

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

LC 57

In the Matter of

PACIFICORP, dba PACIFIC POWER,

2013 Integrated Resource Plan.

BENCH REQUEST

We direct PacifiCorp, dba Pacific Power to respond to the following questions within seven calendar days.

A. TPL-002 Standard

1. With the cancellation of the supply agreement between NV Energy, Inc. and Utah Associated Municipal Power Systems (UAMPS),<sup>1</sup> is Pacific Power in compliance with the North American Electric Reliability Corporation's (NERC) TPL-002 performance standard today?
  - a. If Pacific Power is in compliance with the TPL-002 standard today, please explain why and how it is in compliance.
  - b. If Pacific Power is not in compliance today, please explain why and how it is not in compliance.
  
2. A handout provided to the Commission by Pacific Power during a public meeting in 2012 suggests that if the existing Sigurd to Red Butte Line goes out of service, up to 580 MW of load in the Red Butte area can be served with power delivered north over the TOT 2C Line from the Harry Allen Substation.<sup>2</sup> The exhibit provided on page 5 of Pacific Power's Confidential Response to Commission Staff's Data Request 36 in this docket suggests that forecasted loads in the Red Butte area will be below 580 MW through 2017.
  - a. Is 2018 the first year that Pacific Power forecasts not being able to serve peak load in the Red Butte area in the event that the existing Sigurd to Red Butte Line is out of service?
  - b. Is 2018 the first year that Pacific Power forecasts being out of compliance with the TPL-002 performance standard?

<sup>1</sup> As referenced in Pacific Power's Response to Staff's Data Request 149.

<sup>2</sup> The handout, provided by Pacific Power during its November 5, 2012 public input meeting on the company's transmission, stochastic modeling, and preferred portfolio selection, is available at the following URL: [http://www.pacificorp.com/content/dam/pacificorp/doc/Energy\\_Sources/Integrated\\_Resource\\_Plan/2013IRP/2013IRP\\_DTG-4\\_5-SWUTAreaTransmissionBuilld\\_11-5-12.pdf](http://www.pacificorp.com/content/dam/pacificorp/doc/Energy_Sources/Integrated_Resource_Plan/2013IRP/2013IRP_DTG-4_5-SWUTAreaTransmissionBuilld_11-5-12.pdf)

- c. How is the N-1 contingency analysis for the Sigurd to Red Butte Line conducted?
  3. If the NV Energy supply agreement was still in effect today, would power delivery to Red Butte be limited by the 580 MW capacity of the TOT 2C Line?
    - a. Is the limiting factor to meeting future peak load in the Red Butte area solely with power deliveries from the Harry Allen Substation (1) the capacity of the TOT 2C Line, (2) the availability of a power supply agreement, or (3) both?
  4. What explains the differences in the forecasted average annual rate of growth in peak loads served by Pacific Power, Deseret Generation & Transmission Cooperative, Inc. (Deseret), and (UAMPS) in the Red Butte area?<sup>3</sup>
    - a. By year, what would be the combined peak load forecast for the Red Butte area assuming a 4 percent average annual rate of growth in UAMPS peak loads from 2012 to 2021?
    - b. By year, what would be the combined peak load forecast for the area assuming a 3 percent average annual rate of growth in UAMPS peak loads from 2012 to 2021?
    - c. By year, what would be the combined peak load forecast for the area assuming the same average annual rate of growth in peak demand in the UAMPS area as for Pacific Power's Utah service territory from 2012 to 2021?
  5. What are the underlying assumptions driving the UAMPS and Deseret peak load forecasts for the relevant area? Have any sensitivity analyses been run on UAMPS and Deseret peak load forecasts in the area? What evaluations, if any, have been conducted of the UAMPS and Deseret load forecasts? Has Pacific Power conducted any independent analyses to verify the UAMPS and Deseret load forecasts? Please provide any analyses and work papers related to the UAMPS and Deseret load forecasts.
- B. Alternatives to a Second Sigurd to Red Butte Line
6. Provide all communications, work papers, and analyses regarding any Pacific Power or other utility efforts to renegotiate the NV Energy Supply Agreement that was canceled in 2012.
    - a. Provide all analyses and work papers for Pacific Power's evaluation of securing firm transmission service and firm power from NV Energy on a going-forward basis in lieu of building a second Sigurd to Red Butte Line.
  7. In response to Staff's Data Request 149, Pacific Power states: "UAMPS is a party to the May 9, 2013, WSPP agreement filed and accepted under FERC's order of June 6, 2013, in Docket No. ER13-1349-000 which administers a multilateral,

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<sup>3</sup> See Pacific Power's Confidential Response to Staff's Data Request 36 at 5-6 (Exhibits 1 and 2).

standardized agreement applicable to capacity and/or energy transactions between members and is available to entities which qualify for membership.” Does the WSPP agreement help to ensure that peak loads can be served in the Red Butte area in the event of an outage on the existing Sigurd to Red Butte Line? Why or why not?

8. What options other than constructing a second Sigurd to Red Butte Line were considered and evaluated by all affected utilities?
9. What resource options have UAMPS and Deseret considered, plan to take, or are taking to meet increased loads in the area?
10. What demand response and conservation programs are in place to reduce the peak demands of customers of UAMPS and Deseret in the area? What are the annual savings from those programs?

C. Federal Energy Regulatory Commission (FERC) and Cost Allocation

11. Does FERC allow a transmission provider to require up-front contributions from entities requesting transmission service prior to constructing a new transmission line? Please explain, and provide relevant FERC decisions.
12. Does the ability of a transmission provider to require up-front contributions from entities requesting transmission service prior to Pacific Power constructing a new transmission line vary by whether the requested service is point-to-point or network transmission? Is the transmission provider precluded from requiring an entity requesting network transmission service to explore other less cost alternatives? Please explain and provide relevant FERC decisions.
13. Have there been any discussions or negotiations between Pacific Power, UAMPS, and Deseret regarding alternative funding arrangements for the construction of the Sigurd to Red Butte Line (such as the sharing of upfront capital costs)?

Dated this 20<sup>th</sup> day of March, 2014, at Salem, Oregon.

  
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**Susan K. Ackerman**  
Chair

  
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**John Savage**  
Commissioner

  
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**Stephen M. Bloom**  
Commissioner