

UAE Exhibit 4.1

**RMP's Responses to Data Requests
Referenced in the
Surrebuttal Testimony of
Justin Bieber**

UAE Data Request 2.1

Lines 44-52 of the Direct Testimony of Robert M. Meredith states as follows:

Q. How does the Company propose to allocate the 2021 MPA to customer classes that are not included in the cost of service study?

A. There are three schedules (Schedule 31, Schedule 32, and Schedule 34) that are not included in the Company's cost of service study. For Schedule 31, the Company proposes applying the same percentage change as Schedule 9. For Schedule 32, the Company proposes applying the same percentage change as Schedule 9 for all revenue, except the portion of Schedule 32's revenue that is related to renewable procurement for its Schedule 32 contract. For Schedule 34, the Company applied the percentage change to a portion of its revenue as per the contract for this customer.

- (a) Please explain what is meant by the phrase "the portion of Schedule 32's revenue that is related to renewable procurement for its Schedule 32 contract." In your answer, please state whether that revenue is RMP revenue and/or whether it is or should be included in RMP's revenue requirement.
- (b) When Mr. Meredith states that "[f]or Schedule 32, the Company proposes applying the same percentage change as Schedule 9 for all revenue, except the portion of Schedule 32's revenue that is related to renewable procurement for its Schedule 32 contract," please clarify what percentage change (if any) the Company proposes to apply to the portion of Schedule 32's revenue that is related to renewable procurement for its Schedule 32 contract.
- (c) As a general matter, does the Company believe that it is appropriate to include in rate spread calculations the portion of Schedule 32's revenue that is related to renewable procurement for Schedule 32 contracts? Why or why not?
- (d) Please confirm that RMP's rate spread proposal in Docket No. 20-035-04 included the portion of Schedule 32's revenue that is related to renewable procurement for Schedule 32 contracts.
- (e) Please confirm that the Commission approved RMP's proposal in Docket No. 20-035-04 to include in the rate spread calculation the portion of Schedule 32's revenue that is related to renewable procurement for Schedule 32 contracts.
- (f) Please explain why you believe it is appropriate to exclude the portion of Schedule 32's revenue that is related to renewable procurement for Schedule 32 contracts from the rate spread calculations in this docket.

Response to UAE Data Request 2.1

- (a) What is meant by the “the portion of Schedule 32’s revenue that is related to renewable procurement for its Schedule 32 contract” is revenue for the Renewable Energy Power Purchase Agreement. It is technically Rocky Mountain Power (RMP) revenue and is a part of revenue requirement.
- (b) The Company proposes to apply no change to the portion of Schedule 32’s revenue that is related to renewable procurement for its Schedule 32 contract.
- (c) As a general matter, the Company believes it depends on the circumstances of a particular filing whether the revenue from the Renewable Energy Power Purchase Agreement should be a factor in rate spread determination.
- (d) Confirmed.
- (e) Confirmed.
- (f) As opposed to a general rate case (GRC) where all utility costs are under review, this docket is limited to recovery of two specific wind projects. It is therefore reasonable for the price change from these two projects to be limited to the proportion of Schedule 32’s revenue that is related to service supplied from Company resources. In future GRCs when all costs are under consideration, the Company will have a full 12 months of data from Schedule 32 customer(s) from which it may include them in its cost of service (COS) study. At that time, the Company’s rate spread proposals could be based upon the results in a COS study specifically for a Schedule 32 class instead of relying upon another class, such as Schedule 9, as a proxy to make rate spread proposals.