

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

*Attorneys for Rocky Mountain Power*

**BEFORE THE WYOMING PUBLIC SERVICE COMMISSION**

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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

Docket No. 20000-520-EA-16  
(Record No. 14781)

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**ROCKY MOUNTAIN POWER'S UPDATED SUMMARY OF CONTENTIONS**

Comes now, Rocky Mountain Power (or "Company"), by and through its attorneys, and

hereby files its Updated Summary of Contentions, in accordance with Paragraph 5(a) of the Scheduling Order, issued by the Wyoming Public Service Commission (“Commission”) on February 26, 2018. The Company summarizes its contentions, which are fully explained and supported in more detail in the Company’s pre-filed testimony, as follows:

1. The Company has a time-limited opportunity to secure substantial customer benefits through the procurement of four new Wyoming wind resources (“Wind Projects”) that will be eligible for 100 percent of the federal wind production tax credit (“PTC”) if they are in service by the end of 2020. The PTCs generated by the Wind Projects will subsidize the construction of the Aeolus-to-Bridger/Anticline 500-kilovolt (“kV”) transmission line and 230 kV network upgrades (collectively, the “Transmission Projects”), which are necessary to relieve existing congestion on the Company’s system and allow interconnection of the Wind Projects. Together, the Wind Projects and the Transmission Projects (collectively, the “Combined Projects”) present an unprecedented opportunity to deliver near- and long-term customer savings, reduce customer risk by securing zero-fuel cost, emission-free generation, and construct a much-needed transmission line with minimal impacts to customer rates.

2. The Company has requested that the Commission grant certificates of public convenience and necessity (“CPCNs”) for the Combined Projects, which include the following Wind Projects, totaling 1,311 megawatts (“MW”) of new capacity:

<b>Project Name</b>	<b>Location</b>	<b>Capacity (MW)</b>
TB Flats I and II	Carbon & Albany Counties, WY	500
Cedar Springs	Converse County, WY	400
Ekola Flats	Carbon County, WY	250
Uinta	Uinta County, WY	161

3. TB Flats I and II and Ekola Flats are being developed as Company benchmark projects under an engineering, procurement, and construction (“EPC”) contract structure. Uinta is being developed under a build-transfer agreement (“BTA”). Cedar Springs is being developed as a 50-percent BTA and 50-percent power purchase agreement (“PPA”).

4. The total capital costs for the Combined Projects are approximately \$2.245 billion. Of this amount, the Wind Projects are approximately \$1.46 billion, the Aeolus-to-Bridger/Anticline line is approximately \$679.2 million, and the network upgrades are approximately \$110.7 million. Despite these up-front capital costs, the Company estimates a modest revenue requirement increase of only 1.7 percent in the first full year of service.

5. The Company requests that the CPCN for the Transmission Projects be conditioned on the Company’s acquisition of the necessary easements and rights-of-way for the construction of the facilities. The Company anticipates receiving the necessary easements and rights-of-way by the end of 2018, at which time the Company will have satisfied the condition on the CPCN for the Transmission Projects.

6. In addition, the Company requests that the Commission approve its proposed Resource Tracking Mechanism (“RTM”) as an innovative or nontraditional ratemaking approach designed to better match the costs and benefits of the Combined Projects in rates, mitigate the adverse impact of regulatory lag, and avert the need for multiple general rate cases.

7. In support of its requests, the Company has filed robust and comprehensive testimony and exhibits demonstrating that the Combined Projects are in the public interest because: (1) the Company has the financial capability to invest in the Combined Projects; (2) the Company has acted in good faith; and (3) the present and future public convenience and necessity require

the Combined Projects. The Combined Projects are in the public interest, in the best interest of customers, and in the best interest of the state of Wyoming.

8. The Company provided evidence that it will fund the investment in the Combined Projects through its normal sources of capital, both internal and external, including net cash flow from operating activities, public and private debt offerings, the issuance of commercial paper, the use of unsecured revolving credit facilities, capital contributions, and other sources. Although the Combined Projects are a significant Company investment, the financial impact will not impair the Company's ability to continue to provide safe and reliable electricity service. No party disputed this evidence.

9. The Company has acted in good faith because it is pursuing the Combined Projects for the benefit of customers. Moreover, the Company selected the Wind Projects after a thorough and comprehensive solicitation process, the 2017R Request for Proposals ("2017R RFP"), which was conducted in conformance with the legal requirements of Utah and Oregon. As required by those states, the 2017R RFP was overseen by two independent experts (the Independent Evaluators or "IEs") who were appointed, retained, and managed by the Public Service Commission of Utah and the Public Utility Commission of Oregon. According to the IEs, the 2017R RFP was fair, transparent, and unbiased. These independent experts found that the bids selected to the 2017R RFP final shortlist represent the top viable offers under current transmission planning assumptions, and the Utah IE concluded that the final shortlist should result in significant savings for customers. The IEs each provided thorough and independent analysis of the Company's benchmark resources and bid evaluation and modeling methodology to ensure that the 2017R RFP was not biased in favor of utility-owned resources.

10. The Combined Projects are necessary because they were identified as integral components of the least-cost, least-risk resource portfolio in the 2017 Integrated Resource Plan (“IRP”), which analyzed all methods of meeting customers’ near- and long-term resource needs, including energy efficiency, demand-side management, front-office transactions (“FOTs”), new supply-side resources, and changes in use of or upgrades to existing resources. The Combined Projects bring near- and long-term benefits—in system reliability and flexibility as well as financial benefits—to customers by capitalizing on the continued (but short-lived) availability of PTCs to achieve what would otherwise be unachievable without substantial increases in customer rates. The Combined Projects also reduce risks related to market reliance and future compliance with environmental regulations.

11. The Transmission Projects are needed and in the public interest because they will allow interconnection of the Wind Projects. The Company can construct the Aeolus-to-Bridger/Anticline line in conjunction with the Wind Projects with all-in net benefits to customers. Without the Wind Projects, the Company’s and region’s long-term transmission plan calls for an in-service date of 2024 for the Aeolus-to-Bridger/Anticline line, when its costs will not be offset by the PTCs generated by the Wind Projects. The availability of the PTCs has therefore created a time-limited opportunity to construct the Transmission Projects with minimal impact on customer rates.

12. The Aeolus-to-Bridger/Anticline line provides significant customer benefits as part of the Company’s Energy Gateway West transmission project—an integral component of the long-term transmission plan for the region—by supporting the Company’s short- and long-term energy demands and strengthening the overall reliability of the existing transmission system.

13. The Transmission Projects will relieve existing congestion on the current transmission system in eastern Wyoming and increase transfer capability from east to west across Wyoming. The Transmission Projects further allow the Company to interconnect 1,510 MW of new capacity behind the transmission constraint in southeastern Wyoming. The three wind projects located behind this constraint (TB Flats I and II, Cedar Springs, and Ekola Flats) will use 1,150 MW of the incremental capacity, which will leave 360 MW for additional resources.

14. The Transmission Projects will enable the Company to more efficiently and flexibly use existing generation resources in Wyoming to serve loads in Wyoming, Idaho, Utah, and the Pacific Northwest. The Transmission Projects also better position the Company to interconnect future resources and to more efficiently serve expected customer load. The Transmission Projects create the potential for further increases to the transfer capability across the Aeolus-to-Bridger/Anticline line with the construction of additional segments of Energy Gateway.

15. The Transmission Projects will provide critical voltage support to the Wyoming transmission network and improve overall reliability of the transmission system by adding incremental new transmission capacity westbound between the Company's existing thermal and renewable facilities, the proposed Wind Projects in eastern Wyoming, and other sources of energy in northern Utah. Additional transmission paths will also mitigate the impact of outages on the existing system, thereby enhancing the Company's ability to comply with mandated reliability and performance standards and reducing line losses.

16. The Wind Projects are necessary because they displace higher-cost, higher-risk market transactions in the near term, and defer the need for other higher-cost resources in the 2028 timeframe. The Company currently has less contracted or owned generation resources than needed to meet customer load; the 2017 IRP shows a near-term resource need of 527 MW in 2017 rising

to 1,023 MW in 2021, the first full year that the Combined Projects will be in service. The goal of the IRP is to determine the least-cost, least-risk portfolio of resources to meet those customer load-service needs. The Combined Projects meet both a near-term need within the two-to-four-year period that otherwise would be filled by uncommitted FOTs, and a long-term energy and capacity need—meeting both needs at a heavily discounted cost and with reduced exposure to wholesale markets that are driven by volatile fossil fuel prices and potential carbon-price risk. Consistent with past IRPs, the 2017 IRP modeled FOTs as a supply-side resource that competes with all other supply-side resources for selection in the preferred portfolio on a least-cost and least-risk basis. The Combined Projects out-performed FOTs and any other alternative supply-side resources in the near term and long term across the vast majority of risk-assessment scenarios, as confirmed by the updated modeling in this case.

17. To fill the Company’s near-term and long-term needs for additional resources, the Company conducted the 2017R RFP, which generated robust and competitive responses from market participants and resulted in the selection of the four Wind Projects. Both independent experts overseeing the 2017R RFP agreed with the Company’s selection of the Wind Projects. The results of the 2017R RFP and the extensive modeling that supports it confirm that the Combined Projects are the least-cost, least-risk path available to serve the Company’s customers.

18. The Company evaluated bids in the 2017R RFP using the same two models the Company uses to develop its IRPs—the System Optimizer (“SO”) model and the Planning and Risk model. The bid portfolios were developed for nine different price-policy scenarios, each with varying natural-gas and carbon dioxide (“CO<sub>2</sub>”) price assumptions. The Wind Projects were selected based on over 1,300 20-year simulations of the Company’s system. These simulations thoroughly evaluated how the net benefits of the Combined Projects are affected by a broad range

of variables and uncertainties, including changes in load, wholesale electricity and natural gas prices, hydro generation, and thermal unit outages. Through these studies, the Company assessed how the net benefits of the Combined Projects are affected by the proposed wind repowering project, solar resource opportunities, selection of alternative wind turbine equipment, alternative natural-gas price assumptions, alternative CO<sub>2</sub> price assumptions, and application of alternative assumptions for operations and maintenance (“O&M”) costs and Renewable Energy Credit (“REC”) revenues.

19. The Combined Projects provide net customer benefits under all scenarios studied through 2036 using the IRP models, and in seven of nine scenarios studied through 2050 using nominal revenue requirement modeling. Of the 18 price-policy scenarios analyzed, the Combined Project produced net customer benefits in 16—demonstrating a high likelihood that customer will receive all-in savings because of the Combined Projects.

20. Using the medium natural-gas price, medium CO<sub>2</sub> price scenario, the benefits range from \$357 million to \$405 million using the IRP models through 2036. Through 2050, the nominal revenue requirement benefits are \$167 million. The Combined Projects produce net benefits, *i.e.*, reduce the Company’s forecasted revenue requirement, in most of the Wind Projects’ life and, because of the PTCs, the Combined Projects produce substantial near-term benefits. The medium natural-gas price is based on the Company’s official forward price curve, which is the same forecast the Commission has used in setting customer rates and establishing avoided cost pricing for the Company. The medium natural-gas forecast is the best representation of future market prices and is appropriately used for the central forecast in the Company’s economic analysis; the alternative price-policy scenarios provide a reasonable foundation for judging risk.

21. The only price-policy scenarios that did not result in customer benefits measured through 2050 are the low natural-gas, zero CO<sub>2</sub> scenario and the low natural-gas, medium CO<sub>2</sub> scenario. These results, however, do not indicate that the Combined Projects are not in the public interest. Instead, these results indicate that, at worst, the Company can construct the much-needed Transmission Projects and acquire over 1,300 MW of new wind capacity at a net cost of only \$184 million through 2050. Put another way, customers will receive the benefits of the Aeolus-to-Bridger/Anticline line for approximately 23 percent of the project costs, and also receive substantial new wind resources. Because the Aeolus-to-Bridger/Anticline line remains a part of the Company's long-term transmission plan, building it in 2020 provides a substantial discount that will be unavailable if the Company waits.

22. In addition, the customer benefits forecasted by the Company are conservative and indicate that the Wind Projects have upside benefits that will flow through to customers if realized. First, for all price-policy scenarios, customer benefits would improve by approximately \$34 million for every dollar assigned to the incremental RECs that will be generated from the Wind Projects through 2036. Second, customer benefits rely on conservative O&M cost assumptions, based on the Company's experience in operating and maintaining the existing fleet of owned-wind facilities. The Company's economic analysis does not reflect expected cost savings associated with operating and maintaining wind facilities that will use larger wind turbines—including Uinta, TB Flats I and II, and Ekola Flats. If the O&M cost elements applicable to the larger-turbine equipment are reduced as anticipated, customer benefits calculated through 2036 for all price-policy scenarios would improve by approximately \$19 million. Third, the CO<sub>2</sub> price assumptions were modeled in real, rather than nominal, dollars. Modeling nominal CO<sub>2</sub> prices would increase the customer benefits under all medium and high CO<sub>2</sub> price assumptions.

23. The results of the IRP models through 2036 and the nominal revenue requirement results through 2050 are both useful in assessing the economics of the Combined Projects. The results of the IRP models through 2036 provide a view of economic analysis that is consistent with the planning period and approach used to identify a least-cost, least-risk preferred portfolio in the IRP. The Company has historically relied on its IRP models, using a 20-year planning horizon, to evaluate resource acquisitions and plant investments approved by the Commission, including the acquisition of the Chehalis and Lakeside 2 combined cycle plants. More recently, the Company used its 20-year IRP model results to support the Company's CPCN application for the installation of emission control equipment at Jim Bridger Unit 3 and Unit 4.

24. The nominal revenue requirement analysis through 2050 indicates how the Combined Projects might impact customer rates, relative to alternative resource procurement scenarios, over time. But, as with any long-term study, these longer-term results are increasingly more difficult to project. Moreover, the long-term extrapolation of system benefits used in the 2050 analysis is conservative because the extrapolation approach yields projected benefits that do not reach the levels observed in the model in 2036 until 2047.

25. The 2017R RFP results were tested at the request of the IEs to ensure that the Wind Projects were not selected because of modeling bias. To better reflect how PTCs are included in customer rates, the Company did not levelize the PTC benefits over the life of the resource for utility-owned bids. The IEs were concerned that this refinement made it more likely that the SO model would select utility-owned resources. The Company addressed the IEs' concerns by comparing a bid portfolio selected with levelized PTCs (which resulted in PPAs) to the portfolio that includes the Wind Projects over the life of the resources. The Company's analysis demonstrated that there was no bias in the resource selection process due to the modeling of PTC

benefits because the life-of-resource analysis showed that the Wind Project portfolio outperformed the PPA portfolio. The IEs reviewed the Company's analysis and agreed that the modeling of PTC benefits on a non-levelized basis did not bias the resource selection process.

26. The IEs also confirmed that the Company reasonably accounted for its current transmission planning assumptions when selecting the Wind Projects, and both IEs agreed with the Company's determination of viability based on bidder interconnection queue position.

27. The record in this case demonstrates that the Company must act now to secure the benefits of the Combined Projects because of the elimination of PTCs in 2020. That urgency does not apply to the potential procurement of solar resources. Based on the complete results of the Company's 2017 solar RFP ("2017S RFP"), the Company's solar sensitivity demonstrates that potential solar resources do not displace the economic benefits of the Combined Projects.

28. While solar resources may also provide customer benefits, contrary to claims from certain parties, solar resource bids submitted into the 2017S RFP are not a superior resource alternative to the Combined Projects. Solar resources are best viewed as an incremental opportunity, not as an alternative to the Combined Projects.

29. While the base economic analyses of solar PPA bids identified in the 2017S RFP show that there are potential customer benefits associated with a portfolio of solar PPAs, subsequent sensitivity analyses show risks unique to solar resource opportunities, suggesting that the projected benefits for the solar PPAs are overstated. In particular, increased solar penetration reduces the resource's capacity contribution, and a more refined hourly price curve indicates that the value of solar resources decreases due to the timing of their generation. The Company's additional solar sensitivities—conducted to account for this more refined hourly pricing and decreased capacity contribution—reduce the expected benefits of solar resources. Under the

medium gas, medium CO<sub>2</sub> price-policy scenario, the benefits of the solar resources range from \$237 million to \$248 million using the IRP models through 2036, which is less than the Combined Projects' benefits of \$328 million to \$343 million. Through 2050, the customer benefits of the Combined Projects are roughly equal to the solar resources.

30. In addition, driven by uncertainties regarding tariff and tax reforms, current solar resource pricing likely reflects a risk premium, and solar project costs may decline. Because the 30-percent investment tax credit ("ITC") is available for solar resources that come online by 2021 (regardless of when construction is commenced), the Company expects that solar pricing received in late 2019 for projects that could come online in 2021 will avoid the current risk premium associated with the tariff and tax reform uncertainties. Thus, the Company has time to study these resources in its 2019 IRP, and has decided not to select any of the 2017S RFP bids to the final shortlist.

31. The economic analysis supporting the customer benefits associated with the solar resources does not consider the \$679.2 million in costs associated with the Aeolus-to-Bridger/Anticline line. The Company currently plans an in-service date of 2024 for that line if the Wind Projects are not developed now. Thus, if the Company pursued the solar resources, it would still need to construct the Aeolus-to-Bridger/Anticline line in the near future but would do so without the PTC subsidy provided by the Wind Projects. Accounting for the costs of the Aeolus-to-Bridger/Anticline line, solar resources' customer benefits are largely eliminated.

32. The Company will continue to assess potential economic benefits from solar resource opportunities in the 2019 IRP, including a thorough evaluation of hourly price profile and capacity-contribution risks with full stakeholder engagement and a more orderly assessment of the potential customer benefits of solar generation. Should subsequent analysis in the 2019 IRP

demonstrate that solar resource opportunities provide economic benefits for customers, there will be sufficient time to initiate a new competitive solicitation process for projects capable of achieving commercial operation by the end of 2021 that can qualify for the 30-percent ITC. This potential solicitation could consider storage bids as a means to mitigate valuation risks and allow more time for participants to manage the transmission interconnection process.

33. The Company provided testimony describing its past experience implementing projects comparable in scope to the Combined Projects and on similarly compressed construction schedules. The Company has consistently developed its projects on time and under budget. Like past projects, the Company intends to use contracting provisions to provide greater price certainty and to ensure through all available means that contractors meet the deadlines required for the Combined Projects to become fully operational by the end of 2020.

34. The risks associated with the Combined Projects continue to decrease. The customer benefits of the Combined Projects increased over the course of this case—by 265 to 320 percent through 2036 and by 20 percent through 2050 under the medium gas, medium CO<sub>2</sub> price-policy scenario. The installed capital cost for the Wind Projects decreased 18 percent, from \$1,590 per kilowatt in the initial filing to \$1,310 per kilowatt. Because there are substantial customer benefits in the near-term due to the PTCs, there is greater certainty in the forecasted benefits.

35. There is also greater cost certainty for both the Wind Projects and Transmission Projects because of the competitive market solicitations occurring over the course of this case. The bids for the Wind Projects selected through the 2017R RFP have largely locked in the pricing terms and conditions for those projects. The Company's bid solicitation process for EPC contractors for the Aeolus-to-Bridger/Anticline line confirmed the Company's cost estimate. The

Aeolus-to-Bridger/Anticline line represents approximately 85 percent of the total costs of the Transmission Projects. Because there is now greater certainty regarding the capital costs required for the Combined Projects, there is less risk.

36. The risk of delay beyond 2020 has also decreased over the course of the case as project implementation has continued. Although the schedule for the necessary regulatory approvals has slipped slightly, the Company remains on schedule to deliver the Combined Projects by the end of 2020.

37. The risk associated with changes in the federal tax code has been resolved. While the reduction in the federal corporate income tax rates decreased the customer benefits of the PTCs, that decrease was more than offset by the decreased capital costs resulting from the 2017R RFP. On net, customer benefits increased even with reduced PTC value.

38. The Company testified that the commercial structure of the Wind Projects does not increase customer risk. Because three of the four Wind Projects are being developed exclusively as utility-owned resources, customers will receive any benefits associated with greater-than-expected generation, lower-than-expected costs (both initially and ongoing), and the benefits accruing at the end of the Wind Projects' expected useful lives, in the form of continuing generation, repowering, or redevelopment. These benefits would inure to the project developer under a PPA commercial structure, not customers.

39. To further mitigate customer risk associated with the Combined Projects, the Company has committed to hold customers harmless if the Wind Projects are not 100 percent PTC-eligible because of an issue within the Company's control.

40. In addition, for ratemaking purposes, the Company has agreed to a soft cap of \$2.245 billion based on its current estimated costs for the Combined Projects. The Company

commits to demonstrating the prudence of any cost in excess of the soft cap before the cost can be reflected in rates. And the Company maintains responsibility to continue prudent project implementation and respond reasonably to all changes in circumstance occurring between the issuance of the CPCN and the in-service dates of the Combined Projects.

41. The estimated rate impact of the Combined Projects is modest—in the first full year of operation, 2021, the Company estimates that the Combined Projects will cause a 1.7 percent increase in rates. And, as noted in paragraph 20, of the 30 years of Wind Project operation, the Company forecasts a reduction in revenue requirement in 23 years of the 30-year life of the Wind Projects. The RTM is designed as a time-limited mechanism to match the costs and benefits of the Combined Projects until the full revenue requirement is reflected in base rates. Thereafter, the RTM will act as a tracker for PTCs to ensure that customers receive the full PTC benefits generated by the Wind Projects. Because PTCs are entirely dependent on the variable output of the Wind Projects and are difficult to precisely forecast, tracking PTCs through the RTM ensures that customers receive their full value and that shareholders are treated fairly. Under the RTM, the Company would begin deferring the costs and benefits associated with each new facility in the month it goes into service.

42. If the RTM is denied, the net power cost benefits associated with the Wind Projects should be removed from the Energy Cost Adjustment Mechanism so that customer do not unfairly receive the benefits produced by resources that are not yet in rates. This adjustment ensures fairness and reasonably matches costs and benefits.

43. The statute governing the granting of a CPCN, W.S. 37-2-205, requires that the public interest be given paramount consideration. The intervening property owners who remain in this case, Anadarko Petroleum Company (“Anadarko”), Southland Royalty Company, LLC

(“Southland”), and Rocky Mountain Sheep Company (“RMSC”), in their individual testimony primarily address concerns specific to their financial and individual interests and not the interests of the public as a whole.

44. The issues raised by the property owners are beyond the limited scope of issues before the Commission in this CPCN docket. Specifically, Anadarko and Southland raise private issues and seek specific CPCN conditions related to the impact of the Wind and Transmission Projects on land and mineral interests held by them in areas of the Projects, including the right of way for Aeolus-to-Bridger/Anticline line. The issue of reasonable compensation to property owners however, for either right of way or impact on the mineral estate are a part of the negotiations process which Rocky Mountain Power has commenced. These issues fall outside the applicable public interest review standard for issuance of a CPCN.

45. The allegations made by Anadarko and Southland that mineral interests in Carbon and Sweetwater counties would be negatively impacted by the Combined Projects are speculative. Neither Anadarko nor Southland have offered credible evidence that they will be prohibited from developing mineral interests in the area of the projects. Most of the Aeolus-to Bridger/Anticline line is sited in a corridor that tracks Interstate 80 and includes existing 230 kV transmission lines, buried gas pipelines and fiber-optic cables, and a Union Pacific railroad line. As a result, the majority of the line will not have a significant impact on mineral rights.

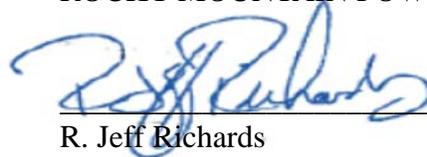
46. To extent that the Aeolus-to-Bridger/Anticline line does impact mineral or land rights, the Company has consistently represented that it will work to mitigate these impacts, review all claims for compensation submitted by these companies, and reasonably and fairly compensate negatively-impacted interests. The Company has already resolved the concerns of a number of landowners impacted by the Combined Projects. It is confident that it can resolve the issues of the

three property owners who remain in this case, as long as the CPCN does not include specific conditions that would permit property owners to make unreasonable demands in the negotiation process.

47. The comprehensive and exhaustive record in this case demonstrates that the Combined Projects are in the public interest and therefore warrant CPCNs. Together, the Combined Projects will provide much-needed capacity to relieve an already constrained transmission system, generate zero-fuel-cost energy, diversify the Company's resource portfolio, and mitigate the future risks of environmental regulations. Most importantly, the Combined Projects achieve these benefits while producing net customer benefits and a modest 1.7 percent revenue requirement increase in the first full year of operations. A full explanation of the facts and issues set forth above is contained in the Company's direct, rebuttal, supplemental direct, second supplemental direct, and supplemental rebuttal testimony.

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

ROCKY MOUNTAIN POWER



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

*Attorneys for Rocky Mountain Power*