



*Yvonne R. Hogle*  
*Assistant General Counsel*  
*1407 West North Temple, Suite 320*  
*Salt Lake City, UT 84116*  
*801.220.4050*  
*801.220.3299 Fax*

January 26, 2018

***VIA ELECTRONIC FILE  
AND OVERNIGHT DELIVERY***

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

Attn: Chris Petrie, Chief Counsel

Docket No. 20000-520-EA-17  
Record No. 14781

**RE: IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER  
FOR CERTIFICATES OF PUBLIC CONVENIENCE AND NECESSITY AND  
NONTRADITIONAL RATEMAKING FOR WIND AND TRANSMISSION  
FACILITIES – Unopposed Motion to Vacate and Amend Procedural Schedule**

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Dear Mr. Petrie:

In accordance with the Rules of Practice & Procedure and General Regulations of the Public Service Commission of Wyoming, please find enclosed for filing an original and four copies of an Unopposed Motion to Vacate and Amend Procedural Schedule in the above-referenced docket.

Feel free to contact Stacy Splittstoesser, Wyoming Regulatory Affairs Manager, at (307) 632-2677 or me at the number referenced above, if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Yvonne R. Hogle".

Yvonne R. Hogle  
Assistant General Counsel

Enclosure

cc: Service List

CERTIFICATE OF SERVICE

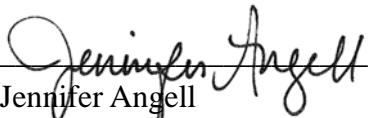
I hereby certify that on this 26<sup>th</sup> day of January, 2018, I caused to be served via E-mail a true and correct copy of Rocky Mountain Power's **Unopposed Motion to Vacate and Amend Procedural Schedule** to the document to the following:

**Docket No. 20000-520-EA-17  
(Record No. 14781)**

<b>OFFICE OF CONSUMER ADVOCATE</b>	
Ivan Williams (C) <i>Counsel for Office of Consumer Advocate</i> 2515 Warren Avenue, Suite 304 Cheyenne, WY 82002 <a href="mailto:ivan.williams@wyo.gov">ivan.williams@wyo.gov</a>	Christopher Leger(C) <i>Counsel for Office of Consumer Advocate</i> 2515 Warren Avenue, Suite 304 Cheyenne, WY 82002 <a href="mailto:christopher.leger@wyo.gov">christopher.leger@wyo.gov</a>
<b>WYOMING INDUSTRIAL ENERGY CONSUMERS (WIEC)</b>	
Abigail C. Briggerman (C) Holland & Hart 6380 South Fiddlers Green Circle, Suite 500 Greenwood Village, CO 80111 <a href="mailto:acbriggerman@hollandhart.com">acbriggerman@hollandhart.com</a>	Thorvald A. Nelson (C) Holland & Hart 6380 South Fiddlers Green Circle, Suite 500 Greenwood Village, CO 80111 <a href="mailto:tnelson@hollandhart.com">tnelson@hollandhart.com</a>
Nikolas S. Stoffel (C) Holland & Hart 6380 South Fiddlers Green Circle, Suite 500 Greenwood Village, CO 80111 <a href="mailto:nsstoffel@hollandhart.com">nsstoffel@hollandhart.com</a>	
<b>NORTHERN LARAMIE RANGE ALLIANCE (NLRA)</b>	
Crystal J. McDonough (C) McDonough Law, LLC 1635 Foxtrail Dr. #327 Loveland, CO 80538 <a href="mailto:crystal@mcdonoughlawllc.com">crystal@mcdonoughlawllc.com</a>	Callie A. Capraro (C) McDonough Law LLC 1635 Foxtrail Drive, Suite 113 Loveland, CO 80538 <a href="mailto:callie@mcdonoughlawllc.com">callie@mcdonoughlawllc.com</a>
<b>INTERWEST ENERGY ALLIANCE</b>	
Lisa Tormoen Hickey (C) 14 N. Sierra Madre Colorado Springs, CO 80903 <a href="mailto:lisahickey@newlawgroup.com">lisahickey@newlawgroup.com</a>	

<b>ROCKY MOUNTAIN SHEEP COMPANY</b>	
Brandon L. Jensen (C) Budd-Fallen Law Offices, LLC 300 E 18th Street Cheyenne, CO 82003-0346 <a href="mailto:brandon@buddfalen.com">brandon@buddfalen.com</a>	Franklin J. Falen Budd-Fallen Law Offices, LLC 300 E 18th Street Cheyenne, CO 82003-0346 <a href="mailto:frank@buddfalen.com">frank@buddfalen.com</a>
<b>ANADARKO LAND CORPS</b>	
Constance E. Brooks C.E. BROOKS & ASSOCIATES, P.C. 5445 DTC Parway, Suite 940 Greenwood Village, CO 80111 <a href="mailto:connie@cebrooms.com">connie@cebrooms.com</a>	Danielle Bettencourt C.E. BROOKS & ASSOCIATES, P.C. 5445 DTC Parway, Suite 940 Greenwood Village, CO 80111 <a href="mailto:danielle@cebrooms.com">danielle@cebrooms.com</a>
Paul Kapp (C) Sundahl, Powers, Kapp & Martin, LLC 1725 Carey Avenue P.O. Box 328 Cheyenne, WY 82003 <a href="mailto:pkapp@spkm.org">pkapp@spkm.org</a>	
<b>SOUTHLAND ROYALTY COMPANY, LLC</b>	
J. Kenneth Barbe (C) Welborn Sullivan Meck & Tooley, P.C. 159 North Wolcott, Suite 220 Casper, WY 82601 <a href="mailto:kbarbe@wsmtlaw.com">kbarbe@wsmtlaw.com</a>	
<b>OVERLAND TRAIL CATTLE COMPANY LLC</b>	
Roxane Perruso Vice President and General Counsel The Overland Trail Cattle Company LLC 555 Seventeenth Street, Suite 2400 Denver, CO 80202 <a href="mailto:roxane.perruso@tac-denver.com">roxane.perruso@tac-denver.com</a>	Jane M. France (C) Sundahl, Powers, Kapp & Martin, LLC 1725 Carey Avenue P.O. Box 328 Cheyenne, WY 82003 <a href="mailto:jfrance@spkm.org">jfrance@spkm.org</a>

<b>BP AMERICA PRODUCTION COMPANY</b>	
Nicol Kramer (#6-3630) (C) BEATTY & WOZNIAK, P.C. 123 West First Street, Suite 120 Casper, WY 82601 <a href="mailto:nkramer@bwenerylaw.com">nkramer@bwenerylaw.com</a>	Jim Martin (C) BEATTY & WOZNIAK, P.C. 216 16th Street, Suite 1100 Denver, CO 80202 <a href="mailto:jmartin@bwenerylaw.com">jmartin@bwenerylaw.com</a>
Bret Sumner (C) Nicole Blevins (#7-5871) BEATTY & WOZNIAK, P.C. 216 16th Street, Suite 1100 Denver, CO 80202 <a href="mailto:bsumner@bwenerylaw.com">bsumner@bwenerylaw.com</a>	Nicole Blevins (#7-5871) BEATTY & WOZNIAK, P.C. 216 16th Street, Suite 1100 Denver, CO 80202 <a href="mailto:nblevins@bwenerylaw.com">nblevins@bwenerylaw.com</a>
<b>ROCKY MOUNTAIN POWER</b>	
Stacy Splittstoesser Wyoming Regulatory Affairs Manager Rocky Mountain Power 315 W. 27th St. Cheyenne, WY 82001 <a href="mailto:stacy.splittstoesser@pacificorp.com">stacy.splittstoesser@pacificorp.com</a> <a href="mailto:datarequest@pacificorp.com">datarequest@pacificorp.com</a>	Yvonne Hogle Assistant General Counsel Rocky Mountain Power 1407 W. North Temple, Suite 320 Salt Lake City, UT 84116 <a href="mailto:yvonne.hogle@pacificorp.com">yvonne.hogle@pacificorp.com</a>
Paul J. Hickey Hickey & Evans, LLP PO Box 467 Cheyenne, WY 82003 <a href="mailto:phickey@hickeyevans.com">phickey@hickeyevans.com</a>	Katherine McDowell McDowell Rackner & Gibson PC 419 SW 11th Avenue, Suite 400 Portland, OR 97205 <a href="mailto:katherine@mrg-law.com">katherine@mrg-law.com</a>
Adam Lowney McDowell Rackner & Gibson PC 419 SW 11th Avenue, Suite 400 Portland, OR 97205 <a href="mailto:adam@mrg-law.com">adam@mrg-law.com</a>	

  
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 Jennifer Angell  
 Supervisor, Regulatory Operations

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

Paul Hickey  
Hickey & Evans, LLP  
1800 Carey Avenue, Suite 700  
P.O. Box 467  
Cheyenne, Wyoming 82003-0467  
Telephone: (307) 634-1525  
Facsimile: (307) 638-7335  
Email: [phickey@hickeyevans.com](mailto:phickey@hickeyevans.com)

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

*Attorneys for Rocky Mountain Power*

**BEFORE THE PUBLIC SERVICE COMMISSION OF WYOMING**

IN THE MATTER OF THE APPLICATION	)	
OF ROCKY MOUNTAIN POWER FOR	)	Docket No. 20000-520-EA-17
CERTIFICATES OF PUBLIC	)	(Record No. 14781)
CONVENIENCE AND NECESSITY AND	)	
NONTRADITIONAL RATEMAKING FOR	)	
WIND AND TRANSMISSION FACILITIES	)	

**UNOPPOSED MOTION TO VACATE AND AMEND PROCEDURAL SCHEDULE**

Pursuant to Section 16 of the Rules of Practice & Procedure of the Public Service Commission of Wyoming (the “Commission”), Rocky Mountain Power (“RMP” or the “Company”) respectfully moves the Commission to a) vacate and amend the remaining procedural schedule established in the Commission’s Scheduling Order (“Scheduling Order”), issued

August 24, 2017 in this Docket, and b) vacate the hearing to consider RMP's Motion to Strike scheduled January 30, 2018. All Parties in this docket were given notice of this Motion before filing including the Office of Consumer Advocate, the Wyoming Industrial Energy Consumers, Northern Laramie Range Alliance, Interwest Energy Alliance, Rocky Mountain Sheep Co., The Overland Trail Cattle Company, Anadarko Land Corp, Southland Royalty Co., LLC, and BP America Production Company (individually, a "Party" and collectively the "Parties") and no Party opposed the Motion.

1. The Commission set a schedule in this docket that allowed the Company to file supplemental testimony on January 16, 2018, with other parties filing responsive testimony on February 5, 2018. The hearing in the case is scheduled to begin on February 22, 2018. This is an expedited schedule designed to preserve the opportunity for the Company to obtain production tax credits ("PTCs") before they expire. The Company appreciates the Commission setting this schedule in this case, and recognizes the challenges associated with an expedited schedule.

2. One of the issues not addressed in the schedule is the need for the Company to complete interconnection studies on the projects selected for the final shortlist in the 2017R Request for Proposals, and the possibility of limited Company supplemental testimony if changes to the final shortlist are necessary as a result of that assessment. The Company expects to have these studies completed, and have limited supplemental testimony on this issue ready to file by February 7, 2018, if necessary to reflect changes in the final shortlist.

3. To accommodate the potential need for such a filing and allow all parties additional time to review the Company's filing, the Company has determined that it can manage a 60-day delay in obtaining a decision from this Commission on its request for

conditional Certificates of Public Convenience and Necessity, and still ensure PTC qualification for the new wind projects. This would move the target decision date from April 1, 2018, to June 1, 2018.

4. On January 19, 2018, certain intervenors in the Utah docket seeking approval of the Combined Projects,<sup>1</sup> filed a motion with the Public Service Commission of Utah (the “Utah Motion”) to vacate the procedural schedule in that docket (the “Utah Gateway docket”), attached hereto as Attachment 1.

5. On January 24, 2018, RMP filed its response to the Utah Motion (“RMP Response”), attached hereto as Attachment 2. Among other things, the RMP Response noted the possibility of the limited Company supplemental testimony, described above. The Company further proposed a 60-day delay in the schedule, moving the hearing in the Utah Gateway docket and requesting an order by June 1, 2018.

6. In light of the developments set forth above, the Company contacted the hearing officer in this Docket, proposing that the Company file a motion in this Docket to extend the procedural schedule.

7. The hearing officer indicated that April 9-13, 2018, are available dates for the evidentiary hearing in this Docket. The Company requests that the Commission consider moving the hearing to these dates, and requests a scheduling conference by phone or in person to set other dates for an amended procedural schedule in this case.

8. In the process of reaching out to the Parties regarding this Motion, and based upon the Company’s proposed extension of the underlying schedule, the Parties also discussed and

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<sup>1</sup> The “Combined Projects” is defined in the Company’s application filed in this Docket June 30, 2017, as supplemented in the Company’s January 16, 2018 supplemental filing.

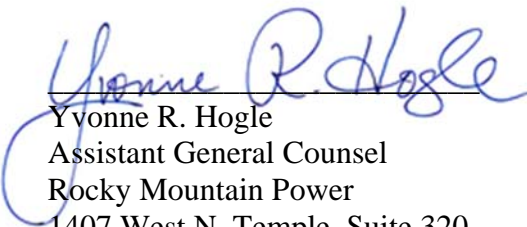
support postponing the January 30, 2018 hearing scheduled to consider the Company's Motion to Strike, to a mutually acceptable date in mid-February, 2018.

9. Because the hearing on the Company's Motion to Strike is scheduled January 30, 2018, the evidentiary hearing in this case is scheduled in less than 30 days, and Staff's and intervenors' testimony is due in less than two weeks, the Company requests expedited review of this motion.

WHEREFORE and based on the foregoing, Rocky Mountain Power respectfully requests that the Commission vacate the remainder of the procedural schedule in this Docket, including the hearing to consider the Company's Motion to Strike on January 30, 2018, and amend its Scheduling Order accordingly.

Respectfully submitted this 26<sup>th</sup> day of January, 2018.

ROCKY MOUNTAIN POWER



Yvonne R. Hogle  
Assistant General Counsel  
Rocky Mountain Power  
1407 West N. Temple, Suite 320  
Salt Lake City, Utah 84116



Attachment 1

Utah Motion

JUSTIN C. JETTER (#13257)  
PATRICIA E. SCHMID (#4908)  
Assistant Attorney Generals  
Counsel for the DIVISION OF PUBLIC UTILITIES  
SEAN D. REYES (#7969)  
Attorney General of Utah  
160 E 300 S, 5<sup>th</sup> Floor  
P.O. Box 140857  
Salt Lake City, UT 84114-0857  
Telephone (801) 366-0335  
jjetter@agutah.gov  
Attorneys for the Utah Division of Public Utilities

STEVEN W. SNARR (#3022)  
Special Assistant Attorney General  
ROBERT J. MOORE (#5764)  
Assistant Attorney General  
160 East 300 South, 5th Floor  
P.O. Box 140857  
Salt Lake City, Utah 84114-0857  
Telephone: (801) 366-0353  
stevensnarr@agutah.gov  
rmoore@agutah.gov  
Attorneys for Utah Office of Consumer Services

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

<p><b>APPLICATION OF ROCKY MOUNTAIN POWER FOR APPROVAL OF A SIGNIFICANT ENERGY RESOURCE DECISION AND REQUEST TO CONSTRUCT WIND RESOURCE AND TRANSMISSION FACILITIES</b></p>	<p>Docket No. 17-035-40</p> <p><b>MOTION TO VACATE REMAINING SCHEDULE AND REQUEST FOR EXPEDITED TREATMENT</b></p>
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Pursuant to Utah Admin. Code r.746-100, the Division of Public Utilities (“Division”) and Office of Consumer Services (“Office”) (together the “Moving Parties”) file this Motion to Vacate Schedule and Request for Expedited Treatment. The Moving Parties request that the Commission vacate the remaining schedule set in the July 27, 2017 Scheduling Order and set a

scheduling conference. Rocky Mountain Power (“Company”) filed substantial new information, project selections, and analysis as part of its January 16, 2018 filing of Supplemental Direct and Rebuttal Testimony. Approval of two billion dollars of capital expenditures warrants a reasonable review that cannot be completed within the current schedule.

The Moving Parties cannot complete an analysis of the new testimony and project proposal changes in the time permitted under the current schedule. To provide some illustrative examples of the changes, the Company’s new testimony significantly changes the basis for approval of the Application. In its Application the Company described the proposed projects an “exciting opportunity for PacifiCorp’s customers” to save money.<sup>1</sup> Now the projects are presented as “necessary to meet an identified resource need and present no more risk than typical utility investments.”<sup>2</sup> What was once an “exciting opportunity” has morphed to “the issue is not *if* the Aeolus-to-Bridger/Anticline line will be constructed, but *when*.”<sup>3</sup>

Similarly, the Application sought approval of 860MW of new wind and a transmission line that were Company owned resources and “mutually dependent on one another.”<sup>4</sup> In the new proposal there is a total of 1,170 MW of wind, that consists of 970 MW of Company owned wind and 200 MW of power purchase agreements. Not only has the project grown by over 36% from the original proposal, the new proposal also envisions a long-term power purchase agreement for a portion of one project. Additionally, one of the projects is not dependent on the new transmission line. And the transmission project that was initially considered necessary for

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<sup>1</sup> Direct Testimony of Cindy Crane, line 27.

<sup>2</sup> Supplemental Direct Testimony of Cindy Crane, Lines 24-26.

<sup>3</sup> *Id.* at lines 151-52 (emphasis in original).

<sup>4</sup> Direct Testimony of Cindy Crane, lines 47-48.

eligibility for 100 percent PTC benefits in the Application is no longer required by 2020.<sup>5</sup> Moreover, the Solar RFP process and selection is not even complete.

These examples do not attempt to capture the entire range of differences between the Application and the proposal presented in the Supplemental Direct and Rebuttal Testimony. They merely illustrate the significance of the changes in the project that the non-Company parties must now evaluate in less than a month's time. The review is not simply an updated analysis of the review of the projects proposed in the Application. More time is necessary for meaningful review and analysis of the new project proposal.

Due to the expedited schedule already in place with upcoming filing dates, the Moving Parties respectfully request that the Commission expedite the time for response and expedite its consideration of this Motion.

Submitted this 18th day of January 2018.

/s/ Justin C. Jetter

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Justin C. Jetter  
Assistant Attorney General  
Utah Division of Public Utilities

/s/ Robert J. Moore

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Robert J. Moore  
Assistant Attorney General  
Utah Office of Consumer Services

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<sup>5</sup> Compare Application at p. 6 (“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”) and Supplemental Direct and Rebuttal Testimony of Nikki L. Kobliha at lines 118-20 (“Wind Projects would still qualify if the Transmission Projects have facilitated synchronization to the transmission grid and commissioning of individual wind turbines...”).

Attachment 2

RMP Response



1407 W. North Temple, Suite 320  
Salt Lake City, UT 84116

January 24, 2018

***VIA ELECTRONIC FILING***

Utah Public Service Commission  
Heber M. Wells Building, 4th Floor  
160 East 300 South  
Salt Lake City, UT 84114

Attention: Gary Widerburg  
Commission Secretary

**RE: Docket No. 17-035-40**  
**Application for Approval of a Significant Energy Resource Decision and Voluntary Request for Approval of Resource Decision**

On January 18, 2018, the Utah Division on Public Utilities and the Utah Office of Consumer Services filed a Motion to Vacate Remaining Schedule and Request for Expedited Treatment in the above referenced matter. The Utah Public Service Commission issued a Notice Setting Deadlines to Respond to the Motion to Vacate Remaining Schedule requesting comments by January 24, 2018. Pursuant to the schedule, Rocky Mountain Power hereby submits its Response to the Motion to Vacate the Remaining Schedule.

Rocky Mountain Power respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

By E-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)  
[jana.saba@pacificorp.com](mailto:jana.saba@pacificorp.com)  
[utahdockets@pacificorp.com](mailto:utahdockets@pacificorp.com)

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

Informal inquiries may be directed to Jana Saba at (801) 220-2823.

Sincerely,

Joelle Steward  
Vice President, Regulation

R. Jeff Richards (#7294)  
Yvonne R. Hogle (#7550)  
1407 West North Temple, Suite 320  
Salt Lake City, Utah 84116  
Telephone: (801) 220-4734  
Facsimile: (801) 220-3299  
Email: [robert.richards@pacificorp.com](mailto:robert.richards@pacificorp.com)  
[yvonne.hogle@pacificorp.com](mailto:yvonne.hogle@pacificorp.com)

Katherine McDowell  
McDowell Rackner & Gibson PC  
419 SW 11th Avenue, Suite 400  
Portland, Oregon 97205  
Telephone: (503) 595-3924  
Facsimile: (503) 595-3928  
Email: [katherine@mrg-law.com](mailto:katherine@mrg-law.com)

Attorneys for Rocky Mountain Power

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

<p><b>In the Matter of:</b></p> <p><b>THE APPLICATION OF ROCKY MOUNTAIN POWER FOR APPROVAL OF A SIGNIFICANT ENERGY RESOURCE DECISION AND VOLUNTARY REQUEST FOR APPROVAL OF RESOURCE DECISION</b></p>	<p>Docket No. 17-035-40</p> <p><b>ROCKY MOUNTAIN POWER'S RESPONSE TO MOTION TO VACATE REMAINING SCHEDULE</b></p>
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**I. INTRODUCTION**

In accordance with Utah Admin. Code R746-1-301(1), PacifiCorp d/b/a Rocky Mountain Power (“Rocky Mountain Power” or “Company”) submits this Response to the Motion to Vacate Remaining Schedule and Request for Expedited Treatment (“Motion”), filed jointly by the Division of Public Utilities (“DPU”) and Office of Consumer Services (“OCS”) on January 19, 2018.

DPU and OCS argue that the procedural schedule provides insufficient time to evaluate the resource decisions resulting from the Company's 2017R request for proposals ("2017R RFP"), and they request a new schedule with more time for review. The current schedule calls for an expedited review of the 2017R RFP results, consistent with the timelines for resource approval set by the Energy Resource Procurement Act ("Act"). An expedited schedule is necessary to preserve the time-sensitive opportunity to capture production tax credits ("PTCs"), enabling the acquisition of needed energy resources with significant benefits to customers.

The schedule includes supplemental testimony for the results of the 2017R RFP, and the Company's supplemental testimony reflecting these results did not materially change the case as DPU and OCS allege. Several months ago, the Commission rejected a related challenge to the schedule, concluding that the Company's request for approval of its resource decisions "should be granted or denied on the merits, not by a procedural motion[.]"<sup>1</sup>

One item not contemplated by the current schedule, however, is the Company's need to complete interconnection studies for the 2017R RFP final shortlist projects and document any resulting changes to the final shortlist. To accommodate this follow-up filing, and to reasonably respond to the concerns of DPU and OCS, the Company agrees to extend the schedule by approximately 60 days, from a target decision date of April 1, 2018, to a target decision date of June 1, 2018. The Company also proposes to move the start date of the hearing in this case by approximately six weeks from March 6, 2018, to either April 18, 2018 or April 24, 2018. The Company has discussed this proposed schedule with DPU, OCS, and other parties.

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<sup>1</sup> Order Denying Motion to Stay at 3 (Nov. 7, 2017).



## II. ARGUMENT

### A. **The Act contemplates an expedited review process, which has already been significantly extended.**

The Act requires the Commission to issue an order on a request for approval of a significant energy resource decision (i.e., the wind projects) within 120 days of the request, and a voluntary resource decision (i.e., the transmission projects) within 180 days of the request.<sup>2</sup> This expedited review process recognizes that resource decisions are time-sensitive, and the public interest is served by prompt and expeditious review. DPU agrees that the “regulatory process must be nimble enough to permit regulated public utilities to react to time-limited opportunities.”<sup>3</sup> The resource decisions in this case are time-sensitive because the customer benefits are driven by expiring PTC benefits, which could be lost if the projects are unreasonably delayed.

The Company filed its Application for Approval of a Significant Energy Resource Decision and Voluntary Request for Approval of Resource Decision (“Application”) on June 30, 2017. If the Commission extends the current schedule by two months as the Company now proposes, until June 1, 2018, the case will span 336 days. Even assuming that the Company’s supplemental filing on January 16, 2018 changed the filing sufficiently to restart the 120-day clock, an end-date of June 1, 2018 meets that timeline and more—136 days to be exact. This schedule reasonably balances the statutory directive for expedited review with the needs of the parties to analyze the Company’s filing.

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<sup>2</sup> Utah Code Ann. §54-17-302(5)(a) (requiring Commission decision for significant energy resource decision “within 120 days of the day on which the affected electrical utility files a request for approval” unless additional time is required in the public interest); Utah Code Ann. §54-17-402(6) (requiring Commission decision for voluntary resource decision “within 180 days of the day on which the energy utility files a request for approval” unless additional time is required in the public interest).

<sup>3</sup> Reply of the Utah Division of Public Utilities to Responses to Utah Industrial Energy Consumers’ Motion to Stay Proceedings at 1-2 (Oct. 16, 2017).

**B. The scope of the Company’s supplemental direct testimony is consistent with the procedural schedule.**

DPU and OCS claim that the Company’s supplemental direct testimony filed on January 16, 2018, was “not simply an updated analysis of the review of the projects proposed in the Application,” but rather “substantial new information, project selections, and analysis[.]”<sup>4</sup> DPU and OCS cannot reasonably claim surprise that the supplemental direct testimony presented different projects for approval. The Company has been clear since the initial filing that the wind projects included were proxies that would be updated, and potentially replaced, by projects competitively selected through the 2017R RFP.<sup>5</sup>

The Company’s direct testimony explicitly stated that, “[a]fter the 2017R RFP shortlist is selected, the Company [will] supplement this Application to provide the Commission and intervening parties with detailed information about the winning bid(s).”<sup>6</sup> Moreover, the Company described the possibility that the benchmark resources would not be selected: “Depending on the outcome [of the 2017R RFP], the results will: (1) identify the Wind Projects as the winning bids and validate their benefits; (2) identify winning wind facilities that are in addition to the Wind Projects and request approval of those projects; or (3) identify winning wind facilities that have been selected instead of one or more of the Wind Projects and request approval of those facilities.”<sup>7</sup> Contrary to DPU’s and OCS’s argument, the supplemental direct testimony was never intended to simply update the analysis of the projects included in the Application. The Company’s potential selection and presentation of additional resources through the supplemental direct testimony was

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<sup>4</sup> Motion at 2-3.

<sup>5</sup> Application at 5-6 (“ . . . 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.”); *id.* at 9-10; Direct Testimony of Cindy A. Crane at lines 181-185.

<sup>6</sup> Direct Testimony of Cindy A. Crane at lines 186-190.

<sup>7</sup> Direct Testimony of Chad A. Teply at lines 146-157.

clear when the Commission established the procedural schedule in this case. It is not a basis to now vacate the schedule.

DPU and OCS overstate the changes resulting from the 2017R RFP. First, the transmission projects included in the Application remain nearly the same. The only new transmission projects are interconnection upgrades related to the wind projects included on the final shortlist. Second, although the 2017R RFP shortlist includes two new wind projects that were not included in the Application, the overall costs for the wind and transmission resources remain substantially the same. The most significant change in the supplemental direct testimony is the fact that the customer benefits increased and became more certain, even after accounting for changes in the federal corporate income tax rate.

**C. The basis for approval of the Application remains the same.**

**1. The wind projects meet the resource need identified in the 2017 IRP.**

DPU and OCS claim that the Company’s “new testimony significantly changes the basis for approval of the Application” because the Company now claims that the wind projects are “necessary to meet an identified resource need.”<sup>8</sup> Far from a novel position set forth for the first time in its supplemental direct testimony, the Company has consistently demonstrated that the wind projects meet an identified resource need. The Company’s direct testimony stated that the wind projects are in the public interest because “they will become an essential element of the Company’s diversified resource portfolio that is *needed* to serve customers.”<sup>9</sup> For each wind project included in the Application, the Company provided a detailed exhibit that included a

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<sup>8</sup> Motion at 2.

<sup>9</sup> Direct Testimony of Chad A. Teply at lines 339-341 (emphasis added); *id.* at lines 71-74.

“statement setting forth the *need* for the facility in meeting present and future demands for service in Utah and other states.”<sup>10</sup>

In addition, at the September 19, 2017 hearing on approval of the 2017R RFP, the Company testified that the “2017 Integrated Resource Plan shows that there is a resource need in our planning forecast, and the proposed wind projects are a component of our least-cost, least-risk plan to meet that need[.]”<sup>11</sup> The Company explained how the proposed wind projects would displace higher cost and higher risk front office transactions that would otherwise be used to meet the resource need identified in the IRP.<sup>12</sup> Following the Company’s explanation, DPU’s witness specifically acknowledged the Company’s position that the wind projects meet a resource need identified in the 2017 IRP.<sup>13</sup>

At the October 11, 2017 technical conference in this case, the Company provided materials to the parties that reiterated that the “proposed Wyoming wind resources are needed to reliably service load and reduce market reliance risk—an area of concern raised by parties during review of the 2015 IRP.”<sup>14</sup> Well before DPU and OCS filed testimony on December 5, 2017—and well before the Company’s supplemental direct testimony—the record was clear that the wind projects meet an identified resource need.

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<sup>10</sup> Exhibit RMP\_\_CAT-1 at 12 (“Development of the proposed wind generation facility in compliance with regulatory requirements is the risk-adjusted, least-cost alternative to meet service obligations in Utah and other states as represented in the Company’s testimony and exhibits. The Company’s prospective generation planning activities are further described in the Company’s 2017 IRP in compliance with Commission Rules.”) (emphasis added); Exhibit RMP\_\_CAT-2 at 13; Exhibit RMP\_\_CAT-3 at 14.

<sup>11</sup> Docket No. 17-035-23, Hearing Transcript at 52, line 22 to 53, line 1 (Sept. 19, 2017); *id.* at 109, lines 2-8 (“the 2017 [integrated] resource plan shows a need in that, the wind resources [we’re] proposing a part of our least-cost and least-risk plan to fill that need.”); *id.* at 110, lines 6-7 (“we have a need for resources, essentially in the very first years of the IRP.”);

<sup>12</sup> *Id.* at 110, lines 8-24; *id.* at 156, lines 1-21.

<sup>13</sup> *Id.* at 217, line 12 to 218, line 4.

<sup>14</sup> Load and Resource Balance Sheet Presentation for October 11, 2017, Technical Conference; *see also* *PacifiCorp’s 2017 Integrated Resource Plan*, Docket No. 17-035-16, Response to the Utah Party Comments on *PacifiCorp’s 2017 Integrated Resource Plan* at 8 (Dec. 15, 2017)

**2. The wind projects affect the timing of the construction of the Aeolus-to-Bridger/Anticline transmission line, but not the underlying need.**

DPU and OCS further claim that the Company “morphed” its justification for the Aeolus-to-Bridger/Anticline transmission line so that the line is now presented as a necessary resource that will be constructed in the future even if the wind projects are not approved.<sup>15</sup> Again, the facts do not support DPU and OCS.

First, the Company has been clear that the Aeolus-to-Bridger/Anticline line is necessary to relieve *existing* congestion on the system.<sup>16</sup> The Company explained that “renewal of the PTCs has created a unique, time-limited opportunity for the Company to construct *critical* transmission facilities in eastern Wyoming, while providing substantial customer savings.”<sup>17</sup> The Company’s direct testimony further described how “NERC’s and WECC’s standards and criteria influenced the need” for the Aeolus-to-Bridger/Anticline line.<sup>18</sup> And at the 2017R RFP hearing, the Company testified that the Aeolus-to-Bridger/Anticline line is necessary to interconnect any additional wind resources in the constrained area.<sup>19</sup>

Second, the Company made clear that the Aeolus-to-Bridger/Anticline line has been “an integral component of the long-term transmission plan for the region” long before the wind

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<sup>15</sup> Motion at 2.

<sup>16</sup> Direct Testimony of Rick A. Vail at lines 72-75 (“Congestion on the current transmission system in eastern Wyoming limits the ability to deliver energy from eastern Wyoming to the Jim Bridger energy hub. The Aeolus-to-Bridger/Anticline Line will relieve this congestion and increase the transmission capacity across Wyoming by 750 MW.”).

<sup>17</sup> Direct Testimony of Cindy A. Crane at lines 206-08 (emphasis added).

<sup>18</sup> Direct Testimony of Rick A. Vail at lines 448-464 (“Q. How do NERC’s and WECC’s standards and criteria influence the need for the Transmission Projects? A. The mandatory standards, particularly, NERC’s TPL-001-4 standard, require the Company to have a forward-looking transmission plan to reliably serve current and anticipated customer demands under all expected operating conditions, including normal system operations (all system elements in service) and during system contingencies (where elements of the transmission system are out of service), both planned or otherwise. \* \* \* The Aeolus-to-Anticline line is sub-segment D.2 of Gateway West, which, as part of Energy Gateway, has been included in the Company’s annual TPL-001-4 assessment as part of its short- and long-term plans to dependably meet NERC and WECC reliability requirements.”).

<sup>19</sup> Docket No. 17-035-23, Hearing Transcript at 146, line 9 to 148, line 16.

projects were contemplated.<sup>20</sup> In fact, the Company's 2015 IRP called for construction of the line by 2024.<sup>21</sup> The Company's filing makes clear that the opportunity to acquire PTC-eligible wind resources to offset the cost of the Aeolus-to-Bridger/Anticline line means that the line will be constructed *earlier* than previously planned—but the plan to build the line by 2024 is well-known and long-standing.

DPU and OCS further claim that the Company now asserts that the transmission projects are no longer necessary for the wind resources to become eligible to receive PTC benefits.<sup>22</sup> The Company's testimony states, however, that a limited delay in the transmission projects will not necessarily jeopardize the PTC eligibility of the wind projects.<sup>23</sup> The testimony was not intended to suggest that the transmission projects are no longer necessary for the wind projects to generate PTCs, and cannot be reasonably interpreted in that manner. In addition, DPU cannot claim to be surprised by this testimony because its own expert witness provided identical testimony.<sup>24</sup>

### III. CONCLUSION

Rocky Mountain Power respectfully requests that the Commission deny DPU's and OCS's Motion to vacate the schedule. Granting the motion could effectively deny the Company's request for approval of the proposed resource decisions. Instead, the Company requests that the Commission reset the hearing to begin either April 16, 2018 or April 24, 2018, reset the target decision date to June 1, 2018, and direct the parties to present a schedule with other necessary, mutually-agreeable milestones.

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<sup>20</sup> Direct Testimony of Cindy A. Crane at lines 57-67; Direct Testimony of Rick A. Vail at lines 94-99.

<sup>21</sup> *PacifiCorp's 2015 Integrated Resource Plan* at 57 (describing the scheduled in-service date for Segment D of the Energy Gateway project as 2019-2024).

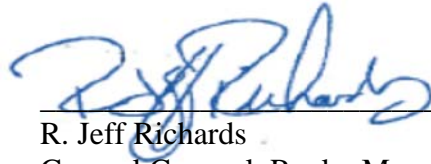
<sup>22</sup> Motion at 2-3.

<sup>23</sup> Supplemental Direct and Rebuttal Testimony of Nikki L. Kobliha at lines 117-131.

<sup>24</sup> Direct Testimony of Daniel Peaco at lines 846-853.

DATED this 24<sup>th</sup> day of January, 2018.

Respectfully submitted,



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R. Jeff Richards  
General Counsel, Rocky Mountain Power  
1407 West North Temple, Suite 320  
Salt Lake City, Utah 84116  
Telephone: (801) 220-4734  
Facsimile: (801) 220-3299  
Email: [robert.richards@pacificorp.com](mailto:robert.richards@pacificorp.com)

Attorney for Rocky Mountain Power

**CERTIFICATE OF SERVICE**

Docket No. 17-035-40

I hereby certify that on January 24, 2018, a true and correct copy of the foregoing was served by electronic mail to the following:

**Utah Office of Consumer Services**

Cheryl Murray – [cmurray@utah.gov](mailto:cmurray@utah.gov)

Michele Beck – [mbeck@utah.gov](mailto:mbeck@utah.gov)

**Division of Public Utilities**

Erika Tedder – [etedder@utah.gov](mailto:etedder@utah.gov)

Consultants:

[dpeaco@daymarkea.com](mailto:dpeaco@daymarkea.com)

[aafnan@daymarkea.com](mailto:aafnan@daymarkea.com)

[jbower@daymarkea.com](mailto:jbower@daymarkea.com)

**Assistant Attorney General**

Patricia Schmid – [pschmid@agutah.gov](mailto:pschmid@agutah.gov)

Justin Jetter – [jjetter@agutah.gov](mailto:jjetter@agutah.gov)

Robert Moore – [rmoore@agutah.gov](mailto:rmoore@agutah.gov)

Steven Snarr – [stevensnarr@agutah.gov](mailto:stevensnarr@agutah.gov)

**Rocky Mountain Power**

Jana Saba – [jana.saba@pacificorp.com](mailto:jana.saba@pacificorp.com)

Yvonne Hogle – [yvonne.hogle@pacificorp.com](mailto:yvonne.hogle@pacificorp.com)

Jeff Richards – [robert.richards@pacificorp.com](mailto:robert.richards@pacificorp.com)

*McDowell Rackner Gibson PC*

Katherine McDowell – [katherine@mrg-law.com](mailto:katherine@mrg-law.com)

Adam Lowney – [adam@mrg-law.com](mailto:adam@mrg-law.com)

**Pacific Power**

Sarah K. Link – [sarah.link@pacificorp.com](mailto:sarah.link@pacificorp.com)

Karen J. Kruse – [karen.kruse@pacificorp.com](mailto:karen.kruse@pacificorp.com)

**Utah Association of Energy Users**

*Hatch, James & Dodge, P.C.*

Gary A. Dodge – [gdodge@hjdllaw.com](mailto:gdodge@hjdllaw.com)

Phillip J. Russell – [prussell@hjdllaw.com](mailto:prussell@hjdllaw.com)



**Nucor Steel-Utah**

*Stone Mattheis Xenopoulous & Brew, P.C.*

Peter J. Mattheis – [pjm@smxblaw.com](mailto:pjm@smxblaw.com)

Eric J. Lacey – [ejl@smxblaw.com](mailto:ejl@smxblaw.com)

*Cohne Kinghorn*

Jeremy R. Cook – [jcook@cohnekinghorn.com](mailto:jcook@cohnekinghorn.com)

**Interwest Energy Alliance**

*Manning Curtis Bradshaw & Bednar PLLC*

Mitch M. Lonson – [mlongson@mc2b.com](mailto:mlongson@mc2b.com)

*Tormoen Hickey LLC*

Lisa Tormoen Hickey – [lisahickey@newLawgroup.com](mailto:lisahickey@newlawgroup.com)

**Utah Clean Energy**

Sophie Hayes – [sophie@utahcleanenergy.org](mailto:sophie@utahcleanenergy.org)

Kate Bowman – [kate@utahcleanenergy.org](mailto:kate@utahcleanenergy.org)

**Utah Industrial Energy Consumers**

*Parsons Behle & Latimer*

William J. Evans – [bevans@parsonsbehle.com](mailto:bevans@parsonsbehle.com)

Vicki M. Baldwin – [vbaldwin@parsonsbehle.com](mailto:vbaldwin@parsonsbehle.com)

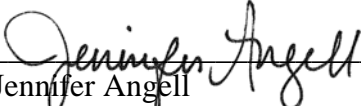
Chad C. Baker – [cbaker@parsonsbehle.com](mailto:cbaker@parsonsbehle.com)

**Western Resource Advocates**

Jennifer E. Gardner – [jennifer.gardner@westernresources.org](mailto:jennifer.gardner@westernresources.org)

Nancy Kelly – [nkelly@westernresources.org](mailto:nkelly@westernresources.org)

Penny Anderson – [penny.anderson@westernresources.org](mailto:penny.anderson@westernresources.org)

  
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Jennifer Angell  
Supervisor, Regulatory Operations