

REDACTED

Rocky Mountain Power
Exhibit RMP___(BR-2R)
Docket No. 23-035-01
Witness: Brad Richards

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF UTAH

ROCKY MOUNTAIN POWER

REDACTED

Exhibit Accompanying Response Testimony of Brad Richards

Discovery Responses

December 2023

22-035-01 / Rocky Mountain Power
May 31, 2022
DPU Data Request 5.23

DPU Data Request 5.23

CONFIDENTIAL REQUEST - Outage Related Questions - The following questions relate to information provided in the file, “2021 Thermal Outage Summary_CFrates-UT_Filtered 72-Hours CONF” (Tab: Forced > 72) shared in response to DPU Data Request 1.6-1.

[Redacted]

(a) [Redacted] ?

(b) [Redacted]

(c) [Redacted]

(d) [Redacted]

Confidential Response to DPU Data Request 5.23

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

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

23-035-01 / Rocky Mountain Power
August 28, 2023
DPU Data Request 9.1

DPU Data Request 9.1

CONFIDENTIAL REQUEST - Fossil Outage Follow-up - Craig 1 –

- [REDACTED]
- (a) Given the pending retirement of this unit (12/31/2025) was any thought given to asking for [REDACTED] inspection requirements? If not, please explain.

Response to DPU Data Request 9.1

- (a) No. Tri-State is a co-owner of the Craig plant and operates Craig Unit 1 and Craig Unit 2 on PacifiCorp's behalf. Asking for a waiver would be inconsistent with Tri-State's Corporate Policy on Compliance that states: "Tri-State's objective is to be 100% compliant with regulatory requirements and will provide the necessary resources to ensure all regulatory requirements are met. Adherence to all applicable compliance regulations, requirements and standards is a guiding principle in the development of Tri-State's current and future business strategies and plans".

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DPU Data Request 10.1

CONFIDENTIAL REQUEST - EBA Attach DPU 7.1-1 CONF –

[REDACTED]

The following confidential graph illustrates lost MWh related to [REDACTED] since 2018 for each unit of the Dave Johnston plant, using the Company’s data from the attachment [REDACTED] from the response to DPU 7.1-1:

[REDACTED]



[REDACTED]

- (i) What explanation can the Company offer for the exponential increase in [REDACTED] since 2020?
- (ii) How does the Company plan to mitigate related [REDACTED] going forward?

Confidential Response to DPU Data Request 10.1

Note: in responding to this data request, the Company did not verify or validate the graph compiled by the Division of Public Utilities (DPU). Based on the foregoing caveat, the Company responds as follows:

- (i) [REDACTED]

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[REDACTED]

(ii)

[REDACTED]

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