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October 18, 2019

***VIA ELECTRONIC FILING***

Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
Salem, OR 97301-3398

Attn: Filing Center

**RE: UE 356—Response to ALJ Bench Request Nos. 1 and 2**

Pursuant to ALJ Rowe's Ruling of October 15, 2019, PacifiCorp d/b/a Pacific Power encloses for filing its Responses to ALJ Bench Request Nos. 1 and 2. Also enclosed are Confidential Attachments ALJ Bench Request 1-1, ALJ Bench Request 1-2, and ALJ Bench Request 2.

The confidential attachments are designated as Protected Information under Order No. 16-128 and may only be disclosed to qualified persons as defined in that order.

Please direct any questions regarding this filing to Cathie Allen at (503) 813-5934.

Sincerely,

Etta Lockey  
Vice President, Regulation

Enclosures

## CERTIFICATE OF SERVICE

I certify that I delivered a true and correct copy of PacifiCorp's **Response to ALJ Bench Request Nos. 1 and 2** on the parties listed below via electronic mail and/or overnight delivery in compliance with OAR 860-001-0180.

### Service List UE 356

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Dated this 18<sup>th</sup> day of October, 2019.




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Katie Savarin  
Coordinator, Regulatory Operations

## **ALJ Bench Request 1**

Exhibit 4 (Confidential) to the stipulation lists the stipulated capacity factors for each PacifiCorp-owned wind facility. The non-confidential title to the table is “New Wind Capacity Factor in February 2018 Analysis.” PacifiCorp's testimony states that the February 2018 economic analysis was included in the 2017 IRP Update. PAC/400, Wilding/9.

Please list the docket and date of PacifiCorp's 2018 filing that contained these capacity factors for the four new wind projects.

## **Response to ALJ Bench Request 1**

The Reply Testimony of company witness, Michael G. Wilding at PAC/400 Wilding/9 specifically referenced the capacity factors of the repowered wind facilities not the new wind facilities. The testimony says PacifiCorp “revised the capacity factors for the repowered wind facilities to align with the company’s February 2018 economic analysis for wind repowering (included in the 2017 IRP Update and the 2019 RAC).” The capacity factors for the repowered projects are provided in the confidential work papers supporting the 2017 Integrated Resource Plan (IRP) Update which was submitted to the Public Utility Commission of Oregon (OPUC) on May 1, 2018 in docket LC 67. Please refer to the confidential data disk that accompanied PacifiCorp’s 2017 IRP Update, specifically file “Wind Repower Template (Jan 30 2018) F.xlsx,” tab “Repower Info” in folder “Assumptions + Inputs\Repower.”

The individual capacity factors for the new wind projects were not identified in the 2017 IRP Update work papers, however, they were included in the modeling in the 2017 IRP Update. The capacity-weighted average annual capacity factor for the new wind can be calculated from the data in the 2017 IRP Update work papers. Please refer to the confidential data disk that accompanied PacifiCorp’s 2017 IRP Update, specifically to the “Net New Project Generation” amount of 4,528 gigawatt-hours (GWh) in file “Table 7.8-7.11 - EV2020 Second Supp Results Summary File - VOM adjusted.xlsx,” tab “PaR - RFP FSLW Studies,” cell I58 in folder “Chapters + Appendix\Chapter 7 - EV2020 Update.” Then divide that amount by the total capacity of the new wind projects in Table 7.7 on page 101 of the 2017 IRP Update, which is 1.311 gigawatts (GW) and then divide by 8,760 hours per year for a result of 39.4 percent.

The individual capacity factors for the four new wind projects referenced in Exhibit 4 (TB Flats I, TB Flats II, Cedar Springs II and Ekola Flats) was included in the Confidential Second Supplemental Direct Testimony of company witness, Rick T. Link in Wyoming Public Service Commission Docket No. 20000-520-EA-17 (Energy Vision 2020 (EV 2020)) dated February 16, 2018. Please refer to Confidential Attachment ALJ Bench Request 1-1, which provides a copy of Confidential Exhibit RMP\_\_\_(RTL-1SS).

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Please refer to Confidential Attachment ALJ Bench Request 1-2, which provides the work paper supporting Confidential Exhibit RMP\_\_\_(RTL-1SS).

Note: the same information was included in Mr. Link's Confidential Second Supplemental Direct Testimony in Public Service Commission of Utah Docket No. 17-035-40 (EV 2020) dated February 16, 2018.

The confidential attachments are designated as Protected Information under Order No. 16-128 and may only be disclosed to qualified persons as defined in that order.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

## **ALJ Bench Request 2**

Exhibit 4 (Confidential) to the stipulation lists the stipulated capacity factors for each PacifiCorp-owned wind facility. The non-confidential title to the table is “New Wind Capacity Factor in February 2018 Analysis.” PacifiCorp's testimony states that the February 2018 economic analysis was included in the 2017 IRP Update. PAC/400, Wilding/9.

Please explain if and why the stipulated capacity factors differ from the publicly available estimate in the IRP Update: “in aggregate the winning bids are expected to operate at a capacity-weighted average annual capacity factor of 39.4 percent.” PacifiCorp 2017 Integrated Resource Plan Update, Docket No. LC 67 at 101 (May 1, 2018).

## **Response to ALJ Bench Request 2**

Please refer to the company's response to ALJ Bench Request 1, which provides supporting documentation for the capacity-weighted average annual capacity factor of 39.4 percent, as stated in PacifiCorp's 2017 Integrated Resource Plan (IRP) Update. The stipulated capacity factors do not differ from the publicly available estimate in the 2017 IRP Update; the publicly available 2017 IRP Update is a capacity-weighted average for all the projects, while the stipulation uses the individual capacity factors for each project.

Please refer to Confidential Attachment ALJ Bench Request 2, which provides a modified extract of the work paper provided with the company's response to ALJ Bench Request 1, specifically Confidential Attachment ALJ Bench Request 1-2. The work paper has been modified to only reflect the four new wind projects (TB Flats I, TB Flats II, Cedar Springs II and Ekola Flats). The work paper removes the Cedar Springs power purchase agreement (PPA) and the Uinta project. The capacity-weighted average annual capacity factor in this modified work paper calculates to 39.2 percent.

The confidential attachment is designated as Protected Information under Order No. 16-128 and may only be disclosed to qualified persons as defined in that order.