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May 30, 2017

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Wyoming Public Service Commission
2515 Warren Avenue, Suite 300
Cheyenne, Wyoming 82002

Attn: Chris Petrie, Chief Counsel

Docket No. 20000-____-EA-17
Record No. _____

RE: NOTICE OF ROCKY MOUNTAIN POWER REGARDING WIND REPOWERING

Dear Mr. Petrie:

Pursuant to the Wyoming Public Service Commission's ("Commission") Rule Chapter 3, Section 21(a)(ii), Rocky Mountain Power ("the Company") hereby files an original and four copies of its notice informing the Commission of the Wind Repowering Project ("the Project") the Company is proposing to initiate.

By June 30, 2017, the Company will be filing a comprehensive application requesting preapproval for the Project under Wyoming Statute Title 37, Chapter 2, Section 121 ("W.S. § 37-2-121") to approve innovative or nontraditional ratemaking methods.

The Company is respectfully requesting a determination by the Commission, within 10 business days, that a Certificate for Public Convenience and Necessity ("CPCN") application is not necessary for the Project.

All formal correspondence and Staff requests regarding this notice should be addressed to:

By E-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, Oregon 97232

with copies to: Stacy Splittstoesser
Wyoming Regulatory Affairs Manager
Rocky Mountain Power
1807 Capitol Ave, Suite 200A
Cheyenne, Wyoming 82001
E-mail: stacy.splittstoesser@pacificorp.com

Wyoming Public Service Commission

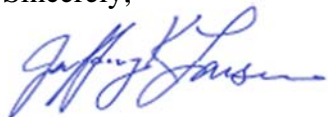
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Salt Lake City, Utah 84116
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Informal information inquiries related to this notice may be directed to Stacy Splittstoesser, (307) 632-2677.

Sincerely,



Jeffrey K. Larsen
Vice President, Regulation

Enclosure

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Attorneys for Rocky Mountain Power

BEFORE THE WYOMING PUBLIC SERVICE COMMISSION

NOTICE OF ROCKY MOUNTAIN
POWER REGARDING WIND
REPOWERING

Docket No. 20000-_____-EA-17
Record No. _____

NOTICE OF ROCKY MOUNTAIN POWER

Comes now PacifiCorp, d/b/a Rocky Mountain Power ("Rocky Mountain Power" or "the

Company") in compliance with Wyoming Public Service Commission ("Commission") Rule Chapter 3, Section 21(b) and provides notice that the Company intends to upgrade or "repower" its Wyoming wind fleet (Glenrock I, Glenrock III, Rolling Hills, Seven Mile Hill I, Seven Mile Hill II, High Plains, McFadden Ridge, and Dunlap), the Marengo I, Marengo II and Goodnoe Hills facilities in Washington, and the Leaning Juniper facility in Oregon. Wind repowering involves construction to install new rotors with longer blades and new nacelles with higher capacity generators. This plant upgrade and maintenance project significantly increases energy output without changing the footprint, towers, foundations, and energy collector systems of the wind facilities. A diagram of the upgraded plant equipment is attached as Exhibit RMP-1 to this Notice. Using modern technology and improved control systems, the repowered wind facilities will produce more cost-effective, zero-emission energy over an extended useful life at reduced operating costs, saving customers millions of dollars. Because existing towers and foundations will remain in place and the footprint of each of the existing projects is unaltered, wind repowering also results in minimal environmental impact and permitting requirements.

Wind repowering more than pays for itself by requalifying the Company's wind resources for federal production tax credits ("PTCs"), which are set to expire 10 years from the original commercial operation date of the resource (expiration dates range from 2016 through 2020). To achieve the full PTC benefits, the Company must complete wind repowering by the end of 2020.

The Company respectfully requests a determination that wind repowering does not require a certificate of public convenience and necessity ("CPCN") because W.S. § 37-2-205(a) provides that a CPCN is not required to "increase capacity of existing plants." By June 30, 2017, the Company will file an application for preapproval for wind repowering under the Commission's authority in W.S. § 37-2-121 to approve innovative or nontraditional ratemaking methods. While

the requirements for a CPCN under Commission Rule Chapter 3, Section 21(c) are not applicable to wind repowering, the Company's application for innovative or nontraditional ratemaking will include much of the same information, as outlined below. Therefore, the Commission will have a robust record to analyze wind repowering without the CPCN filing.

In support of this Notice, the Company represents the following:

1. The Company is a public utility in the state of Wyoming and is subject to the jurisdiction of the Commission regarding its public utility operations, retail rates, service, and accounting practices. The Company provides retail electricity service under the name of Rocky Mountain Power in Wyoming, Utah, and Idaho, and under the name of Pacific Power in the states of Oregon, Washington, and California. Rocky Mountain Power's principal place of business in Wyoming is: 2840 East Yellowstone Highway, Casper, Wyoming 82602.

2. Formal communications and questions regarding this Notice should be addressed to:

By E-mail (preferred): datarequest@pacificorp.com

By regular mail:

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

With copies to:

Stacy Splittstoesser
Wyoming Regulatory Affairs Manager
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Cheyenne, Wyoming 82001
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Yvonne Hogle
Assistant General Counsel
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1407 W. North Temple, Suite 320
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Informal inquiries related to this Notice should be directed to Stacy Splittstoesser, Wyoming Regulatory Affairs Manager, at (307) 632-2677.

I. DISCUSSION

Commission Rule Chapter 3, Section 21(b)(i) requires utilities to notify and provide a summary to the Commission of a “proposed modification, construction or re-route for any project associated with any generation plant[.]” Commission Rule Chapter 3, Section 21(a) states that a utility cannot “commence new construction or an expansion of facilities or projects for which notification is required” until the Commission either grants the utility a CPCN or informs the utility in writing that a CPCN is not required. The following summarizes the Company’s wind repowering and demonstrates that a CPCN is not required.

A. Summary of Wind Repowering.

Recent advancements in wind generation technology, including innovations in wind turbine design and control systems, allow modern wind turbines to generate greater energy from available wind resources. To take advantage of these recent technologies, the Company proposes to repower its wind facilities. Wind repowering consists of installing new rotors with longer blades and new nacelles with higher capacity generators (see Exhibit RMP-1). Longer blades allow wind turbines to produce more energy at lower wind speeds. The nacelle is the housing that sits atop the tower and contains the gear box, low- and high-speed shafts, generator, controller, and brake. The new nacelles will include sophisticated control systems and more robust mechanical and generator

components necessary to handle the greater loads that come with longer blades. Together, the longer blades and new nacelles will substantially increase generation from the repowered facilities.

In addition, the innovative technologies provide for greater control of power quality and voltage, allowing the Company to more easily integrate the energy from the wind projects into the transmission system and support the reliability of the grid. The new equipment also reduces future operating costs and extends the useful life of each wind plant by approximately ten years after repowering. Importantly, because wind repowering involves efficiency improvements to existing facilities, these benefits can be achieved without the costs and complexity of retiring, replacing, or rebuilding plants.

The efficiency improvements and renewed eligibility for PTCs translate directly into substantial customer benefits. In the Company's 2017 Integrated Resource Plan ("IRP"), filed with the Commission on April 4, 2017, the Company modeled all the wind repowering projects except Goodnoe Hills. The repowering case showed benefits of \$66 million through the 2036 planning horizon used for the IRP when compared to the benchmark non-repower case. If the planning horizon is extended through 2050 to account for the extension of the wind fleet operating life due to repowering, then the benefits of wind repowering increase to \$412 million. The Company intends to present an updated analysis of the benefits of wind repowering in its application for approval of innovative or nontraditional ratemaking methods under W.S. § 37-2-121.

B. A CPCN is not Required for Wind Repowering.

A CPCN is required before the “construction of a line, plant or system, or extension of a line, plant or system[.]”¹ But if the construction is limited to increasing the capacity of existing plants, then a CPCN is not required. Wind repowering involves construction at existing plants to

¹ W.S. § 37-2-205(a).

increase their generation and efficiency. Wind repowering does not involve changes to the overall wind project design, footprint, towers, foundations, energy collectors, roads, substations, or buildings currently present at the facilities. Therefore, the Company's wind repowering project fits within the exception to the CPCN requirement for "increas[ing] capacity at existing plants." W.S. § 37-2-205(a).

C. The Company Intends to File a Robust Application under W.S. § 37-2-121, Including Information Similar to that Required for a CPCN.

A number of the requirements for a CPCN under Commission Rule Chapter 3, Section 21(c), appear inapplicable to wind repowering because there is no physical expansion of the existing facilities and no change to the comprehensive information provided for the original CPCNs for the wind resources.² Where possible, however, the Company's application for approval of innovative or nontraditional ratemaking methods under W.S. § 37-2-121 will include information similar to that required for a CPCN. This will ensure that the Commission and parties have a robust and well-developed record to evaluate wind repowering.

Specifically, the Company intends to address the following points in its application for innovative or nontraditional ratemaking: (1) the name and address of applicant (Section 21(c)(i)(A)); (2) the type of plant, property, or facility to be constructed or acquired (Section 21(c)(i)(B)); (3) description of the facilities proposed to be constructed or acquired, including preliminary engineering specifications in sufficient detail to properly describe the principal systems and components, and final and complete engineering specifications when they become

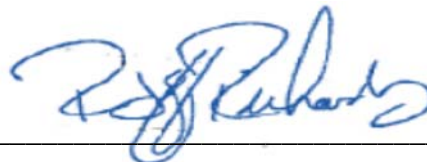
¹ The CPCN docket for the proposed repowered wind resources are: Glenrock I (20000-319-EA-08); Glenrock III (20000-283-EA-07); Rolling Hills (20000-309-EA-07); Seven Mile Hill I (20000-285-EA-07); Seven Mile Hill II (20000-318-EA-08); High Plains (20000-329-EA-08); McFadden Ridge (20000-345-EA-09); Dunlap I (20000-348-EA-09).

available ((Section 21(c)(i)(C)); (4) the rates, if any, proposed to be charged for the service that will be rendered because of the proposed construction or acquisition (Section 21(c)(i)(D)); (5) the estimated total cost of the proposed construction or acquisition (Section 21(c)(i)(E)); (6) the manner by which the proposed construction or acquisition will be financed (Section 21(c)(i)(F)); (7) documentation of the financial condition of the applicant (Section 21(c)(i)(G)); (8) estimated annual operating revenues and expenses that are expected to accrue from the proposed construction or acquisition, including a comparison of the overall effect on the applicant's revenues and expenses (Section 21(c)(i)(H)); (9) estimated start and completion dates of the proposed construction or date of acquisition (Section 21(c)(i)(J)); (10) statement setting forth the need for the facility in meeting present and future demands for service in Wyoming or other states (Section 21(c)(ii)(J)); (11) description of the commodity or service the facility will make available (Section 21(c)(ii)(K)); (12) statement of the facility's effect on the applicant's and other systems' stability and reliability (Section 21(c)(ii)(L)); and (13) status of satisfying local, state, tribal, or federal governmental agency requirements (Section 21(c)(ii)(M)).

II. CONCLUSION

The Company requests a Commission determination that a CPCN is not required for wind repowering because it falls under the exception for construction that increases the capacity of existing plants.

Respectfully submitted this 30th day of May, 2017.



R. Jeff Richards

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Attorneys for Rocky Mountain Power

Exhibit RMP-1
Diagram of Upgraded Plant Equipment

Rotor = *Blade* + *Hub*

Nacelle

Hub

Blade

Tower

Foundation

