

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 Supplemental Direct Testimony of Mr. Timothy J. Hemstreet, February 1, 2018, p. 4, lines 74-76.