	REDACTED Rocky Mountain Power Exhibit RMP(JP-2R) Docket No. 23-035-01 Witness: Jack Painter
BEFORE THE PUBLIC SERVICE COOR THE STATE OF UTA	
ROCKY MOUNTAIN POV	VER
REDACTED Exhibit Accompanying Rebuttal Testimon	ny of Jack Painter
Discovery Responses	
January 2024	

Rocky Mountain Power Exhibit RMP___(JP-2R) Page 1 of 8 Docket No. 23-035-01 Witness: Jack Painter

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).

Attachment DPU 3.7-2

		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Generation Capacit	y Percentage												
	Colstrip	98%	88%	96%	46%	57%	73%	89%	95%	83%	97%	92%	87%
	Craig	89%	69%	79%	78%	83%	79%	80%	88%	84%	67%	56%	42%
	Dave Johnston	51%	55%	63%	33%	42%	48%	67%	59%	69%	59%	59%	46%
	Hayden	96%	85%	71%	73%	54%	70%	83%	86%	76%	73%	80%	89%
	Hunter	77%	66%	38%	50%	70%	75%	82%	82%	57%	24%	32%	47%
	Huntington	80%	73%	69%	72%	68%	65%	78%	85%	81%	42%	67%	75%
	Jim Bridger	52%	51%	58%	54%	51%	42%	74%	73%	72%	76%	60%	54%
	Naughton 1 & 2	78%	36%	34%	32%	42%	43%	76%	78%	71%	79%	66%	84%
	Wyodak	41%	67%	63%	37%	0%	61%	68%	84%	63%	80%	61%	60%
Generation Capacit		1170	01.70	0070	01.70	070	0170	0070	0170	0070	0070	0170	0070
Contraction Supusit	Chehalis	25%	32%	17%	46%	0%	1%	40%	52%	55%	66%	66%	65%
	Currant Creek	50%	52 % 52 %	45%	49%	37%	45%	44%	50%	48%	49%	55%	54%
	Gadsby	0%	0%	0%	1%	3%	6%	14%	16%	10%	8%	4%	4%
	Gadsby CT	0%	0%	0%	0%	0%	0%	1%	1%	1%	0%	0%	1%
	Hermiston	66%	71%	67%	73%	65%	53%	62%	71%	71%	2%	79%	77%
													77% 57%
	Lake Side 1	55%	53%	35%	48%	46%	40%	44%	44%	52%	51%	54%	
	Lake Side 2	58%	55%	46%	36%	37%	49%	50%	57%	57%	52%	61%	62%
	Naughton 3	-1%	-1%	-1%	20%	35%	28%	41%	48%	32%	42%	29%	44%
Actual 2022 Coal G	eneration												
	Colstrip	107,678	87,452	105,735	48,902	62,976	77,595	97,988	104,136	88,209	106,452	97,850	95,504
	Craig	108,532	75,241	96,037	91,615	101,070	92,495	97,178	106,523	98,884	81,659	66,178	51,328
	Dave Johnston	283,360	279,895	352,246	179,372	232,052	260,040	375,475	331,823	376,401	333,904	319,605	257,746
	Hayden	54,717	43,930	40,635	40,025	30,587	38,746	47,276	48,776	41,692	41,725	44,323	50,640
	Hunter	656,821	506,717	327,003	410,902	599,263	624,207	702,793	699,341	468,828	203,151	263,034	403,700
	Huntington	539,332	445,621	464,080	471,297	460,886	424,855	526,211	577,934	530,885	286,250	438,440	507,324
	Jim Bridger	546,236	480,878	604,740	544,518	533,351	428,698	778,834	763,054	731,146	794,713	609,341	560,608
	Naughton 1 & 2	206,569	85,854	91,274	81,841	111,446	109,973	202,574	206,453	181,769	208,890	170,734	222,593
	Wyodak	83,550	121,866	127,375	72,711	2	116,808	133,987	166,814	121,240	157,634	119,935	121,889
Actual 2022 Gas Ge		,	,	,	,		,	,	,	,	,	,	,
	Chehalis	125,384	139,501	80,614	212,498	(471)	2,871	182,021	236,233	245,562	315,880	311,140	320,761
	Currant Creek	257,090	241,372	226,708	234,162	179,358	213,110	209,454	239.479	224.078	239,252	266,306	275.610
	Gadsby	(243)	114	(301)	1,316	5,282	10,124	25,588	28,087	16,948	14,317	6,632	7,609
	Gadsby CT	(25)	258	128	187	(149)	(24)	890	696	867	46	13	461
	Hermiston	130.938	124.670	128.862	135.930	125.118	98.816	118,302	134.845	132.717	4.573	148,272	150.835
	Lake Side 1	300,761	261,431	188,443	243,628	246,617	205,676	236,227	233,974	272,646	268,152	280,946	308,687
	Lake Side 2	347,014	295,783	271,073	202,574	210,193	270,877	281,665	323,913	317,115	298,637	344,997	367,644
	Naughton 3	(982)	(1,093)	(1,139)	35,775	64,962	49,784	74,617	87,751	56,501	77,175	52,526	80,354
	Monthly Hours	744	672	743	720	744	720	744	744	720	744	721	744
	Monthly Hours	744	072	743	720	744	720	744	744	720	744	721	744
Peak Capacity (Nar	neplate) (From GRC)	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21
	Colstrip	148	148	148	148	148	148	148	148	148	148	148	148
	Craig	163	163	163	163	163	163	163	163	163	163	163	163
	Dave Johnston	751	751	751	751	751	751	755	755	755	755	755	755
	Hayden	77	77	77	77	77	77	77	77	77	77	77	77
	Hunter	1,151	1,151	1,151	1,151	1,151	1,151	1,148	1,148	1,151	1,151	1,151	1,151
	Huntington	909	909	909	909	909	909	909	909	909	909	909	909
	Jim Bridger	1,406	1,406	1,406	1,406	1,406	1,406	1,406	1,406	1,406	1,406	1,406	1,406
	Naughton	357	357	357	357	357	357	357	357	357	357	357	357
	Wyodak	272	272	272	272	266	266	266	266	266	266	272	272
	Chehalis	662	657	651	647	635	631	615	613	622	646	657	663
	Currant Creek	692	686	676	663	647	651	643	645	653	656	677	690
	Gadsby	238	238	238	238	238	238	238	238	238	238	238	238
	Gadsby CT	123	122	122	121	120	119	117	118	119	120	122	123
	Hermiston	265	262	259	258	258	257	256	256	259	258	260	264
	Lake Side 1	733	727	719	711	725	722	718	720	724	707	720	730
	Lake Side 2	802	794	786	778	767	768	758	761	771	774	788	799
	Naughton - Gas	247	247	247	247	247	247	247	247	247	247	247	247
		2-17	2-11	2-11	2-11	2-17	2-17	2-11	2-11	2-17	2-17	2-17	2-11

Rocky Mountain Power Exhibit RMP___(JP-2R) Page 3 of 8 Docket No. 23-035-01 Witness: Jack Painter

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.

Rocky Mountain Power
Exhibit RMP___(JP-2R) Page 4 of 8
Docket No. 23-035-01
Witness: Jack Painter

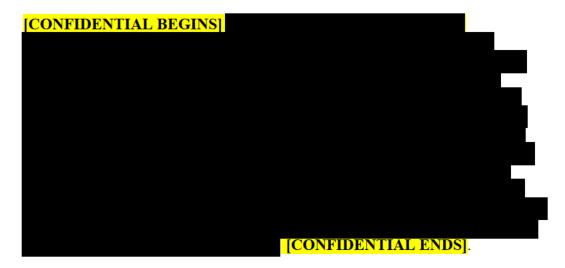
23-035-01 / Rocky Mountain Power October 26, 2023 DPU Data Request 17.2

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.



Rocky Mountain Power Exhibit RMP___(JP-2R) Page 5 of 8 Docket No. 23-035-01 Witness: Jack Painter

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).

Rocky Mountain Power Exhibit RMP__(JP-2R) Page 6 of 8 Docket No. 23-035-01 Witness: Jack Painter

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

Rocky Mountain Power Exhibit RMP___(JP-2R) Page 7 of 8 Docket No. 23-035-01 Witness: Jack Painter

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.

Rocky Mountain Power Exhibit RMP___(JP-2R) Page 8 of 8 Docket No. 23-035-01 Witness: Jack Painter

23-035-01 / Rocky Mountain Power December 22, 2023 DPU Data Request 17.4 – 1st 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.

1st 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 1st 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 1st Supplemental which provides the supporting confidential work paper.