

## **OCS Data Request 2.4**

### **Table 8.14 – Incremental Wind, Waxman-Markey + PTC Ext. to 2020:**

The results of the Company's System Optimizer run with the preferred portfolio set-up + the modified renewable policy assumptions indicate the SO model adds 547 MW of combined westside and eastside wind resources in the 2015-2017 time period. However, the Company's decision is to delay wind acquisition until 2018. Please identify and fully describe all constraints that limit the Company's ability to acquire new wind resources until 2018.

## **Response to OCS Data Request 2.4**

Wind resources cannot be acquired in Wyoming until the 2018 expected completion of the Windstar-Populus segment of the Energy Gateway plan due to the lack of transmission transfer capability for exporting the energy. For locations outside of Wyoming, the constraints are principally economic in nature. Wind resources outside of Wyoming are not cost-effective based on the Company's capacity factor and capital cost assumptions, a result confirmed by the IRP portfolio modeling. The Company would not expect to get cost recovery for wind acquisitions with such higher costs unless those resources were needed to comply with stricter state renewable portfolio standards or new federal renewable targets along the lines of Waxman-Markey. The likelihood of such standards being enacted and requiring significant renewables acquisitions by the Company for 2015-2017 is small given the current economic and political environments. Notwithstanding these constraints, the Company may acquire non-Wyoming wind prior to 2018 through PURPA Qualifying Facility contracting or other procurement opportunities if advantageous for customers.