

Rocky Mountain Power  
Exhibit RMP\_\_(CAT-1SR)  
Docket No. 17-035-40  
Witness: Chad A. Teply

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF UTAH

ROCKY MOUNTAIN POWER

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Exhibit Accompanying Surrebuttal Testimony of Chad A. Teply

Company's Response to OCS 16.7

May 2018

17-035-40 / Rocky Mountain Power  
March 26, 2018  
OCS Data Request 16.7

### **OCS Data Request 16.7**

Refer to the Company's response to UIEC 2.3. Ms. Crane has stated that PacifiCorp is willing to accept risks for the loss of receiving full PTC benefits associated with PacifiCorp's performance. Please confirm that the Company is not willing to absorb the risk of loss of receiving full PTC benefits if the Company operates the new wind units in the round robin scheme? Please fully clarify the risks that the Company is and is not willing to accept concerning the round robin scheme.

### **Response to OCS Data Request 16.7**

The use of a "round robin" scheme does not, by itself, indicate that the Company's performance was less than adequate or that the Company is or is not solely responsible for the lost production tax credits (PTC) during the rotating curtailment. An assessment of the circumstances that brought about the need to use a "round robin" scheme and the Company's performance in light of those circumstances would be necessary to determine the responsibility.

Regarding risks that the Company is and is not willing to accept concerning a "round robin" scheme, the Company objects to the request on the basis that it calls for speculation. Any outcome that is less than favorable would need to be assessed as to whether the outcome was a result of Company's performance or whether an outcome was a result of factors outside of the Company's ability to influence.