

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Voluntary Request of	:	
Rocky Mountain Power for Approval of	:	Docket No. 17-035-39
Resource Decision to Repower Wind	:	DPU Exhibit 1.0
Facilities	:	Response Testimony
	:	

RESPONSE TESTIMONY

OF

DR. JONI S. ZENGER

UTAH DIVISION OF PUBLIC UTILITIES

April 2, 2018

1 **Q. Please state your name, occupation, and business address.**

2 A. My name is Dr. Joni S. Zenger. I am a Technical Consultant for the Utah
3 Division of Public Utilities (Division). My business address is 160 East 300
4 South, Salt Lake City, Utah 84111.

5
6 **Q. On whose behalf are you testifying?**

7 A. The Division.
8

9 **Q. Are you the same Dr. Zenger who previously filed direct testimony in this
10 proceeding on September 20, 2017 and surrebuttal testimony on November
11 15, 2017?**

12 A. Yes, I am.
13

14 **Q. What is the purpose of your response testimony in this proceeding?**

15 A. My response testimony responds to PacifiCorp's (Company) Supplemental Direct
16 Testimony in this docket. On February 1, 2018, the Company filed an updated
17 economic analysis to account for changes in the federal corporate tax rate that
18 were a risk of the repowering projects the Division, as well as other intervening
19 parties, previously identified in testimony to the Utah Public Service Commission
20 (Commission) in this matter.¹

¹ Surrebuttal Testimony of Daniel Peaco, November 15, 2017, p. 8 and Surrebuttal Testimony of Donna Ramas, November 15, 2017, p. 19.

21 I will briefly describe the Division's position, including testimony of the
22 Division's witnesses who testified previously in this docket and who are now
23 testifying in this phase of the docket. This position is formulated after having
24 reviewed what the Company has filed in supplemental testimony and in discovery
25 reviewed to date. I will point out the wide variations in modeling results based on
26 what the Company filed in its supplemental testimony as compared to the results
27 in its Application and its rebuttal testimony submissions.

28 I will discuss the Company's handling of this case from a policy and
29 regulatory perspective. As I later describe in my testimony, because of the
30 Company's decision to file very little information upfront in its Application,
31 parties were forced to investigate this case through multiple rounds of discovery
32 over the course of approximately nine months. For example, in its initial
33 Application the Company failed to perform a project-by-project analysis for the
34 nine price policy scenarios for each of the 12 wind facilities proposed to be
35 repowered. Instead, in its Application the Company modeled all 12 wind projects
36 as one repowering project. In the Company's supplemental testimony, the
37 Company provides some of the project-by-project analysis that should have been
38 included in the original Application last June. In addition to providing a
39 recommendation on the Application (as supplemented), the Division will make
40 recommendations to the Commission regarding the Company's handling of this
41 case for future resource decision requests.

42

43 **Q. Please summarize the Division's position and recommendations.**

44 A. The Division continues to recommend that the Commission not approve the
45 Company's Application to repower the identified wind facilities because the
46 record does not support a conclusion that the projects are in the public interest.
47 The Company has provided an updated analysis based on the federal corporate tax
48 legislation and has attempted to mitigate some of the risks of the projects.
49 However, the Company's shifting analytical results have not had the effect of
50 solidifying projected benefits. Rather, the shifting results highlight the impact of
51 the underlying assumptions and their uncertainty on the projects' ultimate
52 outcomes.

53 In the absence of a need, the economic risk of making large investment
54 decisions based on numerous assumptions and projections decades into the future,
55 is too high. The Company has not adequately shown the wisdom of removing
56 relatively new, currently operating equipment from operation while continuing the
57 recovery of the unused equipment in rates. Nor has the Company demonstrated
58 that this will most likely result in the acquisition, production, and delivery of
59 utility services at the *lowest reasonable cost to the retail customers* of the utility.
60 The projections are simply too uncertain when no need exists for the new
61 equipment.

62 As the Division will point out, the Company's estimation of net benefits to
63 customers has been so widely scattered that the Division has little confidence in
64 the latest version of repowering costs and benefits provided in the Company's
65 supplemental filing. Much like the veiled approach the Company took with
66 respect to wind repowering in its 2017 integrated resource planning (IRP), each

67 iteration of System Optimizer (SO) and PaR results, with its new assumptions and
68 methods, makes it difficult to determine if any specific portfolio of repowering
69 sites are cost effective. The results of the Company's 20-year and 30-year
70 analyses vary significantly through each iteration of testimony.

71 When considering the risk that the Company is asking ratepayers to bear,
72 the short- and long-term impacts, and the fact that the new equipment is not
73 needed for reliability or other purposes, the Division continues to find that the
74 Company's proposal to repower is not prudent or in the public interest.

75

76 **Q. Are the same Division witnesses who testified in earlier phases of this**
77 **proceeding providing response testimony in this phase of the proceeding?**

78 A. Yes. Mr. Daniel Peaco will provide in depth response testimony on the project
79 economics and the reasonableness of the Company's assumptions and analysis.
80 Mr. Peaco will show that the Company's estimate of the benefits of the
81 repowering projects has declined from the analysis it presented in rebuttal
82 testimony, and the cost/benefit margins are not sufficient to assure a high
83 likelihood of benefits to ratepayers. The Company's cost/benefit analysis
84 continues to have methodological flaws such that the results of the repowering
85 projects cannot be relied on as an accurate representation of the economic benefits
86 of each of the 12 projects to Utah ratepayers.

87 Mr. David Thomson will respond to the testimony of Company witness
88 Ms. Joelle R. Steward regarding the change in the RTM carrying charge and the
89 Company's proposal to defer net costs in excess of the cap and seek recovery

90 through an offset from tax reform. He also will reiterate the Division's position
91 with respect to the Company's RTM tracking mechanism: that it is an
92 inappropriate method to use when a general rate case can easily be filed.

93 Mr. Charles Peterson updates his opinion regarding the Company's
94 financial capacity to pursue the wind repowering projects. In addition, he updates
95 his calculations and conclusions regarding the "used and useful" and
96 intergenerational equity issues he previously raised based upon changes the
97 Company made in its supplemental direct testimony.

98 The Division's witnesses all address various aspects concerning the
99 prudence of the Company's decision to repower and the public interest factors
100 the Commission should consider in the Company's request for approval of its
101 resource decision under Utah Code Ann. § 54-17-402.

102

103 **Q. To the extent that your testimony or the testimony of the Division's other**
104 **witnesses does not address an issue, should that be interpreted as acceptance**
105 **of that issue?**

106 A. No.

107

108 **Q. There have already been several rounds of testimony filed in this case since**
109 **the Company submitted its Application dating back to June 30, 2017. What**
110 **led to the Company filing more supplemental testimony approximately eight**
111 **months after it filed its Application?**

112 A. This case has evolved with material changes in the project or the Company's
113 analysis three times now. Last fall, the Division was prepared to go to hearing in
114 this case on November 29, 2017. Then, the week before the scheduled hearing,
115 the Company offered to amend the schedule² based on the uncertainties of certain
116 public policy issues related to federal income tax rates and the continuance or
117 level of production tax credits (PTCs); the parties did not oppose. Of course, the
118 Company could not control whether the tax legislation would pass or not, but it
119 seemed likely that it would pass and that the tax changes would materially affect
120 the economics of the case. As part of the motion, the Company agreed to provide
121 certain updates and analysis, some of which should have been filed in the
122 Company's initial Application.

123

124 **Q. Do the updates in the Company's supplemental testimonies reflect only the**
125 **results after accounting for the final federal tax legislation?**

126 A. No, much like the Company's October 19, 2017, rebuttal filing, on February 1,
127 2018, the Company basically filed an entirely new case with updated assumptions
128 and new projected economic costs and benefits. As Company witness Mr. Rick
129 T. Link points out, the Company's supplemental filing includes a project-by-
130 project analysis, taking into account the changes to corporate taxes, updated
131 market prices for natural gas and carbon dioxide (CO₂), and updated cost and
132 performance information.³

² Docket No. 17-035-39, Unopposed Motion to Amend Procedural Schedule, November 22, 2017.

³ Supplemental Direct Testimony of Rick T. Link, February 1, 2018, p. 2, lines 39-42.

133 Mr. Timothy J. Hemstreet’s Supplemental Testimony outlines the
134 numerous cost and performance changes to the repowering projects, such as
135 changes in turbine type and additional foundation retrofit costs.⁴

136 In his response testimony, Mr. Peaco provides the Division’s analysis on the
137 changes included in the Company’s supplemental filing, including the effect on
138 power output and the estimated costs of the repowering projects.

139

140 **Q. Have the estimated costs of the repowering projects changed?**

141 A. Yes. In the Company’s June 30, 2017 Application, the Company anticipated that
142 project costs would be \$1,130,000,000.⁵ The Company’s supplemental filing
143 shows that total project costs as of February 1, 2018 are \$1,337,000,000.⁶ Mr.
144 Hemstreet describes the increase in projects costs in the Company’s supplemental
145 filing compared to the costs in the Company’s October 19, 2017 rebuttal filing:

146 Project costs have increased by \$17.6 million—or
147 approximately 1.6 percent—to \$1.10 billion for the
148 Company’s base repowering scenario which
149 assumes transmission interconnection agreements
150 in Wyoming are not modified. The Company
151 continues to expect \$36 million in project upgrade
152 costs to allow the Wyoming facilities to deliver
153 additional energy under modified interconnection
154 agreements, for a total cost of \$1.137 billion.

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156 The Division has previously called to the Commission’s attention the
157 magnitude of this endeavor and the uncertainty of project costs in the face of

⁴ Supplemental Direct Testimony of Timothy J. Hemstreet, February 1, 2018, pp. 1-6.

⁵ Application for Approval of a Resource Decision to Repower Wind Facilities, June 20, 2017, p. 9.

⁶ Supplemental Direct Testimony of Timothy J. Hemstreet, February 1, 2018, p. 7, lines 145-150.

158 realized customer benefits in the distant future.⁷ For the captive Utah ratepayer, a
159 project in excess of a billion dollars represents a large investment for a project
160 that is not needed for the utility to reliably serve its customers, particularly when
161 the purported benefits are so small relative to the investment's size.

162 The Division continues to believe that repowering wind facilities is an
163 opportunity investment—a government sale on wind through tax policy that might
164 lead to benefits for some period of time.⁸ Ratepayers' uncertain benefits could
165 materialize or disappear, depending on the suite of unknowns and risks that
166 happen. The only certainty if the Application is approved is that ratepayers will
167 pay significant amounts for a significant time for a resource update that is not
168 needed.

169

170 **Q. Has the Division changed its position with respect to the risks of the wind**
171 **repowering projects?**

172 A. No. While the Company attempts to mitigate some risk in its supplemental filing,
173 there remain significant risks to customers that are inadequately addressed. Mr.
174 Peaco will provide the Division's position with respect to risks and potential
175 concerns that the Company has not reasonably managed or addressed. These
176 include risks from energy production, project life, PTC qualification, federal tax
177 law, and economic benefit risks.

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⁷ Direct Testimony of Dr. Joni S. Zenger, September 20, 2017, p. 6, lines 113-114 and Surrebuttal Testimony of Dr. Joni S. Zenger, November 15, 2017, p. 4, lines 81-82.

⁸ Direct Testimony of Dr. Joni S. Zenger, September 20, 2017, pp. 11-12, lines 218-220.

179 **Q. Earlier you stated that the Company’s supplemental filing raises even more**
180 **concerns surrounding the uncertainties in the case. Will you please explain?**

181 A. Yes. Although Mr. Peaco will discuss in his testimony the Division’s continued
182 concerns with high failure rates in gearboxes and blade failures, I will provide a
183 few other examples:

184 • The Division is skeptical of the Company’s ability to find available
185 contractors to install new wind turbine equipment and to construct the projects
186 that are being replaced with Vestas turbines on time before the December 31,
187 2020, deadline. Although the Company states that it issued a request for
188 proposals last year, the Company is still evaluating bid proposals, at this
189 time.⁹ In his supplemental testimony, Mr. Hemstreet writes that...“the
190 Company has not yet fully evaluated the bids or completed negotiations with
191 the bidders.”¹⁰

192 While the Company executed a master turbine supply agreement with GE
193 early on in this proceeding,¹¹ the Company still has not secured an installation
194 contract for the Vestas equipment,¹² even though all along the Company has
195 assured parties that *all* risks have been addressed.¹³

196 The fact that the Company states it may have to stagger the in-service
197 dates to accommodate the availability of the Vestas installation contractor

⁹ Supplemental Direct Testimony of Timothy J. Hemstreet, February 1, 2018, p. 10, lines 184-190.

¹⁰ Id., at lines 201-202. Also see Company’s 1st Supplemental response to DPU Data Request 3.23.

¹¹ Direct Testimony of Timothy J. Hemstreet, June 30, 2017, pp. 22-23, lines 495-500.

¹² Supplemental Direct Testimony of Timothy J. Hemstreet, February 1, 2018, p. 10, lines 184-190.

¹³ Rebuttal Testimony of Cindy A. Crane, p. 1, lines 13-14.

198 causes concern.¹⁴ There is little assurance that there will not be a disruption
199 or problem of some type with construction and installation of the new
200 equipment. If any of these projects are one day late, the federal PTC may
201 either be lost, or drop to 80 percent instead of 100 percent, increasing the risk
202 that the projects will be uneconomic for customers.¹⁵

203

204 • The Company's original due diligence in evaluating the estimated energy
205 output for the proposed repowering projects at several of the wind facilities
206 was lacking, based on only a single year of historical data. This is true for the
207 Glenrock I, Glenrock III, and the Rolling Hills facilities.¹⁶ While the
208 Company now states that it has been able to evaluate additional data at these
209 facilities, it is important to remember that the benefits of this case claimed by
210 the Company largely rest on the amount of energy produced by each wind
211 turbine generator and at each wind generating facility - amounts seemingly
212 supported by relatively little data.

213

214 • The Division also discovered that the Leaning Juniper and Goodnoe Hills
215 projects will require additional retrofits to strengthen the foundations in order
216 to withstand the larger blades and parts. This results in unplanned and
217 increased turbine installation costs. When asked about the foundation retrofit

¹⁴ Docket No. 20000-519-EA-17, Rebuttal Testimony of Timothy J. Hemstreet, November 2017, p. 20, lines 15-19.

¹⁵ Direct Testimony of Timothy J. Hemstreet, June 30, 2017, pp. 5-6, lines 103-121.

¹⁶ Id. at p. 4, lines 74-76.

218 costs, Mr. Hemstreet replied, "... the cost was not included because we did
219 not know the retrofits would be necessary."¹⁷ Obviously, it remains unknown
220 what other costs the Company does not yet know will be necessary.

221

222 • When asked about the suitability of foundations for the new turbines, Mr.
223 Hemstreet states when his prior testimony was filed, "the Company had not
224 yet verified that the foundations at these facilities were suitable for the
225 specific repowering turbines." This is first order due diligence that the
226 Company should have performed if it were planning wisely.

227

228 • The Division continues to have concerns about the risk of the Company
229 meeting the Internal Revenue Service (IRS) guidelines to qualify for the full
230 value of the PTCs. The Company has claimed on several occasions that it is
231 certain it will meet the qualification requirements. See, e.g. the following
232 statement from Ms. Crane in her rebuttal testimony:¹⁸

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We are confident that our 2016 investment will meet the five percent threshold of total project costs, that we will complete the repowering project well in advance of the 2020 deadline, and that the post-repowering fair market value of each wind turbine will include at least 80 percent new investment.

Yet, the Company's supplemental testimony shows that it might have to go to its parent company, Berkshire Hathaway Energy, to bail out PacifiCorp so that

¹⁷ Id. at p. 6, lines 135-136.

¹⁸ Rebuttal Testimony of Cindy A. Crane, October 19, 2017, p. 6, lines 4-7.

243 the Company will have an adequate supply of safe harbor equipment to still
244 qualify for 100 percent of the PTCs.¹⁹

245

246 **Q. Are you still concerned about the wide variations in the Company's**
247 **calculations?**

248 A. Yes. Attached to this testimony is my Exhibit DPU 1.1-RESP that shows the
249 Company's own economic analysis when it filed its Application on June 30, 2017,
250 next to the results of its rebuttal position on October 19, 2017, and the Company's
251 analysis filed in its February 1, 2018 supplemental testimony. This exhibit points
252 out significant differences in the economic results from the SO model runs and
253 the PaR runs for the 20-year analysis, as well as the results from the Company's
254 30-year extrapolation method. What is most notable is that the benefits vary
255 greatly between filings for the nine different price policy scenarios. Far from
256 constituting a "refreshed" analysis,²⁰ as the Company calls it, this variation is
257 more properly categorized as adding uncertainty and risk. It calls into question
258 whether the Company's modeling analysis is sound and if it provides an accurate
259 representation of the economic benefits of each of the 12 projects to Utah
260 ratepayers. This is a point that Mr. Peaco argues in depth.

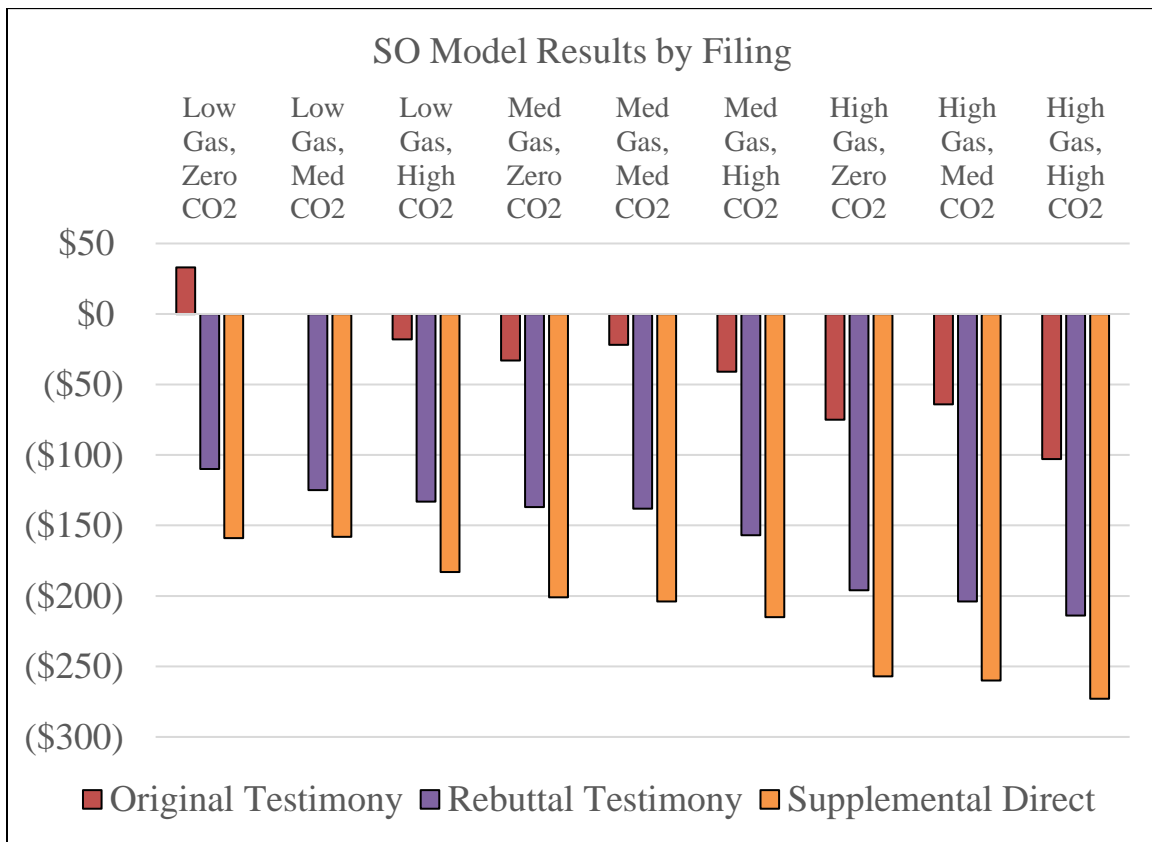
¹⁹ Id. at lines 167-172.

²⁰ Supplemental Direct Testimony of Rick T. Link, February 1, 2018, p. 2, lines 37-38; Rebuttal Testimony of Rick T. Link, October 19, 2017, p. 17, lines 332-333.

261 For simplicity, I have reproduced the table in Exhibit DPU 1.1-RESP
 262 below in the following two figures to visually point out the wide-ranging results
 263 on June 30, 2017, October 19, 2017, and February 1, 2018, respectively.²¹

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Figure 1.1 SO Model Results



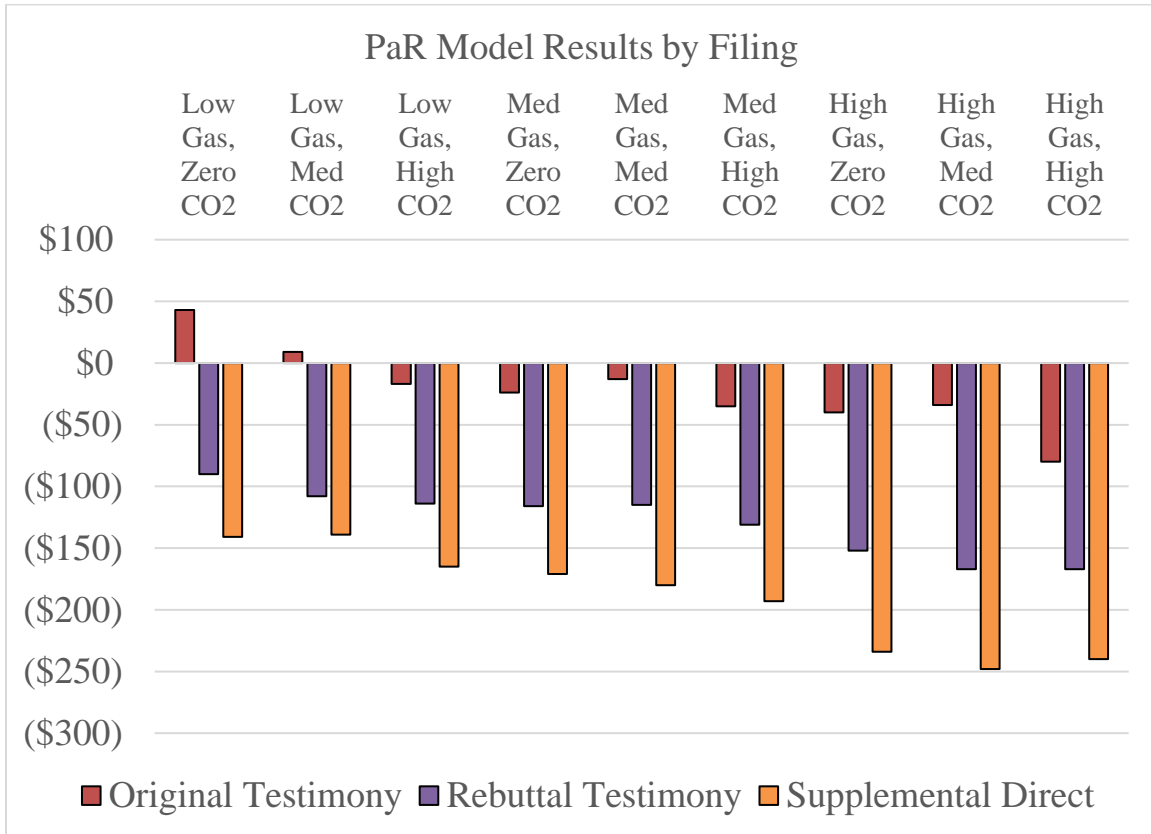
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²¹ Direct Testimony of Rick T. Link, June 30, 2017, p. 28, Table 1. SO Model and PaR PVRR(d) (Benefit)/Cost of Wind Repowering; Rebuttal Testimony of Rick T. Link, October 19, 2017, p. 12, Table 1. SO Model and PaR PVRR(d) (Benefit)/Cost of Wind Repowering; Supplemental Direct Testimony of Rick T. Link, February 1, 2018, p. 20, Table 5-SD. Updated SO Model and PaR PVRR(d) (Benefit)/Cost of the Wind Repowering Projects.

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Figure 1.2 PaR Model Results



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Q. What comments do you have with regard to the handling of this case?

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A. First, the Division’s analysis of this case was largely conducted through

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discovery—not review of a robust application. As I previously mentioned, the

282 Company filed very little upfront in its Application. Most of the Division’s
283 analysis had to come through asking multiple rounds of data requests and follow
284 up to responses. Regulators are generally at a disadvantage in cases because
285 utilities control the flow of information. This has been especially acute in this
286 case. This problem was compounded by the Company’s failure to include
287 discussion of these projects in the 2017 IRP workshops, which might have
288 improved initial analysis and saved parties much fact-finding in this case’s early
289 stages.

290 Second, this case was filed before much due diligence and preparatory
291 work was completed. Of course, the Company argues this is because of the
292 limited time to act in order to take full advantage of tax credits. But the tax credits
293 and their expiration have been known for some time, as the Company met with
294 GE in May of 2016 before contracting with GE and Vestas in December of
295 2016.²² Regardless of whether the late development was necessary, the deficient
296 pre-filing work has led to shifting views of costs, risks, and benefits, which has
297 cost other parties a great deal of time, effort, and money to analyze. Much of the
298 early work in this case was wasted as analyses, assumptions, and projections
299 changed.

300 The Company’s February 1, 2018, supplemental filing is yet another
301 iteration of what the Company calls its “refreshed” analysis. I have already
302 elaborated on the issue of the “demonstrated” benefits being all over the place.

²² Application for Approval of a Resource Decision to Repower Wind Facilities, June 30, 2017, p. 6.

303 The point I am making here is that the Company filed its Application when too
304 much remained uncertain, burdening others with analyzing soon to be stale
305 benefit studies. Still, many months into the case and nearing hearing, the Division
306 continues waiting for data to help analyze the Company's filing.

307 As an example of the type of work and analysis that remains outstanding, I
308 have quoted DPU data request 28.1 below, followed by the Company's response
309 (emphasis added):

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311 17-035-39 / Rocky Mountain Power
312 March 1, 2018
313 DPU Data Request 28.1

314

315 **DPU Data Request 28.1**

316

317 Refer to the Company's Response to Data Request DPU 3.21, stating that
318 an engineering analysis will be conducted on foundations and towers prior
319 to receiving a third-party design certification.

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321 (a) Has the engineering analysis been completed for any of the proposed
322 repowering projects? If so, please identify the projects and provide
323 any reports produced as a result of this analysis. If not, please provide
324 a schedule of expected completion of these analyses for each project.

325

326 (b) Has the third-party design certification been completed for any of the
327 repowering projects? If so, please identify the projects and provide
328 any reports produced as a result of this certification. If not, please
329 provide a schedule of expected completion of these certifications for
330 each project.

331

332 **Response to DPU Data Request 28.1**

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334 (a) The turbine suppliers have completed engineering analysis of the
335 proposed repowering projects to evaluate the towers. Please refer to
336 the Company's responses to DPU Data Request 9.12, which provides
337 these reports. Please refer to the Company's responses to DPU Data
338 Request 1.9 for engineering reports related to the suitability of
339 existing foundations for repowered turbines.

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(b) The third-party design certification has not been completed for the repowering projects. These design certifications are provided pursuant to the master retrofit and turbine supply contracts. The Company expects to receive them by June 30, 2018.

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Thus, on June 30, 2018, exactly one year from the date the Company filed its Application, the non-Company parties still will not have this information over a month after the hearing in this case.

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To date parties have found it necessary to ask 32 sets of data requests to the Company that include 522 questions. In addition to its data responses, the Company has submitted at least 25 supplemental responses to its original data responses. Making matters even worse, is that the Company does not provide the data responses in sets as they are sent out. Rather, random questions from various sets are coming in daily in piecemeal fashion. While this helps get the responses to parties as soon as possible, it also adds tracking and other tasks that increase parties' burdens.

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To reiterate, if the Company submits an Application requesting approval of its resource decision, requesting a prudence finding of the costs and the resource decision, it should simultaneously submit to regulators the corroborating information in its Application to support its request. If such information does not yet exist, perhaps the project is not yet certain enough for a long-term ratepayer commitment to fund it. While the law requires an ongoing duty of prudence, a pre-approval imbues a project with significant momentum that should not be given on such a deficient application.

365 The problem of a deficient application straining other parties' resources
366 has been encountered and addressed before. In the Commission's final order in
367 the Company's 2009 General Rate Case, Docket No. 09-035-23, the Commission
368 stated the following (emphasis added):

369 "The accounting data should ultimately be provided in any
370 cost recovery application rather than through a data
371 request."²³

372 This is not all that the Commission has said on this matter. In fact, as a
373 result of Docket No. 09-035-23, the Commission ordered the Company to file
374 certain information *at the time it files an application for approval of wind*
375 *projects*.²⁴ Consequently, the Division was directed to meet with the Company
376 and any interested parties to come up with a list of basic information that needed
377 to be filed at the time the Company files an application for approval of any wind
378 project.²⁵ This template that the parties collaboratively developed is attached as
379 Exhibit 1.2-RESP to this testimony.²⁶

380 The Division recommends that, in the interest of regulatory efficiency and
381 respect for the time and expense required of parties, the Commission take a more
382 aggressive approach to evaluating the completeness of an application before
383 parties undertake significant work to analyze it. For a wind project, that might
384 include requiring strict compliance with the suggested inclusions contained on
385 Exhibit 1.2-RESP. This docket has cost parties dearly in time, regulatory
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²³ Docket No. 09-035-23, Report and Order on Revenue Requirement, Cost of Service and Spread of Rates, February 18, 2010, p. 113.

²⁴ Id.

²⁵ Id.

²⁶ Docket No. 09-035-23, Comments from DPU, July 1, 2010, Exhibit C.

387 attention, and money. Some of that is inevitable in approval of a large project.
388 Nevertheless, the Company could have mitigated this with more reasonable
389 project development and better consultation with parties during development.

390

391 **Q. Will you please summarize the Division's overall conclusions concerning the**
392 **Company's Application?**

393 A. Yes, the application should be denied. The analysis provided is insufficient for
394 the Division to conclude that the proposal is in the public interest and represents
395 the lowest reasonable cost resource option. As the Division's witnesses will point
396 out, the methodology used to estimate the customer benefits of the repowering
397 projects is problematic in several different ways and does not lead to results that
398 can be relied on.

399 While it is possible that some of the projects could be beneficial to
400 customers, there is a significant probability that multiple, or all, projects are not.
401 Particularly when weighed against expected costs, those tenuous projected
402 benefits are far too small and uncertain to justify the risks of removing operating,
403 relatively young equipment in favor of new equipment and tax credits.

404 The Division concludes that the Company has not sufficiently
405 demonstrated that the wind repowering projects provide clear net benefits to
406 ratepayers or that the decision to repower the Company's wind facilities will most
407 likely result in the acquisition, production, and delivery of utility services at the
408 lowest reasonable cost to the customers of the utility.

409

410 **Q. Does this conclude your Testimony?**

411 A. Yes