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BEFORE THE UTAH UTILITY FACILITY REVIEW BOARD

ROCKY MOUNTAIN POWER, Petitioner, vs. WASATCH COUNTY, Respondent.	**DECLARATION OF KENNETH M. SHORTT IN SUPPORT OF ROCKY MOUNTAIN POWER'S MEMORANDUM IN OPPOSITION TO WASATCH COUNTY'S MOTION TO STAY ORDER OF JUNE 3, 2016** **Docket No. 16-035-09**

SALT LAKE COUNTY	)	
	)	:ss
STATE OF UTAH	)	

I, Kenneth M. Shortt, declare and state as follows:

I am over the age of 18 years and have personal knowledge regarding the facts set forth below. If called upon to testify, I would testify as follows:

1.   I am employed by Rocky Mountain Power (the "Company") as the Director of Area Planning and Field Engineering. I have held that position since January 2016. My duties include management and oversight of Transmission Area Planning and Field Engineering for the Company. My responsibilities include ensuring that proper planning activities are performed as necessary for the Company's medium transmission (161-kilovolt (kV) – 46kV) system and distribution system (under 35kV).

2.   I am familiar with the Railroad-Silver Creek 138 kV transmission line upgrade project (the "Project"). The load area affected by the Project includes all or portions of Wasatch, Summit, Morgan and Salt Lake Counties.

3.   As stated in my direct testimony on file with the Board in this proceeding, when the load area is above 160 Mega-Volt Amps (MVAs), the loss of one of the transformers results in low voltages and/or outages. To mitigate this risk, during peak loading periods, the Company's system must be broken into three radial systems. Each radial system has just one source of power. The number of days the system was operated radially has increased from 15 days in the winter of 2007-2008, to 98 days during the winter of 2015-2016 – an average increase of 69% per year. Completing the Project will provide an additional source into the load area, eliminating the need to operate the system radially and greatly reducing the frequency and duration of outages. (*See also* Direct Testimony of Kenneth M. Shortt, p. 4 line 27 – p. 5 line 11.)

4.   Since 2007, fifteen separate outage or maintenance events have occurred on the two 138kV lines serving the load area, and 21 events have occurred on the 46kV line. (*See also* Shortt Testimony, p. 4 lines 4-12.)

5.   Outages result in a large number of customers being out of power. For example, on February 14, 2016, the Cottonwood-Silver Creek 138 kV line experienced three momentary trips associated with a contaminated insulator. This condition required immediate attention before the insulator suffered a complete failure. During the winter season, while operated radially, this line is the sole source to Snyderville, Silver Creek, Oakley, Kamas, and Park City substations. The repair required the Cottonwood-Silver Creek line be de-energized. The remaining two sources, Cottonwood/LeGrande-Park City 46 kV line, Hale-Midway 138 kV line, and a new source, made available through incremental work performed on the Project, Croydon-Park City 46 kV line, could not supply enough energy to keep all substations in service. Over 8,000 customers served from Snyderville substation were out of power for an hour and a half during the repair procedure. If the Project were in service, no outage would have occurred during this emergency repair. (*See also* Shortt Testimony, p. 6 lines 4-15.)

6.   An outage on a radial system in the Park City area could result in 14,000 to 27,000 customers being subject to a loss of power or rolling blackouts for the duration of the outage, which could last from a few hours to several days, depending on the outage and its cause, and the area affected.

7.   Outages can be caused by any number of unpredictable events, including automobile accidents, fires or natural disasters. It is also sometimes necessary for the Company to take components of its system offline in order to perform maintenance or repairs.

8.   Outages result in the loss of power to businesses, homes and infrastructure, including street lights and traffic control signals, all electric heating systems and fan driven heating systems. The impacts of an extended outage could be devastating to the safety and wellbeing of residents and businesses in the load area. If there is an outage on the Hale —

Midway 138 kV line while operating radially, then most of Wasatch County and parts of Summit and Salt Lake Counties will be subject to rolling blackouts until the Midway – Hale 138 kV line is placed back into service

I declare under penalty of perjury that the foregoing is true and correct.

DATED: July 13, 2016

Kenneth M. Shortt

<div align="center">**CERTIFICATE OF SERVICE**</div>

I hereby certify that on this 13th day of July, 2016, I caused to be sent a true and correct copy of the foregoing **DECLARATION OF KENNETH M. SHORTT IN SUPPORT OF ROCKY MOUNTAIN POWER'S MEMORANDUM IN OPPOSITION TO WASATCH COUNTY'S MOTION TO STAY ORDER**, to the following:

By Electronic-Mail:

Beth Holbrook (bholbrookinc@gmail.com)
Utah League of Cities and Towns

David Wilson (dwilson@co.weber.ut.us)
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<div align="right">*/s/ D. Matthew Moscon*</div>