP” entry in Column O (COS UT GRC 2020) to the 4,249,794 kW shown in the “UT Pricing Model GRC2020” in the “Blocking” tab at line 1378, column D. Logically, how is it possible for the Schedule 8 Total NCP to be greater than the sum of the Schedule 8 Facility Charge billing demands? If one or both of these entries is in error, please provide the correct number(s).
- c. Please refer to the Tab called “Dist. Factors,” line 260.
 - i. Are the entries in Columns C through N in this line intended to be equal to the sum of the individual maximum demands for Schedule 9 customers for each month of the test period? If not, please explain what these entries represent.
 - ii. The entries in this row are pasted values. Please provide the source workpaper that derives these entries in native format with formulas intact.

Response to UAE Data Request 8.2

- a.
 - i. Yes.
 - ii. Please refer Mr. Meredith's workpaper entitled "UT GRC20 Load Research_Final.xlsx".
 - iii. Yes. The Company agrees that this value represents the composite for Schedule 6 Facilities Charges. This value, however, is not inclusive of all customers on the Schedule 6 class in the cost of service study which includes 6-135, 6-136, 6A, 6A-135, 6A-136 and 6B.
 - iv. Please refer to the Company's response to subpart a.iii. of this request. For the whole Schedule 6 class, the Company agrees that these values should be very close to each other, but notes that they are derived from different sources. Facilities charges in the Company's pricing model come from the Company's billing system and reflect the actual charges assessed to customers which measure maximum demand for billing cycle periods that do not always match up with a particular calendar month. Load research values that are input into the cost of service study come directly from the calendar month meter profiles from all Schedule 6 customers. The units for Facilities charges in the Company's pricing model were also prorated for starting bills and closing bills. Thus due to the bill proration, the Schedule 6 Total NCP would be greater than the sum of the Schedule 6 Facility Charge billing demands.
 - v. Yes. The Company agrees that the value for the total facilities charge on line 675 should be the total of the values in lines 676 and 677. The Company will correct this inadvertent mistake in its rebuttal filing. The correct value for cell D676 should be 6,921,590 and the correct value for cell D677 should be 8,655,252.
- b.
 - i. Yes.
 - ii. Please refer Mr. Meredith's workpaper entitled "UT GRC20 Load Research_Final.xlsx".
 - iii. Yes.
 - iv. The Company agrees that these values should be very close to each other, but notes that they are derived from different sources. Facilities charges in the Company's pricing model come from the Company's billing system and reflect the actual charges assessed to customers which measure maximum demand for billing cycle periods that do not always match up with a particular calendar month. Load research values that are input into the cost of service study come directly from the calendar month meter profiles from all Schedule 8 customers. The units for Facilities charges in the Company's pricing model were also prorated for starting bills and closing bills. Thus due to the bill proration, the Schedule 8 Total NCP would be greater than the sum of the Schedule 8 Facility Charge billing demands.

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- c.
 - i. Yes.
 - ii. Please refer Mr. Meredith's workpaper entitled "UT GRC20 Load Research_Final.xlsx".

UAE Data Request 8.3

Schedule 6 Rate Design. Please refer to Mr. Meredith's workpaper called "COS UT GRC 2020," Tab called "Unit Costs – Target," Column E.

- a. In examining lines 75, 93, 99, and 105 – as well as the associated per-unit cost lines 76, 94, 100, and 106 – does RMP agree that the proposed Schedule 6 Facilities Charge of \$4.11/kW materially under-recovers demand-related transmission and distribution costs? If RMP disagrees, please explain in detail.
- b. In examining lines 33 and 45 – as well as the associated per-unit cost lines 34 and 46 – does RMP agree that the proposed Schedule 6 Power Demand charge of \$12.12 (non-summer) and \$13.69 (summer) materially over-recovers demand-related production costs? If RMP disagrees, please explain in detail.
- c. What is the rate design justification for materially under-recovering the Schedule 6 Facilities Charge while materially over-recovering the Power Demand charge?

Response to UAE Data Request 8.3

- a. The Company objects to this request because the term "materially" is vague and ambiguous. The Company agrees that the revenue from Schedule 6 Facilities Charges is less than its demand-related transmission and distribution cost of service.
- b. The Company objects to this request because the term "materially" is vague and ambiguous. The Company agrees that the revenue from Schedule 6 Power Charges is more than its demand-related production cost of service.
- c. For Schedule 6, the only difference between Facilities Charges and Power Charges is the seasonal differentiation of Power Charges. The Company proposed the pricing it did to maintain consistency with present prices and avoid large shifts between categories.

UAE Data Request 8.4

Schedule 8 Rate Design. Please refer to Mr. Meredith's workpaper called "COS UT GRC 2020," Tab called "Unit Costs – Target," Column F.

- a. In examining lines 75, 93, 99, and 105 – as well as the associated per-unit cost lines 76, 94, 100, and 106 – does RMP agree that the proposed Schedule 8 Facilities Charge of \$4.95/kW materially under-recovers demand-related transmission and distribution costs? If RMP disagrees, please explain in detail.
- b. In examining lines 33 and 45 – as well as the associated per-unit cost lines 34 and 46 – does RMP agree that the proposed Schedule 8 Power Demand charge of \$14.31 (non-summer) and \$16.17 (summer) materially over-recovers demand-related production costs? If RMP disagrees, please explain in detail.
- c. What is the rate design justification for significantly under-recovering the Schedule 8 Facilities Charge while materially over-recovering the Power Demand charge?

Response to UAE Data Request 8.4

- a. The Company objects to this request because the term "materially" is vague and ambiguous. The Company agrees that the revenue from Schedule 8 Facilities Charges is less than its demand-related transmission and distribution cost of service.
- b. The Company objects to this request because the term "materially" is vague and ambiguous. The Company agrees that the revenue from Schedule 8 Power Charges is more than its demand-related production cost of service.
- c. The Company proposed the pricing it did to maintain consistency with present prices and avoid large shifts between categories.

UAE Data Request 8.5

Schedule 9 Rate Design. Please refer to Mr. Meredith's workpaper called "COS UT GRC 2020," Tab called "Unit Costs – Target," Column H.

- a. In examining line 75 – as well as the associated per-unit cost line 76 – does RMP agree that the proposed Schedule 9 Facilities Charge of \$2.33/kW materially under-recovers demand-related transmission costs? If RMP disagrees, please explain in detail.
- b. In examining lines 33 and 45 – as well as the associated per-unit cost lines 34 and 46 – does RMP agree that the proposed Schedule 9 Power Demand charge of \$12.96 (non-summer) and \$14.65 (summer) materially over-recovers demand-related production costs? If RMP disagrees, please explain in detail.
- c. What is the rate design justification for materially under-recovering the Schedule 9 Facilities Charge while materially over-recovering the Power Demand charge?

Response to UAE Data Request 8.5

- a. The Company objects to this request because the term "materially" is vague and ambiguous. The Company agrees that the revenue from Schedule 9 Facilities Charges is less than its demand-related transmission cost of service.
- b. The Company objects to this request because the term "materially" is vague and ambiguous. The Company agrees that the revenue from Schedule 9 Power Charges is more than its demand-related production cost of service.
- c. The Company proposed the pricing it did to maintain consistency with present prices and avoid large shifts between categories.