



Joelle R. Steward
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November 14, 2018

***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. 20000-520-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
– Response In Opposition To Request For Stay**

Dear Mr. Petrie:

Rocky Mountain Power hereby files an original and four copies of its Response In Opposition To Request For Stay from Rocky Mountain Sheep Company.

Please contact Stacy Splittstoesser, Wyoming Regulatory Affairs Manager, at (307) 632-2677 if you have any questions or would like additional information.

Sincerely,

Joelle R. Steward
Vice President, Regulation

Enclosure

cc: Service List

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BEFORE THE WYOMING PUBLIC SERVICE COMMISSION

**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)**

**RESPONSE IN OPPOSITION TO
REQUEST FOR STAY**

DOCKET NO. 20000-520-EA-17

Record No. 14781

Rocky Mountain Power (“Company”), pursuant to Chapter 2, Section 13, hereby responds to the October 23, 2018 letter from Rocky Mountain Sheep Company, clarified by a November 9, 2018 letter as a request for a stay based on newly available information (collectively the “Request for Stay”). On November 6, 2018, the Wyoming Public Service Commission (“Commission”) forwarded the October 23, 2018 letter to the Company. The Company opposes the request to stay the issuance of the certificates of public convenience and necessity (“CPCNs”), because the “newly available information” cited by Rocky Mountain Sheep Company in the Request for Stay is not relevant to the Company’s Energy Vision 2020 projects.

I. ARGUMENT

The Request for Stay cites, as its basis, an October 4, 2018 article from the Harvard Gazette by Leah Burrows entitled “The Down Side to Wind Power” (the “Harvard Article”).¹ The Harvard Article discusses two recent papers published in the scientific journals *Environmental Research Letters* and *Joule*. The Request for Stay does not rely directly on the two papers, the actual source material, but instead references only the Harvard Article, which summarizes some of the findings in the papers. Even taking the Harvard Article’s summary as entirely complete, which it is not, the indirectly referenced papers are clearly not applicable to the Company’s CPCNs for the Energy Vision 2020 projects. Because the Harvard Article is not applicable to the CPCNs, it fails to provide the Commission “newly available evidence,” sufficient to warrant a stay of its issuance of the CPCNs.

The Harvard Article describes how the two papers explore a future “large-scale transition toward low-carbon energy sources” and examine the potential impact of wind farms if they are built at a massive scale to facilitate such a transition. The scope of the papers, and the article describing them, therefore sweep far beyond the very specific, commercial-scale wind and transmission projects that are the subject of the CPCNs. For example, the potential climate impacts (i.e. increasing continental U.S. surface temperature by 0.24° C to 1.5° C), were based on the assumption that wind power generators would be built to meet 100 percent of current total U.S. electric demand, which would mean that one-third of the continental U.S. would be covered in wind farms. Further demonstrating how far beyond the scope of this proceeding the Harvard Article is, it notes that the authors of the papers “are quick to point out the unlikelihood of the U.S. generating as much wind power as they simulate in their scenario.”

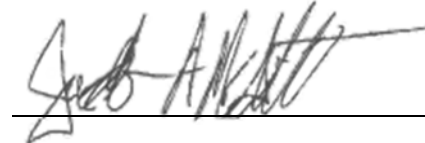
¹ Article available at <https://news.harvard.edu/gazette/story/2018/10/large-scale-wind-power-has-its-down-side/> (last accessed Nov. 13, 2018).

As the October 23, 2018 letter states, “[f]acts are indeed stubborn things,” and the facts here are that the indirectly cited papers and the Harvard Gazette article itself, while interesting, are not applicable to the wind and associated transmission projects that the Commission authorized through the CPCNs in its October 8, 2018 order. The Company’s Energy Vision 2020 projects are not massive wind projects, covering one-third of the continental United States. Instead, the Company’s projects are reasonably sized commercial-scale projects that will bring demonstrated benefits to customers. Rocky Mountain Sheep Company also attempts to raise new evidence here when Wyoming’s Industrial Siting Council (“ISC”) has already thoroughly and critically reviewed the projects’ potential environmental impacts and granted a permit to allow them to proceed.² Accordingly, none of the information provided in the Request for Stay provides new facts or information sufficient for the Commission to decide that a stay on issuance of the CPCNs is warranted and the Commission must therefore deny Rocky Mountain Sheep Company’s request.

DATED this 14th day of November, 2018.

Respectfully submitted,

ROCKY MOUNTAIN POWER



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² See, Wyo. Stat. §35-12-113 (2012), (requires the Industrial Siting Council to grant a permit if it finds, among other things that; “(i) The proposed facility complies with all applicable law; (ii) The facility will not pose a threat of serious injury to the environment nor to the social and economic condition or inhabitants or expected inhabitants in the affected area...”).

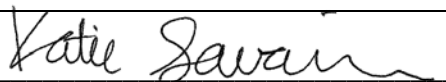
CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2018, I caused to be served via e-mail and/or overnight delivery, a true and correct copy of Rocky Mountain Power's Response in Opposition to Request for Stay to the following:

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

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