Sierra Club Data Request 1-13

Refer to the Confidential Workpapers attached to Rick Link's Testimony, specifically "SO Inputs and Outputs, CONF," subfolders "Base Gas, $0 CO2 (Coal, gms) CONF" and "Base Gas, $0 CO2 (Gas, gms) CONF".

(a) See file CAPEX_VOM.gms. Identify the values in this file associated with Jim Bridger.

(b) See file CAPEX_FixedOM.gms. Provide work papers supporting the fixed O&M values used for Jim Bridger plant. If different from such work papers, provide a breakdown of values within fixed O&M including, but not limited to: capital, labor, taxes, minor maintenance expenses, major maintenance expenses, water expenses, effluent expenses, coal ash disposal expenses, sorbent expenses for flue gas desulfurization, sorbent expenses for other flue gas conditioning, SCR catalyst expenses, parasitic load costs, and other cost categories as applicable.

(c) What capacity factor(s) is assumed by the company to assign total catalyst and sorbent consumption to fixed O&M cost?

(d) Does the company assume any variable O&M costs at Jim Bridger for the purposes of dispatch at the present time?

(e) If the answer is yes, what specific O&M costs are considered variable for the purposes of dispatch at Jim Bridger?

(f) If the answer to "d" is no, why not?

(g) Does the company assume any variable O&M costs at Jim Bridger for the purposes of dispatch in the company's GRID model for any rate case filing between 2010 and the present day?

(h) If the answer to "g" is yes, what specific O&M costs are considered variable for the purposes of dispatch in the GRID model at Jim Bridger?

(i) If the answer to "g." is no, why not?

(j) Please confirm that the capital investment in the SCRs at Jim Bridger 3 & 4 are amortized in the fixed O&M values (i.e. contained in CAPEX_FixedOM.gms).

(k) Please identify the depreciation date and book life associated with the SCRs at Jim Bridger 3 & 4 in Mr. Link's SO analysis.

Response to Sierra Club Data Request 1-13

(a) The referenced file "CAPEX_VOM.gms" does not contain entries for the Jim Bridger plant.

(b) Please refer to Confidential Attachment Sierra Club 1.13 -1 and Confidential Attachment Sierra Club 1.13 -2 for the work papers supporting the operations and maintenance (O&M) values provided in the subfolders entitled "Base Gas, $0 CO2 (Coal, gms) CONF" and "Base Gas, $0 CO2 (Gas, gms) CONF," respectively. The entries for the Jim Bridger units can be identified using the resource identifications (ID), which are listed in the file entitled "CAPEX_Sets.gms" in the respective subfolders. For example, the resource ID for Jim Bridger Unit 3 ("JBridger3") is "T00007" in the file entitled "CAPEX_Sets.gms" in the subfolder entitled "Base Gas, $0 CO2 (Coal, gms) CONF.

(c) Capacity factor(s) were not explicitly used.

(d) Yes.

(e) For modeling purposes, the reagent costs for emission control equipment are assumed to be variable O&M.

(f) Please refer to the Company's response to subpart (d) above.

(g) Only coal fuel supply expenses for Jim Bridger are included in the Generation and Regulation Initiative Decision Tool's (GRID) dispatch decision for Jim Bridger.

(h) Please refer to the Company's response to subpart (g) above.

(i) The inclusion of variable O&M in the dispatch decision is not expected to significantly change the generation dispatch or forecasted net power costs (NPC) produced by GRID.

(j) Yes. Please refer to the Company's response to subpart (b) above.

(k) Book depreciation begins with the installation of the selective catalytic reduction (SCR) investments. The assets are depreciated through the end of the book life of Jim Bridger Unit 3 and Jim Bridger Unit 4, which is 2037. Please refer to the work papers referenced in the Company's response to subpart (b) above.

Confidential information is provided subject to the terms and conditions of the protective order in this proceeding.

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