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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

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

**ROCKY MOUNTAIN POWER'S MOTION TO SUBMIT ADDITIONAL EXHIBITS**

In accordance with paragraph 7 of the Wyoming Public Service Commission's ("Commission") February 26, 2018, Scheduling Order, PacifiCorp d/b/a Rocky Mountain Power ("Rocky Mountain Power" or "Company") requests that the Commission accept four

late-filed exhibits, which accompany this motion. Good cause exists to accept each of these exhibits because they were unavailable on March 26, 2018, when parties were required to file exhibits. The three documentary exhibits were provided to the parties through updated discovery responses on Friday, March 30, 2018, only four days after the March 26, 2018, deadline for filing exhibits. Parties will therefore have ten days to review the exhibits before hearing. As described below, each of these exhibits are admissible evidence and will provide the Commission with additional information relevant the claims made by parties in this case. Their inclusion in the record will not unduly prejudice any of the parties. The fourth exhibit corrects an error in the pre-filed Supplemental Rebuttal Testimony of Rick Vail.

The first exhibit, Rocky Mountain Power Exhibit No. 42.0, is the Company's Aeolus West Transmission Path Transfer Capability Assessment ("Transfer Capability Assessment"), which was finalized on Friday, March 30, 2018.<sup>1</sup> The preliminary draft of the Transfer Capability Assessment is included as Wyoming Industrial Energy Consumers ("WIEC") Exhibit No. 305.1. WIEC's Updated Summary of Contentions makes reference to the fact that Exhibit No. 305.1 is preliminary because it does not include the dynamic stability studies.<sup>2</sup>

On March 30, 2018, the Company completed the dynamic stability studies and provided a final Transfer Capability Assessment to the parties through an update to an earlier data request. This Assessment confirms that the 500 kV Aeolus-to-Bridger/Anticline transmission line will interconnect up to 1,510 MW of resources and increase east-to-west

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<sup>1</sup> This exhibit includes the Assessment, Appendix A, B and the first 11 pages of Appendix C, which summarize the results. To avoid copying hundreds of pages of data, the Company has omitted the balance of Appendix C. The full Appendix C, however, was provided to the parties in discovery.

<sup>2</sup> WIEC Updated Summary of Contentions, ¶ 15.

transmission capacity by approximately 915 MW. Good cause exists to accept the Transfer Capability Assessment because it was unavailable before the March 26, 2018, filing deadline and it is directly responsive to one of the concerns raised by WIEC.

The second exhibit, Rocky Mountain Power Exhibit No. 43.0, is the Independent Evaluator's Closing Report on PacifiCorp's 2017 Solar Request for Proposals ("2017S RFP"), which was prepared for the Company by London Economics International LLC and provided to the Company on March 30, 2018. Good cause exists to accept this exhibit because it was unavailable before the March 26, 2018, exhibit filing deadline and it consists of an independent expert's confirmation of the fairness of the 2017S RFP and the reasonableness of the Company's ultimate decision to not pursue any additional solar resources at this time. WIEC raised the results of the 2017S RFP in its Updated Summary of Contentions.<sup>3</sup>

The third exhibit, Rocky Mountain Power Exhibit No. 44.0, is a letter dated March 27, 2018, from the Bureau of Land Management ("BLM") stating that it "does not consider it appropriate to undertake a supplemental environmental review of the Gateway West Transmission line based on the" Company's proposal to construct the Wind Projects. Anadarko Land Corp.'s ("Anadarko") Summary of Unresolved Issues of Fact and Law states that Anadarko believes that BLM must undertake the supplemental environmental review rejected in BLM's letter.<sup>4</sup> Good cause exists to admit this late-filed exhibit because it was unavailable on March 26, 2018, and bears directly on one of Anadarko's central claims.

The fourth exhibit, Rocky Mountain Power Replacement Exhibit 4.29, contains the corrected supplemental rebuttal testimony of Rick Vail.

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<sup>3</sup> WIEC Updated Summary of Contentions, ¶¶ 6-9.


<sup>4</sup> Anadarko Land Corp. Summary of Unresolved Issues of Fact and Law, ¶ 8.

Accompanying this motion are each of the proposed exhibits and an updated exhibit list.

DATED this 2<sup>nd</sup> day of April, 2018.

Respectfully Submitted,

ROCKY MOUNTAIN POWER



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R. Jeff Richards  
Vice-President and General Counsel

CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2018, I caused to be served via E-mail and/or overnight delivery, a true and correct copy of Rocky Mountain Power's Motion to Submit Additional Exhibits to the following:

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

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