Q. Are you the same Gregory N. Duvall who submitted direct testimony on behalf of the Company in this phase of the proceeding?

A. Yes.

Q. What is the purpose of your rebuttal testimony?

A. My rebuttal testimony responds to the direct testimony submitted by other parties in this phase of the proceeding, including direct testimony submitted by Mr. Abdinasir M. Abdulle, Ph.D. on behalf of the Division of Public Utilities ("Division" or "DPU"); Mr. Randall J. Falkenberg on behalf of the Office of Consumer Services ("OCS"); Ms. Sarah Wright on behalf of Utah Clean Energy ("UCE"); Mr. Luigi Resta on behalf of Scatec Solar of North America ("Scatec Solar"); Mr. Rocco Vrba on behalf of Energy of Utah, LLC ("Energy of Utah"); and Mr. Maurice Brubaker on behalf of Kennecott Utah Copper, LLC and Tesoro Corporation. Specifically, I respond to issues surrounding the methodology for calculating avoided cost pricing for renewable qualifying facilities ("QFs") larger than three megawatts. Company witness Mr. Paul H. Clements will respond to issues related to renewable energy certificate ("REC") ownership for renewable qualifying facilities larger than three megawatts.

Q. How is your rebuttal testimony organized?

A. My rebuttal testimony is divided into four sections. The first section responds to other parties' comments concerning whether the Market Proxy method continues to produce reasonable results. The second section responds to other parties' comments concerning the capacity contribution assumptions used in Proxy/Partial Displacement Differential Revenue Requirement ("Proxy/PDDRR") method for

renewable QF resources. The third section responds to the integration cost assumptions used in the Proxy/PDDRR method for renewable resources. The fourth section responds to all other issues presented by parties.

Q. Please summarize your rebuttal testimony.

A. First, I show that no party has refuted the evidence showing the Market Proxy method is no longer appropriate to calculate avoided costs for wind resources, and the Proxy/PDDRR method should be used to calculate avoided costs for all renewable resources. Second, I demonstrate why OCS's proposed "equalizing" adjustment that increases the capacity contribution of wind resources from 4.1 percent to 13.8 percent is not necessary, and why UCE's proposal to use either the Effective Load Carrying Capability ("ELCC") method or the Equivalent Conventional Power ("ECP") method to determine capacity contribution is inappropriate. Third, I demonstrate why the inclusion of solar integration costs is reasonable. Fourth, I demonstrate that the additional adjustments and proposals made by parties are either not necessary or outside of the scope of this proceeding.

The Market Proxy Method

Q. Has any evidence been presented to justify the continued use of the Market Proxy method?

A. No. None of the parties that filed testimony in support of the Market Proxy method have provided any evidence to address the problems clearly identified in Company's Request for Approval of Changes to Renewable Avoided Cost Methodology for Qualifying Facilities Projects Larger than Three Megawatts

("Request for Agency Action") filed October 9, 2012. The Proxy/PDDRR method is already being used to calculate avoided costs for non-wind renewable qualifying facilities in accordance with the Commission Order dated October 31, 2005 in Docket No. 03-035-14 ("2005 Order"), and should be used for wind qualifying facilities as well.

Q. Which parties continue to support the Market Proxy method?

A. UCE and Scatac Solar are the only parties who recommend that the Market Proxy method be retained. However, UCE conditions its proposal by indicating that the Market Proxy method should be used in the event that the Company's integrated resource plan ("IRP") selects renewable resources. In the alternative, UCE recommends the use of a modified Proxy/PDDRR method when renewable resources are not selected in the Company's preferred portfolio.

Q. Did the preferred portfolio in the Company's 2013 IRP select economic renewable resources?

A. No. The only renewable resources in the 2013 IRP preferred portfolio were selected to meet renewable portfolio standard ("RPS") requirements in Oregon, Washington and California. No cost-effective renewable resources were selected. Based on this outcome, it appears UCE would support a modified Proxy/PDDRR method under current circumstances.

Q. What modifications to the Proxy/PDDRR method does UCE recommend?

A. UCE recommends the following modifications to the Proxy/PDDRR method for renewable QFs:

- Use either the ELCC or ECP method to determine the capacity contribution;

- Displace the cost of a combined cycle combustion turbine ("CCCT") in both the sufficiency and deficiency periods, rather than displacing front office transactions ("FOTs") in the sufficiency period and displacing a CCCT in the deficiency period as is currently done in the Proxy/PDDRR method;
- Exclude integration costs for solar QFs; and
- Add a risk premium for natural gas risk and hedging costs.

Taken together, these modifications make the Proxy/PDDRR method functionally equivalent to the Market Proxy method. I will rebut each of these proposals later in my testimony.

Q. How does UCE address the fact that the Company does not need wind resources on an economic basis and only adds uneconomic wind resources to meet RPS requirements in the 2013 IRP preferred portfolio beginning in 2024?

A. UCE continues to argue that the timing of wind resources is not important and that as long as there are wind resources selected by the IRP, wind QFs should get paid the full cost of a new wind resource beginning in the first year of the QF contract.

Q. Is this reasonable?

A. No. This is one of the major flaws of the Market Proxy method that was identified in my direct testimony and was also recognized by the Division and OCS. It is not reasonable for a renewable QF to receive a capacity payment associated with deferring a wind resource beginning in the first year of their contract when the Company is not avoiding a wind resource until 2024.

Q. Does UCE suggest modifications to the Market Proxy method to make it work in the future?

A. Yes. UCE suggests that an alternative approach might be to use the cost assumptions the Company uses in its IRP for the market proxy cost, Company wind purchased power agreements where available, or publicly available costs for wind purchase power agreements from other utilities.

Q. Do any of these suggested modifications address the issue that the Company does not need wind resources in the immediate future?

A. No. None of these suggested modifications provide any relief to customers of paying too much for wind QFs when the QF does not result in avoiding the cost that is being referenced.

Q. Did Scatec Solar respond to any of the specific problems that the Company identified with the Market Proxy method?

A. No. Without addressing any of the problems with the Market Proxy method identified in the Company's Request for Agency Action, Scatec Solar proposed to expand the Market Proxy method to apply to solar resources as well as wind. Scatec Solar made this proposal without providing any evidence that the Market Proxy method continues to be reasonable.

Q. Scatec Solar also proposed to include a solar target in the IRP which would then form the basis of a solar Market Proxy method. Is this the appropriate forum for this issue?

A. No.

Q. Please summarize your response regarding the continued use of the Market Proxy method.

A. UCE and Scatec Solar are the only parties that have proposed keeping the Market Proxy method without presenting any reasoning to justify its continued use. Accordingly, the Market Proxy method should be discontinued permanently for the reasons cited in my Direct Testimony and the Direct Testimony of OCS and DPU and the fact that no party has presented any evidence showing why it is reasonable.

Peak Capacity Contribution

Q. How do you respond to the claim made by UCE witness Ms. Wright that the Company's historical measurements of peak capacity contribution are energy-focused, rather than an evaluation of capacity value?

A. Ms. Wright introduces the term "capacity value" in place of "capacity contribution." Capacity value as used by Ms. Wright is an energy measure because it uses all of the hours in the year rather than peak load hours and is therefore not appropriate for determining capacity contribution for QF pricing. Moreover, Ms. Wright ignores the fact that the Company's capacity measurements are based on the likelihood that a resource will be available to satisfy system coincident peak loads which is the essence of "capacity contribution." The Company measured wind output in 100 summer hours with the highest loads based on a 90 percent confidence level that output would be available to meet peak loads. Ms. Wright concludes that the Company's calculation is energy-focused because the Company uses a capacity factor. The

Company would agree that a capacity factor calculation is energy-focused if it is calculated for an entire year, but not when it is applied to the 100 summer hours with the highest loads. The Company's capacity contribution methodology is clearly a capacity measurement focused on system coincident peak loads, not an energy measurement, and accurately measures a QFs contribution to meeting the system coincident peak load.

Q. What is the source of capacity value as used by Ms. Wright?

A. Ms. Wright appears to source the term from a report titled "Comparison of Capacity Value for Photovoltaics in the Western United States" prepared by the National Renewable Energy Laboratory ("NREL") that she introduced as UCE Exhibit 4.1(D). The report details the calculations of Ms. Wright's proposed ELCC and ECP methods for determining capacity value. The purpose of the report was to identify whether various simplified methods of calculating capacity value produced results that were similar to the results produced by the ELCC and ECP methods. NREL was clear in the report that the results were not appropriate for measuring the ELCC or ECP at the individual utility level. The NREL report was prepared for the U.S. Department of Energy, Office of Scientific and Technical Information.

Q. Did the report include a disclaimer?

A. Yes. On the first page of the report, the United State Government makes the following disclaimer: "Neither the United States government nor any agency thereof, nor any of their employees, makes any warranty, express or implied, or

assumes any legal liability or responsibility for the accuracy, completeness, or usefulness of any information."

Q. Why do you characterize the capacity values contained in the NREL report as energy measures?

A. Section 4 of the NREL report indicates that the calculations in the report used hourly load data for the years 1998-2005 in the calculation of the various methods including the ELCC and ECP methods that are recommended by Ms. Wright in this proceeding. The term "capacity value" as used in the report applies to all hours of the year and is not limited to just the hours that are representative of the system coincident peak and therefore does not accurately capture "capacity contribution" associated with system coincident peak load.

Q. Are there other assumptions used in the NREL report that render it unsuitable for use in determining the capacity contribution for solar QFs located in Utah?

A. Yes. On page 13 of the report, NREL acknowledges that use of utility-specific data would be more typical of how a utility would consider the capacity value of a generation resource and on page 14 reiterates that the primary purpose of the analysis is to compare methods as opposed to determining a value of solar capacity for a particular utility. On page 15, NREL stresses that any correlation between local loads and local solar resources are not captured in their analysis because they use a Western Energy Coordinating Council ("WECC") wide footprint which assumes utilities have the ability to share capacity resources across the entire Western Interconnect. While this assumption is appropriate for

the purpose of the NREL study, it is not a reasonable assumption for accurately determining the capacity contribution of Utah QFs to meeting PacifiCorp's system coincident peak load.

Q. Are any of the numbers from the NREL report appropriate for use in determining the capacity contribution for Utah QFs?

A. No. It is clear that the numbers produced by NREL are not appropriate to apply on a utility specific basis. The Company's capacity contribution study, on the other hand, uses actual data[1] to measure the variability of output from intermittent resources across peak load hours. It is a reasonable method that produces accurate results. It makes little sense to use a theoretical method that focuses on energy when actual data on peak contribution is available. In addition, capacity from an intermittent resource should be measured based on the resource's ability to reliably satisfy the Company's system coincident peak obligations. It should not be based on a resource's ability to satisfy energy obligations in all hours of the year, which is what the ELCC and ECP proposed by Ms. Wright estimates.

Q. What is Ms. Wright's recommended modification to the Proxy/PDDRR method with regard to the timing and level of capacity contribution?

A. As noted previously, Ms. Wright recommends the capacity payment based on the CCCT begin immediately, regardless of the timing of the next deferrable CCCT. While Ms. Wright recognizes her recommendation is a departure from current practice, she nevertheless makes it under the claim that renewable QFs bring capacity value to the system and they should be compensated for that value in the

[1] For wind resources, the Company uses historical generation data from its own wind plants. For solar resource, the Company uses historical meteorological data provided by the National Renewable Energy Laboratory.

avoided cost rate. She goes on to note that preliminary results from the 2013 IRP indicate that the Company will rely very heavily on FOTs, and concludes that while PacifiCorp may not be planning to add a resource in the near term, there is nevertheless a need for both energy and capacity.

Q. What is wrong with Ms. Wright's proposal?

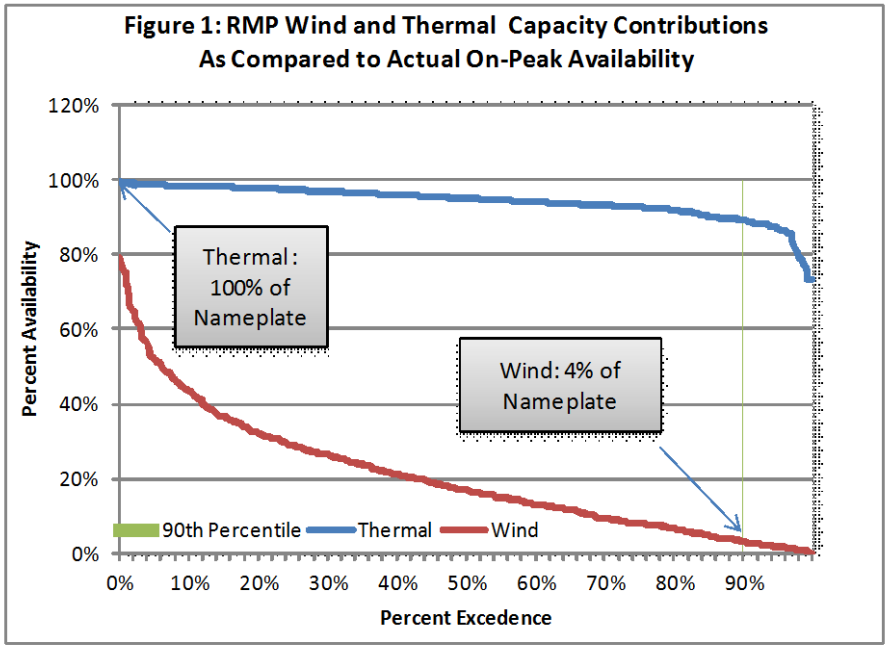
A. The next deferrable CCCT in the 2013 IRP is in 2024. The Company cannot defer the capacity costs of a new CCCT immediately. Ms. Wright's proposal does not reflect costs that the Company can avoid. The Proxy/PDDRR method already includes capacity deferral of FOTs when they are the avoidable capacity resource during the sufficiency period. Specifically, the Proxy/PDDRR method provides QFs a capacity value for the deferral of FOTs each year prior to the year of the next deferrable CCCT. Beginning in the year of the next deferrable CCCT, the Proxy/PDDRR method provides QFs a capacity value for the deferral of the deferrable CCCT. The Proxy/PDDRR method should not be modified to reflect Ms. Wright's proposal because the current approach reflects the Company's avoided cost of capacity consistent with the IRP.

Q. Does Mr. Falkenberg propose any adjustments to the Company's capacity contribution study?

A. Yes. Mr. Falkenberg prepared an analysis from which he concluded that the Company's peak capacity contribution analysis overstates the capacity contribution of a CCCT. Based on this conclusion, Mr. Falkenberg recommended an adjustment be made to the capacity contribution of wind resources so that the wind plant provided the same reliability as a CCCT. He based his conclusion on

Figure 1 in his direct testimony, which the Company has reproduced below.

Figure 1
Reproduction of OCS 1D Falkenberg Figure 1



Q. Why did Mr. Falkenberg conclude that the peak capacity contribution of a CCCT was overstated in the Company's analysis?

A. Mr. Falkenberg concludes that because the entire thermal fleet (coal, gas, geothermal) is not 100 percent available at a 90 percent confidence level it is necessary to make an adjustment to equalize the reliability impacts of wind and the thermal fleet. Mr. Falkenberg does not dispute that the Company's wind portfolio contributes approximately 4.1 percent to peak loads at a 90 percent confidence level.

Q. Do you agree that it would be more appropriate for Mr. Falkenberg to compare the peak capacity contribution of wind to the next deferrable CCCT, not the entire thermal fleet?

A. Yes. The comparison should be between wind and the next deferrable CCCT, not the entire thermal fleet. The capacity costs paid to QFs are based on the value of the next deferrable CCCT, so peak capacity contribution should also be based on the next deferrable CCCT. As explained in the 2005 Order:

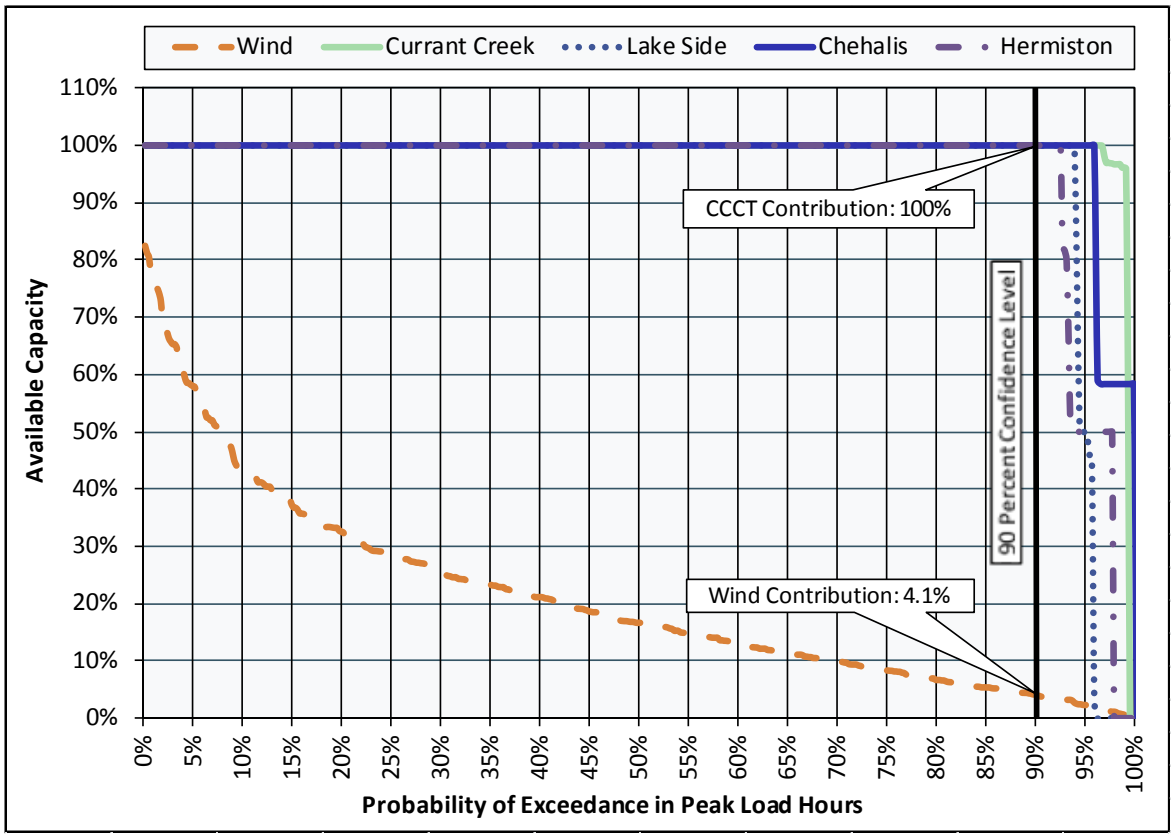
> The Company, Division and Committee support avoided cost determination based on the QF's proposed operating conditions. PDDRR results will reflect QF dispatchability, reliability and availability**.** *For the QF to be paid for avoiding capacity, it must meet the availability of the avoidable resource*. (emphasis added)[2]

Q. Have you recreated Mr. Falkenberg's chart to compare the peak capacity contribution of wind to the Company's CCCT resources?

A. Yes. Figure 2 compares the peak capacity contribution of wind to the Company's existing CCCT resources. The Company believes that the historical peak contribution of these resources is representative of the next deferrable CCCT.

[2] 2005 Order, p17.

Figure 2
Wind and Thermal CCCT
Probability of Exceedance in Peak Load Hours 2007 - 2011



254 **Q. What does Figure 2 show?**

255 A. Figure 2 shows that using a 4.1 percent contribution to capacity for a wind plant is
256 equivalent on a reliability basis to using a 100 percent contribution to capacity for
257 a CCCT with a 90 percent confidence level. Based on this chart, no "equalization"
258 adjustment is warranted.

259 **Q. Please summarize your recommendation with regard to capacity**
260 **contribution.**

261 A. There is no need to use theoretical methods to estimate peak capacity contribution
262 when actual data is available. In addition, the ELCC, which measures unserved
263 energy in all hours of the year, measures energy contribution not peak capacity

contribution. The method developed by Mr. Falkenberg is also inappropriate because it does not compare wind and the next deferrable resource in the IRP which is a CCCT. No compelling evidence has been presented to justify deviation from the use of actual data presented in the Company's historical analysis.

Integration Costs

Q. Have any parties opposed the Company's recommendation to account for wind integration costs in the Proxy/PDDRR calculations using the same method that is used in the IRP and general rate cases?

A. No.

Q. Have any parties opposed the Company's recommendation to use the cost of wind integration as a proxy for solar integration?

A. Yes. UCE witness Ms. Wright recommended excluding integration costs from solar avoided cost calculations. Division witness Mr. Abdulle recommended reducing solar integration costs to 50 to 65 percent of wind integration costs, depending on panel configuration. Other parties have not made alternative proposals to using wind integration as a proxy for solar integration.

Q. Is it reasonable to exclude integration costs entirely from solar avoided cost calculations as proposed by Ms. Wright?

A. No. It would be unreasonable to assume that the Company would not incur any cost to integrate solar resources. Solar resources are intermittent, and just like wind would cause the Company to incur integration costs.

Q. Ms. Wright claims that utility scale solar in PacifiCorp's system is so small that the integration costs are negligible.[3] Is this a valid reason to exclude solar integration costs from avoided cost calculations?

A. No. The solar integration costs included in the avoided cost calculations are proportional to the output of the solar facilities. In other words, if a solar resource is a small facility it will pay less integration cost on a total dollars basis than if it was a large facility.

Q. The Division represented that solar energy is less variable and more predictable than wind energy and, as a result, proposed to use solar integration rates that are lower than the Company's wind integration rate. Do you believe this is accurate?

A. No. The cost of reserves necessary to integrate solar could be equal to or greater than wind integration for the following reasons:

(1) Solar resources have the potential to exhibit sharp swings in output as a result of rapidly changing cloud cover, where wind output changes more gradually;

(2) Sharp changes in solar output may occur nearly instantaneously, resulting in strains on the system that require additional quantity of reserves relative to wind;

(3) Because all of the variability of solar occurs during the day, a greater portion of the reserves necessary to integrate solar must be held during on-peak hours, when the opportunity cost of holding reserves is highest; and

[3] Direct Testimony of Ms. Wright, lines 534-535.

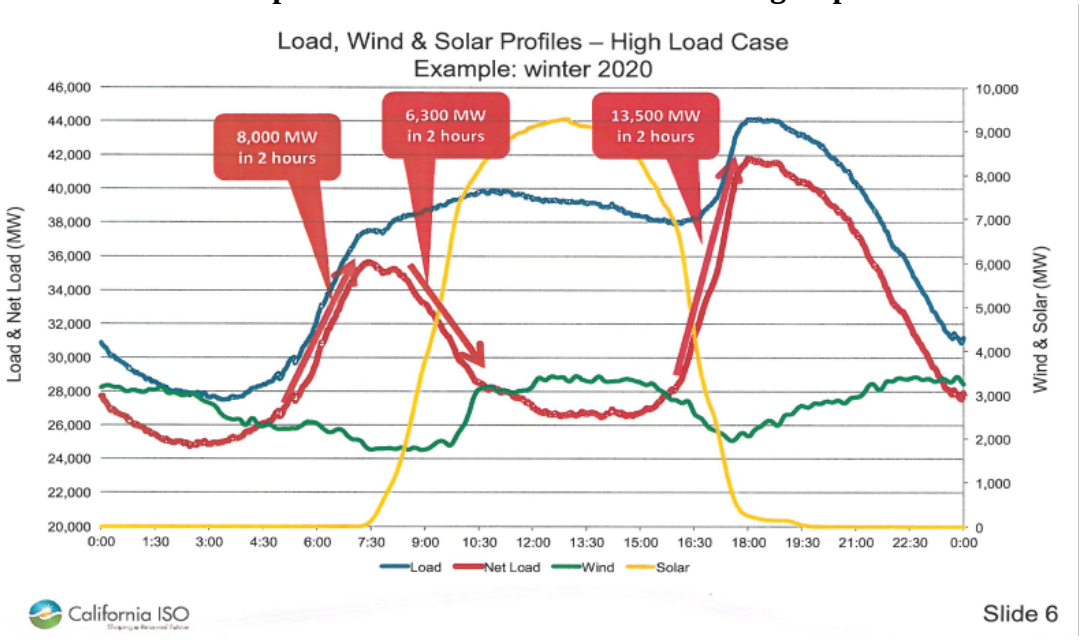
(4) Correlation between load and solar generation has the potential to increase the ramping reserve requirements because of the timing of solar output relative to system load.

These four factors cause the Company to believe that, despite the differences in wind and solar generation, the wind integration costs serve as a fair proxy for the cost to integrate solar resources on PacifiCorp's system.

Q. Do you have an example of the potential impact solar may have on the ramping requirements?

A. Yes. As demonstrated in the following figure prepared by the California ISO, high penetration levels of solar resources have the potential to impose new load following requirements.

Figure 3
California ISO Example of Solar Resource Load Following Implications[4]



As illustrated in Figure 3, after resources have ramped up in the morning to meet

[4] Source: http://www.caiso.com/Documents/FlexibleResourceAdequacyCriteria-MustOfferObligation-ISOPresentation.pdf.

increased load, they must ramp down to follow the increase in solar generation. In the afternoon, resources ramp up to follow the decline of solar generation and then must ramp up further to meet the peak load when solar output is back near zero.

Q. Do you agree with the OCS recommendation that the Commission should direct the Company to perform a solar integration study?

A. No. The addition of solar resources on the Company's system is still in the early growth stages. While the Company has data from small projects participating in the Utah solar incentive program, the Company does not yet have adequate data from utility-scale solar projects connected to its transmission system to perform a full solar integration study.

Q. Please summarize your recommendation regarding integration costs.

A. No party has opposed the use of the IRP and general rate case integration methodology for wind resources in the Proxy/PDDRR calculations. The Company believes that this method is also appropriate for solar resources.

All Other Issues

Q. UCE, Energy of Utah, and Scatec Solar recommended an adjustment to the Proxy/PDDRR method for renewable resources to reflect the fuel cost risks associated of fossil fuel plants that are avoided by the addition of renewable QFs. How do you respond to their proposals?

A. First, fuel cost risk is neither an energy nor capacity cost incurred by the Company, and is therefore not a known and measurable cost that can be avoided by the Company. If a risk premium were included in pricing for renewable QFs, it

would have to be fabricated and would pass costs on to retail customers that are above and beyond the avoided cost of energy and capacity, in violation of the Public Utility Regulatory Policies Act ("PURPA").[5] In addition, it does not seem reasonable to include fabricated costs in a commercial transaction. Second, fuel source does not alter how a QF impacts the Company's risk profile. A renewable QF and a non-renewable QF are both fixed-price power purchase agreements (PPAs) from the Company's perspective. To the extent that two PPAs have the same delivery pattern, they would have the same impact on the Company's risk profile. No adjustment is currently made to QF pricing under the Proxy/PDDRR method to reflect the risk characteristics of non-renewable QFs, so it is not appropriate to adjust QF prices for the risk characteristics of renewable QF resources. Third, avoided cost prices represent expected or median outcome that reflect escalating fuel costs and are just as likely to result in higher cost to customers as they are to result in lower cost. Because the risk is symmetrical, customers receive no incremental benefit by entering into a fixed price QF contract.

Q. Did any party propose a specific methodology to estimate the cost of risk avoided by purchasing power from renewable QFs?

A. No. For example, UCE recommends that a possible method would be to use the Company's averaging hedging costs over a 20 year period, but then fails to identify how the average hedging costs would be calculated. The Company has stated in its IRP that there are no hedging costs. There are gains and losses over

[5] *See, e.g., Connecticut Light and Power Company*, 70 FERC ¶ 61,012, at 61,023, 61,028, *reconsideration denied*, 71 FERC ¶ 61,035, at 61,151 (1995), *appeal dismissed*, 117 F.3d 1485 (D.C. Cir. 1997) (invalidating state QF rates that exceed avoided costs).

time as a result of hedging, but the expected outcome is that the gains and losses will net to zero. Hedging is conducted to mitigate risk, not to increase or decrease costs.

Q. These parties have also characterized a renewable QF resource as a zero cost resource to the Company. Is that accurate?

A. No. It is unlikely that a renewable QF owner would be willing to give power to the Company for free. The Company must pay for every megawatt-hour purchased from a renewable QF resource, so it is not a zero cost resource to the Company. Avoided cost prices paid to renewable resources under the Proxy/PDDRR method reflect escalating natural gas and wholesale market prices over time. Adding a fuel risk premium on top of avoided cost prices that reflect escalating natural gas prices would result in avoided cost prices for renewable resources that reflect a high natural gas price scenario. This is not a reasonable assumption.

Q. Please summarize your recommendation with regard to risk mitigation costs.

A. From the Company's perspective, the risk characteristics of a renewable QF are no different than the risk characteristics of a non-renewable QF. The Company must purchase power from both QFs at its avoided cost which already include escalating natural gas prices based on a medium natural gas price forecast. Any additional price risk premium would not be known and measurable, and would therefore violate PURPA. Accordingly, it is not necessary, appropriate or legal to adjust the Proxy/PDDRR method for renewable resources to reflect avoided fuel price risk.

Q. UCE and Energy of Utah suggest that avoided cost prices for renewable resources should reflect avoidable climate change costs. Do you agree?

A. No. Avoidable climate change costs are not known and measurable and are not an energy or capacity cost incurred by the Company. Avoidable climate change costs should not be included in avoided cost calculations for the same reasons that avoided fuel price risk costs should not be included in avoided cost calculations.

Q. Mr. Brubaker proposed to expand Schedule No. 38 to include an additional list of ten items that the Company must provide each time it submits indicative pricing to a QF developer regardless of whether they are renewable or not. Are these changes to Schedule No. 38 appropriate for this phase of the proceeding?

A. No. The Company has not proposed to make any changes to Schedule No. 38 in this proceeding, and the scope of this phase was limited to addressing the methodology for calculating renewable avoided cost rates. A change to Schedule No. 38 in the fashion prescribed by Mr. Brubaker would impact all QF's, not just renewable resources. The Company does not believe that all parties interested in general Schedule 38 changes are parties to this docket. Accordingly, the Company requests that the Commission not examine these potential changes to Schedule No. 38 at this time.

Q. Much of Mr. Brubaker's recommendation regarding changes to Schedule No. 38 has to do with providing Generation and Regulation Initiative Decision Tools ("GRID") access to recipients of indicative avoided cost pricing. Does the Company already provide GRID access to potential QFs who request indicative pricing?

A. Yes. The Company already provides GRID access to all potential QFs who request it, including Kennecott Utah Copper, LLC and Tesoro Corporation, who routinely receive GRID access following the receipt of indicative pricing.

Q. What additional administrative burden would be imposed on the Company if it were to adopt Mr. Brubaker's changes to Schedule No 38?

A. The Company is supportive of providing GRID access to QF developers who are interested in performing a review of the GRID modeling used to calculate avoided cost pricing. However, the Company is not supportive of providing GRID access for all pricing requests regardless of whether the QF developer intends to review the GRID modeling in the early phases of their development efforts. The Company receives multiple requests for avoided cost prices each month, and many of the projects never progress beyond the very preliminary development stages. Much of the information included in the GRID model is proprietary and can only be provided once appropriate protective agreements are in place. It would be unreasonable to require the Company to dedicate resources to provide access to a developer who never accesses the model.

Q. What resources are necessary to set up GRID access for a new user?

A. From a technology perspective, the process for providing GRID access is time

consuming and complicated. Each GRID user is provided with a separate computer on the Company's network to perform GRID studies. The user has to be set up in the Company's network as a vendor and granted access to the network through the internet. Internet access is established using a unique secure account, which must be approved for each user. The administrative burden to the Company to set up GRID access for each pricing request is significant, and likely could not be performed in the timeframe established under Schedule No. 38.

Q. Division witness Mr. Abdinasir proposes to open a docket to determine the proper treatment of Oregon solar resources in the Company's GRID modeling. Is this necessary?

A. No. A general rate case is the proper venue to discuss the GRID modeling of situs assigned resources, such as the Company's Black Cap solar project. The Black Cap project produces less than one average megawatt, so the Company does not believe it warrants extraneous measures of a separate docket.

Q. Does this conclude your rebuttal testimony?

A. Yes.