

318 as well as the uncertainty in the MSP regarding the portion of the benefits
319 associated with the zero cost wind energy and PTC credits Utah
320 ratepayers will receive. Thus, I recommended that the Commission find
321 that the amount considered to be the approved costs in this case under
322 Section 54-17-4029(7)(a) be based on a Utah jurisdictional amount.

323 ~~I recommend that the Commission approved repowering projects, if~~
324 ~~any are approved, be capped at the Commission determined Utah~~
325 ~~jurisdictional amount in this case with costs exceeding that Utah~~
326 ~~jurisdictional cap excluded from rates charged to Utah ratepayers. This~~
327 ~~would further protect Utah ratepayers should the Commission approve all~~
328 ~~or a portion of the wind repowering projects and the jurisdictional~~
329 ~~allocation process changes such that the projects are no longer beneficial~~
330 ~~or economic for Utah ratepayers. The Company has consistently applied~~
331 ~~a Utah SG jurisdictional factor of 42.6283% to the capital costs in the~~
332 ~~revenue requirement analyses it has presented in this case.³ If the~~
333 ~~Commission approves a subset of the proposed wind repowering projects,~~
334 ~~it could apply the 42.6283% jurisdictional allocation factor to the per-~~
335 ~~project capital costs presented in Confidential Exhibit RMP__TJH-1SD~~
336 ~~included with the supplemental testimony of RMP witness Timothy J.~~
337 ~~Hemstreet in determining the cap.~~

³ The Utah SG factor of 42.6283% is reflected in the Company's supplemental filing in Exhibit RMP__(JRS-2SD) and Exhibit RMP__(JRS-4SD).