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Attorneys for Rocky Mountain Power

BEFORE THE WYOMING PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE APPLICATION OF) Docket No. 20000-__-EA-19
ROCKY MOUNTAIN POWER FOR A)
CERTIFICATE OF PUBLIC CONVENIENCE)
AND NECESSITY TO CONSTRUCT NEW)
WIND TURBINES AND UPDATE) Record No. _____
COLLECTOR LINES AT THE EXISTING)
FOOTE CREEK I WIND ENERGY FACILITY)

APPLICATION

Comes now Rocky Mountain Power (“Rocky Mountain Power” or the “Company”) under W.S. § 37-2-205, Wyoming Public Service Commission (“Commission”) Rule Chapter 3, Section 21(c) with this application (“Application”) and respectfully requests a certificate of public convenience and necessity (“CPCN”) to (1) construct approximately 12 new wind turbines and replace the Company’s 68 existing wind turbines; (2) update existing 34.5 kilovolt (“kV”) collector lines; and 3) other project site upgrades including a switchgear and controls enclosure and limited road realignments necessary for access to the new turbine locations, at the existing Foote Creek I Wind Energy Facility¹ (the “Foote Creek I Project”). The Company also requests authority to continue to recover any remaining book balance of its ownership interest in the turbines that will

¹ The original CPCN application for the Foote Creek I wind energy facility was submitted under Docket No. 20000-EA-94-88. Due to changes in the project, the original CPCN application was later amended under Docket No. 20000-EA-97-125.

be replaced, as explained in in Paragraph 11 below. The Company is not requesting ratemaking treatment at this time.

The Company requests expedited treatment of the Application and a final decision by no later than May 1, 2019. The Foote Creek I Project is a time-limited opportunity that provides benefits to customers by a) increasing energy production with larger, more efficient turbines, b) reducing operating costs, and c) qualifying the new wind turbines for federal production tax credits (“PTCs”), which expire 10 years after a facility’s commercial operation date. To achieve the full PTC benefits, the Company must complete the Foote Creek I Project by the end of 2020. In support of its Application, the Company represents as follows:

1. Rocky Mountain Power, a division of PacifiCorp, is a public utility in the state of Wyoming and is subject to the jurisdiction of the Commission with regard to its public utility operations, retail rates, service, and accounting practices. PacifiCorp provides retail electricity service as “Rocky Mountain Power” in the states of Wyoming, Utah, and Idaho and as “Pacific Power” in the states of Oregon, Washington, and California.

2. Rocky Mountain Power’s principal place of business in Wyoming is 2840 East Yellowstone Highway, Casper, Wyoming, 82609.

3. Formal correspondence and requests for additional information regarding this matter should be addressed to:

By email (preferred): datarequest@pacificorp.com

By regular mail:

Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, Oregon 97232

With copies to:

Stacy Splittstoesser
Wyoming Regulatory Affairs Manager
Rocky Mountain Power
315 W. 27th St.
Cheyenne, Wyoming 82001
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Informal inquiries related to this Application may be directed to Stacy Splittstoesser, Wyoming Regulatory Affairs Manager, at (307) 632-2677.

4. The original Foote Creek I facility was the first utility-scale wind project built in Wyoming and reached commercial operation in April 1999. Foote Creek I operates at one of the most favorable wind sites in the United States and enjoys the highest wind speeds of any of the Company's wind projects.

5. The existing Foote Creek I facility is jointly owned by the Company (78.79 percent share) and the Eugene Water and Electric Board ("EWEB") (21.21 percent share). The Company is currently negotiating an agreement with EWEB to acquire EWEB's interests in the Foote Creek I facility and will acquire EWEB's interests if it obtains Commission approval of this Application. The Company will own 100 percent of the Foote Creek I Project.

6. Thirty-seven percent of the existing Foote Creek I facility output is sold to the Bonneville Power Administration ("BPA") under a power purchase agreement ("BPA PPA"), and the Company is currently negotiating an agreement with BPA and EWEB to terminate the BPA

PPA, which is set to expire in April 2024. Once repowering is complete, 100 percent of the facility's output will be used to serve the Company's customers.

7. The existing Foote Creek I facility has a total installed capacity of 40.8 megawatts ("MW") that consists of 68 turbines with a nameplate capacity of 0.6 MW each.² The Foote Creek I Project will have a total installed capacity of up to 46 MW and consist of several turbines acquired by the Company in 2016 to qualify repowering projects for the full value of federal PTCs (Type 1 turbines) and several other larger turbines that will be delivered in 2020 (Type 2 turbines). The wind turbines will sit atop steel towers hundreds of feet above ground level, as more specifically detailed in Confidential Exhibit RMP-1 and Confidential Exhibit RMP-2.

8. Repowering the Foote Creek I facility will consist of installing new foundations to support modern wind turbine generators that include taller towers, nacelles with higher capacity generators, and much larger rotors (consisting of the blades and hub). The rotors will include longer blades. The nacelle is the housing that sits atop the tower and contains the gear box, low- and high-speed shafts, generator, controller and brake. The new wind turbines will be equipped with sophisticated monitoring and control systems and robust mechanical and electrical components. The Foote Creek I Project will produce more energy with significantly fewer turbines.

9. Repowering the Foote Creek I facility will also require installing new energy collector system circuits and communications lines within the facility. Existing roads will generally be re-used, but construction of limited new road alignments will be needed to access the new turbine locations. New wind measuring equipment will also be installed, along with an internally-housed switchgear and controls enclosure that will be located adjacent to the existing Foote Creek substation.

² The original installed capacity of the Foote Creek I facility was 41.4 MW from a total of 69 wind turbines with 0.6 MW capacity. One wind turbine is no longer in service.

10. The existing 68 turbines will be taken out of service before the new turbines are erected, and certain turbines may be removed from service where new turbine locations would conflict with the new proposed turbine locations to allow for foundation preparation work. Once the existing turbines are removed, the Company will complete the construction of the new turbines.

11. The Company proposes to continue to recover any remaining book balance of its ownership interest in the turbines that will be replaced as included in the 2018 depreciation study, Docket No. 20000-539-EA-18.

12. The Foote Creek I Project is estimated to generate \$2 to \$3 million in local sales and use taxes during construction. The Company estimates that the Foote Creek I Project will generate more than \$4 million of wind energy production taxes and \$6.4 million in property tax income (over the amount currently being assessed from the existing turbines), over the 30-year life of the repowered facility.

13. Supporting testimony from Mr. Timothy J. Hemstreet is provided to support the Application that includes additional detail about the specific aspects of the Foote Creek I Project.

REQUIREMENTS OF COMMISSION RULE CHAPTER 3, SECTION 21(c)

14. **Name and Address of Applicant (Section 21(c)(i)(A)).** PacifiCorp d/b/a Rocky Mountain Power whose principal place of business in Wyoming is 2840 East Yellowstone Highway, Casper, Wyoming, 82609.

15. **Type of Plant, Property, or Facility Proposed to be Constructed or Acquired (Section 21(c)(i)(B)).** Approximately 12 new wind turbines, upgrades to the existing energy collection system, limited road upgrades and realignment, and an enclosed switchgear and controls building. The existing substation and interconnecting transmission lines that serve the substation

will remain unchanged. In addition, paragraphs 4–10 above and Mr. Hemstreet’s direct testimony include additional applicable information.

16. **Description of the Facilities Proposed to be Constructed or Acquired, Including Preliminary Engineering Specifications in Sufficient Detail to Properly Describe the Principal Systems and Components, and Final and Complete Engineering Specifications When They Become Available (Section 21(c)(i)(C)).** Approximately 12 new wind turbines with an installed capacity of up to 46 MW. The turbines are utility-grade, incorporating state-of-the-art mechanical and controls technologies and blade designs, which are designed for large-scale utility applications with a 30-year expected lifespan. The machines use an upwind, three-bladed, rotor and employ variable pitch for optimum performance. The blade pitch system is hydraulically actuated, and includes a hydraulic power unit, servo-control valves, linear actuators and linkages. When wind speeds are below the cut-in speed or above the cut-out speed, the blades are feathered (rotated parallel to the direction of the wind) to prevent excessive rotation. The general specifications of the new turbines are included in Confidential Exhibit RMP-1 and Confidential Exhibit RMP-2 to this Application.

17. **The Rates, if any, Proposed to be Charged for the Service that will be Rendered Because of the Proposed Construction or Acquisition (Section 21(c)(i)(D)).** The rates proposed to be charged for the service rendered as a result of the construction of the new turbines are the applicable standard service schedules, rules, and regulations in the Company’s Wyoming tariffs under P.S.C. Wyoming No. 16, which became effective January 1, 2016, as modified and approved by the Commission and as may be further modified and approved by the Commission in the future. No rate change or ratemaking treatment for the new capital is being proposed as part of this Application.

18. **The Estimated Total Cost of the Proposed Construction or Acquisition (Section 21(c)(i)(E)).** The preliminary estimated total cost for installation of the new turbines is approximately \$60.0 million, and the preliminary estimated total cost for removing the 68 existing turbines is approximately \$4.0 million. These values may change as final construction plans are developed and turbine supply and construction contracts are executed.

19. **The Manner by Which the Proposed Construction or Acquisition will be Financed (Section 21(c)(i)(F)).** The Company intends to finance the Foote Creek I Project through its normal internal and external sources of capital, 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. The financial impact will not impair the Company's ability to continue to provide safe and reliable electricity service at reasonable rates.

20. **Documentation of the Financial Condition of the Application (Section 21(c)(i)(G)).** Rocky Mountain Power's current financial condition is on file with the Commission as reflected in: a) the Company financing activity reports submitted on a quarterly basis in Docket No. 20000-372-EA-10, b) the annual reports submitted as required by Commission Rule Chapter 3, Section 32, c) the semi-annual results of operations reports submitted annually in April and October, and d) credit rating agency reports as they are issued (as required by Docket No. 20000-EA-5-226).

21. **Estimated Annual Operating Revenues and Expenses that are Expected to Accrue from the Proposed Construction or Acquisition, including a Comparison of the Overall Effect on the Applicant's Revenues and Expenses (Section 21(c)(i)(H)).** There will be no annual operating revenues from the Foote Creek I Project; however, the new turbines will

qualify for 100 percent of federal PTCs that will substantially offset the cost of the project to customers. The existing turbines have not qualified for PTCs for nearly 10 years. The Company will also have the ability to use Renewable Energy Credits (“RECs”) and provide the REC revenue benefits back to customers through tariff Schedule 93. Also, the new turbines will include the most up-to-date technology and be covered under a manufacturer’s warranty for two years following construction that will reduce future operations and maintenance expense. Because there are far fewer turbines associated with a repowered facility like the Foote Creek I Project, turbine maintenance expenses will decrease.

22. **Estimated Start and Completion Dates of the Proposed Construction or Date of Acquisition (Section 21(c)(i)(J)).** Construction of any necessary new roads, turbine foundations, and upgrades to the existing collector system will begin in the summer of 2019. Erection of the new turbines will begin as early as site conditions allow in the spring of 2020 in order to avoid extreme winter weather and high wind conditions. Construction of the new turbines is estimated to be complete by October 2020 and, in order to qualify for 100 percent of the federal PTCs that are available for wind energy projects, commercial operation of the new turbines must be achieved before January 1, 2021. The existing turbines will be removed before the new turbines are installed and the existing turbine foundations will be removed to below grade.

23. **Description of the Proposed Site, Including the Counties in Which the Resources will be Located, with a Metes and Bounds Description, and a Description of the Terrain where the Resources will be Constructed (Section 21(c)(ii)(A)).** The new turbines will be built entirely within the footprint of the existing project, which is located in Carbon County near the town of Arlington, Wyoming. The Company provided the location description for the Foote Creek I Project as an exhibit with the original CPCN application and this information is

provided again as Exhibit RMP-3 to this Application along with an updated map that shows the proposed new turbine locations.

24. Geological Report of the Proposed Site, Including Foundation Conditions, Groundwater Conditions, Operating Mineral Deposits Within a One-Mile Radius and a Topographic Map Showing the Area Within a Five-Mile Radius (Section 21(c)(ii)(B)).

A summary of the geology and topography of the site is provided as Exhibit RMP-4 to this Application.

25. Description of the Plans for Protecting the Surrounding Scenic, Historical, Archaeological and Recreational Locations; Natural Resources; Plant and Animal Life; and Land Reclamation (Section 21(c)(ii)(C)). This is an existing wind facility that will ultimately have fewer wind turbines installed. The applicable information from the original CPCN application along with the federally issued Record of Decision related to original project development is included as Exhibit RMP-5 to this Application, and is summarized below:

- Scenic Areas: There are no known scenic areas or designated scenic byways located within the Foote Creek I Project area.
- Historical and Archaeological Areas: Based on archaeological survey conducted prior to development of the original Foote Creek I facility, there are 20 known cultural resource sites, represented by over 600 stone features on Foote Creek Rim. Impacts to these features and Native American ceremonial or traditional values were minimized by consulting with the affected Tribes and avoiding all stone features during development and operation of the original wind project and providing access to the rim top for Native Americans. The repowering project will propose to follow the same

procedure to ensure that impacts to cultural resource sites are avoided or minimized to the maximum extent practicable.

- Recreational Areas: There are no known or identified recreational areas located within the Foote Creek I Project area.
- Natural Resources (Air Quality): Turbine construction will require short-term dust control during construction activities which will be monitored and appropriately mitigated. No additional air quality impacts are expected.
- Natural Resources (Water Quality): There are no streams or waterbodies, including wetlands, impacted by the Foote Creek I Project. Best Management Practices (“BMPs”) would be used as needed to control storm-water discharges. These practices include material handling and temporary storage procedures that minimize the exposure of potential pollutants to storm water, spill prevention and response, sediment and erosion controls, and physical storm-water controls. Site runoff would be controlled and managed in accordance with the Foote Creek I Project’s Storm Water Pollution Prevention Plan, which will be developed and implemented before the Storm Water Permit is obtained.
- Plant and Animal Life: The Company engaged a contractor to prepare a site characterization study for biological resources within the Foote Creek I Project area. The Foote Creek I Project area is arid grassland and shrub land supporting bunchgrasses and sagebrush. No critical habitat for any species has been designated on or near the project. No federally-listed wildlife or plant species are likely to occur in or adjacent to the project. Both bald eagle

and golden eagle are known to occur and nest in the vicinity of the Project. The existing facility experiences periodic bird, e.g., golden eagle, and bat mortality from rotor collision. There is not a greater sage grouse Core Population Area or one known within three miles of the project. All the proposed construction will comply with the Company's Avian Safe Standards to minimize impact to the avian species in the area. Big game species, e.g., deer, elk, pronghorn, are observed on and in the vicinity of the project although no critical winter or other important seasonal ranges are located within the project area. No areas of wildlife congregation, e.g., prairie dog colonies, are known to occur within the project area.

- Land Reclamation: Where possible, existing paved and unpaved highways and roads will be used for the initial transportation of materials and equipment from multi-use yards to locations needed within the project area. If necessary, existing roads will be upgraded, and all roads used will be left in a condition equal to or better than their existing condition prior to construction. In one case there will be a minimal shift in the alignment of the access road where it goes up to the Foote Creek Rim. Vegetation removal and land disturbance will be kept to a minimum (less than 25 acres) and only be performed as necessary to install the new turbines. Areas subject to short-term ground disturbance around the new turbines will be restored to original contours. Disturbed areas will be raked and seeded with a certified weed-free seed mix.
- Plans for Protecting the Environment: See bulleted items listed above. The Company is not aware of any adverse impact of the project on surrounding

scenic, historical, archeological and recreational, or natural resources. Construction of the Foote Creek I Project will employ industry BMPs to protect water, air, and wildlife resources. Mitigation measures currently in place for protecting the environment will remain. Any concerns regarding environmental compliance will result in the Company's Environmental Group being contacted immediately.

The Company is also working with the Bureau of Land Management ("BLM") to update an existing Plan of Development ("POD") that will require compliance with the National Environmental Policy Act ("NEPA"). The updated POD can be submitted to the Commission once the BLM process is complete. Impacts to visual resource concerns should be minimal since the existing 68 turbines will be replaced with approximately 12 new turbines. Potential environmental and natural resource impacts should be minimal due to the reduced number of operating turbines and since each new turbine will be sited to minimize impacts to archaeological and recreational locations, natural resources, and plant/animal life to the best extent practicable. The foundations of the existing 68 turbines to be replaced will be removed to below grade and the areas re-seeded with native vegetation.

26. **General Description of the Devices to be Installed at the Major Utility Facility to Protect Air, Water, Chemical, Biological and Thermal Qualities (Section 21(c)(ii)(C)(I)).** The new wind turbines will produce clean electrical energy using wind as the fuel source and will not require mitigation for air quality, water quality, or thermal issues when operating. The contractor that will be constructing the new turbines and replacing the existing turbines will mitigate any impacts to air and water quality by implementing construction BMPs during construction. Biological impacts and mitigation measures for wildlife will be implemented

as required by the BLM and NEPA requirements, as well as through the Company's consultation with relevant agencies including the U.S. Fish and Wildlife Service and the Wyoming Game and Fish Department.

27. **Designed and Tested Effectiveness of Such Devices (Section 21(c)(ii)(C)(II)).** Specific information is not available at this time. The devices that will be used for the Foote Creek I Project to mitigate air and water quality impacts during construction will be chosen by the contractor responsible for construction of the Foote Creek I Project.

28. **Operational Conditions for Which the Devices were Designed and Tested (Section 21(c)(ii)(C)(III)).** Specific information is not available at this time. The devices that will be used for the Foote Creek I Project to mitigate air and water quality impacts during construction will be chosen by the contractor responsible for construction of the Foote Creek I Project.

29. **Description of Potential Safety Hazards (Section 21(c)(ii)(D)).** Safety hazards and issues from construction of the Foote Creek I Project will be achieved by a combination of planning and controlled site access. Industry guidelines for turbine equipment transport, rigging, installation, and replacement will be followed. During operation, the new turbines will control rotor speed by a redundant pitch control system and a backup disc brake system. Critical components have multiple temperature sensors and a control system to shut the system down and take it off-line if overheating conditions are detected. Lightning protection is a standard feature on turbines and a specially engineered lightning protection and site grounding system will be installed. Turbine towers and foundations will be designed according to applicable building codes and internationally accepted design standards used in the wind industry to avoid failure or collapse. The selected turbine and tower combination will be subjected to engineering review to ensure the design and construction specifications are appropriate for the Foote Creek I Project. The new

turbines have been preliminarily sited at locations that exceed a reasonable set-back from dwellings that is greater than four and a half tip heights.

30. **Description of the Real Property, Fuel and Water Requirements, Including Any Source of Water Along which the Major Utility Facility will be Constructed or From Which it will Obtain or Return Water (Section 21(c)(ii)(E)).** There are no fuel, mineral, or process water requirements for the Foote Creek I Project.

31. **Acquisition Status, Source and Location of Real Property, Right-of-Way, Fuel and Water Requirements (Section 21(c)(ii)(G)).** The Company has existing easement/rights-of-way agreements in place and will need to obtain an updated right-of-way agreement from the BLM. Paragraph 36 below includes a detailed explanation of the BLM requirements. The Company currently possesses necessary real property rights for the Foote Creek I Project and will acquire the interests of its co-owner EWEB as part of the project.

32. **Description of All Mineral Rights Associated with the Facility And Plans for Addressing Any Split-Estate Issues (Section 21(c)(ii)(H)).** There are no mineral rights associated with the Foote Creek I Project and there are no known split-estate issues since this is an existing wind facility that will reduce the number of operating turbines.

33. **Statement Setting Forth the Need for the Facility in Meeting Present and Future Demands for Service in Wyoming or Other States (Section 21(c)(ii)(J)).** The Company has a continuing need for electrical generation to serve its customers in Wyoming and the five other states in which it does business. The Foote Creek I Project will continue serving customers and will allow the Company to meet present and future demands for service in Wyoming and its other service territories by a) reducing the present and future need for front office transactions to meet system demands for an additional 30-years (which is the expected asset life of repowered

facility) by increasing generation from the facility due to increased efficiency from the repowered turbines and significantly increasing generation and capacity available from the facility beginning in 2029 when the existing facility is planned to be retired; b) obtaining federal PTCs that will benefit customers by reducing the cost of the Foote Creek I Project; and c) generating RECs that are returned to customers through tariff Schedule 93.

34. **Description of the Commodity or Service the Facility will Make Available Section 21(c)(ii)(K)).** The Foote Creek I Project will continue to allow the Company to generate electricity using wind as a renewable energy source.

35. **Statement of the Facility's Effect on the Applicant's and Other Systems' Stability and Reliability (Section 21(c)(ii)(L)).** The Foote Creek I Project is expected to positively affect the Company's system stability and/or reliability and improve the existing system because the new wind turbines include modern technology that provide for greater control of power quality and voltage compared to the existing wind turbines at the facility. Importantly, the existing Foote Creek I facility does not have a wind farm control system that is able to dispatch the plant and control output, voltage, or other important generation parameters. The Foote Creek I Project will have such a control system, and the modern wind turbines will provide voltage and frequency support, allowing the Company to more easily integrate the power generated thereby into the transmission system and support the reliability of the grid, while also allowing for easier dispatch to enhance transmission system reliability and respond to market opportunities. New technologies and equipment will also reduce future operating costs and extend the useful life of the facility.

36. **Status of Satisfying Local, State, Tribal, or Federal Governmental Agency Requirements (Section 21(c)(ii)(M)).** The list below outlines each applicable government agency's permit requirements for the Foote Creek I Project:

- **Local/County Agencies:** The Company will obtain the Carbon County Wind Energy Facility Permit before construction begins. The Company submitted this permit application on January 9, 2019.
- **State Agencies:**
 - Wyoming Public Service Commission: CPCN (in progress).
 - Wyoming State Engineer's Office: The Company will assess whether construction water is needed (for turbine foundations and dust suppression) and will apply for a permit before construction begins, if necessary. The Company expects that the existing permit for water use during long-term operations is adequate. If necessary, the engineering, procurement, and construction ("EPC") contractor will file a permit application before construction begins.
 - Wyoming Department of Environmental Quality:
 - Wyoming Pollutant Discharge Elimination System (WyPDES) Large Construction General Permit. The EPC contractor will obtain this permit if the CPCN is granted and before construction begins.
 - Air Quality Division – Temporary/Portable Source Air Permit. The EPC contractor will file for permit (if necessary) before construction begins.

- Wyoming Department of Transportation:
 - Port of Entry Permit for Oversized/Overweight Loads. The turbine supplier or EPC contractor will file for this permit before delivery of nacelles, blades, and crane equipment to the Foote Creek I Project site through State Highway 13 (WY-13) and connecting routes.
 - Road Use Agreement: The Company or its turbine supplier or EPC contractor will execute an agreement before construction begins and when the equipment delivery schedule is finalized.
- **Native American Agencies:** The BLM is consulting with Native American Tribes as part of the right-of-way grant process identified below. As noted above, there are 20 known cultural resource sites along the top of Foote Creek Rim. Turbine locations for the Foote Creek I Project have been sited to avoid these cultural resources, and impacts to these sites will be avoided or minimized during construction; however, no specific requirements or approvals related to the Tribes are known at this time.
- **Federal Agencies:**
 - Federal Aviation Administration (“FAA”): Notice of Proposed Construction or Alteration. Notices (Form 7460-1) of the proposed Foote Creek I Project were provided to FAA on November 6, 2017. On April 9, 2018, FAA issued Determinations of No Hazard to Air Navigation for each of the proposed turbines.
 - BLM: Application for a Right-of-Way Grant for Transportation and Utility Systems and Facilities on Federal lands (SF-299). The Company filed a

SF-299 with the BLM on November 1, 2018. Review of the application is currently in progress.

- U.S. Environmental Protection Agency: Spill Prevention, Containment, and Countermeasures (“SPCC”) Plan – Construction and Operation. A SPCC plan covering construction activities will be prepared, certified, and implemented by the EPC contractor before delivery of nacelles and crane equipment to the Foote Creek I Project site. If necessary, the Company or its EPC contractor will file a new SPCC plan covering facility operations before the Foote Creek I Project’s commercial operation date.

37. The Company provides information related to the requirements under Commission Rule Chapter 3, Section 21(e) (“Discontinuing Service Rule”) below despite its position that the Discontinuing Service Rule is inapplicable as related to the Foote Creek I Project.

COMMISSION RULE CHAPTER 3, SECTION 21(e)

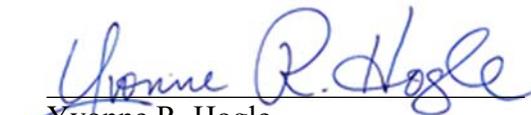
38. **A Utility Shall File an Application Prior To Discontinuing, Abandoning or Otherwise Disposing of Any Utility Facility or Service Currently Offered to the Public. The Application Shall Provide All Studies of Past, Present and Prospective Customer Use of the Utility Facility or Service.** The Foote Creek I wind facility, which is currently serving customers, has a total installed capacity of 40.8 MW that consists of 68 turbines with a nameplate capacity of 0.6 MW each. The 68 turbines, nacelles, blades, towers, and foundations will be removed to below grade, and the Company will re-seed the ground surface with native vegetation to restore each specific turbine site. The Foote Creek I Project will have a total installed capacity of up to 46 MW. The Company files a full Integrated Resource Plan (“IRP”) report every odd-numbered year and a

limited IRP update every even-numbered year. The most recent IRP filed with the Commission can be found under Docket No. 20000-512-EA-17.

WHEREFORE, Rocky Mountain Power respectfully requests that the Commission issue an order granting a CPCN for the Foote Creek I Project; specifically (1) construction of approximately 12 new wind turbines and replacement of the Company's 68 existing wind turbines and (2) updates to the existing 34.5 kV collector lines, and (3) other project site upgrades including a switchgear and controls enclosure and limited road realignments necessary for access to the new turbine locations. The Company also requests authority to continue to recover any remaining book balance of its ownership interest in the turbines that will be replaced.

Dated this 5th day of February, 2019

Respectfully submitted,


Yvonne R. Hogle
Attorney for Rocky Mountain Power