

UAE REDACTED Exhibit 2.1

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

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.

1st Revised Response to UAE Data Request 5.1

Further to the Company’s response to UAE Data Request 5.1 dated October 18, 2022, the Company provides this 1st Revised response and replacement confidential attachment to make two changes to the original calculation provided in Confidential Attachment UAE 5.1. This 1st Revised response is a replacement response pertaining to subparts (c), (d) and (e):

After reviewing the original calculation, the Company has identified two changes—one update and one correction--in the cost calculations in tab “NPC without PTC-Summary” of Confidential Attachment UAE 5.1. First, the original calculation used a cost estimate for natural gas generation of the Company’s owned PacifiCorp East (PACE) natural gas generating facilities at the time of the outage of \$40 per megawatt-hour (\$/MWh). The Company has now updated that

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UAE Data Request 5.1 – 1st Revised

original cost estimate with the actual cost of generation from this energy balancing account (EBA) filing. Second, the original calculation included production tax credit (PTC) impacts of the curtailed wind generation even though the impact to PTCs were accounted for separately in the original attachment.

Please refer to Confidential Attachment UAE 5.1 1st Revised which has been updated to account for the two changes explained above. This 1st Revised attachment replaces, in its entirety, the Company's original confidential attachment. Note: the Company's narrative responses to subparts (a) and (b) of its original response remain unchanged and valid.

Confidential information is provided subject to Public Service Commission of Utah (UPSC) Rules R746-1-601–606.

UAE Data Request 6.1

CONFIDENTIAL REQUEST - Reference is made to the Confidential Exhibit RMP (CME-1R [REDACTED])

Please provide the following:

- (a) Documents sufficient to support the statement, identifying the [REDACTED].

- (b) Documents sufficient to show the [REDACTED].

- (c) Please explain why Page 1 of the Report states that, [REDACTED].

Please reconcile these two

statements.

Confidential Response to UAE Data Request 6.1

PacifiCorp objects to the request to the extent it requests information covered by the attorney-client privilege and the attorney work product doctrine. Without waiving any objection, PacifiCorp responds as follows:

- (a) [REDACTED].
Please refer to Confidential Attachment UAE 6.1 which provides the following confidential files: "Aeolus Transformer Failure Data - Day of Event (Data Only) CONF", "Aeolus Transformer Failure Data Historical Loading Data (Data Only) CONF", and "Aeolus Transformer Failure Data Peak Loading Data (Data Only) CONF".
- (b) Please refer to Confidential Attachment UAE 6.1.
- (c) The referenced calculation did not come from Rocky Mountain Power. These figures were calculated by the experts from Intertye that were retained to perform the investigation into the Aeolus outage.

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UAE Data Request 6.1

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UAE Data Request 6.2

CONFIDENTIAL REQUEST - Please refer to the following statement on Page 1 of the Report [REDACTED]

Please provide the following:

- (a) Please provide all facts supporting the contention in the Report that the [REDACTED]
- (b) Please provide any documents supporting your contention in the Report that the [REDACTED]
- (c) Please state whether either [REDACTED]

Confidential Response to UAE Data Request 6.2

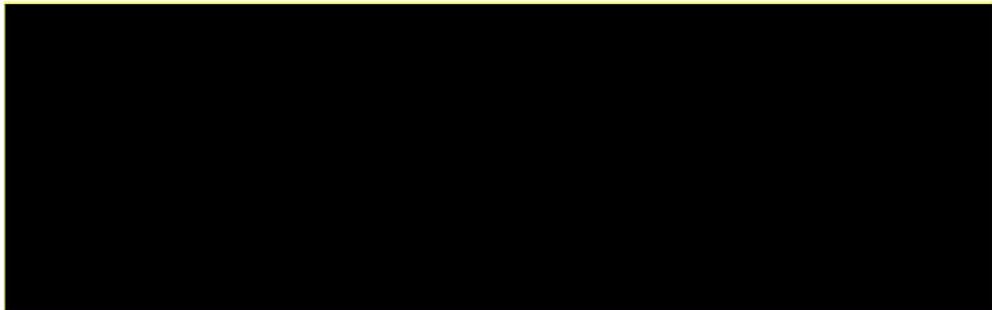
The Company assumes that the reference to “the Report” is intended to be a reference to Confidential Exhibit RMP__ (CME-1R) which provides a copy of Intertye’s “Aeolus Substation 500 kV Transformer Failure Investigation Report”. Based on the foregoing assumption, the Company responds as follows:

PacifiCorp objects to the request based on the attorney-client privilege and the attorney work product doctrine. Without waiving any objection, PacifiCorp responds as follows:

- (a) The referenced calculation did not come from Rocky Mountain Power. These figures were calculated by the experts from Intertye that were retained to perform the investigation into the Aeolus outage.
- (b) Please refer to the Company’s response in subpart (a) above.
- (c) [REDACTED]



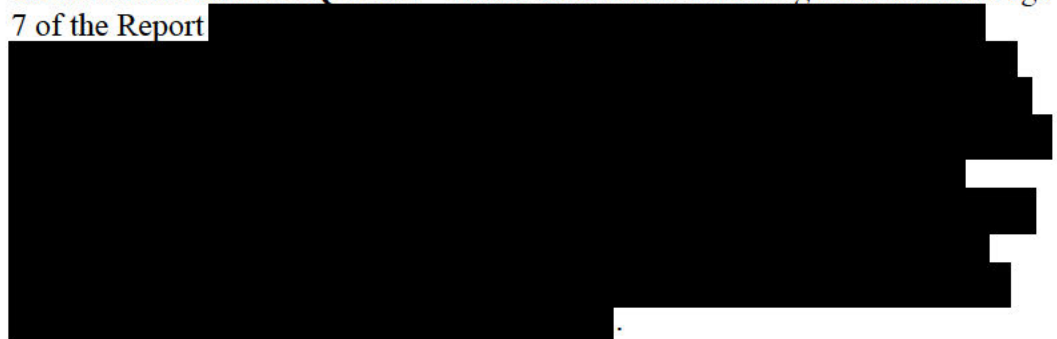
Please refer to confidential Figure 7 of the Report; re-provided below for convenience:



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UAE Data Request 6.3

CONFIDENTIAL REQUEST - Please refer to the following statement on Page 7 of the Report



Response to UAE Data Request 6.3


The Company assumes that “the Report” referenced in this request is intended to be a reference to Confidential Exhibit RMP__ (CME-1R) which provides a copy of Intertye’s “Aeolus Substation 500 kV Transformer Failure Investigation Report”. Based on the foregoing assumption, the Company responds as follows:

PacifiCorp objects to the request to the extent it requests information covered by the attorney-client privilege and the attorney work product doctrine. Without waiving any objection, PacifiCorp responds as follows:

PacifiCorp refers the Utah Association of Energy Users (UAE) to the Report, which speaks for itself. Other than what is referenced in the Report, PacifiCorp does not know all of the evidence Intertye considered in arriving at its conclusion referenced in this data request. That said, PacifiCorp agrees with Intertye’s conclusion, which PacifiCorp believes is supported by the investigation described in the Report.

UAE Data Request 6.4

CONFIDENTIAL REQUEST - Please refer to the following statement on Page 6 of the Report



Response to UAE Data Request 6.4

The Company assumes that the reference to “the Report” is intended to be a reference to Confidential Exhibit RMP__ (CME-1R) which provides a copy of Intertye’s “Aeolus Substation 500 kV Transformer Failure Investigation Report”. Based on the foregoing assumption, the Company responds as follows:

PacifiCorp objects to the request based on the attorney-client privilege and the attorney work product doctrine. Without waiving any objection, PacifiCorp responds as follows:

PacifiCorp refers the Utah Association of Energy Users (UAE) to the Report, which speaks for itself. PacifiCorp does not know all of the evidence Intertye determined was supportive of the conclusion identified in this data request. Please refer to the data files provided with the Company’s response to UAE Data Request 6.1, specifically Confidential Attachment UAE 6.1, which is the underlying evidence that was provided to support this conclusion that was reached by Intertye.

UAE Data Request 6.5

CONFIDENTIAL REQUEST - Please refer to lines 60-63 of the Confidential Rebuttal Testimony of Craig M. Eller, in which Mr. Eller states

[REDACTED]

Please provide the following:

(a) [REDACTED]

(b) [REDACTED]

Confidential Response to UAE Data Request 6.5

PacifiCorp objects to the request to the extent it requests information covered by the attorney-client privilege and the attorney work product doctrine. PacifiCorp additionally objects to subpart (b) as overbroad in the use of “any” documents, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving any objection, PacifiCorp responds as follows:

(a) [REDACTED]

(b) [REDACTED] which has been provided as Confidential Exhibit RMP__ (CME-1R) to the Rebuttal Testimony of Company witness, Craig M. Eller.

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UAE Data Request 6.6

CONFIDENTIAL REQUEST - Please refer to lines 40-48 of the Confidential Rebuttal Testimony of Craig M. Eller, in which Mr. Eller states that the Company engaged [REDACTED]

Please state the following:

- (a) [REDACTED]
- (b) [REDACTED]
- (c) [REDACTED]

Confidential Response to UAE Data Request 6.6

The Company assumes that UAE Data Request 6.6 was mistakenly labelled “6.4” (which would have been redundant of a prior request labelled “6.4”). The Company’s response is numbered “6.6”.

PacifiCorp objects to the request to the extent it requests information covered by the attorney-client privilege and the attorney work product doctrine. Without waiving any objection, PacifiCorp responds as follows:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Confidential information is provided subject to Public Service Commission of Utah (UPSC) Rules R746-1-601–606.