

OCS Data Request 2.10

Refer to the Direct Testimony of Jeffrey K. Larsen, lines 211 - 214, which states: “As repowered wind resources are placed into service, the Company will compare the actual O&M expense for each wind resource to the 2014-2017 historical four-year average of O&M expense by wind resource. The difference will be included in the RTM deferral”. Does the Company propose to include internal labor costs in the O&M expenses to be deferred? If yes, does the Company currently anticipate that its overall employee compliment on a full time equivalent basis will increase during the period the projects are placed into service as compared to the amounts incorporated in current base rates?

Response to OCS Data Request 2.10

The Company is proposing to include incremental operations and maintenance (O&M) expense in the Resource Tracking Mechanism deferral as described in the testimony referenced above. The incremental O&M expense may include internal labor, external labor or a combination of both. It is currently not known what the impact would be on the employee compliment on a full-time-equivalent basis as it is not known what the source of incremental labor will be.