R. Jeff Richards (7294) Yvonne R. Hogle (7550) 1407 West North Temple, Suite 320 Salt Lake City, Utah 84116 Telephone: (801) 220-4050 Facsimile: (801) 220-3299 Email: robert.richards@pacificorp.com yvonne.hogle@pacificorp.com

Katherine McDowell Adam Lowney McDowell Rackner Gibson PC 419 SW 11th Avenue, Suite 400 Portland, Oregon 97205 Telephone: (503) 595-3924 Facsimile: (503) 595-3928 Email: <u>katherine@mrg-law.com</u> <u>adam@mrg-law.com</u>

Attorneys for Rocky Mountain Power

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER FOR APPROVAL OF A SIGNIFICANT ENERGY RESOURCE DECISION AND VOLUNTARY REQUEST FOR APPROVAL OF RESOURCE DECISION

Docket No. 17-035-40.

APPLICATION FOR APPROVAL OF A SIGNIFICANT ENERGY RESOURCE DECISION AND VOLUNTARY REQUEST FOR APPROVAL OF RESOURCE DECISION

I. INTRODUCTION

In accordance with Utah Code Ann. §§ 54-17-302 and 54-17-402, PacifiCorp doing business as Rocky Mountain Power ("Rocky Mountain Power" or "Company") submits this Application to the Public Service Commission of Utah ("Commission"). In accordance with Utah Admin. Code R746-440-1(2)(a), on June 23, 2017, the Company filed a Notice of Intent to file this Application.

The Company respectfully requests (a) under Utah Code Ann. § 54-17-302, that the Commission issue an order approving the Company's "significant energy resource decision" to

construct or procure four new Wyoming wind resources with a total capacity of 860 megawatts ("MW") (collectively, the "Wind Projects") and (b) under Utah Code Ann. § 54-17-402, that the Commission issue an order approving its "resource decision" for the following transmission facilities, significant portions of which are associated with the Company's Energy Gateway West transmission project: (1) the 140-mile, Aeolus-to-Anticline 500 kV line, which includes construction of the new Aeolus and Anticline substations; (2) the five-mile Anticline to Jim Bridger 345 kV line, which includes modifications at the existing Jim Bridger substation to allow termination of the new 345 kV line; (3) installation of a voltage control device at the Latham substation; (4) a new 16-mile 230 kV transmission line parallel to an existing 230 kV line from Shirley Basin substation to the proposed Aeolus substation, including modifications to the existing Shirley Basin substation; (5) the reconstruction of four miles of an existing 230 kV transmission line between the proposed Aeolus substation and the Freezeout substation, including modifications as required at the Freezeout substation; and (6) the reconstruction of 14 miles of an existing 230 kV transmission line between the Freezeout substation and the Standpipe substation including modifications as required at the Freezeout and Standpipe substations (collectively "Transmission Projects"). Items 1-3 above are collectively referred to as the "Aeolus to Bridger/Anticline Line," and items 4-6 above are collectively referred to as the "230 kV Network Upgrades." The Transmission Projects and the Wind Projects are collectively referred to as the "Combined Projects."

The Combined Projects are a time-limited opportunity to obtain cost-effective generation and construct necessary transmission facilities with minimal impact on customer rates. The Transmission Projects are necessary to relieve existing congestion and will enable interconnection of the proposed Wind Projects into the Company's transmission system. The Wind Projects produce zero-fuel-cost energy and federal production tax credits ("PTC"), and provide significant economic benefits for the Company's customers when combined with the Transmission Projects.

The Company further requests, under Utah Code Ann. §§ 54-4-1, 54-4-23, 54-17-303, 54-17-402 and -403, approval of its proposed ratemaking treatment for the Combined Projects. The Company proposes to match the costs and benefits of the Combined Projects through a new deferral and cost recovery Resource Tracking Mechanism ("RTM") until the costs and benefits are reflected in base rates. Variances in PTCs would continue to be tracked after all other costs and a base level of PTCs are reflected in base rates. This proposed ratemaking treatment will ensure that the costs and benefits of the Combined Projects are properly matched and customers and shareholders are treated fairly while delivering long-term benefits overall.

The Combined Projects are time-sensitive because they must be in commercial operation by the end of 2020 to fully achieve the PTC benefits. To complete construction of all facilities by December 31, 2020, the Company requests that the Commission approve the significant energy resource decision related to the Wind Projects and the resource decision related to the Transmission Projects by March 30, 2018.

II. THE APPLICANT

PacifiCorp provides retail electric service under the name Rocky Mountain Power in the states of Wyoming, Utah, and Idaho, and under the name Pacific Power in the states of Oregon, Washington, and California. Rocky Mountain Power is a public utility in the state of Utah subject to the jurisdiction of the Commission with regard to its electric service to retail customers in Utah. The Company serves approximately 840,000 customers and has approximately 2,000 employees in Utah.

Formal correspondence and requests for additional information regarding this matter should be addressed to:

By e-mail (preferred): <u>datarequest@pacificorp.com</u>

By regular mail:

Data Request Response Center PacifiCorp 825 NE Multnomah, Suite 2000 Portland, Oregon 97232

With copies to:

Bob Lively Utah Regulatory Affairs Manager Rocky Mountain Power 1407 West North Temple, Suite 330 Salt Lake City, Utah 84116 E-mail: bob.lively@pacificorp.com Yvonne Hogle Assistant General Counsel Rocky Mountain Power 1407 W. North Temple, Suite 320 Salt Lake City, Utah 84116 E-mail: yvonne.hogle@pacificorp.com

Informal inquiries related to this Application should be directed to Bob Lively, Utah Regulatory Affairs Manager, at (801) 220-4052.

III. SUPPORTING TESTIMONY

This Application is supported by the pre-filed written direct testimony and exhibits of the following Company witnesses:

- **Cindy A. Crane,** President and Chief Executive Officer of Rocky Mountain Power, provides an overview of the Company's Application, outlines the policy considerations supporting the Company's decision to invest in the Combined Projects, explains why these acquisitions are prudent and in the public interest, and describes the financial ability of the Company to invest in the Combined Projects.
- Chad A. Teply, Vice President of Strategy and Development, provides a detailed description of the Company's proposed acquisition of the Wind Projects. Mr. Teply describes the Wind Projects, addresses the impact and timing of PTCs on their acquisition, and provides information to respond to the requirements of Utah Admin. Code R746-430-2.
- Rick A. Vail, Vice President of Transmission, outlines the need for the Transmission Projects, and provides a detailed description of the transmission facilities. Mr. Vail also addresses the requirements in Utah Admin. Code R746-440-1 for the Transmission Projects.
- **Rick T. Link**, Vice President of Resource and Commercial Strategy, testifies regarding the economic analysis that supports the prudence of the Combined Projects, and describes the customer benefits resulting from the timely acquisition

and construction of the wind and transmission facilities. Mr. Link explains the planning and analysis of the Combined Projects in the Company's 2017 Integrated Resource Plan ("2017 IRP"). He also provides background on the pending 2017R request for proposals ("2017R RFP") for the wind resources.

 Jeffrey K. Larsen, Vice President of Regulation, explains the Company's proposal for ratemaking treatment of the costs and benefits of the Combined Projects, including introducing new tariff, Schedule 97B, Resource Tracking Mechanism ("RTM"), and the inter-jurisdictional allocation of costs.

IV. OVERVIEW OF THE COMBINED PROJECTS

The Company requests approval of its significant energy resource decision to construct or procure the 860 MW Wind Projects, along with the resource decision to construct the Transmission Projects. The Combined Projects are time-limited opportunities and inextricably linked—the Transmission Projects relieve congestion in eastern Wyoming, and the Wind Projects will rely on the new Transmission Projects for interconnection and allow the Company to realize the benefits of zero-fuel-cost energy and associated PTCs.

The economics of the Combined Projects rely on PTCs, the Company must complete all construction by the end of 2020 to fully qualify for the PTC benefit. To achieve operation by 2020, the Company needs approval of this Application by March 30, 2018, as set forth in the proposed procedural schedule included in the Application.

To support the critical path schedule of the Transmission Projects, this case must run concurrently with the Company's 2017R RFP for wind resources. The Company anticipates issuing its 2017R RFP to the market in August 2017, and expects to identify the winning bids in January 2018. The Wind Projects will be submitted into the 2017R RFP as Company benchmark resources. The Company requests approval of the resource decision for the Wind Projects so that if selected in the 2017R RFP, the Company can proceed expeditiously to capture the time-limited opportunity discussed above. To comply with the requirements in Utah Code Ann. § 54-17-302(1), once the Company identifies the winning bids from the 2017R RFP, it will provide that information as soon as

practicable to the Commission. If facilities other than, or in addition to, the Company's benchmarks provide incremental value and are ultimately selected, the Company will update its filing accordingly.

A. Proposed Facilities.

1. Wind Projects.

The Company's 2017R RFP will seek the acquisition of up to approximately 1,270 MW of new wind resources capable of interconnecting to, or delivering energy and capacity across, the Company's transmission system in Wyoming. For this Application, the Company requests approval of the four Wind Projects, which are comprised of three nominal 250 MW facilities (referred to as Ekola Flats, TB Flats I, and TB Flats II) and a fourth nominal 110 MW facility (McFadden Ridge II), all located in Wyoming. For each of these facilities, the Company either has control over the site, or has secured development and implementation rights.

The Wind Projects will be submitted into the 2017R RFP as Company benchmark resources. The Company recognizes, however, that these resources may not ultimately be selected. If these resources are not selected in the 2017R RFP, they will be replaced by an economically superior resource.

The Company's assessment of the Combined Projects benefits has also incorporated known qualifying facility ("QF") projects that hold preferential interconnection queue positions and executed contracts, and are reasonably expected to be in service by year-end 2021.

The substantial customer benefits resulting from the acquisition of the Wind Projects assumes those facilities qualify for 100 percent of the federal PTCs. Each of the Wind Projects can demonstrate eligibility for 100 percent of the PTC benefits if the Wind Projects (and the Transmission Projects discussed below) are commercially operational by December 31, 2020. To facilitate construction of the facilities, the Company respectfully requests approval of this significant energy resource decision no later than March 30, 2018, so that equipment and engineering, procurement, and construction ("EPC") contracts can be executed shortly thereafter.

The estimated cost for the Wind Projects is outlined in Mr. Teply's testimony.

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2. Transmission Projects.

The Transmission Projects include the six major elements outlined in the first section of the Application, which comprise the Aeolus-to-Bridger/Anticline Line and the 230 kV Network Upgrades. The Transmission Projects will allow the Company to implement system improvements, relieve existing congestion, and interconnect incremental Wyoming wind resources, including the Wind Projects, to support customer needs and deliver benefits to customers in the most cost-effective way.

First, the Transmission Projects will increase transfer capability out of eastern Wyoming. Currently, the Company's transmission system in eastern Wyoming is operating at capacity, which limits transfer of existing resources from eastern Wyoming and precludes the ability to interconnect additional resources east of where the new Anticline substation will be located. The Transmission Projects will increase the transfer capability from east to west Wyoming by 750 MW. When the Transmission Projects are complete, they will allow up to 1,270 MW of incremental wind resources to be interconnected into the system east of the proposed location for the new Anticline substation including the 860 MW Wind Projects.

Second, the Transmission Projects will provide critical voltage support to the transmission system in southeastern Wyoming. Under certain operating conditions, voltage control issues have limited the ability to add additional resources, particularly wind resources. The addition of the Transmission Projects will solve the voltage control issues.

Third, the Transmission Projects will increase reliability, relieve congestion, reduce capacity and energy losses on the transmission system, and provide greater flexibility managing existing generation resources. Currently, outages on the existing 230 kV system in eastern Wyoming result in deration of the transfer capacity out of eastern Wyoming and some outage scenarios require significant generation curtailment. The new Aeolus-to-Anticline line will significantly reduce, if not eliminate, many of the impacts caused by the 230 kV outages. Reduced capacity and energy losses on the transmission system have the potential to provide significant cost savings over time.

The estimated cost for the Transmission Projects is outlined in Mr. Vail's testimony.

As of the filing of this Application, the Company has obtained a federal right-of-way permit from the Bureau of Land Management ("BLM") for the portion of the Aeolus-to-Anticline line that crosses BLM lands, which covers approximately half of the 140 miles. Once the Commission approves the resource decision, and the Wyoming Public Service Commission issues certificates of public convenience and necessity, the Company will obtain the additional rights-of-way and state and local permits necessary to construct the Transmission Projects.

B. The Proposed Resources Provide Substantial Customer Benefits and Advance the Public Interest.

The Company's 2017 IRP, which was filed with the Commission on April 4, 2017, identified the Combined Projects as least-cost, least-risk resources.¹ The Company's 2017 IRP is designed to ensure, on a long-term basis, an adequate and reliable electricity supply at a reasonable cost and in a manner that is consistent with the long-term public interest. To that end, the IRP's primary objective is to identify the best mix of resources to serve customers over the short- and long-term, based on an analysis of the costs and risks associated with various resource portfolios. The IRP identifies the preferred portfolio as the least-cost, least-risk portfolio that can be delivered through specific action items at a reasonable cost and with manageable risks, while ensuring compliance with state and federal regulatory obligations. The preferred portfolio in the 2017 IRP included the acquisition of additional Wyoming wind resources, like the Wind Projects, and the Transmission Projects.

Assuming the new Combined Projects are operational by the end of 2020, and thus eligible for 100 percent PTCs, the Company's economic analysis in support of this Application demonstrates that the Projects will provide substantial customer benefits. The Company's economic analysis included multiple electricity and natural gas price and carbon-risk scenarios, measured over several different time periods. In virtually all cases, the Combined Projects result in significant customer benefits. For example, with medium natural gas and medium CO₂ price assumptions over the life of the facilities, the present-value reduction in the change to revenue requirement due to the Combined

¹ The IRP does not identify specific resources. Wind resources in eastern Wyoming, like the Wind Projects, however, were identified in the preferred portfolio as least-cost, least-risk resources.

Projects is \$137 million. Because the Company did not quantify the added benefits associated with RECs, the economic analysis is conservative.

In the first full year of operation of the Combined Projects, 2021, the rate impact to customers is less than 1.9 percent. While this percentage change reflects the year-one impact to customers, it does not fully reflect the value of the Combined Projects due to costs avoided over time.

C. To Meet the 2020 PTC Deadline, the Company is Concurrently Conducting its 2017R RFP Process.

The Combined Projects are mutually dependent. The Wind Projects are not economic without the Transmission Projects, which are needed to relieve existing congestion and to interconnect new PTC-eligible wind resources in high-wind areas of Wyoming. The Transmission Projects are not economic if there are no incremental cost-effective wind resources generating zero-fuel-cost energy and the associated PTCs. This interdependence requires that the Combined Projects be developed together. The lead time for constructing the Transmission Projects is longer than the lead time to construct the Wind Projects, but the Company recognizes the need for review and approval of its competitive market procurement of the Wind Projects and their impact on overall Project economics before it commits to proceed with construction of the Transmission Projects. This dictates the need for approval by March 30, 2018.

The Company has already initiated the process for obtaining approval or acknowledgment of its 2017R RFP from the Commission.² Following the necessary regulatory approvals, the Company anticipates issuing the 2017R RFP to the market in August 2017. Responses to the 2017R RFP will be due by October 2017 and in November and December, the Company will complete the initial shortlist bid evaluation. The Company plans to complete its final shortlist bid evaluation in early January 2018, and execute contracts in April 2018.

To facilitate review of this Application before the conclusion of the 2017R RFP process and the selection of winning bids, the Company has included the Wind Projects, which will be submitted

² See Docket No. 17-035-23.

into the 2017R RFP as benchmark resources. Upon completion of the 2017R RFP shortlist determination, the Company will provide the Commission with updated information, as soon as practicable, related to the Wind Projects and the outcome of the solicitation process.

D. Proposed Ratemaking Treatment.

The Company further requests, under Utah Code Ann. §§ 54-4-1, 54-4-23, 54-17-303, 54-17-402 and -403, approval of the ratemaking treatment for the Combined Projects. The Company proposes to match the costs and benefits of the Combined Projects through the RTM until the costs and benefits are reflected in base rates. Once the full costs and benefits are included in base rates, recovery of those elements would cease through the RTM, with the exception of PTCs. After the impacts of the Combined Projects are fully reflected in base rates, the Company proposes to use the RTM to track the actual change in PTCs from the base level included in rates. Because PTCs are entirely dependent on the variable output of the Wind Projects and difficult to precisely forecast, tracking PTCs through the RTM ensures that customers and the Company are treated fairly, with the actual value of the PTCs provided to customers.

V. LEGAL STANDARD

A. Significant Energy Resource Decision Related to the Wind Projects.

Utah Code Annotated § 54-17-302(1) requires utilities to obtain approval of significant energy resource decisions after the completion of the solicitation process, if one is required, and before the utility constructs or enters into a binding agreement to acquire a significant energy resource. A significant energy resource is defined in Utah Code Ann. § 54-17-102(4) and includes a resource that is 100 MW or more of new generating capacity with a dependable life of 10 or more years. The Commission must determine whether the significant energy resource decision is: (1) consistent with the Commission's administrative rules; (2) reached in compliance with the solicitation process approved by the Commission; and (3) in the public interest. Utah Code Ann. § 54-17-302(3).

The public interest determination must consider the following:

- Whether the decision will most likely result in the acquisition, production, and delivery of utility services at the lowest reasonable cost to the retail customers of the utility;
- Long-term and short-term impacts;
- Risk;
- Reliability;
- Financial impacts on the utility; and
- Other factors determined by the commission to be relevant.

Utah Code Ann. § 15-17-302(3)(c).

In addition, the Commission has previously relied on a pending utility IRP when approving a significant energy resource decision. *See In the Matter of the Application of PacifiCorp, by and through its Rocky Mountain Power Division for Approval of a Solicitation Process for a Flexible Resource for the 2012-2017 Time Period, and for Approval of a Significant Energy Resource Decision*, Docket Nos. 07-035-94 & 10-035-126, Report and Order at 21, 23 (April 20, 2011).

The proposed Wind Projects are greater than 100 MW and therefore qualify as a significant energy resource and require Commission approval under Utah Code Ann. § 54-17-302(1).

The Uniform System of Accounts and Generally Accepted Accounting Principles allows deferrals of identifiable utility expenses or revenues to the period in which the underlying expense or revenue will be included in the determination of customers' rates. Pursuant to Utah Code Ann. §§ 54-4-23 and 54-17-303, the Company requests that the Commission allow it to defer the costs and benefits of the Wind Projects and recover the balance through the RTM through an annual rate adjustment, as described in Mr. Larsen's testimony.

B. Energy Resource Decision Related to the Transmission Projects.

Utah Code Ann. § 54-17-402 authorizes the Commission to approve a utility's proposed "resource decisions" outside of a general rate case. Resource decisions are defined to include those relating to "an energy utility's acquisition, management, or operation of energy production, processing, transmission, or distribution facilities or processes." Utah Code Ann. § 54-17-401(2)(a). When considering a request to approve a resource decision, the Commission must determine

"whether the decision is in the public interest." Utah Code Ann. § 54-17-402(3)(b). The public interest determination must consider the following:

- Whether the decision will most likely result in the acquisition, production, and delivery of utility services at the lowest reasonable cost to the retail customers of the utility;
- Long-term and short-term impacts;
- Risk;
- Reliability;
- Financial impacts on the utility; and
- Other factors determined by the Commission to be relevant.

Utah Code Ann. § 15-17-402(3)(b).

The Company's decision to construct the Transmission Projects is a resource decision under Utah Code Ann. § 54-17-401(2)(a)(i) because it involves the acquisition of transmission facilities.

The Uniform System of Accounts and Generally Accepted Accounting Principles allows deferrals of identifiable utility expenses or revenues to the period in which the underlying expense or revenue will be included in the determination of customers' rates. Pursuant to Utah Code Ann. §§ 54-4-23 and 54-17-403, the Company requests that the Commission allow it to defer the costs and benefits of the Transmission Projects and recover the balance through the RTM through an annual rate adjustment, as described in Mr. Larsen's testimony.

C. The Projects Satisfy the Public Interest Standard in Utah Code Ann. §§ 54-17-302 and 54-17-402.

The public interest determination under Utah Code Ann. §§ 54-17-302 and 54-17-402 requires the Commission to consider the same five factors. This Application and the accompanying testimony of Ms. Crane and Messrs. Teply, Vail, Link, and Larsen, demonstrate that the Combined Projects are the least-cost, least-risk resource option for the Company and will provide substantial customer benefits. Indeed, as discussed above, the Projects will save customers money over the long-term. The Combined Projects are also consistent with the analysis and modeling in the Company's 2017 IRP, where both types of resources are included in the near-term action plan as part of the

preferred portfolio. Mr. Vail's testimony describes the reliability benefits that will result from the construction of the Transmission Projects.

The testimony of Ms. Crane further demonstrates that the Company has the financial ability to construct or acquire the Projects and that this significant energy resource decision will not adversely impact the Company's ability to provide safe and reliable electric service at just and reasonable rates.

Finally, the Company's testimony and this Application demonstrate compliance with the Commission's administrative rules, as set forth in Attachment A. The Company's supplemental filing following the conclusion of the 2017R RFP process will demonstrate compliance with the Commission's solicitation process.

Together, the 2017 IRP, this Application, and the accompanying testimony demonstrate that the proposed significant energy resource decision—Wind Projects—and resource decision— Transmission Projects—are in the public interest.

VI. PROPOSED PROCEDURAL SCHEDULE

To achieve commercial operation of the Combined Projects by 2020, the Company requests that the Commission adopt the following schedule, with a final decision by March 30, 2018:

June 30, 2017	Application Filed
July 7, 2017	Scheduling Conference
July 31, 2017	Technical Conference
November 17, 2017	Intervenor Testimony Due
December 15, 2017	RMP Rebuttal Testimony on Transmission
January 9, 2018	Sur-rebuttal Testimony Due
January 16, 2018	RMP Supplemental with RFP Results
January 26, 2018	Intervenor Supplemental Testimony on New Wind
February 7, 2018	RMP Rebuttal on New Wind
February 12, 2018	Hearings Begin
March 30, 2018	Target Order Issued

VII. REQUEST FOR RELIEF

WHEREFORE, the Company requests relief as follows:

1. That the Commission hold a scheduling conference to set a schedule for interested persons to file comments and reply comments on the requests for approval of a significant energy resource decision and a resource decision, for any technical conferences deemed useful to the Commission or interested parties, for a hearing on this request, and for other processes and procedures deemed reasonable or necessary by the Commission in determining to approve these requests. The Company's proposed schedule provides for a full review of this filing.

2. That the Commission issue an order pursuant to Utah Code Ann. §§ 54-17-302 and 54-17-402 approving the Company's significant energy resource decision to acquire the 860 MW Wind Projects and resource decision to construct the Transmission Projects. Rocky Mountain Power will authorize construction as soon as the Commission grants the approval and other regulatory and permitting requirements are met.

3. That the Commission approve a new deferral and cost recovery RTM, under Utah Code Ann. §§ 54-4-1, 54-4-23, 54-17-303 and 54-17-402 and -403, to address the proper ratemaking treatment of the Combined Projects.

DATED this 30th day of June, 2017.

Respectfully submitted,

R. Jeff Richards Yvonne R. Hogle Rocky Mountain Power 1407 West North Temple, Suite 320 Salt Lake City, Utah 84116 Telephone: (801) 220-4734 Facsimile: (801) 220-3299 Email: <u>Robert.Richards@pacificorp.com</u> Email: <u>yvonne.hogle@pacificorp.com</u>

Attorneys for Rocky Mountain Power

ATTACHMENT A

R746-430-2(a)-(i) Information Location Matrix for Wind Facilities

Paragraph	Filing Requirement	Testimony and Exhibits
(a)	Information to demonstrate the utility has complied with the requirements of the Energy Resource Procurement Act and Commission rules	 Prefiling Public Notice of Intent to File Application For Approval of a Significant Energy Resource Decision and Voluntary Request For Approval of Resource Decision, filed June 23, 2017. Teply testimony Link testimony Upon completion of the 2017R RFP, the Company will provide additional testimony demonstrating compliance.
(b)	Information to demonstrate whether approval of the selected Significant Energy Resource is in the public interest	 Teply testimony Link testimony
(c)	 Information regarding the solicitation process, if the Significant Energy Resource was solicited through a solicitation process, including, but not limited to: (i) Summaries of all bids received; (ii) Summaries of the Affected Utility's rankings and evaluations of bids; (iii) Copies of all reports relating to the solicitation process made by an independent evaluator who may have been involved with the solicitation process; (iv) A copy of the complete Commission approved Solicitation with appendices, attachments and drafts, if applicable; and (v) A signed acknowledgment from a utility officer involved in the solicitation that to the best of his or her knowledge, the utility fully observed and complied with the requirements of the Commission's rules or statutes 	

(d)	Identification of all information, data, models and analyses used by the Affected Utility to evaluate the acquisition of the Significant Energy Resource if the acquisition is pursuant to Section 54-17-201(3), or to evaluate and rank bids and the selected resource, if the acquisition is by a solicitation process pursuant to Section 54-17-201(2)	 Link testimony Upon completion of the 2017R RFP, the Company will provide additional testimony demonstrating compliance
(e)	Contracts proposed for execution or use in connection with the acquisition of the Significant Energy Resource and identification of matters for which contracts are being negotiated or remain to be negotiated	 Teply testimony Upon completion of the 2017R RFP, the Company will provide additional testimony demonstrating compliance.
(f)	Information on the estimated costs for the Significant Energy Resource, including but not limited to engineering studies, data, and models used in the analysis, and any other costs which the utility considers recoverable pursuant to Section 54-17-303	 Teply testimony Link testimony Larsen testimony
(g)	An analysis of the estimated effects the Significant Energy Resource will have on the Affected Utility's revenue requirement	 Link testimony Larsen testimony
(h)	Financial information demonstrating adequate financial capability to obtain the Significant Energy Resource pursuant to the proposed acquisition	Crane testimony
(i)	Identification of all other relevant information in support of the requested approval	 Crane testimony Teply testimony Link testimony Larsen testimony

Paragraph	Filing Requirement	Testimony and Exhibits
(a)	A description of the Resource decision	Vail testimony
(b)	Information to demonstrate that the Energy utility has complied with the applicable requirements of the Act and Commission rules	 Prefiling Public Notice of Intent to File a Voluntary Request for Approval of Significant Energy Resource Decision, filed June 23, 2017. Vail testimony Link testimony
(c)	The purposes and reasons for the Resource decision	Vail testimony
(d)	An analysis of the estimated or projected costs of the Resource decision, including the engineering studies, data, information and models used in the Energy utility's analysis	 Vail testimony Link testimony
(e)	Descriptions and comparisons of other resources or alternatives evaluated or considered by the Energy utility, in lieu of the proposed Resource decision	Link testimony
(f)	Sufficient data, information, spreadsheets, and models to permit an analysis and verification of the conclusions reached and models used by the Energy utility	Link testimony
(g)	An analysis of the estimated effect of the Resource decision on the Energy utility's revenue requirement	 Link testimony Larsen testimony
(h)	Financial information demonstrating adequate financial capability to implement the Resource decision	Crane testimony
(i)	Major contracts, if any, proposed for execution or use in connection with the Resource decision	Vail testimony
(j)	Information to show that the Energy utility has or will obtain any required authorization from the appropriate governmental bodies for the Resource decision	Vail testimony
(k)	Other information as the Commission may require	No other information has currently been requested.

R746-440-1(1)(a)-(k) Information Location Matrix for Transmission Facilities