

**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 FOR CERTIFICATES OF PUBLIC	Docket No. 20000-520-EA-17 (Record No. 14781)
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**STIPULATED SUMMARY OF UNCONTROVERTED FACTS**

Come now the parties in the above-captioned docket and pursuant to paragraph 5(d) of the Scheduling Order issued February 26, 2018, hereby submit their Stipulated Summary of Uncontroverted Facts. By their signatures below, each party is stipulating, as to such party, that the following facts will not be contested by them at the hearing and will be uncontroverted by such parties in this proceeding.

1. The Stipulated Summary of Uncontroverted Facts is submitted by the following parties: Rocky Mountain Power, Wyoming Office of Consumer Advocate, Wyoming Industrial Energy Consumers, Northern Laramie Range Alliance, Interwest Energy Alliance, Rocky Mountain Sheep Co., Anadarko Land Corp., and Southland Royalty Company, LLCC.

2. Rocky Mountain Power (“RMP” or “Company”) is a division of PacifiCorp, an Oregon corporation, which provides electric service to retail customers through its Rocky Mountain Power division in the states of Wyoming, Utah, and Idaho, and through its Pacific Power division in the states of Oregon, California, and Washington.

3. RMP is a public utility in the state of Wyoming, as defined in Title 37 and is subject to the jurisdiction of the Wyoming Public Service Commission (“Commission”) with respect to its prices and terms of electric service to retail customers in Wyoming.

4. The Wyoming Office of Consumer Advocate (“OCA”) is an independent division within the Commission created by an Act of the Wyoming Legislature in March 2003. The OCA is charged with representing the interests of Wyoming citizens and all classes of utility customers in matters involving public utilities. *See* WYO. STAT. ANN. §§ 37-2-401 through 404.

5. Wyoming Industrial Energy Consumers (“WIEC”) is an unincorporated association whose members are corporations duly authorized to transact business in the State of Wyoming. WIEC members operate facilities within the service territory of Rocky Mountain Power, from whom they purchase electricity and energy services.

6. Northern Laramie Range Alliance (“NLRA”) is a citizens’ group with more than 900 members, the large majority of whom are residents of Converse, Albany and Natrona Counties in central Wyoming. The residents of these counties are within the service area of, and purchase electricity from Rocky Mountain Power.

7. Interwest Energy Alliance (“Interwest”) is a 501(c)(6) nonprofit trade association of renewable energy project developers and manufacturers working with the non-governmental conservation community to promote renewable energy in Wyoming (and also in Utah, Colorado, Nevada, Arizona and New Mexico).

8. Rocky Mountain Sheep Co. (“RMS”) is a Wyoming-based corporation, originally incorporated in 1903 and owns approximately 19,500+ acres in Carbon County, Wyoming.

9. Anadarko Land Corp. (“Anadarko”) is a wholly owned subsidiary of Anadarko Petroleum Corporation along with subsidiaries Anadarko E&P Onshore LLC, and Bitter Creek Coal Company. Anadarko is headquartered in The Woodlands, Texas, with regional United States and international offices, including offices in Gillette, Casper, and Douglas, Wyoming. Anadarko Land Corp. holds title the land, both surface and split-estate minerals in the Wyoming

Checkerboard and holds federal leases. The Transmission Line Projects and Wind Power Projects proposed by Rocky Mountain Power Company include the Anadarko owned land. Anadarko E&P Onshore LLC operates the oil and gas exploration and production from these lands, while the Bitter Creek Coal Company develops the coal deposits located on the Anadarko lands.

10. Southland Royalty Company LLC (“Southland”) is a landowner in Carbon and Sweetwater County, Wyoming owning approximately 90,000 acres of surface estate, and over 300,000 acres of mineral estate. Additionally, Southland holds approximately 198,000 acres of State and Federal leasehold for development in Wyoming. .

11. Rock Creek Wind, LLC (“Rock Creek”) is a Delaware limited liability company. Rock Creek owns a wind project in Wyoming in the same general area as McFadden Ridge and TB Flats wind projects.

12. On June 30, 2017, RMP filed its application together with testimony, and exhibits requesting:

- Pursuant to Wyoming Statute § 37-2-205(c), approval of certificates of public convenience and necessity to construct or approval to acquire, (a) four new Wyoming wind resources; and b) certain “230 kV Network Upgrades” described in Mr. Rick Vail’s Direct Testimony at page 2, line 13 through page 3, line 4;
- Pursuant to Wyoming Statute § 37-2-205(c) and Paragraph 13 of the Stipulation and Agreement in Docket No. 20000-384-ER-10, approval of certificates of public convenience and necessity to construct or approval to acquire the “Aeolus-to-Bridger/Anticline Line” described in Mr. Rick Vail’s Direct Testimony at page 2, lines 4–23; and

- Pursuant to Wyoming Statute § 37-2-121, approval of a Resource Tracking Mechanism (“RTM”) described Mr. Jeffrey Larsen’s Direct Testimony (subsequently adopted by Ms. Joelle Steward) at page 4, line 20 through page 6, line 6.

13. On July 6, 2017, the Commission issued a Suspension Order, ordering the June 30, 2017 Application be suspended, for investigation and the Commission’s final order, for the six-month term prescribed by subsection (c) of Wyoming Statutes 37-3-106, starting after the 30 days’ notice term provided for in subsection (b).

14. On July 7, 2017, WIEC filed a petition to intervene and request for hearing.

15. On July 17, 2017, the Commission issued the Notice of Application.

16. On July 19, 2017, the OCA filed a notice of intervention and request for hearing.

17. On August 3, 2017, NLRA filed a petition to intervene.

18. On August 10, 2017, the Commission issued its Special Order Authorizing One Commissioner and/or Hearing Examiner to Conduct Public Hearing

19. On August 11, 2017 Interwest filed petition to intervene.

20. On August 11, 2017, the Commission issued an Order Authorizing Intervention for WIEC and NLRA.

21. On August 17, 2017, the designated hearing officer conducted a scheduling conference. The Commission issued its Scheduling Order on August 24, 2017.

22. On September 1, 2017 RMS filed a petition to intervene. The Commission issued an Order Authorizing Intervention October 13, 2017.

23. On September 5, 2017, RMP filed a list of affected landowners for the proposed transmission line construction.

24. On September 20, 2017, RMP filed an updated list of affected landowners for the proposed transmission line construction.

25. On October 23, 2017, Peterson Outfitters, LLC (“Peterson Outfitters”) filed a petition to intervene. The Commission issued an Order Authorizing Intervention October 31, 2017.

26. On October 26, 2017, Anadarko and Southland filed petitions to intervene. The Commission issued an Order Authorizing Intervention for each of Anadarko and Southland November 29, 2017.

27. On October 27, 2017, the Overland Trail Cattle Company, LLC (“TOTCO”) filed a petition to intervene. The Commission issued an Order Authorizing Intervention November 29, 2017.

28. On November 14, 2017, BP America Production Company filed a petition to intervene.

29. On November 20, 2017, the following parties filed direct testimony: Interwest (Greg Jenner); NLRA (Kenneth G. Lay); Peterson Outfitters (Joshiwa T. Peterson); OCA (Bryce Freeman); RMS (Kristy V. Thomson); WIEC (Nicholas L. Phillips, Kevin C. Higgins, James R. Dauphinais); BP (Shannon Martin).

30. On November 22, 2017, RMP filed an Opposition to BP Petition to Intervene.

31. On November 28, 2017, BP filed a Reply in Support of Petition for and Notice of Intervention. The Commission issued an Order Authorizing Intervention January 4, 2018.

32. On December 14, 2017, Peterson Outfitters filed a Motion to Withdraw as Intervenor. The Commission issued an Order Granting Motion to Withdraw Intervention January 3, 2018.

33. On December 15, 2017, Southland filed the direct testimony of Jonathan Holmes.

34. On December 18, 2017, the following parties filed rebuttal testimony with exhibits: RMP (Cindy A. Crane, Chad A. Teply, Rick A. Vail, Rick T. Link, Joelle R. Steward, Roderick D. Fisher); TOTCO (Garry L. Miller); and Anadarko (Susan Aldridge, Harrison Godwin, Brent Naherny, Andrew Wurdack, Lee Shannon).

35. On January 8, 2018, RMP filed a Motion to Strike or Limit Testimony requesting that certain portions of each of the direct testimony of RMS, Southland, Anadarko, TOTCO and BP be stricken or limited. RMP also filed supplemental rebuttal testimony of Roderick D. Fisher.

36. On January 12, 2018, Anadarko, Southland, and BP filed objections to the proposed briefing schedule to respond to RMP's Motion to Strike or Limit Testimony.

37. On January 16, 2018, RMP filed direct supplemental testimony and exhibits of Cindy A. Crane, Chad A. Teply, Rick A. Vail, Rick T. Link, Joelle R. Steward and Nikki L. Koblaha.

38. On January 18, 2018, RMP filed a replacement Confidential Exhibit RMP\_\_(RTL-2SD) to the supplemental direct testimony of Rick T. Link.

39. On January 19, 2018, the Commission filed a Notice of Supplemented Application and a letter to landowners notifying them that the Company supplemented its application and exhibits after having identified the specific wind projects through the request for proposal process, which supplement increased the proposed total capacity from 860 MW to approximately 1171 MW.

40. On January 26, 2018, RMP filed an Unopposed Motion to Vacate and Amend Procedural Schedule.

41. On January 29, 2018, the Commission issued a Suspension Order, ordering the June 30, 2017 Application be suspended, for investigation and the Commission's final order, for

the final three (3) month term prescribed by subsection (c) of Wyoming Statutes 37-3-106, starting after the 30 days' notice term provided for in subsection (b).

42. On January 29, 2018, TOTCO filed a Response to RMP Motion to Strike, and testimony of Garry L. Miller.

43. On January 30, 2018, Rock Creek filed a Petition to Intervene.

44. On January 31, 2018, RMP filed Replacement Confidential Exhibits RMP \_\_\_\_(CAT-1SD-4) and (CAT-2SD-1) to the supplemental direct testimony of Chad A. Teply.

45. On January 31, 2018, BP, Anadarko and Southland filed a Joint Memorandum in Opposition to RMP Motion to Strike.

46. On February 5, 2018, RMS filed a Response in Opposition to RMP Mtn to Strike or Otherwise Limit Scope.

47. On February 6, 2018, the Commission issued a Suspension Order, ordering the January 16, 2018 "Amended Application" be suspended, for investigation and the Commission's final order, for the six month term prescribed by subsection (c) of Wyoming Statutes 37-3-106, starting after the 30 days' notice term provided for in subsection (b).

48. On February 6, 2018, RMP filed a Reply in Support of Motion to Strike.

49. On February 6, 2018, BP filed its Motion to Withdraw as Intervenor.

50. On February 8, 2018, the Commission denied the Motion to Strike or Limit Testimony with leave to refile the motion.

51. On February 14, 2018, the Commission issued a Notice and Order Vacating Public Hearing, pursuant to open meeting action taken on February 6, 2018 wherein the remaining procedural schedule and public hearing set to commence on February 22, 2018 were vacated with a new schedule to be set at a later date.

52. On February 15, 2018, RMP filed its Opposition to Rock Creek Intervention.
53. On February 16, 2018 RMP filed second supplemental direct testimony and exhibits of Cindy A. Crane, Chad A. Teply, Rick A. Vail, Rick T. Link and Joelle R. Steward.
54. On February 21, 2018, Rock Creek filed its Reply in Support of Petition to Intervene.
55. On February 23, 2018 RMP filed replacement pages of supplemental direct testimony and second supplemental direct testimony (redline and clean versions of both) for witnesses Rick T. Link and Cindy A. Crane, as well as corrected exhibits and workpapers for Rick T. Link.
56. On February 26, 2018, the Commission issued its Order Granting Motion to Withdraw Intervention of BP.
57. On February 26, 2018, the Commission issued a Scheduling Order.
58. On February 27, 2018, TOTCO filed supplemental testimony of Garry L. Miller.
59. On March 1, 2018, the Commission issued its Notice of Second Supplemented Application.
60. On March 1, 2018, NLRA filed supplemental direct testimony of Kenneth G. Lay.
61. On March 2, 2018, OCA filed supplemental direct testimony of Bryce Freeman; RMS filed supplemental testimony of Kristy V. Thomson; Rock Creek filed direct supplemental testimony of Mark D. Milburn; Southland filed supplemental testimony of Jonathan Holmes; WIEC filed supplemental response testimony of Nicholas L. Phillips, James R. Dauphinais, and Kevin C. Higgins; Anadarko filed supplemental testimony of Susan Aldridge, Brent Naherny, Lee Shannon, Tom Taylor, and Andrew Wurdack; and Interwest filed supplemental direct testimony of Gregory F. Jenner.



62. On March 5, 2018, WIEC filed corrected non-confidential supplemental response testimony of Nicholas L. Phillips.

63. On March 9, 2018, the Commission issued its Order Granting Rock Creek Petition to Intervene.

64. On March 14, 2018, RMP filed supplemental rebuttal testimony and exhibits of Cindy A. Crane, Chad A. Teply, Rick A. Vail, Rick T. Link, Joelle R. Steward and Roderick D. Fisher, and WIEC filed cross answer testimony of James R. Dauphinais and Nicholas L. Phillips.

65. On March 14, 2018, Anadarko filed a Notice reserving its right to address the rebuttal testimony of RMP filed March 14, 2018 at the evidentiary hearing April 9, 2018.

66. On March 15, 2018, WIEC filed second corrected supplemental response testimony of Nicholas L. Phillips.

67. On March 16, 2018, RMP filed its Objection to Notice Filed By Anadarko Land Corp.

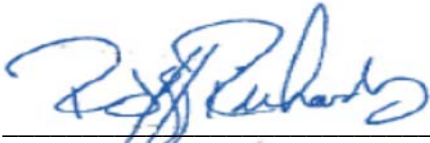
68. On March 19, 2018, the Commission issued its Notice and Order Setting Public Hearing.

69. On March 22, 2018, TOTCO filed a petition for leave to withdraw.

70. On March 23, 2018, Rock Creek filed a petition for leave to withdraw.

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

**ROCKY MOUNTAIN POWER**



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**WYOMING INDUSTRIAL ENERGY CONSUMERS**



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**NORTHERN LARAMIE RANGE ALLIANCE**



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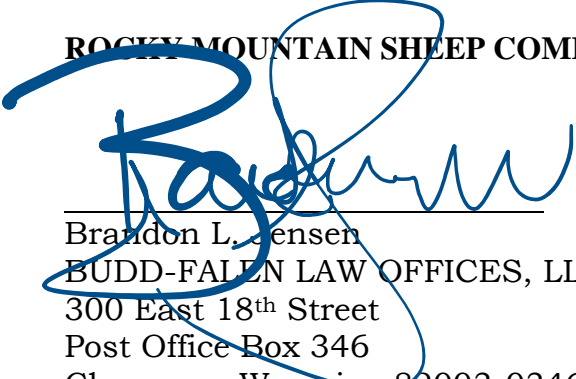
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