

UE-152253 / Pacific Power & Light Company
May 19, 2016
WUTC Data Request 183

WUTC Data Request 183

REQUESTED BY: Jeremy Twitchell

Referring to page 2, lines 15-16 of Exhibit No. CAC-1CT, please identify, by exhibit cite with page and line references, each instance where in the record for this proceeding the Company has provided evidence that it considered increased coal costs prior to issuing the FNTF.

Response to WUTC Data Request 183

Exhibit No. CAT-14CT 13:8-14
Exhibit No. CAT-14CT, 20:20-21:14
Exhibit No. DR-1CT 2:21-22
Exhibit No. DR-1CT 7:16-22
Exhibit No. DR-1CT 8:6-10
Exhibit No. RTL-11CT 8:7-14
Exhibit No. CAT-40CT 3:13-23
Exhibit No. CAT-40CT 4:22-5:10
Exhibit No. RTL-15CT 6:1-6

PREPARER: Matt McVee

SPONSOR: Cindy A. Crane/Chad A. Teply

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REQUESTED BY: Jeremy Twitchell

Referring to page 4, lines 11-14 of Exhibit No. CAC-1CT, please confirm that Ms. Crane's analysis of BCC coal costs references a 2014-2023 time frame, as opposed to the 2016-2030 time frame used in the Company's SCR analysis and by Mr. Twitchell in his analysis of BCC coal costs in his supplemental testimony.

Response to WUTC Data Request 185

Confirmed.

PREPARER: Brad Davis

SPONSOR: Cindy A. Crane

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Referring to page 7, lines 7-13 of Exhibit No. CAC-1CT, please confirm whether the Company conducted any analysis, prior to issuing the FNTP, to quantify the relationship between cash and capital cost changes in the October 2013 Mine Plan. If such an analysis was done within the referenced time frame, please provide documentation of its assumptions and conclusions.

Response to WUTC Data Request 187

During the budgeting process, the Company recognized that increases in Bridger Coal cash costs would be substantially offset by reduced Bridger Coal capital spending and third-party costs. Therefore, the Company did not quantify the specific relationship between cost changes in the October 2013 mine plan and the January 2013 long-term fueling plan before issuing the full notice to proceed.

PREPARER: Brad Davis

SPONSOR: Cindy A. Crane

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REQUESTED BY: Jeremy Twitchell

Please refer to page 8, lines 16-17; page 9, lines 4-5; and page 9, lines 8-11 of Exhibit No. CAC-1CT. Ms. Crane asserts that Staff's analysis assumes that the increase it calculated for BCC coal based on the October 2013 Mine Plan would be an annual increase applied every year through 2030, based on page 18, lines 18-22 of Exhibit No. JBT-28HCT. Please provide the following:

- An explanation of how the Company arrived at this conclusion based on the referenced passage of Mr. Twitchell's supplemental testimony; and
- Identification of the specific sections of Mr. Twitchell's supplemental exhibits and work papers that support Ms. Crane's assertion.

Response to WUTC Data Request 188

- The Company's initial review of the Exhibit No. JBT-28HCT appeared to indicate an annual increase applied every year through 2030. Upon further analysis, the Company concurs that Mr. Twitchell's supplemental testimony does not suggest an annual increase of the percentage assumed, but instead a plan-on-plan increase.
- See the response above.

PREPARER: David Webb

SPONSOR: Cindy A. Crane

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REQUESTED BY: Jeremy Twitchell

Please confirm that Staff's analysis of increased coal costs associated with the October 2013 Mine Plan, as presented in Exhibit Nos. JBT-31C and JBT-32C, calculated a one-time increase based on an NPV calculation, rather than an annual increase.

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The Staff analysis does reflect a plan-on-plan cost increase based on the net present value of costs from the October 2013 mine plan compared to the January 2013 long-term fueling plan, rather than an annual increase.

PREPARER: David Webb

SPONSOR: Cindy A. Crane

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REQUESTED BY: Jeremy Twitchell

Referring to page 9, lines 15-20 of Exhibit No. CAC-1CT and cells B97 through E97 of the "October 2013 Mine Plan" tab of Exhibit No. CAC-2C, please identify where these third-party coal costs were previously provided in the record and a detailed explanation of how they were calculated.

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The third-party coal costs for the January 2013 long-term fueling plan are incorporated as a part of the total Bridger plant coal costs in the System Optimizer confidential workpapers. These Bridger plant coal costs were provided on Disc 3, E. Link Confidential Workpapers\SO Inputs and Outputs, CONF\Base Gas, Base CO2 (Coal Outputs) CONF\StaMoFuel-C_M1209_16_OPC.out. Additionally, these amounts can be found in the confidential workpapers supporting Sierra Club's Direct testimony in the "Synapse Adjustment 1 - October 2013 Coal Plan 03172016 - CONF.xlsx" file on the "Adjustment 2" tab. The third-party costs are calculated by taking the difference between the total Bridger plant coal costs and the Pacific Power two-thirds share of Bridger Coal Company cash costs provided in Sierra Club Data Response 1.6 1st Supplemental.

Third-party coal costs for the fall 2013 ten-year business plan have not been previously requested and therefore have not been provided in discovery. The third-party coal costs for the fall 2013 ten-year business plan were presented in Exhibit No. CAC-2C and are included in the workpapers for that exhibit.

PREPARER: David Webb

SPONSOR: Cindy A. Crane

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Please refer to Exhibit No. CAC-2C, to cells D31 and D39 of the "January 2013 Mine Plan" tab and cells D39 and D47 of the "October 2013 Mine Plan" tab. Please explain why the Company's alternative calculation of levelized costs discounts the heat content (btu) component of the calculation.

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In the referenced cells, the Company divides the net present value of costs by the net present value of mmBtu. This approach considers the weighting or annual changes in quantities and produces an accurate nominal levelized value.

PREPARER: Brad Davis

SPONSOR: Cindy A. Crane

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Since 2010, please identify:

- The date (month and year) of every mine plan developed for BCC;
- The date (month and year) of every long-term fuel plan prepared by the Company and the mine plan used as input in each plan; and
- For each mine plan and fuel plan, a list of proceedings for all six jurisdictions in which the Company used the plan.

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The Company objects to this request as overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, the Company responds as follows:

To the best of the Company's knowledge based on investigation during the limited timeframe for responding to this request:

- Mine plans were developed for BCC on the following dates:
 - January 2010
 - May 2010
 - June 2010
 - October 2010
 - December 2010
 - February 2011
 - March 2011
 - May 2011
 - September 2011
 - January 2012
 - March 2012
 - May 2012
 - July 2012
 - September 2012
 - January 2013
 - October 2013
 - July 9, 2014
 - July 22, 2014
 - November 2014
 - February 2015
 - June 2015
 - July 2015
 - February 2016

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- Long-term fueling plans were prepared on the following dates, in connection with the IRP filings:
 - May 2010 2011 IRP
 - January 2013 2013 IRP
 - July 22, 2014 2015 IRP

- Mine/fueling plans were used in the following proceedings:

BCC Mine Plans	Docket	State
January 2010	UE-216 2011 TAM	OR
June 2010	ID PAC-E-10-07	ID
October 2010	2011 UT GRC (10-035-124)	UT
October 2010	2011 UT GRC (10-035-124)	UT
December 2010	2011 UT GRC (10-035-124)	WY
February 2011	UE-246 2012 GRC	OR
February 2011	UE-227 2012 TAM	OR
March 2011	ID-PAC-E-11-12	ID
May 2011	UE-111190 GRC	WA
September 2011	WY 20000-405-ER-11	WY
September 2011	UE-245 2013 TAM	OR
January 2012	2012 UT GRC (11-035-200)	UT
May 2012	2012 UT GRC (11-035-200)	UT
September 2012	UE-130043 GRC	WA
September 2012	UE-234 2014 TAM	OR
September 2012	UE-263 2013 GRC	OR
January 2013	UE-287 2015 TAM	OR
January 2013	UT 12-035-92 JB 3&4	UT
January 2013	WY 20000-418-EA-12 CPCN JB 3&4	WY
October 2013	WY 20000-446-ER-14	WY
October 2013	UE-140762 GRC 2014	WA
October 2013	2014 UT GRC (13-035-184)	UT
July 9, 2014	UE-140762 GRC 2014	WA
November 2014	WY 20000-469-ER-15	WY
February 2015	UE-296 2016 TAM	OR
June 2015	WY 20000-469-ER-15	WY
February 2016	UE-307 2017 TAM	OR

Long-Term Plans	Docket	State
May 2010	LC-52 - 2011 IRP	OR
May 2010	UT 11-2035-01 2011 IRP	UT
May 2010	WY 20000-394-EA-11 IRP 2011	WY
May 2010	ID PAC-E-11-10 IRP 2011	ID
January 2013	LC-57 - 2013 IRP	OR
January 2013	UE-130031 - IRP 2013	WA
January 2013	UT 13-2035-01 2013 IRP	UT
January 2013	WY 20000-424-EA-13 IRP 2013	WY
January 2013	ID PAC-E-13-05 IRP 2013	ID
July 22, 2014	LC-62 - 2015 IRP	OR
July 22, 2014	UE-140546 - IRP 2015	WA
July 22, 2014	CA R.15-02-020 IRP 2015	CA
July 22, 2014	UT 15-035-04 2015 IRP	UT
July 22, 2014	WY 20000-474-EA-15 IRP 2015	WY
July 22, 2014	ID PAC-E-15-04 IRP 2015	ID

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SPONSOR: Cindy A. Crane