WRA EXHIBIT___(KB-2)

Selected Data Request Responses from Docket No. 25-035-06

OCS 1.1: Please refer to Mr. Higgins' testimony criticizing the use of Schedule 38. If Schedule 38 is deemed inappropriate, what specific alternative resource valuation methodology does the Agency propose? Please provide a complete description of the proposed methodology.

Agency Response:

Mr. Higgins discusses the need for updates and corrections to the Schedule 38 avoided cost calculation in its current form before it would be reasonable to use this method to calculate the benefits of the Program Resource, but he did not recommend rejecting the Schedule 38 method altogether.

If the Commission determines that Schedule 38 is inappropriate for calculating the benefits of the Program Resource, an alternative would be to calculate the benefits of the Program Resource using the same approach PacifiCorp uses for calculating the benefits of its own resource acquisitions, generally referred to as its PVRR analyses, which are typically presented by the Company when including generation resources into rates. Note that the Company's PVRR analyses calculate benefits and costs. For the purpose of valuing the Program Resource, the main utility of using the PVRR approach would be to determine the benefits of the Program Resource (e.g., avoided costs). The primary cost of the Program Resource would be the purchased power costs, although Company witness MacNeil identifies other costs RMP is likely to consider. As discussed on lines 322-488 of his direct testimony, Mr. Higgins strongly disagrees with certain of the additional costs that RMP indicates it is likely to propose (e.g., RECs) and reserves judgement as to the reasonableness of other costs the Company may propose.

CREA Data Request 4.1

When PacifiCorp values resources bid into Requests for Proposals (RFP) it administers, does it exclude certain preferred portfolio proxy resources in the hourly dispatch simulations with and without the project bid being studied? If so, please identify the preferred portfolio resources excluded.

Response to CREA Data Request 4.1

In a typical request for proposals (RFP) process, PacifiCorp assumes that the bids received represent the entire pool of resource options through the latest allowed commercial operation date (COD). Proxy resources are excluded from selection through the latest COD allowed in the RFP and the portfolio would be comprehensively reoptimized using the available bids in the near term and proxy resources in the long term. Some interpretation of these assumptions may be required, as opportunities for resource procurement outside of the instant RFP would increase as CODs get further in the future. This can also be impacted by resource type, as proxy long-lead resources (e.g. pumped hydro or nuclear) might need to be delayed longer than resources that can be sited and constructed quickly. While the portfolio would be comprehensively reoptimized in an RFP relative to a preferred portfolio, variant analysis of alternative outcomes is typically prepared by adding and/or removing marginal bids. This variant analysis may not use comprehensive re-optimization and may instead reflect replacement of bids and/or proxy resources in comparable locations. Alternatively, variant analysis may not include any other portfolio changes other than the marginal bid being evaluated. In any case, the determination of excluded resources would be specific to the circumstances.

For Utah Schedule 100 resources, PacifiCorp does not assume that the bids received will represent the entire pool of resource options. PacifiCorp expects that the “like for like displacement” applicable under the Partial Displacement Differential Revenue Requirement (PDDRR) methodology used to calculate avoided costs under Utah Schedule 38 would be used to identify preferred portfolio proxy resources to be excluded when a project bid is added. That methodology was adopted in the Public Service Commission of Utah’s (UPSC) January 23, 2018 order in Docket No. 17-035-37. For discussion of the displacement of preferred portfolio proxy resources, please refer to the filing supporting the PacifiCorp’s proposed Schedule 37 avoided cost updates in Docket No. 25-035-T03 and the PacifiCorp’s filings of quarterly avoided cost input updates in Docket No. 25-035-30. For example, refer to page 4 of Appendix A in PacifiCorp’s May 7, 2025 quarterly filing, publicly available on UPSC’s website using the following website link:
https://pscdocs.utah.gov/electric/25docs/2503530/339680RMP2025Q1AvdCstInptChngs5-7-2025.pdf

25-035-06 / Rocky Mountain Power
July 23, 2025
OCS Data Request 2.9

OCS Data Request 2.9

Direct Testimony of Daniel J. MacNeil – Refer to page 11 of your testimony lines 212-214, stating for contract terms beyond the study horizon, "a simple extrapolation may not suffice".

(a) What specific, alternative methodologies does the Company propose to use instead of a simple extrapolation?

(b) Please provide an example calculation using the Company's proposed methodology.

Response to OCS Data Request 2.9

(a) PacifiCorp has not proposed a specific methodology. Any extrapolation will account for the specific circumstances and variability in the data. A multi-year trend can limit the impact of a data point at the very end of the production cost model horizon that may represent a transient condition (applicable to only 2045) rather than something that is emblematic of all future years (e.g. 2045-2060). Determining which years should be included or excluded is subject to evaluation.

(b) For an example of a multi-year extrapolation, please refer to Attachment OCS 2.9.

WRA Data Request 1.15

For the most recent five years for which the Company has data, please provide the percentage of Utah load, on an energy basis, represented by the participating communities.

Response to WRA Data Request 1.15

The Company assumes that the "participating communities" relevant to this request are [list]. Based on the foregoing assumption, the Company responds as follows:

Please refer to the table below which provides actual annual Utah load (megawatt-hours (MWh)), and actual annual participating communities load (MWh) together with the calculated percentage:

Calendar Year	Total Utah	Utah Participating Communities	Percent
	Megawatt-Hours (MWh)		(%)
2024	27,108,710	14,140,554	52.16
2023	25,971,102	13,671,286	52.64
2022	26,031,084	13,685,800	52.57
2021	25,574,821	13,421,763	52.48
2020	24,839,348	13,110,010	52.78