

Attachment C: Proposed Filing Requirements for Net Power Costs

The OCS has traditionally spent considerable resources evaluating the net power cost portion of Rocky Mountain Power (and its predecessor organization.) Our recommendations for the information necessary to do a complete analysis are as follows. These net power costs requirements would only apply to an electric utility.

Rocky Mountain Power should be required to provide, at the time of the filing workpapers and supporting documents as described below. All information should be required to be provided electronically and, in the case of Excel spreadsheets, with all formulas intact including all hierarchy of linked spreadsheets.

In the following, the term GRID shall refer to the power cost model currently used by Rocky Mountain Power, or any subsequent enhancements to or replacements of that model.

The term “workpapers” means the documents used to develop the inputs to GRID. This may include such items such as contracts, emails, white papers, studies, PacifiCorp computer programs, Excel spreadsheets, Word documents, pdf and text files, computer programs, or any other data or documents relied upon to support the cost details in the filing.

In cases where systems change or are replaced in the future, Rocky Mountain Power should be required to continue to provide substantially the same information .

If the inputs used in GRID were developed from a document, such as a contract, provide the contract with the GRID inputs highlighted.

1. Basic Data:
 - a) Workpapers that show the source, calculations and details supporting the testimony, other exhibits and all GRID input data. The workpapers will include, at a minimum, copies of the net power cost report in Excel and the net power cost model database.
 - b) Identification of the Four Year Period used to determine outage rates and other input items in the net power cost model.
 - c) Compilations of actual net power costs produced by PacifiCorp that were referenced in the testimony or exhibits, to the extent that actual power cost results are discussed or cited in the Company’s direct testimony or exhibits. *See, e.g.,* MDR 2.54 in 08-035-38. Transaction level detail for the most recent 12 months of actual power costs will be provided in a format comparable to and at a level of detail comparable to CCS 7.4 from Docket No. 07-035-93.
 - d) A list and explanation of all modeling or logic changes or enhancements to the net power cost model that have been implemented since the most recent

general rate case. This will include a statement of the direction and amount of change in net power costs resulting from each such change and documentation describing each change as well as net power cost model runs and workpapers quantifying the impacts of these changes.

- e) Access to or a copy of the GRID model used by the Company to compute power costs in the test year.
- f) The latest documentation for the GRID model.

2. Additional Data

- a) All documents, workpapers or other information relied upon by the Company in determining the market caps used in the power cost model for the Pro-Forma Period.
- b) The current topology maps in the power cost model along with an explanation for all the differences that have been made to the topology since the last GRC case and an explanation of why the changes were made. Include supporting documentation, such as contracts resulting in changes to the transfer capabilities used in GRID.
- c) Workpapers showing the computation of the outage rates (planned and unplanned) used in the power cost model. Include all backup data showing each outage (planned or unplanned, etc.) and duration (planned or unplanned) considered in the four-year period, including NERC cause code, type of event, duration, energy lost, etc. *See, e.g. MDR 2.57-1 and MDR 2.57-2.*
- d) The date and a copy of the forward price curve, showing monthly heavy load hour and light load hour, used in creating the Test Year power cost model. *See e.g. MDR 2.59*
- e) Documents showing all pertinent data for short-term firm transactions (including short-term firm indexed transactions and swaps) modeled in the test year power cost study. In addition, each contract will have a designation as to its purpose (i.e., trading, arbitrage or balancing.) *See e.g. MDR 2.63 from Docket No. 08-035-38 for the data to be supplied.*
- f) For all contracts modeled in GRID that were not included in the most recent general rate case:
 - 1. A copy of the contract (in pdf or electronic format, if available).
 - 2. Any workpapers used to develop the power cost model input assumptions related to the contract.
- g) Regulatory Fuel Budget filing used for the test year and any other workpapers used in developing the power cost model fuel cost inputs.
- h) The heat rate curves for each resource, supporting data and spreadsheets showing the derivation of the heat rate curves. Provide that data with the same content and comparable format to CCS 7.5 from Docket No. 07-035-93.
- i) Workpapers and documentation supporting the “Other Cost” file used in the power cost model, including all electronic spreadsheets used to compute any of the line items in the file. This includes test year wheeling expenses modeled in GRID.

- j) Workpapers and documentation supporting the “Energy Cost,” “Demand Cost,” and “Demand” files used in the power cost model, including all electronic spreadsheets used to compute any of the line items in the file.
- k) Identification of each instance in which the Company changed any maximum capacities, minimum up or down times or unit minimum capacities for thermal or hydro generators modeled in the power cost model since the last GRC, if applicable.
- l) Workpapers explaining the development of each line of load adjustments presented on the Company’s power cost model output reports. These include but are not limited to:
 - 1. DSM (irrigation)
 - 2. U. S. Magnesium Curtailment
 - 3. Monsanto Curtailment
 - 4. Station Service
- m) Workpapers used to develop inputs for QF contracts modeled in GRID.
- n) Workpapers for any screens applied to restrict uneconomic dispatch of resources in the GRID model.
- o) Workpapers showing the derivation of start up fuel costs, start up O&M costs and any other form of start up costs modeled in GRID. See e.g. CCS 18.51 from Docket No. 08-35-38.
- p) Provide the loss factor data showing losses for the system and for each state for the most recent five calendar years and for the most recent five fiscal years. Compare those loss factors to those that were used in developing loads for the GRID for the test period used in this case.
- q) Provide the system level loss factors assumed in GRID in the most recent (or current) Utah, Oregon, Idaho, Wyoming and Washington rate cases.
- r) Provide a table showing the actual generation of each PacifiCorp coal, gas, hydro and wind generating unit modeled in GRID for each month for the four year period.
- s) Provide hourly generator logs for each wind, coal, gas and hydro unit modeled in GRID for the Four-Year Period as defined above.
- t) Provide the actual most current schedule for thermal and hydro generator planned outages for the test year, the most recent calendar year and the next four calendar years.
- u) Provide hourly logs for all contracts modeled in GRID, showing actual data (hourly sales or purchases) for the four year period.
- v) Provide workpapers showing the details of STF and NF transmission used by the Company during the four year period. Please provide in a format and level of detail comparable to CCS 10.25 and CCS 30.3 from Docket No. 08-035-38.
- w) For each of the transmission contracts whose costs are included in GRID, please identify the purpose of the transaction, why it is used and useful in the Test Year, the amount of capacity or type of transmission service it provides, and where the capacity or service provided by this contract is modeled in GRID. Please provide in the same level of detail and format as CCS 23.16 in Docket No. 08-035-38.

- x) Provide data for the Four Year period or for the most recent four years available for all third party transmission imbalance transactions that have been included in STF or secondary transactions in the Actual Power Cost reports during that period. Provide data in the same level of detail and comparable format to CCS 23.36 from Docket No. 08-035-38.
- y) Please provide the workpapers used by the Company to compute the links and other inputs for short-term firm (including any related to SP 15) and non-firm transmission modeling used in GRID.
- z) Please provide all documents related to preparation the hydro planned and unplanned outage rates.
- aa) Please provide the same data as supplied in MDR 2.12 Confidential and 2.13 Confidential. Data comparable to that provided in MDR 2.12 should be supplied for the test year and at the Company's discretion may be limited to net power variable power costs data.
- bb) To the extent that the Company is using the ramping adjustment in this case, please provide the same information (but for all units for which ramping has been applied) as provided in the response to CCS 18.49 from Docket No. 08-035-93.
- cc) Please provide all documents and workpapers utilized in the development of the costs of wind integration as modeling in the power cost study. To the extent that the figures used were developed as part of an IRP or similar report, provide the underlying data, spreadsheets, model runs and all other workpapers used.