

Rocky Mountain Power  
Exhibit A  
Docket No. 20000-\_\_\_\_-EN-20

BEFORE THE WYOMING PUBLIC SERVICE  
COMMISSION

ROCKY MOUNTAIN POWER

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Exhibit Accompanying Application  
Requirements of Commission Rule Chapter 3, Section 21

August 2020

## **EXHIBIT A**

### **REQUIREMENTS OF COMMISSION RULE CHAPTER 3, SECTION 21**

#### **A. Name and Address of the Applicant (Section 21(c)(i)(A)).**

PacifiCorp d/b/a Rocky Mountain Power with an address at 1407 West North Temple, Salt Lake City, Utah 84116.

#### **B. Type of Plant, Property, or Facility Proposed to be Constructed or Acquired (Section 21(c)(i)(B)).**

As described above, and in more detail in Mr. Vail's testimony, the Company proposes to construct the Transmission Projects.

Gateway South includes the following elements, which may include additional ancillary facilities as the engineering design plan becomes final:

- A 414 mile, high-voltage 500-kV transmission line from the Aeolus substation, near Medicine Bow, Wyoming, to the Clover substation near Mona, Utah.
- Rebuilding certain 345-kV transmission facilities in and around the Mona and Clover substations.
- Two new series compensation stations.
- Expansion of both the Aeolus and Anticline substations.
- Additional shunt capacitors at Bonanza (Utah), Riverton and Mustang (Wyoming) substations.

Gateway West Segment D.1 includes the following elements, which may include additional ancillary facilities as the engineering design plan becomes final:

- A new 59 mile high-voltage 230-kV transmission line from the Shirley Basin substation in southeastern Wyoming to the Windstar substation near Glenrock, Wyoming.
- Rebuild of the existing Dave Johnston – Amasa – Difficulty – Shirley Basin 230-kV transmission line, which runs approximately 57 miles from the Shirley

Basin substation in southeastern Wyoming to the Dave Johnston substation near Glenrock, Wyoming.

- A new 230-kV Heward substation adjacent to the Difficulty substation, which is owned by Tri-State Generation and Transmission.
- Additions to the Shirley Basin, Dave Johnston, Windstar, and Anticline substations.

**C. 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)).**

Gateway South is a high voltage single-circuit 500-kV alternating current (“AC”) transmission line that extends approximately 414 miles from southeastern Wyoming to northern Utah. Gateway South will begin at the Aeolus substation, which is located near Medicine Bow, Wyoming, and is being constructed as part of the Aeolus-to-Bridger/Anticline segment D.2 of the Gateway West Transmission Line Project approved in Docket No. 20000-520-EA-17. From the Aeolus substation, the line extends west to Wamsutter, Wyoming, and then generally south to the Colorado border. From there, the line crosses through the northwest corner of Colorado, and enters Utah, eventually terminating at the Clover substation near Mona, Utah.

After leaving the Aeolus substation, for approximately 91 miles the line runs roughly parallel to the nearly completed Aeolus-Bridger/Anticline 500-kV transmission line, which runs southwest and then west. Approximately 12 miles west of the existing Latham substation the line turns south towards the Colorado state line for the next 52 miles.

After crossing into Colorado, the line runs for five miles before entering the proposed Little Snake series compensation substation (note the Little Snake was formerly labeled the “Godiva” substation). After exiting the Little Snake substation, the transmission line runs south and then west for the next 85 miles before entering Utah, which occurs roughly five miles southwest of Dinosaur, Colorado.

The transmission line then extends another 21 miles southwest to the proposed Coyote series compensation substation. After the Coyote substation, the line runs west for 168 miles across Uintah and Duchesne Counties in Utah before entering Spanish Fork Canyon.

Once in Spanish Fork Canyon, the line generally follows U.S. Highway 6 from Solider Summit to near the intersection with U.S. Highway 89. At that point, the line turns south and generally follows U.S. Highway 89 and existing transmission line facilities before entering Sanpete County. The line then runs parallel to existing transmission facilities for three miles before turning west to enter Salt Creek Canyon and then routing east and north of Nephi, Utah into the Clover substation.

The Company must also modify the existing 345-kV transmission infrastructure in the Mona/Clover area. Specifically, the Company proposes to reconstruct approximately five miles of the existing single-circuit Mona-to-Clover 345-kV transmission line to a double-circuit configuration. In addition, the existing 345-kV Huntington-to-Mona transmission line will be rerouted through the Clover substation via two miles of new 345-kV transmission line.

The Company also proposes installing additional shunt capacitors at the Bonanza 138-kV substation in Utah and the Mustang 230-kV and Riverton 230-kV substations in Wyoming.

The Company must also modify the Aeolus remedial action scheme. Other ancillary facilities may be necessary as the engineering designs are finalized for construction.

Gateway West Segment D.1 will consist of one new 230-kV AC transmission line. The new transmission line is 59-miles long and will begin at the existing Windstar substation, which is located approximately two miles north of the Dave Johnston Generating Station and five miles east of Glenrock, Wyoming. The line will run southwest from Windstar and then south for approximately 59 miles, generally parallel to the existing Dave Johnston – Amasa – Difficulty – Shirley Basin 230-kV transmission line. For most of the route the new line will be approximately 1,500 feet west of the existing transmission line. The line will terminate at the existing Shirley Basin substation, which is located 20 miles north of Medicine Bow, Wyoming, along Highway 487. The new transmission line will require expansion of the existing line

termination bays at the Windstar and Shirley Basin substations to accommodate the new line. This is anticipated to be via the expansion of existing line termination bays.

In addition, Gateway West Segment D.1 also includes rebuilding the existing Dave Johnston – Amasa – Difficulty – Shirley Basin 230-kV transmission line, which runs approximately 57 miles from the Shirley Basin substation in southeastern Wyoming to the Dave Johnston substation near Glenrock, Wyoming.

The Company will also construct a new 230-kV Heward substation, which will be constructed adjacent to existing Difficulty substation owned by Tri-State Generation and Transmission. The Company will also construct additions to the Shirley Basin, Dave Johnston, Windstar, Amasa, and Anticline substations. There may be other additional ancillary facilities once the engineering design work becomes final in preparation for construction.

The Transmission Projects traverse through Carbon, Converse, Natrona and Sweetwater Counties in Wyoming.

Mr. Vail's testimony provides additional description of the specific facilities that will be constructed.

**D. 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 estimated revenue requirement of the proposed Transmission Projects is shown in the table below. In addition, the table shows the overall estimated revenue requirement with the proxy wind resources incorporated in the economic analysis presented in Mr. Link's testimony. The Company will seek recovery in rates in a future general rate case. In addition, the Company will provide service on the Transmission Projects subject to the terms and conditions of its Open Access Transmission Tariff, as described in Mr. Vail's testimony.

<b>2024 Revenue Requirement (\$ millions)</b>	
<i>\$ millions</i>	<b>2024</b>
<b>With Gateway South and New Resources</b>	
Transmission Revenue	\$ 205
New Wind Revenue	\$ 106
<b>Total</b>	<b>\$ 311</b>
<b>Without Gateway South and New Resources</b>	
Transmission	\$ 134
System Fixed Costs	\$ 65
<b>Total</b>	<b>\$ 199</b>
<b>Difference</b>	<b>\$ 111</b>

**E. The Estimated Total Cost of the Proposed Construction or Acquisition (Section 21(c)(i)(E)).**

Mr. Vail’s testimony includes details on the cost of the Transmission Projects.

**F. The Manner by Which the Proposed Construction or Acquisition will be Financed (Section 21(c)(i)(F)).**

The Company intends to finance the Transmission 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 Transmission Projects are a significant investment on the part of the Company, the financial impact will not impair the Company’s ability to continue to provide safe and reliable electricity service at reasonable rates.

**G. Documentation of the Financial Condition of the Application (Section 21(c)(i)(G)).**

Mr. Hoogeveen’s testimony describes the Company’s financial condition and explains that the Company has the financial ability to make these investments. The Company’s current

financial condition is also on file with the Commission as reflected in: 1) the Company financing activity reports submitted on a quarterly basis in Docket No. 20000-372-EA-10, 2) the annual reports submitted as required by Commission Rule Chapter 3, Section 32, 3) the semi-annual results of operations reports submitted annually in April and October, and 4) credit rating agency reports as they are issued as required by Docket No. 20000-EA-5-226.

**H. 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)).**

The estimated annual operating revenues and expenses are incorporated in the revenue requirement calculation in D. above, which the Company will seek to be incorporated into retail rates in a future rate case. The Company estimates incremental revenue credits to retail customers of \$7 million, attributable to third-party transmission customers that pay PacifiCorp's OATT rates and annual incremental expenses of approximately \$30,000 for operating and maintenance expense.

**I. Estimated Start and Completion Dates of the Proposed Construction or Date of Acquisition (Section 21(c)(i)(J)).**

The Company expects to begin construction of the Transmission Projects by August 1, 2021. The Company expects the Transmission Projects to become commercially operational by October 31, 2023. Additional details of the estimated construction timelines for each facility are provided in Mr. Vail's testimony.

**J. 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)).**

In Wyoming, Gateway South will be sited entirely Carbon and Sweetwater Counties and the terrain is primarily open rangeland. Gateway West Segment D.1 will be sited entirely in Wyoming's Carbon, Natrona and Converse Counties and terrain varies from open rangeland to mountainous hillsides and valleys.

Cadastral surveying (which is a field survey that establishes or re-establishes legal property boundaries) for all transmission lines and associated access roads is in progress and, for that reason, metes and bounds descriptions are not available at this time. The Company can provide the results of the surveys once they are complete. Exhibit A-1 to this application provides the Transmission Projects' sections on federal, private, and state lands. The maps attached as Exhibit A-2 to this application show the complete proposed route for the Transmission Projects and the portions of the Transmission Projects in Wyoming only.

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

As part of the federal permitting process for Gateway South, the Company conducted a two-year geotechnical exploration and geologic hazards assessment. The geotechnical exploration program consisted of conducting 149 bores across the project (14 of those in Wyoming), collection of soil samples for laboratory testing, lab testing and determination of soil properties, and reporting for use in the foundation design. The Company intends to conduct an additional 391 bores across the project (133 of those in Wyoming) to further inform foundation designs. During the same period, the Company conducted surficial geology and geologic hazard reconnaissance. Recommendations regarding noted geologic hazards were published in reports for all segments of Gateway South. The geological reports are included in Exhibit A-3 to the application.

The geotechnical engineering studies concluded that all tower sites were suitable for drilled pier foundations as planned, as long as the recommended values for soil engineering properties are used in the design and consideration is given to potential excavation difficulties during construction.

Additional geotechnical investigations will be completed to support Gateway West Segment D.1 starting in 2021. The Company anticipates drilling 44 additional bores to further

inform the foundation design. During this same period, the Company will conduct surficial geology and geologic hazard reconnaissance to identify geologic hazards.

Shallow groundwater is not likely to pose a significant constraint on the Transmission Projects, but could complicate foundation drilling and construction. Areas where annual or seasonal groundwater depths are less than 10 feet below the ground surface are considered high risk. Geologic hazard reconnaissance confirms high ground water in only few isolated locations.

Maps showing the operating mineral deposits are included in Exhibit A-4.

**L. Description of and 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)).**

- a. 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)).**
- b. Designed and Tested Effectiveness of Such Devices (Section 21(c)(ii)(C)(II)).**
- c. Operational Conditions for Which the Devices were Designed and Tested (Section 21(c)(ii)(C)(III)).**

The Company has conducted a thorough assessment of the impacts of the Transmission Projects on the surrounding environment and resources. Much of this assessment occurred as part of the National Environmental Policy Act (“NEPA”) permitting process as described in Mr. Fisher’s direct testimony. For Gateway West Segment D.1, the route was analyzed for impacts as an alternative under the Gateway West project. For Gateway South, the route was analyzed for impacts as an alternative under its own Environmental Impact Statement (“EIS”). The Company and the Bureau of Land Management (“BLM”) are currently finalizing the requirements necessary to comply with the decision document and right-of-way grant prior to issuing a final notice to proceed.

In addition to requirements developed as part of the NEPA process, the Company will also ensure compliance with the Company Avian Protection Plan and other Company Standards.

The BLM used the following criteria to select the authorized route:

- Allow for reasonable construction costs associated with the preferred route;
- Route on public land where practical;
- Avoid cultural and natural resource areas;
- Avoid sensitive species habitat (plant and animal, bald eagle nests and big game winter range;
- Follow existing corridors or linear structures, to the extent practical;
- Avoid Visual Resource Management Class II areas;
- Avoid designated areas such as National Monuments, Areas of Critical Environmental Concern, Wilderness Study Areas, National Landscape Conservation System areas and State and local parks; and
- Avoid BLM-identified preliminary priority sage grouse habitat and Wyoming core habitat areas.

The assessment that supported the BLM's EIS analyzed the impact of construction, reclamation, ongoing operation and maintenance, and decommissioning of the Gateway South and Gateway West Lines. The assessment considered the cumulative effects of the proposed Transmission Projects, together with past, present, and reasonably foreseeable future actions, and addressed the following:

- Cultural resources, such as prehistoric or historic archaeological sites, districts, buildings, historic trails, roads, and landscapes;
- Vegetation communities, including the potential impact of invasive plant species due to the construction process;
- Wetlands and riparian areas;
- Wildlife and fish, including big game, small mammals, reptiles, amphibians, migratory birds and raptors;
- Special status species, including those listed under the federal Endangered Species Act ("ESA"), those proposed for federal listing as well as

candidates under the ESA, BLM, or Forest Service Sensitive species, Forest Service Management Indicator Species, and State Heritage Program plant species of concern;

- Soils, include clearing, grubbing, and grading along the rights-of-way and at additional temporary workspaces; trenching; backfilling; excavating; and construction of permanent structures, such as transmission line structures, access and service roads, co-generation sites, and substations;
- Paleontological resources;
- Water resources;
- Agricultural resources;
- Air quality; and
- Noise.

In the assessment, the BLM, and cooperating agencies, concluded that, for many resources, the effects of the Transmission Projects coupled with the effects of other known projects will not be substantial. The assessment also concluded that to the extent that resources may be impacted, the Company has proposed reasonable mitigation efforts to minimize the impact.

Numerous studies related to the impact assessment are required to be completed in BLM's Record of Decision. The studies are voluminous and can be found at following websites:

- For the 230 kV line (D.1) the Final EIS: <https://eplanning.blm.gov/eplanning-ui/project/65164/570>
- For the 500 kV line (GWS) the Final EIS: <https://eplanning.blm.gov/eplanning-ui/project/53044/570>

The mitigation plans are also included in the above links.

Once the Transmission Projects are in-service, they will not produce emissions into the environment. The Company is preparing the plans of development, one for each line

respectively, these plans will govern the construction phase of the Gateway West Segment D.1 and Gateway South and must be approved by BLM. These plans will include specific requirements to ensure full compliance with all applicable regulations and requirements of the right-of-way permit granted by BLM for siting Gateway West Segment D.1 and Gateway South on federal lands. The plans of development will also include best practices for all aspects of environmental protection. The plans of development for the construction phases will account for fugitive dust control, storm water pollution prevention, spill containment and counter measures, plant/wildlife restrictions, and ground disturbance reclamation. The plans are similar to those implemented on the Company's Aeolus-to-Anticline/Jim Bridger and Windstar-to-Shirley Basin Lines transmission projects, adjusted to meet the specifics of this project as necessary.

Once the Transmission Projects are in-service, the Company will install three primary devices to protect air, water, chemical, biological and thermal qualities:

- Construction of retention basins at the substation sites to control storm water runoff, to manage erosion control and waterflows across adjacent properties as well as at the substation sites;
- Storm water control along the transmission line access routes will be managed using ditches at the verge of new access roads along with water control and diversion techniques, such as the use of water bars; and
- At the substation sites, an oil containment plan will be incorporated into the final design such that, in the event of a leak, the contents of any oil-filled equipment would be contained within the substation site and not leach into the underlying soils.

All the devices listed above represent proven effective technology employed at numerous substations and other facilities across the United States. Water-retention designs will comply with all relevant codes, as well as the Clean Water Act requirements, where applicable. The Company has successfully employed all of these techniques on recent transmission projects including Populus-to-Terminal, Mona-to-Oquirrh, and Sigurd-to-Red Butte, and Aeolus-to-Anticline/Jim Bridger Line and Aeolus-to-Shirley Basin Lines transmission projects.

**M. Description of Potential Safety Hazards (Section 21(c)(ii)(D)).**

The Company requires a high standard of safety performance and planning by all of its employees and contractors. During the construction phase, the primary safety hazards will vary somewhat by stage of the project, but will generally relate to:

- Heavy equipment operations;
- Open excavations;
- Slips, trips and falls;
- Crane operations;
- Working at height;
- Working around energized facilities; and
- Climatic conditions.

The Company will require all personnel working on the Transmission Projects to perform safety training specific to the Transmission Projects. The safety plan will require appropriate safety markings, barriers and other restriction devices to prevent worker or public access to potentially unsafe conditions.

During operations, the main safety hazard will be the energized facilities. Tower structures are designed to provide electrical clearances to the ground and structures and prevent climbing without specialized equipment, so that the public cannot reach the conductor.

All substation energized facilities are constructed so that the high-voltage equipment is placed with sufficient clearances from the site security fence to prevent accidental contact with the energized equipment. All substations will include security fencing, controlled access devices, security monitoring to limit and manage personnel gaining access to the site.

**N. 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)).**

A description of the real property in the form of required rights-of-way for the proposed site of the Transmission Projects is provided in the testimony of Mr. Fisher. The Company is in the process but has not yet acquired all rights-of-way for the Transmission Projects. Upon issuance of a conditional CPCN, the Company will obtain all necessary rights-of-way to construct the Transmission Projects.

Fuel will be sourced by the Company's contractor at wholesale or retail locations within a reasonable distance from the equipment working location.

Water will be sourced from previously allocated public or private sources. The locations have not been identified. Water will be used primarily in the production of concrete for foundations and dust control. Concrete will be procured from local batch plants or temporary batch plants where required.

Where required, the Company's contractor will transport fuel in placarded and appropriately licensed tanker trucks. Refueling will be completed away from locations where inadvertent spills could have a detrimental environmental impact. These locations have been identified in the Final EIS prepared for the Transmission Projects and will be set forth in the

plans of development. Inadvertent spills will be immediately contained and cleaned up according to requirements detailed in the plans of development.

Water will be transported using a properly placarded and appropriately licensed water tanker truck. It will be spread along the Transmission Projects roads at a rate that effectively controls dust. Where water needs for dust control are deemed excessive, other environmentally approved dust palliatives may be used.

The Transmission Projects will not use any water or fuel during the operation of the facilities. During construction, the contractors will be responsible for sourcing any water requirements. Alternates to water for fugitive dust control during construction will be included in the plan of development and future detailed construction specifications.

**O. Acquisition Status, Source and Location of Real Property, Right-of-Way, Fuel and Water Requirements (Section 21(c)(ii)(F)).**

The Company has not yet acquired all rights-of-way for the Transmission Projects. Upon issuance of a conditional CPCN, the Company will obtain all necessary rights-of-way to construct the Transmission Projects. The location of real property is described in Exhibit A-1 to this Application.

Fuel will be sourced by the Company's contractor at wholesale or retail locations within a reasonable distance from the equipment working location.

Water will be sourced from previously allocated public or private sources. The locations have not been identified. Water will be used primarily in the production of concrete for foundations and dust control. Concrete will be procured from local batch plants or temporary batch plants where required.

**P. Proposed Means of Transporting Fuel and Water Requirements (Section 21(c)(ii)(G)).**

Where required, the Company's contractor will transport fuel in placarded and appropriately licensed tanker trucks. Refueling will be completed away from locations where inadvertent spills could have a detrimental environmental impact. These locations have been identified in the Final EIS prepared for the Transmission Projects and will be set forth in the plan of development. Inadvertent spills will be immediately contained and cleaned up according to requirements detailed in the plan of development.

Water will be transported using a properly placarded and appropriately licensed water tanker truck. It will be spread along the Transmission Projects roads at a rate that effectively controls dust. Where water needs for dust control are deemed excessive, other environmentally approved dust palliatives may be used.

The proposed Transmission Projects do not require transportation of fuel or water once they are operational.

**Q. Description of All Mineral Rights Associated with the Facility and Plans for Addressing Any Split-Estate Issues (Section 21(c)(ii)(H)).**

No mineral rights or minerals are required for the construction, operation, and maintenance of the Transmission Projects. If during negotiations with landowners, conflicts arise with the placement of the transmission line, mineral rights or extraction terms will be negotiated with the landowner to mitigate the impact (*i.e.*, line relocation, compensation, etc.).

**R. 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 need for the proposed Transmission Projects is described above and further described in Mr. Link's and Mr. Vail's testimony. Mr. Vail also explains how the Transmission

Projects satisfy federal requirements to expand the transmission system in response to requests for interconnection and transmission service, embodied in executed contracts.

**S. Description of the Commodity or Service the Facility will Make Available (Section 21(c)(ii)(K)).**

The proposed Transmission Projects will enhance the Company's ability to provide retail electric service to customers in Wyoming, and the other five states in which the Company provides retail service. The Transmission Projects will also allow the Company to provide wholesale transmission service.

**T. Statement of the Facility's Effect on the Applicant's and Other Systems' Stability and Reliability (Section 21(c)(ii)(L)).**

Mr. Vail's testimony describes how the Transmission Projects will improve the stability and reliability of the Company's electrical system.

**U. Status of Satisfying Local, State, Tribal, or Federal Governmental Agency Requirements (Section 21(c)(ii)(M)).**

The Company has obtained a federal right-of-way permit from the BLM and the United States Forest Service ("USFS"), which covers the Transmission Projects. The right-of-way grants were authorized concurrently with the release of the Record of Decisions. The BLM's decision provides the authorizations, with stipulations, necessary for the Company to begin construction on federally administered lands.

Stipulations in the right-of-way grant require additional environmental surveys to be completed to clear construction areas before receiving the notice to proceed to construct on public land. The Company is currently conducting surveys for cultural, paleontological, biological and potential wetland resources that will need to be protected and, if adversely impacted, mitigated. The BLM and the U.S. Corp of Engineers will issue final notices to proceed after receipt and approval of survey reports, pre-construction notifications, and payment of any required mitigation funds determined.

In addition, the right-of-way grant includes the requirement to comply with several additional federal agency required permits and approvals, which the Company is currently in the process of completing, including Section 106 Consultation under the National Historic Preservation Act, Section 404 Clean Water Act Permit, and Resource Protection Plans required by the BLM. The Company has or will receive the required consents, franchises, and permits from all the local governmental entities having jurisdiction over the proposed route for the Transmission Projects. These will include an application to the Wyoming Department of Environmental Quality and the Wyoming Industrial Siting Council for the issuance of a permit.

The Company will also obtain a conditional use permit from Carbon, and Natrona Counties, an industrial permit from Converse County, and a construction permit from Sweetwater County.

The Company is in the process of obtaining the required consents and permits from the State of Wyoming, subject to completion of the final design of the transmission line alignment. In addition, the Company will obtain any permits and approvals required from state agencies for actual construction and operation of the Transmission Projects in the ordinary course of development. These required consents and permits may include, but may not be limited to, stream alteration permits from the Wyoming Game and Fish Department, highway encroachment permits from the Wyoming Department of Transportation, storm water permits from the Wyoming Department of Environmental Quality (Water Quality Division), rights-of-way grants from the Wyoming State Trust Lands Administration, and approvals from the State Historic Preservation Office of Wyoming.

Based on the current routing plan, these are the only permits, franchises, and consents required for the Transmission Projects. If a routing change resulting from the environmental approval process requires any additional local consents or permits, the Company will inform

the Commission. Mr. Fisher's testimony describes the status of the major permitting requirements for the Transmission Projects.

### **ADDITIONAL REQUIREMENTS OF ADVANCED REVIEW PROCESS**

In addition to the filing requirements found in the Commission's Rules Chapter 3, Section 21, the Advanced Review Process also requires that the Company's Application include the following:

**A. A description of the proposed facilities.**

A description of the proposed facilities is set forth above.

**B. An estimate of the cost to construct the proposed facilities.**

An estimate of the costs to construct the proposed facilities is included in the testimony of Mr. Vail.

**C. A detailed analysis and quantification of the benefits of the facilities both to the overall PacifiCorp system and to Wyoming customers in particular in terms of increased reliability or relatively lower net power costs, increased generation alternatives and the benefits of generation diversity.**

In addition to the discussion above, the detailed analysis of the benefits of the Transmission Projects is provided in the testimony of Mr. Link and Mr. Vail.

**D. A discussion of alternatives to the facilities including but not limited to new generation sited more proximate to load.**

Mr. Link's testimony describes the alternative facilities that were analyzed in the 2019 IRP and the Company's updated modeling, all of which selected the Transmission Projects as an integral component of the Company's preferred resource portfolio.

**E. A discussion of the impact on access to renewable generation resources.**

In addition to the discussion above, Mr. Vail's testimony describes how the Transmission Projects will provide greater access to renewable generation resources.

**F. A discussion of the proposed allocation of the cost of the facilities between the federal and state jurisdictions.**

As described in greater detail in the testimony of Mr. Vail, the Transmission Projects will be considered network transmission assets under PacifiCorp's OATT, and FERC precedent for ratemaking supports rolling in the costs of these assets into PacifiCorp's transmission rates. Mr. Vail's testimony describes how by inclusion in the Company's OATT, part of the costs of the Transmission Projects will be recovered from third-party transmission customers and included as an offset to retail customer rates.

**G. Description of any sage grouse habitat in the vicinity of the facilities.**

As part of the NEPA process, the Company's assessment specifically addressed the potential impact of the Transmission Projects on sage grouse habitat. The studies related to sage grouse are included in the Final EIS issued by BLM. In addition, the mitigation plan associated with sage grouse is described in Exhibit A-5 to the application.

