

**UAE Exhibit 1.1**

**RMP Responses to  
Data Requests  
Referenced in  
Testimony**

## UAE Data Request 2.5

**CONFIDENTIAL REQUEST** - Follow up to DPU Data Request Nos. 2.4 & 7.1. Please refer to the spreadsheet titled “Attach DPU 7.1 CONF.xlsx” and to the tab labeled “Attach DPU 7.1 CONF.” In response to DPU Data Request No. 7.1,

[REDACTED]. For any wind plant for which the actual wind plant generation was 30% or more below the normalized projected generation in any month, please provide the following:

- (a) Please confirm that all the wind turbines for the plant were in operation for the month. If in any month the capacity of the plant in operation was less than the number modeled in the last GRC, please provide an explanation as to why the plant was not operating consistent with the number used in the last GRC.
- (b) For months that any plant was operating with the capacity consistent with the capacity for that month in the last GRC, please explain if there were operational factors other than wind speed that negatively impacted generation output in that month.
- (c) For wind plants where the in-service date of repowered wind turbines was delayed, please explain if the plant was able to produce wind generation using the old wind turbines during the delay period.

## Confidential Response to UAE Data Request 2.5

The Company corrects the premise of the request which incorrectly describes the Company’s response to DPU Data Request 2.4, specifically Confidential Attachment DPU 2.4-1 as providing actual wind generation data, and the Company’s response to DPU Data Request 7.1, specifically Confidential Attachment DPU 7.1 as providing forecasted wind generation data. Both referenced attachments are providing production tax credit (PTC) calculations on the Company’s eligible wind resources derived from actual wind generation data (Confidential Attachment DPU 2.4-1), and derived from forecasted wind generation data (Confidential Attachment DPU 7.1). Actual wind generation data for calendar year 2021 was provided with the Company’s response to DPU Data Request 2.4, specifically Confidential Attachment DPU 2.4-2. As explained in the Company’s response to UAE Data Request 2.1, actual wind generation and wind generation data used for PTC calculation purposes will not necessarily match. Please refer to the Company’s response to UAE Data Request 2.1. Based on the foregoing clarification, the Company responds as follows:

(a) Please refer to the information provided below:

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Please refer to the tables provided below (in meters per second (m/s)):

	June	July
Seven Mile I Average Wind Speed 2009-2020	6.7 m/s	6.1 m/s
Seven Mile I Average Wind Speed 2021	5.8 m/s	5.3 m/s

	June	July
Seven Mile II Average Wind Speed 2009-2020	7.0 m/s	6.0 m/s
Seven Mile II Average Wind Speed 2021	6.4 m/s	5.4 m/s

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- (b) Please refer to the Company's response to subpart (a) above.
- (c) Foote Creek I was the only repowered wind project under construction in 2021. All the old wind turbines were removed from the site in 2020 and

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therefore unable to generate any energy during the repowering process in  
2021.

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**UAE Data Request 3.5**

**CONFIDENTIAL REQUEST - Follow up to RMP's response to UAE Data Request 2.5(a).**

(a) In response to UAE Data Request 2.5(a), you provided a response numbered 2.5(a)(6), which states in part as follows:

[REDACTED]

(i) Please describe in detail the cause of the [REDACTED]  
[REDACTED].

(ii) Please describe in detail the cause of the [REDACTED]  
[REDACTED].

(b) In response to UAE Data Request 2.5(a), you provided a response numbered 2.5(a)(10), which states in part as follows:

[REDACTED]

(i) Please describe in detail the cause of the [REDACTED]  
[REDACTED].

(ii) If a root cause analysis was performed, please produce it. .

(iii) Were any other generation resources were affected by this [REDACTED]  
[REDACTED]? If so, provide data to show the effects.

(iv) When was the [REDACTED]  
[REDACTED] resolved?

(v) Does the [REDACTED]  
[REDACTED]

[REDACTED]

### Confidential Response to UAE Data Request 3.5

(a) Please refer to the Company's responses to subparts i. and ii. below:

i. With regard to [REDACTED] the  
[REDACTED] Company responds as follows:

In October 2021, curtailments impacting the High Plains wind project (and generally all East Wyoming generation) was [REDACTED]

[REDACTED] Please refer to the Company's  
response to subpart (b) below.

[REDACTED]

ii. With regard to [REDACTED],  
[REDACTED] the Company responds as follows:

In January 2021, there did not appear to be a specific transmission outage that was limiting transfers out of East Wyoming (i.e. there was not a major transmission outage such as the Aeolus Substation outage referenced in the Company's responses to subpart (a)i. above, and subpart (b) below. It is therefore likely that actual power flow out of East Wyoming was at or near the contractual limits.

In both the above referenced months (and operating the Wyoming transmission system in general), the actual generation dispatch is determined by the Western Energy Imbalance Market (EIM), in real time, in collaboration with PacifiCorp. The transmission system in Wyoming is heavily congested, and while the 500 kV line nearly doubles the overall export capacity, there are still times when net generation exceeds the transmission capacity of the system. Once limits are reached, generation is curtailed to maintain system reliability.

(b) Please refer to the Company's responses to subparts i. through v. below:

i. Please refer to Confidential Attachment UAE 3.5 which provides a photograph of the transformer failure at the Aeolus substation which occurred on September 30, 2021. The A-phase Aeolus 500/230 kV transformer was removed from service. The Company is unable to provide

additional information at this time. Additional information regarding the September 30, 2021 Aeolus substation outage is attorney-client privilege and attorney work product doctrine. [REDACTED]

ii. Please refer to the Company's response to subpart (b) i. above.

iii. Yes. Generally, all East Wyoming generation was impacted by the September 30, 2021 Aeolus substation outage. As referenced in the Company's response to UAE Data Request 2.5 subpart (a)(10), the TB Flats wind project generation was [REDACTED]

[REDACTED]. The Ekola Flats wind project was also [REDACTED]

iv. [REDACTED]

v. [REDACTED]

[REDACTED] described in the Company's responses to subparts (b)i. through (b)iv. above. The [REDACTED]

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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 <sup>st</sup> 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
<b>PTC increase – Total Company</b>	<b>\$1,275</b>

- (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).

## UAE Data Request 5.1

**CONFIDENTIAL REQUEST - Follow-up to RMP Response to UAE Data Request No. 3.5.** In its response to UAE Data Request No. 3.5(b)(i), RMP references a transformer failure at the Aeolus substation which occurred on September 30, 2021. In response to UAE Data Request 3.5(b)(iii), RMP indicates that “Generally, all East Wyoming generation was impacted by the September 30, 2021 Aeolus substation outage”. In response to UAE Data Request 3.5(b)(iv), RMP states that [REDACTED]

[REDACTED] Please provide the following information:

- (a) Identify the duration of the substation outage or the duration of the period in which the substation did not operate at full capacity because of a transformer failure;
- (b) Identify by name each generation unit impacted or curtailed by the Aeolus substation outage or transformer failure;
- (c) At each such generating unit, identify the amount (in MWh) of reduced production due to curtailments as a result of the substation outage or transformer failure in both HLH and LLH;
- (d) For each such generating unit, identify the loss in value (in \$) of Production Tax Credits that the Company expects would have been produced but for the Aeolus substation outage or transformer failure; and
- (e) Excluding the lost value of Production Tax Credits, identify the overall increase to actual net power costs in 2021 associated with the Aeolus substation outage or transformer failure.

## Confidential Response to UAE Data Request 5.1

The Company takes this opportunity to correct the dates of the Aeolus substation outage that was previously stated in the Company’s response to UAE Data Request 3.5. Please refer to the Company’s response to subpart (a) below for the correct actual dates / times of the Aeolus substation outage.

- (a) [REDACTED]

- (b) Please refer to the list below for the PacifiCorp owned and contracted generation resources that were impacted or curtailed during the Aeolus

substation outage:

[REDACTED]

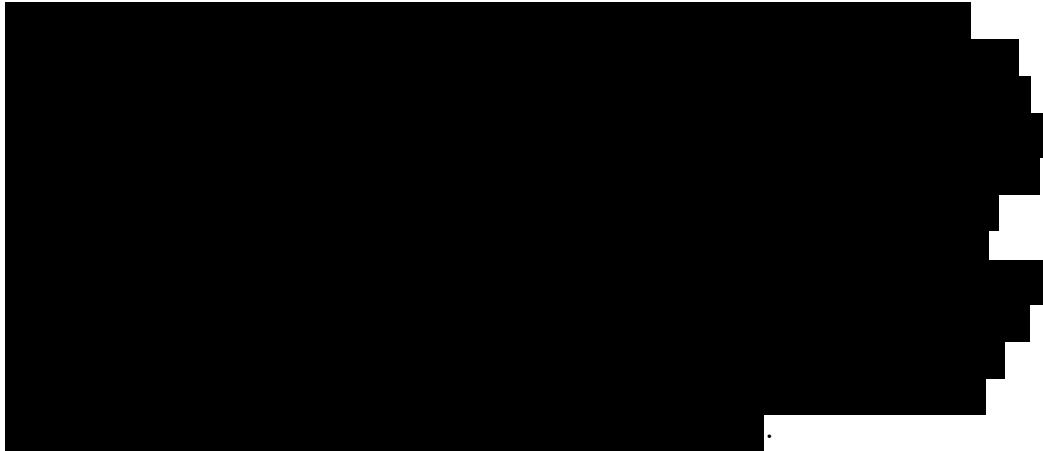
- (c) Please refer to Confidential Attachment UAE 5.1
- (d) Please refer to Confidential Attachment UAE 5.1.
- (e) Please refer to Confidential Attachment UAE 5.1.

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**UAE Data Request 5.3**

**Follow-up to RMP Response to UAE Data Request No. 3.5.** Please state all the reasons for the transformer failure at the Aeolus substation.

**Confidential Response to UAE Data Request 5.3**



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**UAE Data Request 5.4**

**Follow-up to RMP Response to UAE Data Request No. 3.5(b)(i)**

[REDACTED]

**Confidential Response to UAE Data Request 5.4**

Referencing the Company's response to UAE Data Request 3.5 subpart (b)(i), the Company responds as follows:

[REDACTED]

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