

**REDACTED**

Rocky Mountain Power  
Exhibit RMP\_\_\_(JP-2R)  
Docket No. 23-035-01  
Witness: Jack Painter

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF UTAH

ROCKY MOUNTAIN POWER

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**REDACTED**

Exhibit Accompanying Rebuttal Testimony of Jack Painter

Discovery Responses

January 2024

23-035-01 / Rocky Mountain Power  
June 23, 2023  
DPU Data Request 3.9

### **DPU Data Request 3.9**

Painter work paper Attachment B, (2.5) Actual NPC – Coal Generation

- (a) For each coal plant, provide the generation capacity percentage that each plant operated at on a monthly basis during 2022.

### **Response to DPU Data Request 3.9**

The Company assumes that the reference to “Attachment B” is intended to be a reference to the confidential work papers supporting the direct testimony of Company witness, Jack Painter, specifically confidential file “23-035-01 RMP EBA PROPRIETARY Painter Workpapers and Exhibit (5-1-23)”. Based on the foregoing assumption, the Company responds as follows:

Please refer to the Company’s response to DPU Data Request 3.7 subpart (d).



23-035-01 / Rocky Mountain Power  
October 26, 2023  
DPU Data Request 17.1

### **DPU Data Request 17.1**

- (a) Provide PCI Optimization Model details that would detail, explain, and evaluate the generation dispatched and market purchases made during the month of September and December 2022. Indicate the reason for actual gas and coal generation and the amount of market purchases made.
- (b) Indicate how each coal and gas plant is selected for distribution generally, and specifically for the months of September and December during peak load.
- (c) Indicate what assumption on coal and gas pricing was used in determining generation generally, and specifically for the months of September and December during peak load.

### **Response to DPU Data Request 17.1**

- (a) The Company retains a daily archive of short-term PCI Energy Solutions (formerly Power Costs Incorporated) (PCI) optimization model results. These documents include a selection of hourly outputs such as the model's recommended unit dispatch, fuel consumption, transmission utilization, solar/wind/hydro forecasts, operating reserve requirements, load forecasts, and market transactions. Note: the results are not dispatch/trading instructions but are considered by traders when making decisions around unit commitment, resource scheduling, and market purchases/sales. Please refer to Confidential Attachment DPU 17.1 which provides copies of the archived short-term PCI model outputs for the requested period.
- (b) The PCI optimization model receives the following data points as inputs: existing forward electricity transactions (standard product transactions and other contracts), forward energy prices, estimated market depth at each market hub, and solar, wind, and hydroelectric generation forecasts. Additionally, dispatchable units are modeled according to their physical characteristics such as heat rate curves, ramp rate, startup fuel, minimum generation, operating reserve carrying abilities, minimum on time, etc. The node and transmission topology can also be considered an input.
- (c) The assumptions used for the dispatch price for coal and gas units is based on the fuel costs and variable operating expenses. The assumptions used in prior periods, such as September 2022 and / or December 2022, are not archived or retained in the PCI optimization model or by PacifiCorp in the ordinary course of business.

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

23-035-01 / Rocky Mountain Power  
October 26, 2023  
DPU Data Request 17.2

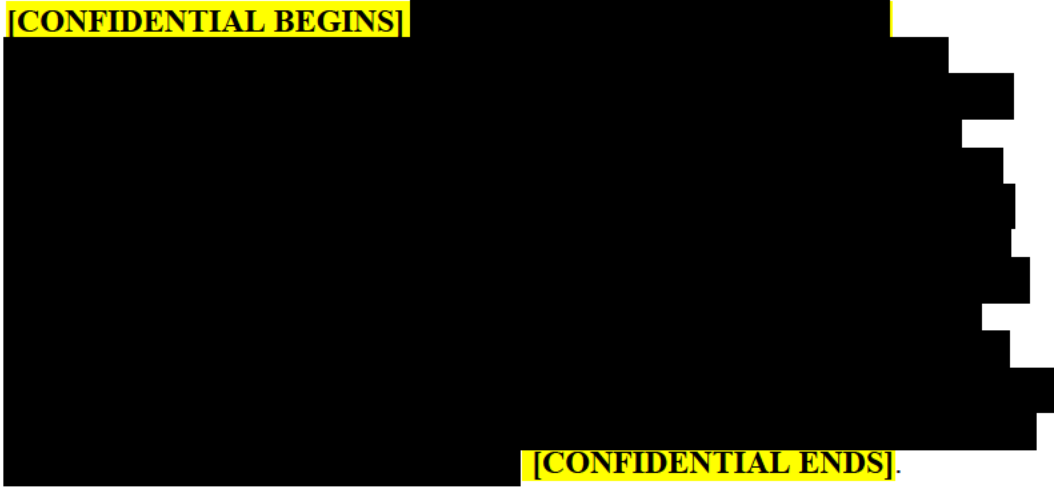
**DPU Data Request 17.2**

Identify the generation and distribution constraints for coal and gas plants experienced by PacifiCorp in 2022 generally and specifically during the months of September and December 2022.

**Confidential Response to DPU Data Request 17.2**

Thermal generation plants can be constrained by outages both planned and unplanned, derates, coal supply issues, transmission constraints, and emission constraints.

**[CONFIDENTIAL BEGINS]**



**[CONFIDENTIAL ENDS]**

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23-035-01 / Rocky Mountain Power  
October 26, 2023  
DPU Data Request 17.3

### **DPU Data Request 17.3**

Provide a monthly comparison chart for the last 5 years (calendar years 2022 – 2018) detailing the coal reserve levels at each of the PacifiCorp coal generation units, indicating and including reserve locations used by each plant. Include the required reserve level for each month by location and provide a copy of the reserve requirement policy for this period with updates as enacted.

### **Response to DPU Data Request 17.3**

The Company objects to this request seeking information for periods not relevant to the 2023 energy balancing account (EBA) for the deferral calendar year 2022 and which is unlikely to lead to admissible evidence in this 2023 EBA proceeding. Notwithstanding the foregoing objection, the Company responds as follows:

Please refer to Confidential Attachment DPU 17.3-1 which provides coal reserve levels by location for each plant, calendar years 2018 through 2022.

Please refer to Confidential Attachment DPU 17.3-2 which provides copies of PacifiCorp's Coal Inventory Policies and Procedures as listed below:

- Docket 18-035-07 – PacifiCorp's Coal Inventory Policies and Procedures updated March 20, 2018.
- Docket 19-035-07 – PacifiCorp's Coal Inventory Policies and Procedures updated March 14, 2019.
- Docket 20-035-12 – PacifiCorp's Coal Inventory Policies and Procedures updated March 13, 2020.
- Docket 21-035-12 – PacifiCorp's Coal Inventory Policies and Procedures updated March 18, 2021.
- Docket 22-035-22 – PacifiCorp's Coal Inventory Policies and Procedures updated March 22, 2022.

Note: the provided policy / procedure documents are the same documents that the Division of Public Utilities (DPU) reviews each year during its annual audit of PacifiCorp's fuel inventory management, policy, procedures and actual practices.

In addition, in Confidential Attachment DPU 17.3-2, the Company has included a copy of the most recent PacifiCorp's Coal Inventory Policies and Procedures updated March 10, 2023 (reviewed during the DPU's audit conducted earlier this year as part of Docket 23-035-14).

23-035-01 / Rocky Mountain Power  
October 26, 2023  
DPU Data Request 17.3

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23-035-01 / Rocky Mountain Power  
October 26, 2023  
DPU Data Request 17.4

#### **DPU Data Request 17.4**

On May 17, 2023, Rocky Mountain Power submitted reply comments to the Idaho Public Utilities Commission in Case No. PAC-E-23-09. Please provide all supporting work papers including confidential materials. Please provide a confidential (non-redacted) copy of the above referenced letter with the confidential table information viewable.

On May 31, 2023, the Idaho Public Utilities Commission filed its Order No. 35801 in Case No. PAC-E-23-09 wherein it requested a report on the issues causing the extraordinarily high NPC as follows “In order to ensure the Company was maximizing its coal fleet to customers’ benefit, we direct the Company to investigate and report on the issues causing the extraordinarily high NPC, with a focus on the lack of coal generation and coal supplies, and the Company’s management of those issues, as described in Staff’s and P4’s comments. This report should be completed before the end of the 2023 ECAM year”. Provide a full copy (work papers, etc.) supporting RMP’s response to this request and prepared for this report as soon as it is available, include any interim work papers and progress updates as soon as available.

#### **Response to DPU Data Request 17.4**

The Company objects to this request as outside the scope of this proceeding, and not reasonably calculated to lead to the discovery of admissible information. Notwithstanding the foregoing objection, the Company responds as follows:

Please refer to Confidential Attachment DPU 17.4 which provides a copy of the Company’s confidential reply comments filed with the Idaho Public Utilities Commission (IPUC) in Case PAC-E-23-09 on May 17, 2023. The report requested in IPUC Order 35801 will be completed at the end of calendar year 2023.

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



23-035-01 / Rocky Mountain Power  
December 22, 2023  
DPU Data Request 17.4 – 1<sup>st</sup> Supplemental

#### **DPU Data Request 17.4**

On May 17, 2023, Rocky Mountain Power submitted reply comments to the Idaho Public Utilities Commission in Case No. PAC-E-23-09. Please provide all supporting work papers including confidential materials. Please provide a confidential (non-redacted) copy of the above referenced letter with the confidential table information viewable.

On May 31, 2023, the Idaho Public Utilities Commission filed its Order No. 35801 in Case No. PAC-E-23-09 wherein it requested a report on the issues causing the extraordinarily high NPC as follows “In order to ensure the Company was maximizing its coal fleet to customers’ benefit, we direct the Company to investigate and report on the issues causing the extraordinarily high NPC, with a focus on the lack of coal generation and coal supplies, and the Company’s management of those issues, as described in Staff’s and P4’s comments. This report should be completed before the end of the 2023 ECAM year”. Provide a full copy (work papers, etc.) supporting RMP’s response to this request and prepared for this report as soon as it is available, include any interim work papers and progress updates as soon as available.

#### **1<sup>st</sup> Supplemental Response to DPU Data Request 17.4**

Further to the Company’s response to DPU Data Request 17.4 dated October 26, 2023, the Company provides the following supplemental response:

The Company continues to object to this request as outside the scope of this proceeding, and not reasonably calculated to lead to the discovery of admissible information. Notwithstanding the foregoing objection, the Company responds as follows:

Please refer to Confidential Attachment DPU 17.4-1 1<sup>st</sup> Supplemental which provides a copy of the Company’s 2022 Energy Cost Adjustment Mechanism (ECAM) Confidential Investigative Report filed with the Idaho Public Utilities Commission (IPUC) on December 22, 2023 pursuant to IPUC Case PAC-E-23-09, Order 35801.

Please refer to Confidential Attachment DPU 17.4-2 1<sup>st</sup> Supplemental which provides the supporting confidential work paper.

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