

Rocky Mountain Power
Exhibit RMP___(DJM-1R)
Docket No. 20000-518-EA-17
Witness: Daniel J. MacNeil

BEFORE THE WYOMING PUBLIC SERVICE
COMMISSION

ROCKY MOUNTAIN POWER

Exhibit Accompanying Rebuttal Testimony of Daniel J. MacNeil

Renewable Energy Coalition's Response to Rocky Mountain Power's Data Request 1.1

December 2017

BEFORE THE PUBLIC SERVICE COMMISSION OF WYOMING

IN THE MATTER OF THE APPLICATION)
OF ROCKY MOUNTAIN POWER FOR)
APPROVAL OF SCHEDULE 37 STANDARD) **Docket No. 20000-581-EA-17**
RATES FOR PURCHASES OF POWER) **(Record No. 14736)**
FROM QUALIFYING FACILITIES)

**RENEWABLE ENERGY COALITION’S RESPONSES TO
ROCKY MOUNTAIN POWER’S FIRST SET OF DISCOVERY REQUESTS**

Renewable Energy Coalition (“REC”), by and through its attorneys, hereby serves its response to the Rocky Mountain Power’s First Set of Discovery Requests.

RMP Data Request to REC 1.1 Please provide the Schedule 37 avoided cost rates proposed by Mr. Lowe for the base load, wind, fixed tilt solar, and tracking solar resource types reflected in the Schedule 37 tariff. Please provide all workpapers and assumptions used in the development of the proposed rates.

RESPONSE:

REC has not prepared the requested calculations. REC is proposing a change to the methodology consistent with REC's recommendations in Oregon, Utah, and Wyoming that are in the manner in which Rocky Mountain Power's affiliated company, PacifiCorp, currently calculates renewable avoided cost rates in Oregon. Rocky Mountain Power is therefore familiar with these recommendations, has calculated and filed avoided cost rates consistent with REC's recommendation in Oregon, and can easily perform these calculations itself. REC is willing to work with Rocky Mountain Power to ensure that its calculations are performed correctly should Rocky Mountain Power provide access to the requisite data modeling. Finally, REC notes that PacifiCorp has previously explained in comments in Oregon that the question of whether and what type of renewable avoided cost rate should be set is a legal and policy question that does not require evidentiary proceedings. PacifiCorp also recently proposed more substantive avoided cost rate changes than are at issue in this proceeding in Washington without providing any specific rate forecasts with supporting workpapers and assumptions.

RESPONDENT:

John R. Lowe