## **PUBLIC SERVICE COMMISSION OF UTAH**

Docket No. 16-035-36

# PUBLIC HEARING PROCEEDINGS

April 28, 2021

#### ADVANCED REPORTING SOLUTIONS

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#### Public Hearing Proceedings April 28, 2021

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -000-

In the Matter of the
Application of Rocky Mountain )
Power to Implement Programs )
Authorized by the Sustainable )
Transportation and Energy Plan)
Act )

DOCKET NO. 16-035-36

PUBLIC HEARING PROCEEDINGS

TAKEN VIA GOOGLE MEET

THROUGH ADVANCED REPORTING SOLUTIONS

Taken on Wednesday, April 28, 2021 9:00 a.m. to 10:33 a.m.

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APPEARANCES

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FOR ROCKY MOUNTAIN POWER:

Emily Wegener

FOR THE DIVISION OF PUBLIC UTILITIES:

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FOR THE OFFICE OF CONSUMER SERVICES:

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ALSO PRESENT:

Abdinasir Abdulle
Bela Vastag
Bob Davis
Chris Parker
James Campbell
Jason R.
John Harvey
Marc Mansfield
Marie Durrant
Melissa Paschal
Michael Hammer
Michele Beck
Patricia Schmid
Stephanie Barber-Renteria

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PROCEEDINGS 1 2 -000-3 MR. HAMMER: ...occasion to implement 4 programs authorized by the sustainable transportation and energy planet. It's Commission Docket 5 No. 16-035-36. My name is Michael Hammer, and I'm 6 the Commission's designated presiding officer. Let's 7 go ahead and take appearances beginning with Rocky 8 9 Mountain Power, please. 10 MS. WEGENER: Good morning. This is 11 Emily Wegener for Rocky Mountain Power. With me 12 today, I have James Campbell, a company employee who 13 will be adopting our comments and providing a 14 I have cocounsel Marie Durrant, Jana Saba. 15 And then, also, I have with me Marc Mansfield, who 16 will be adopting the study that was attached to the 17 application and providing a summary, and Robert 18 Hammer, who is participating and helping with the 19 study, a consultant with SLR Consulting, who's 20 available for questions but will not be providing a 21 summary. 22 MR. HAMMER: Thank you. 23 And for the Division of Public Utilities? 24 MR. JETTER: Good morning. I'm Justin 25 Jetter with the Utah Attorney General's Office, and

1	I'm here today representing the Utah Division of
2	Public Utilities. With me today, I have Robert
3	A. Davis who will testify for the Division at today's
4	hearing. For the folks on the call who are not
5	familiar, he'll show up on your screen as Bob Davis.
6	MR. HAMMER: Thank you.
7	One one moment. Ms. Harrison, were you
8	trying to say something Ms. Harmon? I'm sorry.
9	Ms. Harmon, you can't hear us?
10	Melissa, can you contact her by text and let
11	her know that we're all able to hear each other just
12	fine?
13	Okay. We'll go ahead and proceed since this
14	is being recorded.
15	Thank you, Mr. Jetter.
16	And the Office of Consumer Services?
17	MR. MOORE: Yes. The Office of Consumer
18	Services. I am Robert Moore. I rep am from the
19	AG's office representing the Office of Consumer
20	Services. With me is Bela Vastag. He's a utility
21	analyst from the Office.
22	MR. JETTER: Mr. Hammer, I think you are on
23	mute now.
24	MR. HAMMER: That was inadvertent.
25	Are there any preliminary issues before the

1 Company calls its first witness? 2 MS. WEGENER: Yes. Before we begin, I have 3 a couple of corrections to make to the application. 4 In the application, the Company moves for approval of STEP funding under two different provisions, Section 5 6 54-20-105 for innovative utility programs and Section 54-20-107 for other programs. 7 The first correction I need to make is that 8 9 the specific subsection under 54-20-105, which is 10 stated as (1)(h) in the Company's application, is 11 actually 54-20-105(1)(i). 12 The second correction I would like to make 13 is that the Company is no longer pursuing approval under Section 54-20-107. While the Company believes 14 15 the program is cost-effective in the sense that the 16 potential benefits exceed the cost of the program, 17 the Company has not performed a detailed analysis of 18 these benefits, and so we'll just proceed under 19 Section 54-20-105(1)(i) only. 20 MR. HAMMER: Thank you. 21 All right. Is there anything else before Ms. Wegener calls her first witness? 22 23 (No response.) 24 MR. HAMMER: Go ahead, Ms. Wegener. 25 MS. WEGENER: The Company calls James

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1
     Campbell.
 2
                           Mr. Campbell, do you swear to
              MR. HAMMER:
 3
     tell the truth?
 4
              THE WITNESS: I do.
 5
              MR. HAMMER: Go ahead.
 6
 7
     Thereupon --
 8
                        JAMES CAMPBELL,
 9
     was called as a witness, and having been first duly
10
     sworn to tell the truth, the whole truth, and nothing
11
     but the truth, testified as follows:
12
13
                       DIRECT EXAMINATION
     BY MS. WEGENER:
14
15
              Mr. Campbell, will you please state and
         Ο.
16
     spell your name for the record?
17
         Α.
              Yes.
                    My name is James Campbell, J-A-M-E-S
18
     C-A-M-P-B-E-L-L.
19
              What's your business address?
         Ο.
20
         Α.
              1407 West North Temple, Suite 310,
21
     Salt Lake City, Utah.
22
              By whom are you employed, and in what
         Q.
23
     capacity?
24
         Α.
              I'm employed by Rocky Mountain Power, and I
25
     am currently the director of innovation and
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sustainability policy.

- Q. What other roles have you had leading up to this position?
- A. I joined the Company in 2007, initially as an environmental analyst in the environmental policy and strategy group. I've also worked in government affairs and customer innovations within the Company. I've been in my current role since 2019.

And prior to joining Rocky Mountain Power, I worked at the Utah Division of Air Quality.

- Q. Thank you. What has your involvement been with the STEP legislation, the legislation that is -- that we are pursuing approval of the program today, and other programs that have been approved under the STEP legislation?
- A. Yeah. So I was involved with the initial STEP filing and the application and in a lot of the program development and analysis. I've also participated in legislative community hearings, both prior to the passage of the STEP legislation, and after, sharing with legislature some of the successes and progress of the STEP program.
  - Q. Thank you.

Have you ever testified in front of the Utah Public Service Commission before?

I've -- I filed testimony in 1 Yes, I have. Α. 2 support of other STEP projects, including the Gadsby 3 Curtailment Program and -- which is an innovative 4 project that addressed emissions in a non-attainment And most recently, I provided testimony on the 5 Intermodal Hub Project, which is a innovative 6 technology project that looks at developing a power 7 balance and demand control system with the 8 9 university. 10 Ο. Have you reviewed the application filed by 11 the Company on March 3rd, 2021, and the reply 12 comments filed on April 23rd, 2021, by the Company in 13 this proceeding? 14 Α. Yes, I have. 15 Ο. Do you adopt those reply comments as your 16 testimony? 17 Α. Yes, I do. 18 At this time, I'd like to move MS. WEGENER: 19 to admit the Company's reply comments. 20 MR. HAMMER: They're admitted. 21 (Rocky Mountain Power Company Reply 22 Comments were admitted.) 23 BY MS. WEGENER: 24 Ο. Mr. Campbell, can you please provide a 25 summary?

A. Sure. Well, good morning, Mr. Hammer, counsel, and parties. It's great for me to be back. I see a lot of welcome faces. I've been out for a while, so it's good to see everybody.

But on March 3rd, 2021, the Company filed an application requesting STEP funding to support a Utah State University study on "Projecting the Impact of the Electrification of the Uintah Basin Oil and Gas Fields on Air Quality." The Company is requesting to provide the Uintah Basin Study project with an amount of \$200,715. And as supported in the Company's application, sufficient STEP funds are unallocated that can be used for this project.

The Company has identified the study as providing a variety of benefits including, one, identifying what pollutants to target to most effectively reduce ozone events in the Uintah Basin area of Utah; two, identifying ways electrification can facilitate reduction in the emissions contributing to the high ozone events in the basin; and, three, producing data on the general feasibility and potential benefits of increasing the supply of electricity to a rural area with high oil and gas production and associated high ozone levels.

My testimony focuses on the appropriateness

of the study as a candidate under the enabling STEP statutes and provides an overview of the Company's response to the positions taken by the Division of Public Utilities and the Office of Consumer Services.

With me today is Dr. Marc Mansfield, who is a research professor in the department of chemistry and biochemistry for Utah State University.

Dr. Mansfield's testimony will focus on the details of the project proposal, including the Company's application as Appendix A.

Also with us today is Mr. Robert Hammer with SLR Consulting, who will be partnering with Dr. Mansfield at Utah State University to complete this study. Mr. Hammer will not provide a summary today but is available for questions pertaining to the certain aspects of the study and, in particular, the benefits of the study for the Company's oil and gas customers in the region.

The Office of Consumer Services stated in their comments that they found the Uintah Basin Study to be very promising, and they support providing STEP funding to move forward with the study subject to two recommended conditions: a phased funding approach and a reduction to the funding level. The Company respectfully requests that the Commission not adopt

1 either of these recommendations. Dr. Mansfield will 2 address why a phased funding approach is not feasible 3 for this project. 4 With respect to the reduction in the funding level, to remove indirect costs, I reiterate that the 5 6 indirect costs are typical for a university study. In fact, there are other approved STEP projects that 7 provide funding for studies conducted by the 8 9 university that are included with similar levels of 10 indirect costs, including the coalbed methane, which also included indirect cost --11 12 I'd like to pose an objection MR. MOORE: 13 here. That's outside of his comments and, therefore, 14 constitutes live surrebuttal, which is not called for 15 in the scheduling order. 16 MR. HAMMER: Ms. Wegener? MS. WEGENER: 17 The studies that Mr. Campbell 18 is referring to are on the record in this docket, but 19 I agree they're not in the comments. So if -- if you 20 would prefer, he can skip the part referring to other 21 portions of the record in this docket. 22 MR. HAMMER: I think that would be 23 appropriate, Mr. Campbell. 24 THE WITNESS: It would be appropriate for me 25 to skip it or appropriate for me to --

MR. HAMMER: To skip it. I don't think the other parties were noticed that those issues were going to be discussed today, and the record's quite extensive going back to 2016. So I'll --

THE WITNESS: Okay.

MR. HAMMER: -- go ahead and sustain the objection.

Then you can proceed with the rest of your testimony.

THE WITNESS: Okay.

The Division of Public Utilities recommends against approval of the Company's application for several reasons. They claim that the study benefits will flow to not only RMP customers, but also the other customers of Moon Lake Electric. This is not a reason to deny STEP funding to the study, as it adds an important piece of information for a relatively small amount of money. Furthermore, the STEP pilot program was intended to support these types of projects. Dr. Mansfield addresses the Division's other arguments, including the additional information the Division claims is lacking from the study.

I recommend the Commission approve the Company's application as filed. The Uintah Basin Study is a prudent use of available STEP funds and

will provide valuable information to aid ozone 1 2 reduction efforts in the basin. 3 Thank you for your time allowing me to 4 present my testimony in support of the Uintah Basin 5 Study. This concludes my summary. 6 MR. HAMMER: You're on mute, Ms. Wegener. Thank you. I have nothing 7 MS. WEGENER: further for Mr. Campbell, and he is available for 8 9 cross-examination and questions from the 10 Commission -- or from the hearing officer. 11 MR. HAMMER: Mr. Jetter? 12 13 CROSS-EXAMINATION 14 BY MR. JETTER: 15 Ο. Hi, good morning. I do have a few 16 questions, Mr. Campbell. 17 In the comments that you've adopted this 18 morning, the Company's been -- and by "Company," I 19 mean Rocky Mountain Power -- has been critical of the 20 Division in its comments recommending disapproval, 21 and as part of that, those comments that the Division 22 has been critical of the Company for not providing 23 all of the pieces to a complex puzzle; is that 24 correct? 25 Α. The -- that the Division -- that the Company has not provided pieces to a complex puzzle?

- Q. Yeah. That was the Company's description of the Division's objections.
  - A. Oh, okay. Yes.

Q. And I'd like to ask you a few questions along those lines.

Do you think that it would be reasonable for utility ratepayers to pay for a study of something that is either impossible or highly unlikely to become reality?

- A. I believe that it is reasonable for ratepayers to provide funding for the -- the utility to work on innovative programs to -- especially since the electric industry is in massive transformation.

  And so it -- I do think it is reasonable for ratepayers to provide -- particularly under the STEP statute, to provide some funding for innovative programs so it can -- so the Company can be positioned to address current issues.
- Q. Okay. But I'm not sure that quite answered my question. My question goes to, what about the scenario where the -- the item being studied is either extremely unprobable or impossible? So let's -- maybe I'll give you a hypothetical of -- would it be reasonable for customer ratepayers to pay

for the study of a cold fusion reactor with today's information we have?

- A. With today's information -- I'm not an expert on cold fusion, so I do not know. If cold fusion was a good, innovative project, then maybe it would be, but I -- I don't know. If you look back to maybe 1989, I -- when the -- when cold fusion came about, but I'm not an expert on cold fusion. So I -- I don't know if that would be reasonable. I'd have to look at the actual prospect of it and it -- to determine if it was reasonable, but right now, I don't know.
- Q. And in making that determination, wouldn't you think it would be reasonable to perform at least some high-level or background look at whether the -- the cold fusion in this example were a plausible technology?
- A. It -- in -- so should I do a background -- if I was trying to apply -- if your question is if I was trying to apply the -- to do a cold fusion project, should I do background work on cold fusion? Is that what your question is?
- Q. Well, shouldn't you, at least at a base level, before you spend money researching the effects of it, get some high-level view of does it work?

1 Α. So I would --2 (Simultaneous speaking.) 3 BY MR. JETTER: 4 Ο. -- does it work? So I think it is appropriate to do a certain 5 Α. review of a technology, which is -- which is really 6 what we're proposing to do right now, is a very 7 preliminary assessment of this electrification. 8 Electrification is not cold fusion. I mean, those 9 10 are completely two different types of technologies in 11 terms of -- out there. But doing a very 12 preliminary -- I mean, I think that's kind of what we're proposing right now, is to do a very initial 13 14 assessment to determine whether or not this is a --15 really, if this is a stepping-stone to go down the 16 path. 17 Ο. Okay. And -- but as part of that sort of 18 just basic background, high-level review, the Company 19 didn't ask any of the -- the oil and gas mining 20 operators of these wells if they were interested in electrification, did it? 21 22 Well, I -- you know, in terms of the specifics, that's what we have Dr. Mansfield and --23 24 and also his colleagues here today, who could really 25 answer some of the very specific questions related to

- that. So if we wanted to talk really specifically about that, we can have -- about the project, about its role, I know Mr. Hammer is an expert with and does work with oil and gas customers. So I'm pretty confident that oil and gas customers are familiar with this technology and are looking forward to it.
  - Q. Okay. And so I'm going to read to you -- I don't know if you have the DPU comments with you or the data request responses from the Division. If not, I can simply read to you what Rocky Mountain Power told the Division when we asked this question.

And what I'm looking at --

A. I'm sure he has it.

Q. -- is the DPU Data Request 15.6 where the Company asked if Rocky Mountain Power, Utah State University, or SLR had had any correspondence with well developers regarding the changeover from oil and gas to electrification, and Rocky Mountain Power's response was that Rocky Mountain Power "has not communicated with well developers regarding the potential changeover from natural gas-powered pumps to electric pumps that is being evaluated in the study." And that's part of the complete answer. It goes on to -- I'll summarize that Utah State or/and SLR have not had any formal discussions but maybe

have had some informal discussions and no correspondence formally with the well owners.

Doesn't that seem like it would be something reasonable to ask the well owners, whether they're interested in this?

A. So electrification of wells is a pretty common -- it's not -- it's not cold fusion. So it's one of those things that there's definitely been interest with other oil and gas. I know nationally this has been a topic that -- of discussion, so it's not like this is an imaginary conversation that would be a complete surprise to those -- to our oil and gas customers up there. And we've had various levels of conversations, but not -- maybe not specifically to this specific project.

But there's been other types of conversations in general related to -- to electrification, especially, as I mentioned, nationally. This is an ongoing type of evaluation, especially as we see nationally a push towards electrification and broader areas related to fugitive emissions and other types of applications like this. So it's not a -- it's not like this is a foreign topic that would be a complete surprise to these operators.

- Q. Sure. But -- but you didn't actually ask these operators if they were interested in doing this?
  - A. Did -- I personally did not.
- Q. And Rocky Mountain Power did not, that you're aware of?
- A. I'm not aware of -- of -- of very specific conversations for this project. I know that there's been other types of conversations with customers, but I'm not aware of specific conversations for this project.
  - O. And --

- A. But as I said, Mr. Hammer with SLR is an expert in this area and does have and is very familiar with the oil and gas customers in the area.
- Q. Okay. And would you imagine that it would be primarily based on the economics whether an oil and gas pump operator would switch their oil pump mode of force from the combustion engines to electric?
- A. There -- there's a lot of factors that goes into it, and, again, Mr. Hammer can elaborate on that. But economics is definitely one, and -- but part of that economics is the regulatory aspect of it. And operating in a non-attainment area is a

major challenge, and especially for our customers that live in the Uintah Basin. Oil and gas is one of the primary kind of economic activities out there, and being in a non-attainment area for ozone is a really big deal for both those individual operators, but also all of our customers that are out there.

So when you talk about the economics, it's a combinate- -- it's the direct economics, but also the economics with -- associated with the regulate- -- complying with the regulations and the different regulatory requirements.

- Q. Okay. But Rocky Mountain Power, in this case, did not have any estimates of the costs, either at an individual well basis or in general, for the electrification of these pumps. Is that accurate?
- A. Correct. This is the very beginning. So before you want to go down this full path of do we start making major investments and electrification, one thing you want to make sure is, well, is it going to matter? Is electrification actually going to make a difference for the broader non-attainment area classification? So that's why this is really the first step.

And then if this passes, so to speak, where it will make a difference, then you can begin to

start going down that next path of evaluating the economics and the actual specifics of the electrification of those wells.

- Q. And before you spend \$200,000 studying the chemistry of the air quality, wouldn't it make sense to do a back-of-the-envelope calculation to see if the economics are even in the realm of plausibility?
- A. And I -- again, on the specifics related to the oil/gas, I believe Mr. Hammer can -- could answer some of -- can answer some of that.
- Q. Okay. And wouldn't Rocky Mountain Power be -- isn't Rocky Mountain Power in a good position to be able to do those back-of-the-envelope calculations on the cost of Rocky Mountain Power's infrastructure that would be necessary to reach these pumps?
- A. Well, there's a lot of factors that would go into them, a lot of assumptions that would go into it. What are some of the future regulations?

  There's -- so you can kind of start getting into this analysis creep. Like, where do you draw the lines and whatnot?

But really, before you want to go down that path, you'd want to make the determination, does it even make a difference in terms of the air quality?

- 1 Because this is really about studying, does 2 electrification make a difference in the air quality 3 in that region? If it doesn't and it could come out 4 where electric won't make a difference, then it's -we don't have to, you know, address any of those 5 other issues of doing those analyses and that 6 further -- that further study. 7 So this is really just that beginning 8 analysis step, and even where you could -- you know, 9 10 as you're talking about some of those 11 back-of-the-envelope -- well, this is the beginning 12 of that. 13 Ο. Okay. Well, but if you can't economically 14 provide electricity to the wells, the air quality 15 really doesn't matter, does it? 16 Α. If you -- well, I don't -- I wouldn't say 17 you can't economic -- I want to say that you can't do 18 that. Basically, I --19 Well, what's your basis for that? Because 20 Rocky Mountain Power --21 Α. T --22 -- has told us in data responses that Ο. 23 they've done no analysis of that.
  - A. That's what I'm saying. I couldn't say yes or no either way.

24

- Q. Okay. So we don't know if it's economically possible to provide --
  - A. Right. If you were asking me to hypothesize about something that I don't -- you know, we have -- that hasn't been done. And before -- and that's a pretty, pretty extensive analysis. But before you do that, what we want to do is do this study to make -- to make the determination it may -- it's relevant to do.
  - Q. Okay. And you haven't even tried at any high level to even get a ballpark of what that would look like?
    - A. I -- I have not.
  - Q. Okay. And Rocky Mountain Power hasn't either, that you're aware of?
    - A. That I'm aware of -- not that I'm aware of.
  - Q. Okay.

- A. I know that there's some broader evaluations for electrification, but there's so many -- so many assumptions and factors that go into -- so when you look at some of these broader things, it may -- unless your -- you really got to do it detailed, very specific to have it be relevant.
  - Q. Within the study, at least as I understand it -- and correct me if I'm wrong -- part of the

1 study would review the -- or provide analysis of the 2 distribution of costs between the oil and gas 3 industry and Rocky Mountain Power. How would you suggest that that can be done 4 without any information on the costs of providing 5 6 that electric service? So some of the analysis of the proposed 7 Α. study would look at that. Is that what you're -- I'm 8 9 sorry. I'm trying to --10 That's what Rocky Mountain Power told Ο. Yes. 11 us in a data response, and I'm curious how -- how you 12 would suggest that that's going to happen without 13 some information on the costs of providing the 14 electric service. I don't know how you analyze the 15 distribution of costs without knowing what the costs 16 are. 17 MS. WEGENER: I quess --Well, you'd have to --18 THE WITNESS: Can I -- can I object to the 19 MS. WEGENER: 20 general reference to our data responses? If you're 21 going to point Mr. Campbell to a specific data 22 response, that's fine, but just saying that that's 23 what Rocky Mountain Power provided in the data 24 response isn't --

No, this is Data Response 15.3,

MR. JETTER:

1 and it's about midway through the responsive 2 paragraph. 3 MS. WEGENER: And additionally -- sorry. 4 Excuse me -- Mr. Campbell was not necessarily 5 involved in preparing these data responses and may not have the information about them completely -- he 6 adopted the comments and not the data responses. 7 I would object to questions assuming that he has 8 9 knowledge on the data responses as well. 10 MR. JETTER: Okay. I -- maybe I'll ask --MR. HAMMER: 11 Mr. Jetter, you're certainly 12 allowed to ask about the data request responses. 13 But, Mr. Campbell, to the extent you don't 14 know the answer, of course, you should answer 15 truthfully. 16 So the objection is overruled. 17 THE WITNESS: So I don't know the -- I don't 18 know the answer. 19 BY MR. JETTER: 20 Maybe I'm going to change gears to a Ο. Okay. little bit of a different couple of questions. 21 22 When you discuss the potential benefits of 23 this study and potentially even the benefits of the 24 electrification of these oil and gas wells, those 25 benefits are primarily air quality benefits for the

Uintah Basin; is that right?

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- A. For our customers?
- Q. For -- I guess it would be residents of the Uintah Basin, which are largely -- some customers of Rocky Mountain Power, as I understand it, and some of Moon Lake and --
- Yeah. I would say the benefits -- there's Α. kind of -- I'd call it three -- three layers of There's -- there's -- there's the air benefits. quality benefits. There is some, also, direct economic benefits for our oil and gas customers. There's some other benefits -- economic benefits as well for our Uintah Basin customers, like in the Vernal area, because their economy is creek dependent, but then there's also -- for all of our customers, I think having more familiarity and experience working with electrification in general and seeing where some of these -- these -- by electrifying to eliminate -- or improve air quality benefit, we're going to be posed to do that more and more as a society. I think if you look at just the current administration, just the current trends that are happening.

So the more exposure and experience we get working on that does have a -- an additional benefit.

Obviously, it's not as direct as some of the direct benefits of air quality in the basin, but there's still some tangential benefit to the Company of just getting experience working on that.

Q. Okay. And so those are -- you know, we're talking about air quality and potentially job creation benefits.

None of those benefits you mentioned are customer utility rate benefits, are they? They don't -- they don't -- there's no projection that utility rate customers will see lower rates as a result of this?

A. No. No. The -- these are benefits that are basically in the interest of our -- of our customers and under the STEP statute. That's really what we're talking about, under innovative utility programs, is whether or not these types of programs are in the interest of our customers.

And actually, if you look at -- in the statute where they talk about whether the types of programs that the legislature, you know, directed or at least authorized us to work on, those include -- if you look in there, there's economic development. That's a -- that's the type of project. And -- and then there's also -- you know, they talk about solar

generation, but they also -- battery storage. But. there's also a program to curtail emissions in 3 non-attainment areas.

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So those are the types of programs the legislature intended for the utility to work on under the innovative utility program section. And so this Uintah Basin Study is consistent with both an economic development, and it's consistent with both a air quality project and a non-attainment area.

- Okay. And I think that I understand that Ο. these are -- right -- these are -- these are sort of general benefits to the public at large --
- Α. Correct. Yeah, this is in our customers' interest.
  - Ο. And the public at large happens to include some of your customers?
  - Α. Yes. If -- yes. Our customers in Vernal, in particular, which is the largest community in the area, we -- we -- a lot of our -- that's most of our customers in there, and they are -- it is definitely in their interest, this project, definitely.
  - Because of the economic job creation Ο. benefits?
  - Α. The combination of the economic development --

1 Q. Okay.

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- A. -- and the emissions and address -- a program to help address the emissions in a non-attainment area.
- Q. Okay. And just to make sure it's clear on the record, the emissions problems in the non-attainment area are not the result of Rocky Mountain Power's emissions. These are a result of oil and gas fields and other source emissions?
- A. Well, that's what I think we want to -- that's what the study would evaluate.
- Q. Okay. But there -- Rocky Mountain Power doesn't have a generation --
  - A. I --
  - Q. -- facility in the basin, does it?
- 16 Rocky Mountain Power does not, but there is Α. 17 a question about, you know, transport of NOx and 18 ozone and all that kind of stuff, and -- which is 19 part -- part of the basis of the study is to evaluate 20 what is the source of the air quality challenges in 21 the basin. And -- and the good doctor -- the good 22 professor could probably get into that a little bit 23 more than I can, but yeah. But we'll -- but we don't 24 know, and that's one of the reasons why we want to do 25 the study.

1 Q. Okay.

- A. But -- but you're correct. We -- Rocky
  Mountain Power does not have a generation facility in
  the Uintah Basin.
- Q. And it's -- Rocky Mountain Power is not at risk of environmental rules in the Uintah Basin causing it to have to shut down a generator or discontinue service or change -- change its own service; is that right?
- A. Not that I'm aware of, but you can kind of go down this whole path of how you do environmental regulations. And if there is, there could be down the road. If our other -- if it's determined that our other facilities are impacting these -- the area, then there could be an impact on our facilities, but I'm not aware of it right now. But there is that potential.
- Q. Okay. I'm going to ask you just a few questions about Moon Lake Electric.

It's -- is it accurate that Moon Lake

Electric is another electric utility that serves a

large portion, geographically, of the Uintah Basin?

- A. Yes.
- Q. And are you familiar with or were you involved in any of the conversations that occurred

- between Rocky Mountain Power and Moon Lake Electric
  about this study?
  - A. I -- I was not involved in any of that.
  - Q. Okay. Do you have any knowledge of whether Moon Lake Electric has either the ability or the interest to build facilities out to serve the oil pumps that are in Moon Lake Electric's service territory?
  - A. I -- I don't know. I wasn't involved -- I wasn't involved in that. I do know that there was -- there was a meeting with -- with Moon Lake Electric, and they did not oppose this project.
  - Q. Okay. And that -- that would have happened sometime between when the Division asked you about that in DPU Data Request 15.5 --
    - A. I believe that's correct. I believe --
- 17 | Q. -- and your --

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- 18 A. -- that was that. I believe that was 19 accurate.
- Q. Okay. So all we know at this point is the other electric service provider doesn't oppose this study?
  - A. That -- that's -- that's my understanding.
  - Q. Okay.
- Those are all of the questions that I have

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Thank you for your time.
 1
     for you this morning.
                                                        Ι
 2
     appreciate it.
 3
              MR. HAMMER:
                            Mr. Moore?
 4
              MR. MOORE:
                           Just a few questions.
 5
 6
                       CROSS-EXAMINATION
     BY MR. MOORE:
 7
              Hello, Mr. Campbell.
 8
         Ο.
              Good morning.
 9
         Α.
10
              I would like you -- direct your attention to
         Ο.
11
     the section of your reply comments that is the
12
     purpose of the Uintah Basin project. On page 2 under
13
     the heading "Purpose of the Study," could you please
14
     read the last and concluding paragraph of that
15
     section into the record starting with there has --
16
     "There are now supportable"?
17
         Α.
              Okay. What -- what -- I didn't get the
18
     first part. I apologize. I had difficulty hearing
19
           What --
     you.
20
              I'm sorry. Let me ask it again.
         Q.
21
              I'm just directing your attention to page 2,
22
     under the heading Purpose of the Project or Project's
23
     Purpose.
24
         Α.
              Okay.
25
              There are three paragraphs. Could you
         Ο.
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1 please read the last paragraph into the record 2 starting with "There are now supportable indications 3 that NOx emissions have become a controlling factor." 4 Α. Yeah, I would defer the specifics to the project to the professor who's here and Dr. Mansfield 5 6 who can address that directly. I don't have his right -- I'd have to pull it up. I don't have it 7 right in front of me. 8 9 Well, this is a portion of the comments I'm 10 asking you to quote that you adopted of your -- from 11 your --12 No, I -- no, I understand. If you'll Α. 13 allow -- I don't have it memorized. I've got to pull 14 it up. I apologize. 15 Yes. Would you -- would you please read it? Ο. 16 Thank you. 17 Α. And that was in the --18 No, that was --Ο. 19 -- Appendix A, I'm assuming, in the --Α. 20 No, no, no. I'm talking about your actual Q. 21 comments on page 2. 22 The -- not the reply comments, but what Α. 23 we --

No, you only have reply comments.

I'm

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0.

sorry.

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1
              Oh, okay.
         Α.
 2
              I should --
         Q.
 3
         Α.
              Sorry.
                      That's what --
 4
                    (Simultaneous speaking.)
     BY MR. MOORE:
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 6
              I apologize.
         Q.
                     No, I -- okay. I've got them.
 7
         Α.
              Yeah.
                                                       Ι
     apologize for the delay there.
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 9
              Could you read the last paragraph in the --
10
     under the heading Project's Purpose starting with
11
     "There are now supportable indications"?
12
         Α.
              And what -- I'm sorry. What page was that
13
     on again?
14
         Ο.
              Page 2.
15
              Oh, okay. All right. The last -- so the
         Α.
16
     last paragraph before the response to OCS comments?
17
         Ο.
              I believe so, yes.
18
              Okay. Yes, it says:
19
         "There are now supportable indications that
20
         NOx emissions have become a controlling
21
         factor after years of reducing VOC emissions.
22
         Indications of a change from VOC control to
23
         NOx control should be examined to see if they
24
         prove to be true, to what degree the NOx
25
         control theory is true, why it might be true,
```

and if NOx emissions reductions will be 1 2 effective and plausible going forward. 3 the study's working hypothesis is confirmed, 4 results will change both the focus and efficacy of ozone reduction and regulatory 5 efforts in the basin." 6 Thank you. 7 O. Could you turn to page 4 of your reply 8 9 comments? The last paragraph, second -- second 10 sentence, you state: "Electrification could effect more pollutants 11 12 than NOx. In particular, could play -- it 13 could play an important role in further 14 reducing VOCs emissions." 15 Did I read that correctly? 16 You said on page 4? Α. 17 O. Page 4. Your reply comments. Tell me when 18 you're there. 19 Α. Yeah, I'm on page 4. 20 On the last paragraph? I'm just going to Ο. 21 read it to you. 22 Yeah, okay. "Additionally, OCS's Α. Oh, okay. 23 comments imply that feasibility of electrification is 24 only" -- okay. Go. I'm in -- I'm there. 25 Ο. Okay. Electric -- you state:

"Electrification could affect more pollutants 1 2 In particular, it could play an than NOx. 3 important role in further reducing VOCs 4 emissions." Is that correct? Did I read that correctly? 5 6 Α. Yeah. This role of electric -- the role of 7 Ο. electrification to reduce VOCs emissions -- not part 8 9 of the paragraph -- is the purpose of the study that 10 you read into the record; is that correct? 11 Α. It's not the -- your question is that VOCs 12 are not part of the original study? 13 Ο. I'm asking the -- well, no, I'm asking 14 whether it's part of the purpose of the study that you just read. 15 16 Α. About VOC emissions? About NOx emissions, where you said now 17 Ο. 18 there's supportable indications that NOx emissions 19 have become a controlling factor after years of 20 reducing VOCs emissions. That paragraph that you 21 just read is -- states the purpose of the study. 22

And my question is, did the role in electrification to reduce VOC -- to reduce VOCs emissions, that's not part of the paragraph of the purpose of the study that has been read into the

23

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- 1 | record; isn't that true?
- A. Yeah. I'd have to defer to the professor who's going to do the study on -- on that.
  - Q. Again --

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- A. I don't --
  - Q. Again, I'm quoting from your comments that are -- you test -- that you've put into the record. So you must have some understanding of what the purpose of the study is since you adopted comments that discuss the purpose of the study.
  - A. Maybe I'm confusing what -- because you -- are you -- you're saying NOx, and then you're calling it VOC. Are you referring --
    - Q. No, I might -- I --
  - A. -- to VOCs? Because that's not a term of art. There's no such this thing as "a VOC." They're referred to as "V-O-C."
- 18 0. Okay.
- A. So that's why I was getting confused. I apologize. I just didn't know what you were talking about.
- Q. I apologize. That's my fault. So let's try
  it one more time.
  - This role in electrification to reduce VOC emissions is not part of the paragraph of the purpose

- of the study that's been read into the record; isn't that correct?
  - A. It -- well, there -- it does talk about VOCs.
  - Q. But is it part of the purpose of the study that you just read into the record?
  - A. Of the purpose of the study? It -- I'd say it's a side benefit.
    - O. Right.

- A. I -- it's -- and what I read into the record did include the reference to VOCs and reducing VOC emissions.
- Q. Well, that's after years of reducing VOC emissions, so that's not -- that's referring to past attempts to reduce ozone by reducing VOC levels.

  Is -- that part of the quote is not related to the purpose of the study?
- A. Yeah. I mean, I think there's a lot of -yeah, there's -- it's an additional benefit of the
  study.

And, again, I'd like to defer to

Professor Mansfield on the specifics of the study

since he's the one who's doing the study. But -- and

what I read into the record, the paragraph you had me

read into the record, did refer to VOC emissions.

The only -- the only reference to VOC 1 Ο. 2 emissions comes in the following sentence: 3 "There are now supportable indications that 4 NOx emissions have become a controlling factor after years of reducing VOC 5 6 emissions." Isn't that the only place in the paragraph 7 on the purpose of the study that you read into the 8 9 record that mentions VOC emissions? 10 Α. Yes, that's what -- that mentions VOC 11 emissions, what I read into the record, yes. 12 Ο. Well, I -- I think your testimony speaks for 13 itself. 14 In fact, the VOC emissions have been reduced, but how VOC emissions are reduced by 15 16 electrification was not included as part of the 17 purpose and the goal of the Uintah Basin Study, which 18 was filed with your application; isn't that correct? 19 I don't think you can -- I mean, you're Α. 20 talking about -- these emissions don't happen in 21 isolation. They're connected. 22 But, again, you have a section in the Ο. Yes. 23 comments that comes under the topic of purpose of the 24 study.

Uh-huh.

Α.

1 And I'm just asking, is it the general O. 2 purpose of the -- goal or the purpose of the Uintah 3 Basin Study that -- to reduce VOC emissions? 4 Α. The purpose of the study is related to ozone reduction because that's the non-attainment status, 5 and what contributes to ozone is both this NOx 6 emissions and VOC emissions. But there's a -- highly 7 complicated chemical reactions and dynamics that's 8 9 going on that the professor can talk -- that's 10 definitely more qualified to talk about than myself, 11 but they're -- but they're related because those 12 are -- these are all emissions and byproducts of 13 fossil fuel combustion. So these are -- they're 14 related. 15 I didn't ask you if they were related. Ο. 16 MR. MOORE: I'm going to -- I'm going to 17 finish this off, Mr. Hammer. 18 BY MR. MOORE: 19 I didn't ask you if they were related. Ο. 20 Α. Okay. 21 I asked, is reduced VOC emissions part of Ο. 22 the purpose of the statute as you set out in your 23 comments?

801-746-5080

Do you want me to rule on your

MR. HAMMER:

motion to strike, Mr. Moore?

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1 MR. MOORE: I won't make a motion to strike 2 If he continues, I will. now. 3 THE WITNESS: So the question is VO- -- are 4 VOCs the purpose of the study? BY MR. MOORE: 5 6 Q. Is --Is the reduction of VOCs the purpose of the 7 Α. 8 study? 9 Ο. Yes. 10 I think it -- they're related. So it is Α. 11 part of the purpose, but it's a secondary benefit. 12 But the primary -- and, again, I'll -- you know, the 13 professor can talk to it, but primary is related to 14 the -- these NOx control -- you know, NOx is the 15 primary controlling factor. 16 Ο. Isn't the study meant to determine whether 17 it -- whether the controlling factor in the Uintah 18 Basin for ozone pollution is NOx emissions and not 19 VOC emissions as previously assumed? 20 Α. I think -- I think so. 21 Ο. Okay. 22 I think that --Α. 23 I don't want to cut you off. I'm sorry. 0. 24 Α. Oh, no, no. I -- I -- I apologize. I was 25 just having difficulty, and it could be the -- the

1 microphone or the speaker on my phone. I'm having 2 difficulty hearing you, so I apologize. 3 Ο. Oh, I apologize. I'll see if I can speak 4 louder and more clearly. I think we got your answer. 5 I -- I want to move on to a specific statement you made on page 4 of your reply comments. 6 7 Α. Okay. You stated: 8 Ο. 9 "VOCs emissions from tanks are often 10 controlled with flares, which reduces 11 emission to about 5 percent of the potential 12 tank emissions. Using electricity to control 13 the emissions would increase the efficiency 14 by twentyfold, reducing the emissions to only 15 .25 percent of the potential tank emissions." 16 Did I read that correctly? 17 Α. Yes. 18 It's true, then, isn't it, that only 19 5 percent of the VOCs emissions remain after flaring? Yes. 20 Α. And that means electric could not be helpful 21 Ο. 22 to remove -- would only be helpful to remove a 23 portion of the remaining 5 percent of the VOC; isn't 24 that correct?

That what -- I -- what would be?

25

Α.

O. Electrification.

A. Okay. Electrification.

If there's flaring. Well, the -- for VOCs, correct, but VOCs have a big -- a bigger -- have a big impact. But I'll -- again, I'll defer to the professor in chemistry. But, yes, there would be 5 percent left.

- Q. Finally, these percentages on VOC emissions that I just mentioned, they do not appear in the application or anywhere in the record before they appeared in your reply comments; isn't that correct?
  - A. I believe that is correct.
- Q. All right. Thank you, Mr. Campbell. I have no further questions.

MR. HAMMER: Before we go to redirect from Ms. Wegener, I'll just apologize. I've had a few network issues. I don't know if you-all noticed me popping in and out of the call. I think I've heard everything. I think I'm still hearing all of the testimony, so don't be concerned about that. We should be getting it all on the record. If it continues to be a problem, I may have to dial in, and you'll just hear my voice.

With that, please go ahead, Ms. Wegener.

MS. WEGENER: Thank you.

## REDIRECT EXAMINATION

## 2 BY MS. WEGENER:

1

- Q. I just have a few questions, Mr. Campbell.
- When Mr. Jetter was asking you about
- 5 "impossible or unlikely to become reality" programs,
- 6 | would you characterize the electrification of the
- 7 | Uintah Basin oil and gas wells as something that is
- 8 | impossible or unlikely to become reality?
- 9 A. I would not characterize electrification of
- 10 | oil wells -- oil and gas wells in the Uintah Basin as
- 11 | unlike -- improbable, or I would not characterize it
- 12 | like that.
- Q. Do you know whether the Company currently
- 14 | provides electric service to oil and gas sites within
- 15 | the Uintah Basin?
- 16 A. I think there might be some, but I'm not
- 17 | too -- I'm not aware. I think there might be. I
- 18 | know we do provide electric service to oil and gas
- 19 | wells in other areas.
- 20 Q. Would -- would you agree with me that if --
- 21 | if there is electric service to oil and gas wells
- 22 | within the Uintah Basin and in other places, that
- 23 | that would indicate that at least in some
- 24 | circumstances, it's economic to provide electricity
- 25 or to electrify oil and gas well sites?

I -- it -- electrification can be 1 Α. Yes. 2 economic to provide that for oil and gas wells. 3 It -- it can be, definitely. 4 Ο. And Mr. Jetter asked you questions about analysis that the Company's performed concerning 5 electrification of the basin. 6 Are you familiar with all of the 7 electrification analysis performed by the Company? 8 9 I am not aware of all of it. Α. And then, finally, Mr. Jetter talked to you 10 Ο. 11 about the STEP statute and benefits to customers. 12 Is it your understanding of the STEP statute 13 that programs need to benefit customers as ratepayers 14 or -- well, yeah, just that. Is that your understanding, that it must benefit them as 15 16 ratepayers? 17 Α. No. That -- that is not my under -- my 18 understanding. My understanding of the statute is 19 that these innovative utility programs just need --20 the Commission just needs to determine that they're 21 in the interest of Rocky Mountain Power customers, 22 not that -- not as the traditional ratepayer, but 23 just the kind of general interest.

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     would satisfy the statute?
 2
                    Yes, that is my understanding, and
              Yes.
 3
     that is consistent with hearings -- public hearings
 4
     with the legislature and -- yes, that is my
 5
     understanding.
              MS. WEGENER:
                             Thank you. I have no further
 6
     questions for Mr. Campbell.
 7
 8
              MR. HAMMER:
                            I have nothing for you,
 9
     Mr. Campbell. Thank you.
10
              Ms. Wegener, would you like to call your
11
     next witness?
12
                                   The Company calls --
              MS. WEGENER:
                             Yes.
13
              MR. JETTER:
                            May I --
14
              MS. WEGENER: -- Dr. Mansfield.
15
                            Would you like to do recross,
              MR. HAMMER:
16
     Mr. Jetter?
17
              MR. JETTER:
                            I would, yes.
18
              MR. HAMMER:
                            All right.
                                        Go ahead.
19
              MR. JETTER:
                            Thank you. I'll try to keep it
20
     brief.
21
22
                     RECROSS-EXAMINATION
23
     BY MR. JETTER:
24
         Ο.
              You were asked on redirect about an
25
     inference that because there are existing electrified
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wells, maybe ten on the Rocky Mountain Power system in that area, that it would -- that must mean that it's economical to do so.

Do you have any knowledge of those wells or the economics of those wells?

- A. No. No, I don't. I -- what I was -- my indication that it can be economic. I think it would have to obviously be so -- it's site specific. But as a general rule, technology electrification can be economic for -- to support oil and gas wells. That was what I was trying to say.
- Q. Okay. And -- but Rocky Mountain Power didn't reach out to even the existing customers? It hasn't asked them about that?
  - A. I -- I did not.
- 16 0. Okay.

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- A. I'm not aware of.
- Q. And then, with -- quickly, with respect to the benefit as ratepayers, would you say as a policy, it's appropriate for customers of the electric utility to pay higher rates to create jobs in the community?
  - A. I think the legislature created the STEP Act to allow -- to encourage the utility to work on innovative utility programs to look at a whole host

1 of types of technology program that will benefit our 2 customers and -- in their general interests, and so I 3 think that's appropriate. 4 Ο. Okay. So --Α. 5 It's appropriate for --6 So you do think in some situations, it's Q. appropriate for utility ratepayers to pay higher 7 rates to create jobs in the community, generally? 8 9 As part of the STEP Act, I think it's Α. 10 appropriate. 11 Okay. Thank you. That's all MR. JETTER: 12 of my recross. 13 MR. HAMMER: Mr. Moore, do you want an 14 opportunity to ask any additional questions? 15 MR. MOORE: No, Mr. Hammer. Thank you very 16 much. 17 MR. HAMMER: All right. We'll go back to you, Ms. Wegener. 18 19 MS. WEGENER: Thank you. The Company calls 20 Dr. Marc Mansfield. 21 Dr. Mansfield, do you swear to MR. HAMMER: 22 tell the truth? 23 Is Dr. Mansfield on the line? 24 MS. WEGENER: Let me check. 25 DR. MANSFIELD: I'm sorry. It took me Yes.

1	a minute to unmute.
2	MR. HAMMER: We all make that mistake.
3	Do you swear to tell the truth,
4	Dr. Mansfield?
5	DR. MANSFIELD: Yes, I do.
6	MR. HAMMER: Thank you. Go ahead.
7	
8	Thereupon
9	MARC MANSFIELD,
10	was called as a witness, and having been first duly
11	sworn to tell the truth, the whole truth, and nothing
12	but the truth, testified as follows:
13	
14	DIRECT EXAMINATION
15	BY MS. WEGENER:
16	Q. Good morning, Dr. Mansfield. Will you
17	please state your name for the record?
18	A. My name is Marc Mansfield. That's M-A-R-C
19	M-A-N-S-F-I-E-L-D.
20	Q. And what is your business address,
21	Dr. Mansfield?
22	A. Bingham Research Center, Utah State
23	University, Uintah Basin, 320 North Aggie Boulevard,
24	Vernal, Utah 84078.
25	Q. By whom are you employed and in what

1 capacity? 2 Α. I'm a research professor in the chemistry 3 and biochemistry department of the Utah State 4 University. Have you ever testified before any Public 5 Service Commission before this? 6 This is my first time. 7 Α. No. Well, welcome. 8 Ο. 9 Did you prepare the research proposal 10 attached as Appendix A to the Company's application entitled "Projecting the Impact of the 11 12 Electrification of the Uintah Basin Oil and Gas 13 Fields on Air Quality, " which was filed on March 3rd, 14 2021? 15 Yes, I did. Α. 16 Do you adopt that Appendix A as your Ο. 17 testimony in this matter? 18 Α. Yes. 19 MS. WEGENER: I move to admit Appendix A 20 into the -- into evidence. 21 MR. HAMMER: It's admitted. 22 (Appendix A was admitted.) 23 BY MS. WEGENER: 24 Ο. Did you also assist with the preparation of 25 the reply comments filed by the Company filed on

April 23rd, 2021, which were admitted earlier in this proceeding?

A. Yes.

- Q. And have you prepared a summary of your research proposal and a portion of the comments that you would like to share with the Commission?
  - A. Yes.
  - Q. Please proceed.
- A. Good morning, Mr. Hammer, counsel, and parties. I appreciate this opportunity to address.

I am a research professor and scientist at Utah State University and the author of the research proposal that is attached to the Company's March 3rd, 2021 application entitled "Projecting the Impact of the Electrification of the Uintah Basin Oil and Gas Fields on Air Quality." The purpose of my testimony is to explain the scope of the study and the impact it could have on the electrification of the Uintah Basin.

I have an extensive background researching and modeling ozone in the Uintah Basin. I have worked on many projects and published many papers and reports on ozone and its relationship to the oil and gas industry. I live and work in the Uintah Basin, which means I have both a professional and a personal

interest in improving air quality in the basin, all the while supporting the most important industry in the basin to the -- most important industry to the basin economy, the oil and gas -- oil and natural gas industry.

Over the past decade, USU has worked in partnership with the oil and gas industry, the Ute Tribe, and state and federal regulators to attack the ozone problem. Since 2010, we have seen a general decline in ozone levels for various reasons. However, the basin is currently designated as non-attainment for ozone, and it appears very likely that the designation -- in fact, not very likely. It seems mathe- -- mathematic -- a mathematical certainty that the designation will be bumped up to the next level with more stringent controls in the coming years. The study was designed as an important next step to make sure the controls are targeted as effectively as possible to reduce ozone in the basin.

The study will test the following
hypotheses: whether the reduction of nitrogen
oxides, also known as NOx, or volatile organic
compounds, also known as VOCs, will lead to greater
ozone reductions in the Uintah Basin area of Utah;
two, whether electrification of oil and gas fields in

the basin will permit significant long-lasting reductions in winter ozone -- in winter ozone levels; three, whether the benefits of electricity can offset other NOx emissions, such as drilling; and four, whether electrification can provide an additional option that allows the oil and gas industry to continue successfully operating in the basin.

I'm prepared to answer any questions from the Division of Public Utilities, the Office of Consumer Services, or the Commission about how the research fits into the broader area of research in the basin as well as costs and performance of the study. I can also answer questions about the effects of the Office's recommendations on the research study.

The Office has stated that the Uintah Basin Study is very promising, and they support providing STEP funds -- excuse me -- providing STEP funds for the study subject to two recommended conditions: a phased funding approach and reduction to the funding level. The Division recommends the Commission reject the study and raises concerns about the limited focus of the study and the overall value of the study. As someone who has conducted and participated in most of the air quality studies that have taken place in the

basin, I can assure the Commission that this study will provide valuable information that builds upon and supplements other past studies on Uintah Basin pollution.

The study has a discrete focus on NOx as the -- as the controlling pollutant and the relationship of electrification to reducing NOx emissions. No study like this has been completed, and the findings of the study will add valuable data to the body of research on the basin and on air quality and on ozone, in general. The Uintah Basin Study on its own will provide the Company with solid evidence to inform further pursuit of electricity in the basin.

The Office's recommendation for a phased funding approach would pose challenges to both the research design and the timeline we have proposed for the study. First, dividing the study into two phases would require USU to reorder and divide its goals, which would be especially difficult considering the timing constraints of the funding. This would significantly and unnecessarily increase the amount of work for the study. For example, it would require twice as many modeling runs. In addition, several of the goals for the study are integrated, and knowledge

gained from one goal will inform and improve other goals.

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The increased work caused by phasing the research would also lead to increased costs. The indirect costs are typically included in research study budgets. The study and budget have been designed and reviewed by professionals at Utah State University, USU, a state-owned, nonprofit research university. The USU Sponsored Programs Office has verified that the proposal meets all necessary professional research criteria and addresses all required legal and ethical compliance issues, including compliance with Title 2 of the Code of Federal Regulations which governs USU's administration of grants. All overhead and indirect costs are set by the Sponsored Programs Office and align with standard rates accepted by government and private funding sources.

I'm happy to answer your technical questions about the study. My colleague, Robert Hammer, who is also contributing to this study, is also available to answer questions within his technical expertise, which includes operations of the oil and gas industry and use of electricity for oil and gas industry equipment in the basin. Thank you for your

1 This concludes my summary. attention. 2 Thank you, Dr. Mansfield. MS. WEGENER: 3 I have no further questions for this 4 witness, and he is available for cross-examination 5 and any questions from the hearing officer. 6 MR. HAMMER: Mr. Jetter? 7 8 CROSS-EXAMINATION 9 BY MR. JETTER: 10 Ο. Hi. Good morning, Mr. Mansfield. 11 Morning. Α. 12 I have a few questions I'd just like to run Ο. 13 through with you briefly. 14 Is it accurate that part of this study will 15 evaluate the economics and the economic impact of the 16 conversion of the pumps to electric -- electric 17 pumping motors? 18 That is correct. We've written that into 19 the proposal, but the intention is for it to be a 20 high-level study. 21 Okay. And you don't have any information on Ο. 22 the cost of converting a typical well to electric, do 23 you? 24 Α. No, I do not. Okay. And you don't have any information 25 Ο.

1 from Rocky Mountain Power on the costs or timeline of 2 extending electric service to serve the wells, do 3 you? 4 Α. No. And how do you -- do you intend to 5 Ο. Okav. research those as part of your study, or how do you 6 plan on doing an economic analysis without those --7 without the costs? 8 I quess the best way to answer that is that 9 10 that's one of the things we intend to study as the 11 study proceeds. Mr. Robert Hammer, who we've already 12 referred to, S- -- his organization, SLR, would be 13 hitting up that part of the study, and so he may be 14 better able to answer that particular question. 15 O. Okay. Thank you. 16 MR. JETTER: Those are the only questions I 17 have. Thank you for your time. 18 MR. HAMMER: Mr. Moore? 19 MR. MOORE: The Office has no questions. 20 Thank you. MR. HAMMER: 21 And I have none. Thank you, 22 Dr. Mansfield. 23 THE WITNESS: Thank you. 24 MR. HAMMER: Ms. Wegener? I have nothing further for 25 MS. WEGENER:

1 Dr. Mansfield. And unless any -- anyone has 2 questions for Mr. Hammer, the Company concludes its 3 presentation of this case. 4 MR. HAMMER: So if I understand you correctly, the Company does not wish to affirmatively 5 6 call Mr. Hammer as a direct witness, but will make him available to questions? 7 Exactly. Yes. 8 MS. WEGENER: Mr. Jetter, would you like to 9 MR. HAMMER: 10 ask any questions of Mr. Hammer? 11 MR. JETTER: No, I don't need to. Thank 12 you. 13 MR. HAMMER: Mr. Moore? 14 MR. MOORE: No questions. Thank you. 15 MR. HAMMER: Okay. And I don't have any. 16 And for the record and as far as you're 17 curious, I don't believe me and Mr. Hammer are 18 related or have ever met. 19 So there's nothing else from you, 20 Ms. Wegener? 21 No, nothing else from me. MS. WEGENER: 22 MR. HAMMER: Mr. Jetter? 23 MR. JETTER: Thank you. The Division would 24 like to call and have sworn in Bob Davis, or Robert 25 A. Davis. Excuse me.

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MR. HAMMER:
 1
                            Mr. Davis, do you swear to tell
 2
     the truth?
 3
              THE WITNESS:
                             T do.
 4
 5
     Thereupon --
 6
                        ROBERT A. DAVIS,
     was called as a witness, and having been first duly
 7
     sworn to tell the truth, the whole truth, and nothing
 8
 9
     but the truth, testified as follows:
10
11
                       DIRECT EXAMINATION
12
     BY MR. JETTER:
13
              Mr. Davis, would you please state your name
14
     and occupation for the record?
                    It's Robert A. Davis, and I am a
15
         Α.
              Yes.
16
     utility technical consultant for the Division of
17
     Public Utilities.
18
              Thank you.
         Ο.
19
                            And I'm going to take a brief
              MR. JETTER:
20
     pause from questioning Mr. Davis just to let
21
     Dr. Mansfield know that your microphone is still on,
22
     and I just didn't want you to have an accidental
23
            And, also, just on the record, to apologize to
24
     Dr. Mansfield for not addressing him correctly in my
25
     cross-examination questions.
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## BY MR. JETTER: O. Mr. D

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- Q. Mr. Davis, did you create and cause to be filed with the Commission comments from the Division dated November -- excuse me -- April 16th, 2021?
  - A. Yes, that's correct.
- Q. And do you have any corrections or changes you'd like to make to those?
- A. Just one. On page 4, paragraph 2, I commented that both statute 54-20-105 and 54-20-107 requires the Commission to determine that the proposal is in the interest of the large-scale utilities customers. Statute 54-20-107 states if the Commission determines that the program is cost-effective and in the public interest.
- Q. Thank you. With that correction, would you adopt your comments as your testimony today?
- 17 A. Yes.
- Q. And have you prepared a summary of your testimony or your --
- 20 A. I have.
- 21 Q. -- comments about that testimony?
- 22 A. I have.
- 23 O. Please go ahead.
- 24 A. Good morning, Mr. Hammer.
- 25 RMP's application seeks STEP funds to study

the potential for air quality improvement through electrification of pump jacks located throughout the Uintah Basin. Utah State University and the SLR International Corporation team plan to research and report the possible air quality benefits and economics to the oil and gas industry of converting the pump jack power sources from the current use of primarily natural gas to electricity.

The Division agrees that mitigation of pollution is important and in the broad public interest. However, the Division statutory objectives articulate a narrower public interest that requires a weighing of the variety of factors, not merely whether some action may have a general social benefit. The proposed project comes with costs, and those costs should not outweigh the benefits to those who are paying for those costs.

In this case, the proposed costs come with no sufficiently concrete benefit to those paying the costs. While research is always speculative, the dearth of information about what might be done with the study's results and what those actions cost and benefits might be renders the Division unable to advocate that the study is in the public interest. As it stands, the proposal is to spend money to

determine a narrow scientific question that might have some application to utilities' business if the results are as expected and if a variety of external conditions or decisions occur as a result of the findings.

Air quality and studies concerning it are important, but they are not primarily the ratepayers' responsibility. RMP's application has speculated potential benefits that electricity might facilitate to reduce emissions of NOx and volatile organic compounds, or VOCs, that contribute to high ozone events in the Utah Basin area. In addition to the four key research questions purported in Rocky Mountain Power's application, the researchers propose to study the economics and obtain quantitative estimates of the potential air quality improvement from electrification of wells and surrounding equipment in the oil and gas fields located in the Uintah Basin.

The Division's review of the application found insufficient evidence of a direct or reasonably anticipated benefit to Rocky Mountain Power ratepayers. Rocky Mountain Power presented no evidence regarding the feasibility of electrifying the area in the event potential benefits materialize,

which is perhaps the most significant economic question for the Commission to consider.

Rocky Mountain made no evaluation of the extent to which other participants and beneficiaries, including Moon Lake, might benefit or contribute to the project or any future action stemming from the project. Clearly, the potential reduction of NOx or VOCs is evident and important, but without studying the feasibility of electrification, the cost benefit equation is empty. Furthermore, the lack of sufficient nexus between RMP's activities and the much broader dispersion of benefits, if they eventually materialize, suggest the program is more appropriately funded through sources other than Rocky Mountain's captive ratepayers.

Rocky Mountain's application may not be in the interest of its ratepayers, even if the study is successful in identifying ways electricity can facilitate reduction in the NOx or VOC emissions contributing to high ozone events in the Uintah Basin area. The nexus between the hope for air quality benefits and utility shareholders and ratepayers is not explained well enough to garner the Division's support, especially given the near total deficiency of information on what it would actually take to

1 electrify the area and the fact that other potential 2 beneficiaries of improved air quality are not key 3 partners in funding the study. In short, the Division believes the study of the Uintah Basin air 4 quality and electrification benefits is likely 5 6 beneficial, but the application lacks meaningful 7 information to allow assessment of whether any ratepayer benefits are likely to follow. 8

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Contrary to the suggestion in Rocky Mountain Power's reply comments that the Division is demanding thorough and premature economic study of electrification, the Division seeks only a relatively high-level assessment of the nature of the load that might be served and the resources that might be necessary to serve that load. The record contains insufficient information to asses whether electrification is feasible at a reasonable cost regardless of what the findings yield. Division noted, based on a rough estimate of well numbers and loads, the resources needed to serve the additional load could be significant. Rocky Mountain Power has offered no assessment or response, even at a cursory level, to these questions asked in data requests.

To conclude, the Division recommends the

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1
     Public Service Commission of Utah not approve Rocky
 2
     Mountain Power's request for $200,715 of STEP funds
 3
     because it is not in the public interest the Division
 4
     is charged with advocating. Rocky Mountain Power has
     not demonstrated that its Uintah Basin is in the
 5
 6
     interest of its ratepayers under Statute 54-20-105
     nor the public interest requirement under
 7
     Statute 54-20-107.
 8
 9
              This concludes my summary.
                                          Thank you.
10
         Ο.
              Thank you, Mr. Davis.
                           I'd like to move -- because I
11
              MR. JETTER:
12
     believe I have not done this, I'd like to move to
13
     enter into the record of the hearing the April 16th,
14
     2021 comments filed by the Division along with the
15
     attached Appendix A, which includes the data request
16
     responses.
17
              MR. HAMMER:
                           They're admitted.
                   (April 16, 2021 DPU Comments with
18
19
                   attached Appendix A were admitted.)
20
              MR. JETTER:
                           Thank you.
                                        And I have no
21
     further questions for Mr. Davis. He's available for
22
     cross-examination and questions from the hearing
23
     officer.
24
              MR. HAMMER:
                           Ms. Wegener?
25
              MS. WEGENER:
                             Yes.
```

## 1 CROSS-EXAMINATION 2 BY MS. WEGENER: 3 Ο. Good morning, Mr. Davis. 4 Α. Good morning. It is the Division's position that there are 5 Ο. not sufficient benefits to ratepayers to justify this 6 program; is that right? 7 8 Α. That's correct. 9 But you would agree with me that there are a Ο. 10 number of Rocky Mountain Power customers that are 11 served in the Uintah Basin; right? 12 That's correct. Α. 13 You would also agree with me that there's Ο. 14 some -- some oil and gas customers in the Uintah 15 Basin, customers of Rocky Mountain Power, that have 16 already electrified their well sites. Would you agree with that? 17 18 Just -- I would from the reply comments. Ι 19 did not know that in the initial comments. 20 Thank you. Q. Okay. 21 Have you been involved in analyzing other 22 proposed programs under Utah Code Section 23 54-20-105(1)? 24 Α. Yes, I have. 25 Ο. And you're familiar with that statute?

- A. Pretty familiar, yes.
- Q. Would you agree with me that the statute allows for programs to curtail emissions from a thermal generation plant?
  - A. Yes.

- Q. And that's in place even though there are a number of residents specifically along the Wasatch Front who are not Rocky Mountain Power customers; right?
- A. Yeah. I don't know the numbers, but yes, that's correct.
- Q. And those -- those folks who aren't the Company's customers -- they're customers of municipalities -- would still benefit from a curtailment of emissions; isn't that right?
  - A. Yes.
- Q. And the statute also provides for economic development incentives. Is that your understanding?
- MR. JETTER: Can I introduce just a quick objection, and then we can continue? To the extent it calls for a legal conclusion that Mr. Davis has not represented himself as an attorney, and so these are answers that should be, I guess, viewed in that respect.
  - MR. HAMMER: That's sustained.

- Ms. Wegener, feel free to contextualize your 1 2 question by reference to the statute, but Mr. Moore 3 needn't testify about what he thinks it means. 4 BY MS. WEGENER: I quess my question -- and I can't 5 Ο. Okav. remember what my open question was, but it concerned 6 whether one of the programs in the statute that's 7 authorized would be an economic development incentive 8 9 rate. 10 Α. Yes. 11 And would it make sense to you -- and 0. Okav. 12 I understand that you're not a lawyer or a 13 legislator, but would it make sense to you that 14 including programs that incentivize economic 15 development could have been included because the 16 legislature wanted to encourage economic growth 17 through this statute? 18 Yeah, I think that's correct, but it still 19 falls under if it is within the public interest. 20 Thank you. Q. 21 Would you agree that the extent to which 22 electrification reduces emissions, which is one of 23 the goals of this study, could affect whether it is
  - Α. Yes, if all the information is there to make

economical to electrify oil and gas sites?

24

that -- make that decision or make -- or have that 1 2 understanding. 3 Ο. Okay. Thank you. 4 MS. WEGENER: I have no further questions 5 for Mr. Davis. 6 MR. HAMMER: Mr. Moore? No questions from the Office of 7 MR. MOORE: 8 Consumer Services. Thank you. 9 MR. HAMMER: Mr. Jetter? 10 MR. JETTER: I have no redirect. And the 11 Division does not intend to call any other witnesses, 12 so that would be all that we would like to present 13 today. 14 MR. HAMMER: Thank you. 15 Mr. Davis, I have nothing for you. Thank 16 you. 17 THE WITNESS: Thank you. 18 MR. HAMMER: We'll go to you, Mr. Moore. 19 The OSC calls and asks to be MR. MOORE: 20 sworn Bela Vastaq. 21 Mr. Vastag, can you hear me? MR. HAMMER: 22 THE WITNESS: Yes. 23 MR. HAMMER: Do you swear to tell the truth? 24 THE WITNESS: I do. 25 MR. HAMMER: Thank you. Go ahead.

1 2 Thereupon --3 BELA VASTAG, 4 was called as a witness, and having been first duly sworn to tell the truth, the whole truth, and nothing 5 6 but the truth, testified as follows: 7 8 DIRECT EXAMINATION 9 BY MR. MOORE: 10 Mr. Vastag, could you, for the record, state Ο. 11 and spell your name and give your occupation? 12 Α. My name is Bela -- that's B-E-L-A --13 Vastaq, V-A-S-T-A-G. And I am a utility analyst, and 14 I work for the Office of Consumer Services. 15 In your capacity as a utility analyst, have Ο. 16 you reviewed the filings related to the USU Uintah 17 Basin Study in this docket? 18 Α. Yes, I have. 19 Have you prepared and filed comments on Ο. 20 April 16th, 2021, and reply comments on April 23rd, 21 2021, and filed them with the Commission? 22 Α. Yes, I have. 23 Do you have any changes you'd like to make 0. 24 to these comments at this time? 25 Α. No, I have no changes.

1 Do you adopt these comments as your sworn O. 2 testimony today? 3 Α. Yes. 4 Mr. Hammer, at this point, the MR. MOORE: Office would move for the admission of their 5 6 comments, both the April 16 comments and the April 23rd reply comments. 7 They're admitted. 8 MR. HAMMER: 9 (April 16, 2021 OCS Comments and April 10 23, 2021 Reply Comments were admitted.) BY MR. MOORE: 11 12 0. Have you prepared statements summarizing the 13 OCS's position? 14 Α. Yes, I have. 15 Ο. Would you please proceed with the summary. 16 Okay. Good morning, Mr. Hammer and parties Α. 17 here today at today's hearing. First, as an initial 18 matter, the Utah Office of Consumer Service, or OCS, 19 appreciates the Company clarifying that it is not 20 seeking approval for the Uintah Basin Study under 21 Section 107 of the STEP Act. Section 107 requires a 22 showing that a proposed program is cost-effective, 23 and nowhere in its application has RMP provided 24 evidence or even attempted to show that the proposed 25 Uintah Basin Study is cost-effective. Therefore, the

OCS agrees with the Company's clarification at this hearing that this program should be approved only under Section 105 of the STEP Act.

The Office of Consumer Services supports the proposed Uintah Basin Study in this docket if steps are taken to ensure that ratepayer funds are spent wisely and not wasted. Utah State University, who is the sponsor of the Uintah Study funding request, has also requested funding from the Utah Division of Air Quality, or UDAQ, for essentially the same project that is being reviewed here today. And UDAQ limits indirect costs on proposals that it accepts to 10 percent, and this limit should also be used for the proposed Uintah Basin Study in this docket.

USU should only be allowed a 10 percent adder on its portion of the budget and not on the consultant fees which are already based on very high hourly rates. By applying UDAQ's standard for indirect costs, the OCS recommends that the budget for the Uintah proposal be reduced from the requested \$200,715 to 141,197 if it's approved and as we described in detail in our initial comments.

The OCS also recommends that funding for this study, if approved, should be released in two phases. The premise of the Uintah Basin Study is

```
that the ozone pollution problem in the basin is
 1
 2
     primarily caused by nitrogen oxides, or NOx, and not
 3
     by volatile organic compounds, or VOCs. Thus, if the
 4
     NOx hypothesis is true, electrification of
     NOx-producing equipment in the basin could solve or
 5
 6
     at least significantly improve the ozone problem.
     However, if the NOx hypothesis is found to be false,
 7
     there is no need to study the electrification of
 8
 9
     NOx-producing equipment in the basin.
10
              Therefore, if approved, the OCS recommends
11
     funding be released in two phases. The first phase,
12
     to determine if the NOx hypothesis is true.
13
     only if NOx is found to be the ozone-controlling
14
     pollutant, the second phase of funding would be
15
     released to study how electrification could eliminate
16
     the NOx, otherwise the funding held for the second
     phase should be returned to ratepayers.
17
18
     simplicity, OCS recommends half the funding be
19
     released for Phase 1 and half for Phase 2.
20
              That concludes my statement.
21
              MR. MOORE:
                          Thank you.
22
              Mr. Vastag is now available for cross and
23
     questions from the hearing officer.
24
              MR. HAMMER:
                           Ms. Wegener, we'll go to you
     first.
25
```

1	MS. WEGENER: Thank you.
2	
3	CROSS-EXAMINATION
4	BY MS. WEGENER:
5	Q. Good morning, Mr. Vastag.
6	A. Good morning.
7	Q. Have you been involved in analyzing previous
8	applications for STEP funding?
9	A. Yes.
10	Q. And you would agree with me that there's
11	been, I think, subject to check, 18 programs that
12	have been approved for STEP funding since the program
13	was initially opened?
14	A. I don't know the number, but I will trust
15	your estimation.
16	Q. Okay. And isn't it true that some of those
17	programs are research studies that are conducted by
18	universities such as Brigham Young University,
19	University of Utah, and Utah State; right?
20	A. Yeah, I remember that.
21	Q. And isn't it true that those studies that
22	are university conducted by a university also
23	included indirect costs for facilities and
24	administration?
25	A. I don't remember specifically, but, I mean,

1	it is likely that they did include those costs.		
2	MS. WEGENER: Okay. Thank you. That's all		
3	the questions I have.		
4	MR. HAMMER: Mr. Moore?		
5	MR. MOORE: No redirect. The Office rests.		
6	MR. HAMMER: Thank you.		
7	And I have nothing for you, Mr. Vastag.		
8	Thank you for your participation.		
9	Is there anything else before we adjourn		
10	today? Ms. Wegener?		
11	MS. WEGENER: Nothing from the Company.		
12	MR. HAMMER: Mr. Jetter?		
13	MR. JETTER: Nothing from the Division.		
14	MR. HAMMER: Mr. Moore?		
15	MR. MOORE: Nothing from the OCS.		
16	MR. HAMMER: All right, everyone. Thank you		
17	very much. Have a wonderful day.		
18	(Proceedings concluded at 10:33 a.m.)		
19	* * *		
20			
21			
22			
23			
24			
25			

	REPORTER'S	CERTIFICATE
STATE OF UTAH	)	
COUNTY OF UTAH	)	

I, KIMBERLY A. HARMON, a Certified Shorthand
Reporter and Registered Professional Reporter, hereby
certify:

THAT the foregoing proceedings were taken before me at the time and place set forth; that the witnesses were placed under oath to tell the truth; that the proceedings were taken down by me in shorthand and thereafter my notes were transcribed through computer-aided transcription; and the foregoing transcript constitutes a full, true, and accurate record of such testimony adduced and oral proceedings had, and of the whole thereof.

I further certify that I am not a relative or employee of any attorney of the parties, nor do I have a financial interest in the action.

I have subscribed my name on this 10th day of May, 2021.

Kimberly A. Harmon, RPR, CSR

Index: \$200,000..agree

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