Information Requests related to UGP's 2024 Annual Update

A) MRES Data Requests on WAPA's 2022 True-Up and 2024 Estimate

1. Referring to the file "WAPA-UGP-Trans-Anc-Service-Rates-2022-TrueUp-Templates," tab "Summary-True-Up," line 25, col. (3), please provide the source document for $10,681,584. This is the same amount shown for SSCD Revenue Requirement in the 2021 True-Up.

   Updated value to correct amount. Does not affect formula value, but the template has been updated, see 2022 True-Up Rev1.

2. Referring to the file "WAPA-UGP-Trans-Anc-Service-Rates-2022-TrueUp-Templates," tab "Summary-True-Up," line 28, col. (3), please provide the source document for $447,694. This is the same amount shown for the Regulation & Frequency Response Revenue Requirement in the 2021 True-Up.

   Updated value to correct amount. Does not affect formula value, but the template has been updated, see 2022 True-Up Rev1.

3. Referring to the file "WAPA-UGP-Trans-Anc-Service-Rates-2022-TrueUp-Templates," tab "Summary-True-Up," line 31, col. (3), please provide the source document for $487,465. This is the same amount shown for Reserves Revenue Requirement in the 2021 True-Up.

   Updated value to correct amount. Does not affect formula value, but the template has been updated, see 2022 True-Up Rev1.

4. Referring to the file "WAPA-UGP-Trans-Anc-Service-Rates-2022-TrueUp-Templates," Worksheet 8 – Transmission Facilities, please explain whether column 4, Prior Year Facility Totals, consists of data for 2022 or for 2021.

   Column 4 Facility Totals consist of 2022 data. UGP updated the column heading for clarification. See 2022 True-Up Rev1.

5. Referring to the file "WAPA-UGP-Trans-Anc-Service-Rates-2022-TrueUp-Templates," Worksheet 8 – Transmission Facilities, please explain why some of the Attachment AI Adjustments in column 5 change substantially from year to year, while the plant in-service does not change significantly. For example:
   a. Jamestown Substation

      The difference in what was excluded based upon Attachment AI between the 2021 True-Up and the 2022 True-Up is related to replacement of KY2A and various 115-kV and 41.8-kV equipment that do not meet AI criteria for inclusion. Due to timing issues between when different internal UGP reports are updated, some facilities that were not yet updated in the audited financial Results of Operations (ROOs) were erroneously included in the 2022 True-Up Attachment AI Adjustments column. This has been corrected in the 2022 True-Up Rev1.

b. Rugby Substation
The amount removed based upon Attachment AI for the 2021 True-Up was not correct due to erroneously not excluding transformer KY1A. The associated AI-excluded amounts in the 2022 True-Up and 2024 Estimate are correct. This exclusion of transformer KY1A has been recalculated in the 2021 True Up, and that difference has been incorporated in the 2022 True-Up Rev1 and reflected in the 2024 Estimate Rev1.

c. Shelby Substation
In the 2021 True-Up, the Shelby plant value increased, but the amount excluded due to Attachment AI was erroneously not adjusted. The associated AI-excluded amounts in the 2022 True-up and 2024 Estimate are correct. This adjustment has been recalculated in the 2021 True Up, and that difference has been incorporated in the 2022 True-Up Rev1 and reflected in the 2024 Estimate Rev1.

6. Referring to the file "WAPA-UGP-Trans-Anc-Service-Rates-2022-TrueUp-Templates," Worksheet 13- SSCD Facilities, please describe how the percentages are calculated in columns 4 and 6 of this worksheet, and what causes the percentages to change from year to year.
These percentages are calculated from the number of employees providing SSCD services, Real-Time employees, and non-Merchant from the total employees in the Watertown Operations Office. Percentages change based on the number of employees and duties in that location.

7. Referring to the file "WAPA-UGP-Trans-Anc-Service-Rates-2022-TrueUp-Templates," Worksheet 13- SSCD Facilities, lines 1-3, please explain why the totals in columns 3 and 7 do not match those found in the file "UGP Schedule 1 - Watertown.pdf."
The SSCD Facilities consist of WAO (Watertown Alternate Operations Center), WTO F (Watertown Operations Center), and WTO (Watertown Operations Center). The individual facility costs are under the FIDs listed, which include BFPS and BCPS costs located in the UGP Schedule 1 – Watertown.pdf and UGP Schedule 1 – Fort Peck.pdf source data provided on UGP's OASIS.

8. Referring to the file "WAPA-UGP-Trans-Anc-Service-Rates-2022-TrueUp-Templates," Worksheet 4, A&G Expenses, and file "PS Schedule 11A," please explain why WAPA did not include the amounts for A&G Object Classes 1432, 1442 and 1444.
These values have been updated in the 2022 True-Up, Rev 1.

9. Referring to the file "WAPA-UGP-Trans-Anc-Service-Rates-2022-TrueUp-Templates," Worksheet 4, O&M Expenses, line 112, Prior Year Adjustments, please provide the source for the $137,450 amount included here for Western-UGP.
These values are from FY2022 UGP ROOs Schedule 11 FERC Code 40105703000.

10. Referring to the file "WAPA-UGP-Trans-Anc-Service-Rates-2022-TrueUp-Templates," Worksheet 4, O&M Expenses, line 113, please explain why the Annual Reserve Sharing

Group Cost is listed as $38,360 for both Western UGP and Western RMR rather than the $42,587 shown in the file "Reserves.pdf."

These values have been updated in the 2022 True-up Rev1 and 2024 Estimate Rev1 to reflect the correct value of $42,587.

11. Referring to the file "WAPA-UGP-Trans-Anc-Service-Rates-2022-TrueUp-Templates," Worksheet 4, O&M Expenses, line 118, column 3, please explain why the formula does not remove line 113 as part of the PS Total O&M for Western-RMR.

    The Ancillary Reserve Rate recovers UGP's portion of the Reserve Sharing Group expense so UGP's portion is removed from the O&M expenses in the ATRR. RMR's portion is not recovered through UGP's ATRR so their expense is not removed from their O&M expenses.

12. Referring to the file "SSCD 2022 O&M.pdf," and the response to MRES on WAPA's 2021 True-Up #2, please explain what categories of costs are being included in SSCD O&M expenses (e.g., by FERC Account, if possible), and how these costs are allocated. Please confirm that the O&M costs allocated to SSCD are not being recovered in the total O&M costs listed on line 108 of Worksheet 4, O&M Expenses.

    The SSCD O&M expenses are labor costs by Org Codes B41 and B48, Org Codes A20, A22, A26, A27, A2A, B43 and B53. The included Object Classes are 1100, 1151, 1152, 14, 23, 25PD, 26, 31. These costs are not recovered elsewhere as the ATRR is reduced by the SSCD revenue requirement.

13. Referring to the file "WAPA-UGP-Trans-Anc-Service-Rates-2022-TrueUp-Templates," Worksheet 2 – Allocation Factor (labeled as Worksheet 3 in the header), please confirm that the allocations calculated in this spreadsheet are not used elsewhere in the template. If this is incorrect, please explain where these factors are used. If these allocators are used for a different purpose, please describe how these factors are used.

    The Allocation Factors are used in calculation of UGP's west-side WAUW Balancing Authority Area ancillary service rates.

14. Referring to the file "WAPA-UGP-Trans-Anc-Service-Rates-2022-TrueUp-Templates," Worksheet 14, Regulation, line 4, please provide support for the 2,438,000 kW of Plant Capacity.

    Actual Operating Capability on page 96 of the FY22 WAPA Annual Report, Statistical Appendix source data provided on UGP's OASIS.

15. Referring to the file "WAPA-UGP-Trans-Anc-Service-Rates-2022-TrueUp-Templates," Worksheet 9, line 87, is the addition of [Denison] breaker 2552 a new and/or replacement facility? If so, what was the reason? If not, was it updated for other reasons (i.e., correction, etc.)?

    This was a correction. Denison breaker 2552 should have been included based on Attachment AI eligibility for inclusion of the line to the City of Denison and associated South Main Substation and facilities in that substation. The AI-excluded amount has been corrected in the 2022 True-Up Rev1, and this adjustment was also recalculated in the 2021 True Up, and that difference has also

been incorporated in the 2022 True-Up Rev1 and reflected in the 2024 Estimate Rev1.

16. Referring to the file "WAPA-UGP-Trans-Anc-Service-Rates-ESTIMATE-Templates-2024-0101," Worksheet 5, line 5, please describe the Moorhead Reactor (TL) addition. What is the reason for the entry, and the costs associated with the Moorhead Reactor?

    a. Is this associated with NTC 210585 or NTC 210640?
    This is associated with SPP NTC 210585
    b. If so, are these project costs recovered directly by WAPA via its posted ATRR, or by WAPA through a contract with the transmission owner of the NTC?
    These project costs associated with UGP work related to the Reactor addition under the NTC were funded by the City of Moorhead (direct assigned) through a contract and therefore the Base Plan Upgrade (BPU) previously included in the 2024 Estimate has been removed in the 2024 Estimate Rev1.

17. Referring to the file "WAPA-UGP-Trans-Anc-Service-Rates-ESTIMATE-Templates-2024-0101," Worksheet 11, line 8, what was the circumstance preceding the rebuild of Gregory to an expandable ring bus?

    The Gregory Substation was a 4-breaker ring bus previously. It was rebuilt per UGP's maintenance requirements due to age and condition and to continue reliable service. The yard was redesigned per UGP's standard practice to accommodate a possible expanded bus (i.e., the reference to an expandable ring bus in Worksheet 11), if required in the future. However, the rebuild was constructed in-kind as a 4 breaker ring.

18. Referring to the file "WAPA-UGP-Trans-Anc-Service-Rates-ESTIMATE-Templates-2024-0101," Worksheet 11, line 14, what was the circumstance preceding the rebuild of Killdeer-Charlie Creek?

    The original Killdeer-Charlie Creek line was built in 1951 with wood H-frame and three pole structures and did not originally include overhead ground wires. Bayonets were added for an overhead ground wire in 1956. The original conductor was 397.5 ACSR "Ibis". As part of UGP's age and condition transmission line replacement program and for continued reliability, structures will be replaced and the conductor will be replaced with the UGP standard replacement for this voltage class and application (765 kcmi 45/7 Strand "Drake") along with 2 overhead ground wires that include an optical fiber needed for protection and communication.