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RE: UT Docket No. 22-035-01
UAE 4th Set Data Request (1)

Please find enclosed Rocky Mountain Power's Redacted Response to UAE 4th Set Data Request 4.1. Also provided is Attachment UAE 4.1. Provided via BOX is Confidential Response UAE 4.1. Confidential information is provided subject to R746-1-601-606 of the Utah Public Service Commission Rules.

If you have any questions, please call me at (801) 220-2823.

Sincerely,

_____/s/_____
Jana Saba
Manager, Regulation

Enclosures

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UAE Data Request 4.1

CONFIDENTIAL REQUEST - Follow-up to RMP Response to UAE Data Request No. 2.3 (Production Tax Credits). In response to UAE Data Request No. 2.3(b), RMP indicates that “negative values described in the Company’s response to subpart (a) should not be included for the purposes of calculating production tax credits (PTC).” The “negative values described in the Company’s response to subpart (a)” refers to RMP’s response to UAE Data Request 2.3(a), which states, in part, that “[a] wind plant can show negative production when station service demands . . . from the wind turbines exceeds the energy generation from the wind turbines. This occurred at the TB Flats II wind project prior to any of the single facilities comprising the wind project being placed in service”.

- (a) Please confirm that the actual 2021 Total Company PTC (before tax affect) is [REDACTED] as shown on RMP witness Jack Painter’s Confidential EBA work paper 9 (tab labeled “(9.1) PTC”).
- (b) Please confirm that the Total Company PTC calculation supporting Mr. Painter’s Confidential EBA work paper 9 (tab labeled “(9.1) PTC”) was provided in response to DPU Data Request No. 2.4, in Confidential Attachment DPU 2.4-1.
- (c) Assuming Confidential Attachment DPU 2.4-1 supports the “actual” 2021 PTC calculation, please confirm that this confidential attachment includes [REDACTED].
- (d) Please clarify RMP’s response to UAE Data Request 2.3(b). Is the reason that “the back feed causing the negative values described in the Company’s response to subpart (a) should not be included for the purposes of calculating production tax credits (PTC)” (1) because the negative values occurred at TB Flats II before any of the single facilities comprising TB Flats II were placed in service; (2) because negative production when station service demands exceed energy generation from the wind turbines in any given hour should not be included for purposes of calculating PTCs; or (3) some other reason. Please explain in detail.
- (e) Consistent with your response to UAE Data Request 4.1(d), above, please prepare a revised actual 2021 PTC calculation that removes any and all negative wind generation values at any wind plant used in the actual PTC calculation that should not be included for purposes of calculating PTCs.

- (f) Please provide the EBA impact if the revised actual PTC calculation referenced in UAE data request 4.1(e) were to be included in RMP's EBA filing instead of the actual PTC value used by Mr. Painter.

Response to UAE Data Request 4.1

- (a) Confirmed.
- (b) Confirmed.
- (c) Confirmed.
- (d) The explanation in (1) is correct. The negative kilowatt-hours (kWh) generation in January 2021 for TB Flats Wind 2 should not have been included in the production tax credit (PTC) calculation for calendar year 2021 as that generation was not considered electricity produced and sold during the period.
- (e) Please refer to Attachment UAE 4.1. The impact of removing (51,000) kWh generation in January 2021 for TB Flats Wind 2 is summarized below:

PTC generation calculated in Attachment DPU 2.4-1 1 st Revised	6,566,624,100 kWh
PTC generation calculated in Attachment UAE 4.1	6,566,675,100 kWh
Change – Increase in qualified generation	51,000 kWh
PTC Rate – Calendar year 2021	\$0.025
PTC increase – Total Company	\$1,275

- (f) The impact to the 2022 Energy Balancing Account (EBA) for calendar year 2021, on a Utah allocated basis, of a revised calendar year 2021 PTC calculation consistent with the Company's response to subpart (e) above, removing the (51,000) kWh generation in January 2021 for TB Flats Wind 2 is \$787 (including interest).