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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

|  |                      |
|--|----------------------|
| In the Matter of Glen Canyon Solar A, LLC and Glen Canyon Solar B, LLC's Request for Agency Action to Adjudicate Rights and Obligations under PURPA, Schedule 38 and Power Purchase Agreements with Rocky Mountain Power | Docket No. 17-035-36 |
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**PREFILED REBUTTAL TESTIMONY OF HANS ISERN**

Glen Canyon Solar A, LLC and Glen Canyon Solar B, LLC hereby submit the Prefiled Rebuttal Testimony of Hans Isern in this docket.

DATED this 25th day of September 2017.

HATCH, JAMES & DODGE

*/s/ Phillip J. Russell*  
\_\_\_\_\_  
Gary A. Dodge  
Phillip J. Russell  
*Attorneys for Glen Canyon Solar A, LLC &  
Glen Canyon Solar B, LLC*

**CERTIFICATE OF SERVICE**  
**Docket No. 17-035-36**

I hereby certify that a true and correct copy of the foregoing was served by email this 25th day of September 2017 on the following:

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/s/ Phillip J. Russell

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**Rebuttal Testimony of Hans Isern**

**On Behalf of Glen Canyon Solar A, LLC and Glen Canyon Solar B, LLC**

**September 25, 2017**

1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Hans Isern.

4 **Q. Have you previously filed testimony in this docket?**

5 A. Yes. On behalf of Glen Canyon Solar A, LLC and Glen Canyon Solar B,  
6 LLC (collectively, "Glen Canyon Solar"), I filed direct testimony in this docket  
7 on June 29, 2017.

8 **Q. What is the purpose of your rebuttal testimony?**

9 A. I will respond to direct testimony submitted by PacifiCorp witness Rick A.  
10 Vail.

11 **II. REBUTTAL OF PACIFICORP WITNESS RICK A. VAIL**

12 **Q. What aspect of Mr. Vail's testimony will you respond to?**

13 A. I disagree with many aspects of the testimony offered by Mr. Vail, though  
14 my rebuttal will focus only a factual statement he made about a communication  
15 made to Glen Canyon Solar representatives at a meeting with representatives of  
16 PacifiCorp Transmission. Glen Canyon Solar witness Keegan Moyer will offer  
17 rebuttal of other portions of Mr. Vail's testimony and my silence on the remaining  
18 portions of Mr. Vail's testimony should not be read as an endorsement of that  
19 testimony.

20 **Q. With what factual statements in Mr. Vail's testimony do you disagree?**

21 A. At lines 562 to 571 of his testimony, Mr. Vail makes a factual statement  
22 about a September 23, 2016 email ("PacTrans Email") sent from PacifiCorp

23 Transmission to sPower (Glen Canyon Solar's parent company). The PacTrans  
24 Email was attached as Confidential Exhibit 4 to Glen Canyon Solar's Motion for  
25 Preliminary Injunction in this docket. As I stated at lines 182-190 of my direct  
26 testimony, PacifiCorp Transmission has asserted to Glen Canyon Solar that it can  
27 consider Rocky Mountain Power's existing transmission rights and redispatch  
28 tools in studies regarding Glen Canyon Solar's interconnection request. The  
29 PacTrans Email confirms that testimony.

30 In response, Mr. Vail claims without proof in his direct testimony that at  
31 an in-person meeting on March 2, 2017, a PacifiCorp Transmission employee told  
32 Glen Canyon Solar that the statement contained in the PacTrans Email was a  
33 mistake.

34 **Q. Please explain why you disagree with Mr. Vail's testimony on this point.**

35 A. I attended the March 2, 2017 meeting referenced in Mr. Vail's testimony.  
36 To the best of my recollection, Mr. Vail did not attend that meeting, so his  
37 testimony cannot reflect personal knowledge about statements made at that  
38 meeting. Rather, at best, it could reflect what someone told him *about* statements  
39 made at the meeting. In addition to me, the other Glen Canyon Solar  
40 representatives at the meeting were Ryan Creamer, Jim Howell, Adam  
41 Schumacher and Adam Foltz. Several representatives of PacifiCorp Transmission  
42 attended the meeting, including Brian Fritz, PacifiCorp's director of transmission  
43 services. Neither Mr. Fritz nor any other PacifiCorp representative at the meeting  
44 stated that the statements or implications of the PacTrans Email were mistakes.

45 Indeed, neither Mr. Fritz nor any other representative of PacifiCorp had—until the  
46 filing of this docket—stated to sPower that PacTrans cannot perform  
47 interconnection studies that take into account Rocky Mountain Power’s existing  
48 transmission rights or redispatch tools. Indeed, as explained in my direct  
49 testimony, both oral and written statements to the contrary were made to me and  
50 other sPower representatives at various times.

51 I have spoken with the other sPower representatives present at the March  
52 2, 2017 meeting. None of those sPower representatives has any recollection of  
53 Mr. Fritz or any other PacifiCorp employee making any statement such as the one  
54 claimed by Mr. Vail in his direct testimony. Mr. Vail was not in attendance at the  
55 meeting. The statement he claims was made was not made.

56 **Q. Does this conclude your direct testimony?**

57 **A.** Yes, it does.