21-035-01 / Rocky Mountain Power March 15, 2021 EBA Filing Requirement 6

## **EBA Filing Requirement 6**

## **Supporting Information**

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

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

"The Company agrees to continue to provide in its quarterly EBA reports trade information consistent with EBA filing requirement 6(b). This information will be provided in the same format and detail as the Company's response to DPU Data Request 3.1 in Docket 14-035-31. The Company agrees to make its best efforts to provide the fourth quarter trade information in EBA filing requirement 6(b) annually, on February 15, but no later than March 1, prior to an annual EBA filing on March 15. When the fourth quarter information is provided, it will be provided in the same format and detail as DPU Data Request 3.1 in Docket 14-035-31 and include data for all four quarters. This information will be filed again with the Company's EBA application filing and will replace the current FR 6- 2, 6-3, 6-4 and 6-5 spreadsheets. The SAP reconciliations that are currently shown in the FR 6-2, 6-3, 6-4, 6-5 spreadsheets will also be provided in the annual EBA application filing".

At a minimum, the trade data will include the following:

- (i) Deal Number,
- (ii) Instrument Type,
- (iii) Buy / Sell,
- (iv) Month,
- (v) Year,
- (vi) Delivery Start,
- (vii) Delivery End,
- (viii) Done Date,
- (ix) Point of Receipt (POR),
- (x) Point of Delivery (POD),
- (xi) Fixed Price,
- (xii) Floating Price,
- (xiii) Index,

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

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

## **Response to EBA Filing Requirement 6**

- (a) Please refer to Confidential Attachment EBA FR 6-1 which provides a copy of the Company's latest Semi-Annual Hedging Report, filed with the Public Service Commission of Utah (UPSC) on February 15, 2021 (Docket 21-035-10).
- (b) Please refer to Confidential Attachment EBA FR 6-2 which provides power physical transactions that were settled during the energy balancing account (EBA) deferral period. There were no power financial transactions that were settled during the EBA deferral period. Please refer to Confidential Attachment EBA FR 6-3 which provides natural gas physical transactions that were settled during the EBA deferral period. Please refer to Confidential Attachment EBA FR 6-4 which provides natural gas financial transactions that were settled during the EBA deferral period. Please refer to Confidential Attachment EBA FR 6-4 which provides natural gas financial transactions that were settled during the EBA deferral period. Please refer to Confidential Attachment EBA FR 6-5 which provides the trade data from Confidential Attachment EBA FR 6-2 through Confidential Attachment EBA FR 6-4 in the format agreed upon in the Settlement Stipulation in Docket No. 14-035-31.

With regard to subpart (b)(xvi) – transaction liquidation takes place through final settlement of a swap transaction or delivery and settlement of a physical transaction. The Company does not explicitly transact to liquidate a particular transaction in advance of settlement.

- (c) Please refer to Confidential Attachment EBA FR 6-6 which provides outage information for the Company's owned (1) thermal, (2) hydroelectric and (3) wind resources, relevant to the EBA deferral period. Notes: (1) thermal outage data – includes North American Electric Reliability Corporation (NERC) Generating Availability Data System (GADS) information for each thermal outage. The calculated lost megawatt-hours (MWh) included in the attachment incorporates the capacity factors included in rates for the respective units and time periods, (2) hydroelectric outage data – includes NERC GADS information for hydro units for which GADS reporting is required, and (3) wind outage data – provides NERC GADS information for wind projects for which GADS reporting is required.
- (d) Please refer to Confidential Attachment EBA FR 6-7 which provides plant performance information for the Company's owned (1) thermal, (2) hydroelectric, and (3) wind resources, relevant to the EBA deferral period.

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

<u>Cedar Springs Wind, LLC; also referred to as Cedar Springs Wind I</u> – this is an Energy Vision 2020 (EV 2020) project which was considered by the Public Utility Commission of Utah (UPSC) in Docket 17-035-40. Please refer to Attachment EBA FR 6-9 which provides a copy of the UPSC order dated June 22, 2018. Additional information is available on the UPSC website for Docket 17-035-40 and can be accessed by the following website link:

https://psc.utah.gov/2017/06/23/docket-no-17-035-40

<u>Cedar Springs Wind III, LLC</u> – please refer to Confidential Attachment EBA FR 6-10 which provides a copy of PacifiCorp's internal governance memorandum associated with this PPA dated February 4, 2019.

<u>Cove Mountain Solar, LLC</u> – this PPA is associated with a specific customer served by PacifiCorp under Oregon Schedule 272 (Renewable Energy Rider / Optional Bulk Purchase Option). Please refer to Attachment EBA FR 6-9 which provides a copy of the current Oregon Schedule 272 tariff. Please refer to Confidential Attachment EBA FR 6.10 which provides a copy of PacifiCorp's internal governance memorandum associated with this PPA dated June 7, 2018. Note: there are five other PPAs associated with this specific customer and the attachments responsive to Oregon Schedule 272 and PacifiCorp's internal governance memorandum -(1) Hunter Solar, LLC, (2) Milford Solar I, LLC, (3) Millican Solar Energy, LLC, (4) Prineville Solar Energy, LLC, and (5) Sigurd Solar, LLC. Cove Mountain Solar, LLC and Milford Solar I, LLC achieved commercial operation during 2020. Hunter Solar, LLC, Millican Solar Energy, LLC, Prineville Solar Energy, LLC and Sigurd Solar, LLC are scheduled to achieve commercial operation during 2021 and are therefore not relevant to this 2021 EBA for calendar year 2020.

<u>Cove Mountain Solar 2, LLC</u> – this PPA was acquired on behalf of a Utah Schedule 34 customer, the customer's retail contract of which was considered by the UPSC in Docket 16-035-27. Please refer to Attachment EBA FR 6-9 which provides a copy of the UPSC order dated August 29, 21-035-01 / Rocky Mountain Power March 15, 2021 EBA Filing Requirement 6

2016. Also provided is a copy of the Company's courtesy notice of resource procurement dated September 9, 2019. Additional information is available on the UPSC website for Docket 16-035-27 and can be accessed by the following website link:

## https://psc.utah.gov/2016/06/23/docket-no-16-035-27

<u>Milford Solar I, LLC</u> – please refer to the Company's response above for Cove Mountain Solar, LLC.

<u>**Prineville Solar Energy, LLC**</u> – please refer to the Company's response above for Cove Mountain Solar, LLC.

- (g) Please refer to Confidential Attachment EBA FR 6-11 and Attachment EBA FR 6-12 which provides copies of new or modified long-term PPAs entered into, which commenced delivery in the EBA deferral period, and / or which were not previously included with the Company's previous year's EBA Filing Requirements (Docket 20-035-01).
- (h) For all short-term power purchases relevant to the EBA deferral period, please refer to the Company's response to subpart (b) above.
- (i) For all system balancing transactions relevant to the EBA deferral period, please refer to the Company's response to subpart (b) above.
- (j) Please refer to Attachment EBA FR 6-13 which provides historical electricity prices for calendar year 2020.
- (k) Please refer to Confidential Attachment EBA FR 6-14 which provides a summary of coal agreements relevant during the EBA deferral period.
- For all physical natural gas and financial natural gas transactions relevant to the EBA deferral period, please refer to the Company's response to subpart (b) above.
- (m) Please refer to Confidential Attachment EBA FR 6-15 which provides the California Independent System Operator (CAISO) service and wheeling fees relevant during the EBA deferral period.
- (n) <u>Net Power Costs</u> Please refer to the direct testimony of Company witness, Jack Painter.

Wheeling Revenues – Please refer to the information provided below:

• Non-firm (NF) wheeling revenue is approximately \$4.6 million higher for January 2020 through December 2020 compared to the revenue forecast in

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the base EBA period primarily due to higher capacity reserved by customers during 2020 and higher rates, compared with the volumes and rates in the revenue forecast.

- Actual short-term firm (STF) revenues increased during 2020 compared with the base EBA period primarily due to higher rates and volumes.
- Actual long-term firm (LTF) transmission wheeling revenue, including legacy contracts, is higher in comparison with the base EBA primarily due to higher LTF point-to-point (PTP), contract conversion from legacy to network service, plus slightly higher increase in network loads, plus transmission rates higher than the assumption utilized in the base EBA.
- Ancillary service revenues for 2020 increased compared with the base EBA primarily due to higher volumes from additional capacity, contract conversions, and loads as noted above. In addition, the methodologies for application of services including Schedule 3 (Regulation Reserve), Schedule 3a (Generation Regulation Reserve), Schedule 5 (Spinning Reserve) and Schedule 6 (Supplemental Reserve) changed compared with the assumptions used in the base EBA as well as the applicable rates.

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