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April 10, 2019

***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. 20000-553-EN-19
Record No. 15202

**RE: IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO
CONSTRUCT NEW WIND TURBINES AND UPDATE COLLECTOR LINES AT THE
EXISTING FOOTE CREEK I WIND ENERGY FACILITY– Rebuttal Testimony**

Dear Mr. Petrie:

Rocky Mountain Power (the “Company”) hereby submits for electronic filing the rebuttal testimony as required by the Scheduling Order issued on February 27, 2019. An original and four copies are being provided for the docket.

All formal correspondence and staff requests regarding this matter should be addressed to:

By E-mail (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
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Cheyenne, Wyoming 82001
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Wyoming Public Service Commission

April 10, 2019

Page 2

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

Sincerely,



Joelle R. Steward
Vice President, Regulation

Enclosure

cc: Service List

CERTIFICATE OF SERVICE

I hereby certify that on April 10, 2019, I caused to be served via E-mail a true and correct copy of the foregoing document to the following:

**Docket No. 20000-553-EN-19
(Record No. 15202)**

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ROCKY MOUNTAIN POWER	
Stacy Splittstoesser Wyoming Regulatory Affairs Manager Rocky Mountain Power 315 W. 27th St. Cheyenne, WY 82001 stacy.splittstoesser@pacificorp.com datarequest@pacificorp.com	Yvonne Hogle Assistant General Counsel Rocky Mountain Power 1407 W. North Temple, Suite 320 Salt Lake City, UT 84116 yvonne.hogle@pacificorp.com



Katie Savarin
Coordinator, Regulatory Operations

Docket No. 20000-553-EN-19
Witness: Stacy A. Splittstoesser

BEFORE THE WYOMING PUBLIC SERVICE
COMMISSION

ROCKY MOUNTAIN POWER

Rebuttal Testimony of Stacy A. Splittstoesser

April 2019

1 **Q. Please state your name and business address with PacifiCorp dba Rocky**
2 **Mountain Power (“the Company”).**

3 A. My name is Stacy A. Splittstoesser and my business address is 315 W. 27th Street,
4 Cheyenne, Wyoming 82001.

5 **Q. Please describe your education and professional background.**

6 A. I have a Bachelor of Science degree in Geological Engineering from the South Dakota
7 School of Mines and Technology. I was employed as an environmental engineer for
8 the State of South Dakota Department of Environment and Natural Resources from
9 January 2001 through August 2008. From 2008 through 2010, I worked as a pipeline
10 safety engineer and utility analyst with the South Dakota Public Utilities Commission.
11 From 2010 through 2014, I was employed in a variety of different positions with the
12 Black Hills Corporation subsidiaries that included a position which managed regulatory
13 affairs for Cheyenne Light Fuel and Power until July 2014. I joined Rocky Mountain
14 Power in July 2014.

15 **Q. What is your current position with Rocky Mountain Power?**

16 A. I am currently employed as the Wyoming Regulatory Affairs Manager.

17 **Q. What are your responsibilities as the Wyoming Regulatory Affairs Manager?**

18 A. My responsibilities include the preparation, coordination and management of the
19 Company’s regulatory applications and compliance filings in Wyoming. In addition, I
20 work on Wyoming-specific customer issues, legislative initiatives, and I provide
21 recommendations to the Company’s management regarding Wyoming regulatory
22 issues.

1 **Q. Have you appeared as a witness in previous regulatory proceedings?**

2 A. Yes. I have presented Company applications on numerous occasions before the
3 Commission at its open meetings and as a witness in the 2015, 2016, and 2017 Energy
4 Cost Adjustment Mechanism proceedings.

5 **Q. Please summarize the Company's request for a Certificate of Public Convenience
6 and Necessity for the Foote Creek I Repowering project ("CPCN Application").**

7 A. In the Company's CPCN Application, the Company requests to repower the existing
8 Foote Creek I wind facility by 1) constructing new wind turbines and decommissioning
9 the existing turbines; 2) updating the existing 34.5 kilovolt ("kV") collector lines; and
10 3) upgrading a switchgear and controls enclosure and realigning roads to access the
11 new turbines (the "Foote Creek I Project"). The Company also seeks continued
12 recovery of the remaining book balance of the Company's ownership interest in the
13 replaced turbines as proposed in the pending 2018 Depreciation Study (Docket No.
14 20000-539-EA-18).

15 **Q. What is the purpose of your rebuttal testimony in this proceeding?**

16 A. My testimony addresses the recommendations in the direct testimony of Mr. Kevin
17 Higgins who testifies on behalf of the Wyoming Industrial Energy Consumers
18 ("WIEC"). I will explain why Mr. Higgins' proposed cost cap for the Foote Creek
19 project is unnecessary, outside the scope of this proceeding, and is not necessarily in
20 customer's interest. I will also address Mr. Higgins' proposal to impute the value of the
21 production tax credits ("PTCs") if the Foote Creek project is not in-service by
22 December 31, 2020 and how it unfairly forces the Company to absorb risks that are
23 beyond the Company's control. Finally, I will summarize the CPCN process and

1 explain why Mr. Higgins recommendations are premature given the purpose and scope
2 of this proceeding.

3 **Q. Did other intervenors submit direct testimony in this CPCN Application?**

4 A. Yes. Dr. Belinda Kolb on behalf of the Wyoming Office of Consumer Advocate
5 (“OCA”) is the only other party who submitted direct testimony. Ms. Kolb’s testimony
6 is generally supportive of the Company’s request for a CPCN for the Foote Creek I
7 Project.

8 **Q. What recommendations does WIEC propose in this proceeding?**

9 A. Mr. Higgins recommends that if the Wyoming Public Service Commission
10 (“Commission”) grants a CPCN for the Foote Creek I Project, it does so with conditions
11 that include: 1) a cost cap in the total amount of the Company’s preliminary
12 decommissioning costs plus the costs and revenues from the existing contracts between
13 the Company and the Eugene Water and Electric Board (“EWEB”) and Bonneville
14 Power Administration (“BPA”);¹ 2) the imputation in future rates of production tax
15 credit (“PTC”) values at 100 percent of the PTC value if the Company fails to receive
16 100 percent of the PTCs;² and 3) disallowance or reduction of cost recovery associated
17 with the project if the first two conditions are not satisfied. Mr. Higgins claims that
18 these conditions are necessary because the Foote Creek I project is not based on
19 resource need but a potential economic opportunity.³

¹ Higgins Direct, page 5-6, lines 21-22 and lines 1-3; page 14, lines 10-13.

² Higgins Direct, page 6, lines 3-6; page 14, lines 13-16.

³ Higgins Direct, page 4, lines 9-10.

1 **RESOURCE NEED**

2 **Q. Do you agree with WIEC’s premise that the project is not driven by resource**
3 **need?**

4 A. No. The facility was originally issued a CPCN in 1995 because it fulfilled a resource
5 need for the Company’s customers and met the public interest by diversifying the
6 natural resources that Wyoming has available for the provision of energy.⁴ The facility
7 continues to meet a resource need, and repowering as proposed in the Company’s
8 CPCN Application will expand the ability of the project to meet the energy needs of
9 the Company’s customers, but at reduced cost and with greater benefits, as outlined in
10 the application and supported by the direct testimony of Mr. Timothy J. Hemstreet. In
11 addition, the Foote Creek I Project shows customer benefits in the preliminary
12 economic analysis submitted in this case.⁵ Also, 100 percent of the benefits of federal
13 PTCs will flow back to customers in future rate proceedings and will offset a significant
14 portion of the capital costs associated with the project.

15 **Q. Has the Company identified a resource need that the Foote Creek I Project would**
16 **help to address?**

17 A. Yes. The Foote Creek I Project meets both near-term and long-term resource needs
18 identified in the Company’s 2017 Integrated Resource Plan (“IRP”) and 2017 IRP
19 Update. The Foote Creek I Project leverages federal PTCs to help meet these needs
20 with a least-cost resource when compared to the alternative of not repowering, and does
21 so with substantial savings to customers.

⁴ Docket No. 20000-EA-94-88. Findings. Conclusions and Order and Confirming Bench Decision After Hearing. Issued July 14, 1995.

⁵ Confidential WIEC Exhibit 300.2.

1 **Q. Does the load-and-resource balance presented in the Company’s IRP show a near-**
2 **term resource need?**

3 A. Yes. Accounting for assumed resource retirements, contract terminations, and
4 incremental Demand Side Management (“DSM”) savings from the preferred portfolio,
5 both the 2017 IRP and the 2017 IRP Update show a near-term resource need in 2017
6 through 2021,⁶ the first full year that the repowered Foote Creek I facility will be in
7 service. These needs increase over time, and the 21-year increased life of the Foote
8 Creek I facility with repowering helps to address these identified long-term resource
9 needs.

10 **PROPOSED COST CAP AND PTC IMPUTATION**

11 **Q. Why is WIEC recommending that the Commission include a cost cap for the Foote**
12 **Creek I Project and that PTCs be imputed at their full value?**

13 A. Mr. Higgins contends that the project does not meet a resource need, and that, as such,
14 it is appropriate to impose conditions that are intended to “place the economic risks of
15 the project on RMP” rather than ratepayers.⁷

16 **Q. Do you agree with WIEC’s recommendations?**

17 A. Absolutely not. The Company is requesting a CPCN for the Foote Creek I Project
18 consistent with Wyoming CPCN statutes and rules which require certain information
19 that the Company submitted with its Application.⁸ In fact, the Company submitted
20 additional economic analyses, per WIEC’s request and for informational purposes only,

⁶ Table 5.14 PacifiCorp’s 2017 IRP, Volume I. See also, Table 4.4 in PacifiCorp’s 2017 IRP Update where the near-term resource need will require PacifiCorp to obtain uncommitted front office transactions to fill in the deficit.

⁷ Higgins, page 15, lines 4-8.

⁸ W.S. § 37-2-205 and Commission Rules Chapter 3, Section 21(c).

1 but that type of information is not required in a CPCN proceeding.

2 The Company disagrees with the types of conditions that WIEC is proposing
3 because they are beyond those the Commission imposes in typical CPCN proceedings,
4 and are not appropriate in proceedings in which the Company is not seeking ratemaking
5 treatment.⁹ Additionally, these conditions could prevent the Company from
6 implementing a project that benefits customers.

7 **Q. Do you agree that a cost cap is an appropriate condition for the Commission to**
8 **include in a CPCN for the Foote Creek I Project?**

9 A. No. A cost cap is premature and is not appropriate because the Company has not
10 finalized its commercial arrangements related to repowering. While the Company
11 provided a preliminary economic analysis to demonstrate customer benefits related to
12 its proposal, the related costs that WIEC seeks to cap are preliminary. It is not consistent
13 with standard ratemaking processes for the Commission to include a cost cap – which
14 locks in the maximum amount the Company may expend on the project – at this time
15 when costs are preliminary estimates. Doing so essentially pre-judges prudence related
16 to the Company’s implementation of the project before the Company has even
17 committed to undertake the project.

18 **Q. Could customers be harmed by WIEC’s proposed condition?**

19 A. Yes. WIEC’s proposed condition could harm customers by precluding the Company
20 from implementing an otherwise beneficial project. For example, capital costs that

⁹ The conditions that typically attach to CPCNs relate to coordination with agencies that have shared jurisdiction over an aspect of the project, the acquisition of permits or rights of way (and not necessarily always related to rights of way/easements related to the construction of transmission lines which is an express requirement under the CPCN statutes), or both: *See e.g.*, Docket No. 20000-520-EA-17 and the conditional CPCN based on the utility’s acquisition of all rights of way or easements before beginning construction of the transmission line.

1 exceed WIEC's proposed cap would not necessarily render the project uneconomic for
2 customers, and ignores the possibility that additional costs could produce additional
3 benefits. Thus, a cost cap could discourage the Company from pursuing the project
4 even if the project remains highly economic since the Company would be at risk of
5 disallowance if its costs exceeded the proposed cost cap.

6 **Q. Do you agree that a cost cap is a reasonable means for the Commission to assure**
7 **customer benefits related to the Foote Creek I Project?**

8 A. No. WIEC's proposed condition presupposes that increased project costs will harm
9 customers, without accounting for the facts that may justify the increase in such a
10 potential outcome. It is possible that the Company could expend more on the project
11 than the net amounts contained in the Company's preliminary financial analysis and
12 create an even more beneficial outcome for customers. This could occur if additional
13 capital expenditures result in the project producing more energy, lower the ongoing
14 operations and maintenance costs of the project, or create other value to customers that
15 have not yet been factored into the Company's economic analysis. Given that the
16 Company is not seeking ratemaking treatment in this proceeding, WIEC's condition is
17 unreasonable and restricts the Company's ability to pursue a project that has
18 demonstrated customer benefits. These types of conditions, that essentially evaluate the
19 prudence of the Company's actions for ratemaking purposes, are more appropriately
20 addressed when the Company seeks recovery of project costs through a subsequent
21 ratemaking proceeding, when all relevant facts and circumstances are available to
22 determine if the Company has acted prudently.

1 **Q. Do you agree with WIEC’s proposal to impute the full value of PTCs in customer**
2 **rates if the Company fails to obtain 100 percent of the value of the PTCs?**

3 A. No. Similar to the proposed cost cap condition, this condition unfairly ties the
4 Company’s hands with respect to project implementation and presupposes that
5 customers would be harmed if the Company were to implement the Foote Creek I
6 Project in a manner that provided less than 100 percent PTC value. For example, if a
7 force majeure event occurs that is beyond the Company’s control, it is possible that not
8 all turbines repowered at the Foote Creek I Project would qualify for 100 percent of the
9 value of the PTC. Such a circumstance may not render the project uneconomic for
10 customers yet a predetermined PTC imputation would unfairly penalize the Company
11 unfairly. This also creates a disincentive for the Company to pursue the project, by
12 creating conditions that require the Company to guarantee an outcome, regardless of
13 whether the Company’s actions were prudent.

14 **Q. Would a cost cap and PTC imputation be punitive to the Company in a traditional**
15 **CPCN proceeding like this one?**

16 A. Yes. In a traditional CPCN proceeding like this one, utilities are required to provide
17 estimated costs but are not required to provide assurances that the final costs will be
18 the same or close to its estimated cost. Rather, once a CPCN is obtained utilities have
19 the burden to prove in a rate proceeding that the final costs incurred for their project
20 and for which they seek recovery were prudent. It would be punitive to treat the
21 Company differently from other utilities by conditioning the CPCN to a project whose
22 costs are capped at its preliminary estimates.¹⁰ Regarding the recommendation to

¹⁰ To the best of the Company’s knowledge, the Commission has never imposed this type of condition on any other utility.

1 impute the value of PTCs, while the Company is confident that the Foote Creek I
2 Project will be complete and on-line in time to obtain 100 percent of the PTCs, there is
3 never 100 percent certainty that all projects will go as planned. If there are any
4 unforeseen circumstances, inclement weather or other issues outside of the Company's
5 control, the Company could be harmed without a fair hearing to determine if the
6 Company's circumstances justify imputation for customer rates. Mr. Higgins'
7 recommendations appear to want it both ways in this case. On the one hand, he proposes
8 a cost cap and PTC imputation and on the other hand he states that even with his
9 proposed recommendations, the Commission's decision should not imply a "finding of
10 prudence nor assure cost recovery".¹¹

11 **Q. Has the Company agreed to cost caps and PTC imputation in other CPCN**
12 **proceedings?**

13 A. Yes. The Company agreed to cost caps and PTC imputation as part of settlement
14 agreements in Dockets No. 20000-519-EA-17 (the "Repowering" docket) and No.
15 20000-520-EA-17 (the "New Wind/Gateway Transmission" docket) in which the
16 Company sought both a CPCN and ratemaking treatment.

17 **Q. Why did the Company agree to cost caps and PTC imputation in the Repowering**
18 **and New Wind/Gateway Transmission dockets?**

19 A. The Company agreed to cost caps and PTC imputation in the Repowering and New
20 Wind/Gateway Transmission dockets, and other similar proceedings, because the
21 Company was seeking preapproval of its costs related to significant investments. In
22 exchange for the Company committing to this "preapproval" process, parties agreed

¹¹ Higgins Direct, page 5, lines 9-12.

1 they would not challenge the prudence of the Company’s costs in a general rate case
2 and further agreed to limit their challenge to any actual costs incurred above the costs
3 that were filed as part of the dockets.

4 Specific to the Repowering and New Wind/Gateway Transmission projects, the
5 Company and the parties negotiated in good faith to come up with terms that were
6 acceptable and, as a result, the Company determined that cost caps, PTC imputation
7 and other provisions were an acceptable compromise for these major capital
8 expenditure projects *in lieu of* the Company’s requested Resource Tracking
9 Mechanism. Here, the Application does not request any ratemaking treatment and the
10 Company carries 100 percent of the burden of proof to show the prudence of its
11 investments when it seeks recovery of the Foote Creek I Project costs in a future
12 ratemaking proceeding. The Commission has recognized that “this subsequent
13 prudence review by the Commission acts as a check on any tendency the Company
14 might have to inflate cost estimates.”¹²

15 **Q. Can the Commission be bound by cost caps or PTC imputation in future**
16 **ratemaking proceedings?**

17 A. No. The Commission is not bound by cost caps or PTC imputation agreed upon in
18 stipulated settlements, only the parties to the settlements. The Commission has the right
19 to determine cost recovery in future ratemaking proceedings. In every proceeding in
20 which I have been involved, the Commission includes statements to that effect. For
21 instance, in Docket No. 20000-519-EA-17 the Memorandum Opinion, Findings, and

¹² See In the Matter of the Application of Rocky Mountain Power for Approval of a Certificate of Public Convenience and Necessity to Construct Selective Catalytic Reduction Systems on Jim Bridger Units 3 and 4 Located Near Point of Rocks, Wyoming, Docket No. 20000-418-EA-12 (Record No. 13314), ¶ 67.

1 Order Approving Stipulation issued December 21, 2018 on page 18 states, “[t]his Order
2 does not determine any ratemaking issues whatsoever, all of which are expressly
3 reserved for further decision in appropriate proceedings before the Commission.” This
4 same statement is also included in the Memorandum Opinion, Findings, and Order
5 Approving Stipulation issued October 8, 2018, in Docket No. 20000-520-EA-17.

6 My understanding is that the Commission also indicated as much in other cases
7 such as in its order approving the settlement stipulation that was reached in the 2010
8 general rate case, Docket No. 20000-384-ER-10 (the “2010 GRC”).

9 **CPCN APPLICATIONS**

10 **Q. Is there specific information the CPCN statutes and rules require for submission**
11 **with CPCN applications?**

12 A. Yes. While I will not go into great detail on the requirements, I will note that CPCNs
13 are governed by Wyoming Statute § 37-2-205 which states that “the commission shall
14 have the power, after hearing involving the financial ability and good faith of the
15 applicant and the necessity of additional service in the community, to issue said
16 certificate, as prayed for, or to refuse to issue the same ...”, and specific CPCN
17 application requirements are set forth in Commission rule Chapter 3, Section 21(c).
18 The Commission is tasked with making that determination based on the information
19 submitted.

20 **Q. Did the Company provide the information required by Chapter 3, Section 21(c)?**

21 A. Yes. The CPCN Application lists each specific rule and provides the required
22 information. In addition, as I testified above, the Company also submitted preliminary
23 economic analyses that are not required under the CPCN statutes and rules. Therefore,

1 the Company believes that the Application and Mr. Hemstreet’s direct testimony and
2 exhibits, meet the statutory requirements applicable to CPCN applications.¹³

3 **Q. Does the fact that the Commission grant a CPCN guarantee future rate recovery?**

4 A. No. CPCN approvals (i.e. the final orders) contain specific statements that ratemaking
5 will be determined in future proceedings¹⁴ even when the Commission approves a
6 stipulation that contains certain ratemaking treatments. Signing parties are bound by
7 Commission-approved stipulations but the Commission itself is not and will determine
8 if the Company’s actions and proposed costs were prudently incurred in future
9 ratemaking proceedings. The conditions that WIEC is proposing are, therefore,
10 unnecessary and should be rejected.

11 **Q. What is the Company’s proposed accounting treatment for the decommissioned
12 wind turbine generator (“WTG”) equipment?**

13 A. The existing WTGs that will be taken out of service have not been fully depreciated
14 out of customer rates. The Company proposes to recover the remaining book balance
15 of this portion of the Company’s ownership interest of the retired WTG equipment and
16 recover it as requested in the Company’s 2018 Depreciation Study (Docket No. 20000-
17 539-EA-18), which is a separate case pending before the Commission.

¹³ While I am not a lawyer, my understanding is that the Wyoming Supreme Court has interpreted the requirements for a CPCN as a three part standard by which the PSC is to decide applications for certificates in *Williston Basin Interstate Pipeline Co. v. Wyoming PSC*, 2000 WY 16, ¶ 10, 996 P.2d 663, 667 (Wyo. 2000). In that case, the Supreme Court indicated that the financial ability standard may be met through evidence of “corporate financial records and the testimony of corporate officers.” (Id., ¶11, 996 P.2d at 668.) The good faith standard may be met by reference to established definitions of good faith, including “an honest intention to abstain from taking any unconscientious advantage of another, even through the forms or technicalities of law together with an absence of all information or belief of facts which would render the transaction unconscientious.” (Id., ¶13, 996 P.2d at 668.) The necessity of additional service may be met by evidence that the proposed facility “was not duplicative and was in the best interest of the community.” (Id., ¶16, 996 P.2d at 669.)

¹⁴ See, e.g., 2002 WL 35078960, 2014 WL 2884897, 2013 WL 8706186, 2008 WL 9894835 in which the Commission orders that the approval granted does not constitute approval for ratemaking purposes and that such issues are expressly reserved for later ratemaking treatment.

1 The Company is not requesting ratemaking treatment with this CPCN
2 Application but included it to be consistent with the treatment of the retired WTG
3 equipment from the Commission-approved stipulated settlement agreement from the
4 Company's other wind facilities that will be repowered from Docket No. 20000-519-
5 EA-17.

6 **Q. What is your recommendation to this Commission?**

7 A. I recommend the Commission reject WIEC's recommendations of the proposed cost
8 cap and PTC imputation and approve the CPCN Application as filed. The proposed
9 recommendations are outside the scope of a CPCN proceeding, unnecessary and
10 punitive, and are not necessarily in customer's interest if they preclude the Company
11 from pursuing a beneficial project. I recommend the Commission continue with current
12 and past precedent that the CPCN approval does not determine ratemaking, which will
13 be reserved for future proceedings.

14 The Foote Creek I Project is in the public interest because it will continue to
15 meet the energy needs of the Company's customers while reducing costs, improving
16 the Company's ability to dispatch the facility economically, and providing benefits to
17 the transmission system that will improve system reliability. The Company's economic
18 analysis shows customer benefits from the Foote Creek I Project and implementing the
19 project will extend the useful life of the facility by 21 years while reducing costs as
20 compared to continuing to operate the facility as it now exists through the remainder of
21 its useful life.

22 **Q. Does this conclude your rebuttal testimony?**

23 A. Yes.

BEFORE THE WYOMING PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE)
APPLICATION OF ROCKY MOUNTAIN)
POWER FOR A CERTIFICATE OF)
PUBLIC CONVENIENCE AND)
NECESSITY TO CONSTRUCT NEW)
WIND TURBINES AND UPDATE)
COLLECTOR LINES AT THE EXISTING)
FOOTE CREEK I WIND ENERGY)
FACILITY)

DOCKET NO. 20000-553-EN-19
(RECORD NO. 15202)

AFFIDAVIT, OATH AND VERIFICATION

Stacy A. Splittstoesser (Affiant) being of lawful age and being first duly sworn, hereby deposes and says that:

Affiant is the Wyoming Regulatory Affairs Manager for PacifiCorp, which is a party in this matter.

Affiant prepared and caused to be filed the foregoing testimony. Affiant has, by all necessary action, been duly authorized to file this testimony and make this Oath and Verification.

Affiant hereby verifies that, based on Affiant's knowledge, all statements and information contained within the testimony and all of its associated attachments are true and complete and constitute the recommendations of the Affiant in her official capacity as Wyoming Regulatory Affairs Manager.

Further Affiant Sayeth Not.

Dated this 9th day of April, 2019

Stacy A. Splittstoesser
Stacy A. Splittstoesser
Wyoming Regulatory Affairs Manager
315 W. 27th St.
Cheyenne, WY 82001

STATE OF Wyoming)
) SS:
COUNTY OF Laramie)

The foregoing was acknowledged before me by Stacy A. Splittstoesser on this 9th day of April, 2019. Witness my hand and official seal.

My Commission Expires: April 17, 2022

Earla Checchi
Notary Public
EARLA CHECCHI - NOTARY PUBLIC
COUNTY OF LARAMIE STATE OF WYOMING
My Commission Expires April 17, 2022