

## BEFORE THE WYOMING PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE APPLICATION OF  
ROCKY MOUNTAIN POWER FOR  
CERTIFICATES OF PUBLIC CONVENIENCE  
AND NECESSITY AND NONTRADITIONAL  
RATEMAKING FOR WIND AND  
TRANSMISSION FACILITIES

Docket No. 20000-520-EA-17  
(Record No. 14781)

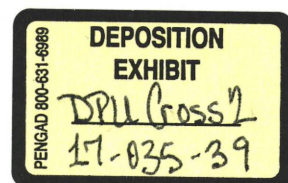
### STIPULATION AND SETTLEMENT AGREEMENT

#### RECITALS

1. Whereas, Rocky Mountain Power ("RMP" or the "Company"), the Wyoming Industrial Energy Consumers ("WIEC"), and the Wyoming Office of Consumer Advocate ("OCA") (collectively "520 Settling Parties") stipulate and agree to the following resolution to all of the issues raised between the 520 Settling Parties in Docket No. 20000-520-EA-17.

2. Whereas, RMP and WIEC have engaged in several discussions regarding RMP's request for approval of Certificates of Public Convenience and Necessity ("CPCN") and nontraditional ratemaking for the Combined Projects in Docket No. 20000-520-EA-17 (as defined below), approval of the Repowering Project in Docket No. 20000-519-EA-17 (as defined below), and RMP's request for approval of the Resource Tracking Mechanism ("RTM") for the Combined Projects and the Repowering Project.

3. Whereas, as a result of these discussions, RMP and WIEC have reached a compromise and agreement that resolves all outstanding issues in Docket No. 20000-519-ER-17, Docket No. 20000-520-EA-17, and with regards to the Tax Cuts and Jobs Act of 2017, which compromise and agreement the RMP and WIEC believe is in the public interest.



4. Whereas, RMP and WIEC acknowledge that these issues are each being addressed in separate proceedings. As a result, this Stipulation is specifically intended to only address the issues raised in Docket No. 20000-520-EA-17.

5. Whereas, as a result of these discussions, the OCA has reached a compromise and agreement that resolves all outstanding issues in Docket No. 20000-520-EA-17, which the OCA believes is in the public interest. The OCA reserves the right to accept or object to, in whole or in part, the agreements in Docket No. 20000-519-EA-17 and with regard to the Tax Cuts and Jobs Act of 2017. No portion of the OCA's agreement in Docket No. 20000-520-EA-17 shall be binding on the OCA in Docket No. 20000-519-EA-17 or in any proceeding regarding the Tax Cuts and Jobs Act of 2017.

6. Whereas, the separate stipulations resolving the contested issues between RMP and WIEC in Docket No. 20000-519-EA-17 and regarding the Tax Cuts and Jobs Act of 2017 will be filed and made subject to the Commission's approval in each of those respective proceedings.

7. Whereas, the 520 Settling Parties are not asking the Commission to consider or act upon in this proceeding the separate stipulations between RMP and WIEC resolving the contested issues in Docket No. 20000-519-EA-17 or regarding the Tax Cuts and Jobs Act of 2017.

## **BACKGROUND**

### **Docket No. 20000-520-EA-17**

8. On June 30, 2017, RMP filed an application together with testimony and exhibits requesting: (1) pursuant to Wyoming Statute § 37-2-205(c), approval of CPCNs to construct or approval to acquire four new Wyoming wind resources ("Wind Projects"); (2) pursuant to Wyoming Statute § 37-2-205(c) and Paragraph 13 of the Stipulation and Agreement in Docket No. 20000-384-ER-10, approval of CPCNs to construct the Aeolus-to-Bridger/Anticline 500-kV

transmission line and associated network upgrades (“Transmission Projects”); and (3) pursuant to Wyoming Statute § 37-2-121, approval of a RTM to address the ratemaking treatment of the costs and benefits of the Wind Projects and Transmission Projects (together, the “Combined Projects”).

9. On July 6, 2017, the Commission issued a Suspension Order, ordering the June 30, 2017 Application be suspended, for investigation and the Commission’s final order, for the six-month term prescribed by subsection (c) of Wyoming Statutes § 37-3-106, starting after the 30 days’ notice term provided for in subsection (b).

10. On July 7, 2017, the WIEC filed a petition to intervene and request for hearing.

11. On July 17, 2017, the Commission issued the Notice of Application.

12. On July 19, 2017, the OCA filed a notice of intervention and request for hearing.

13. On August 3, 2017, Northern Laramie Range Alliance (“NLRA”) filed a petition to intervene.

14. On August 10, 2017, the Commission issued its Special Order Authorizing One Commissioner and/or Hearing Examiner to Conduct Public Hearing.

15. On August 11, 2017 Interwest Energy Alliance (“Interwest”) filed petition to intervene.

16. On August 11, 2017, the Commission issued an Order Authorizing Intervention for WIEC and NLRA.

17. On August 17, 2017, the designated hearing officer conducted a scheduling conference. The Commission issued its Scheduling Order on August 24, 2017.

18. On September 1, 2017 Rocky Mountain Sheep Co. (“RMS”) filed a petition to intervene. The Commission issued an Order Authorizing Intervention October 13, 2017.



19. On September 5, 2017, RMS filed a list of affected landowners for the proposed transmission line construction.

20. On September 20, 2017, RMP filed an updated list of affected landowners for the proposed transmission line construction.

21. On October 23, 2017, Peterson Outfitters, LLC ("Peterson Outfitters") filed a petition to intervene. The Commission issued an Order Authorizing Intervention October 31, 2017.

22. On October 26, 2017, Anadarko Land Corp. ("Anadarko") and Southland Royalty Company LLC ("Southland") filed petitions to intervene. The Commission issued an Order Authorizing Intervention for each of Anadarko and Southland November 29, 2017.

23. On October 27, 2017, the Overland Trail Cattle Company, LLC ("TOTCO") filed a petition to intervene. The Commission issued an Order Authorizing Intervention November 29, 2017.

24. On November 14, 2017, BP America Production Company ("BP") filed a petition to intervene.

25. On November 20, 2017, the following parties filed direct testimony: Interwest, NLRA, Peterson Outfitters, OCA, RMS, WIEC, and BP.

26. On November 22, 2017, RMP filed an Opposition to BP Petition to Intervene.

27. On November 28, 2017, BP filed a Reply in Support of Petition for and Notice of Intervention. The Commission issued an Order Authorizing Intervention January 4, 2018.

28. On December 14, 2017, Peterson Outfitters filed a Motion to Withdraw as Intervenor. The Commission issued an Order Granting Motion to Withdraw Intervention January 3, 2018.

29. On December 15, 2017, Southland filed direct testimony.



30. On December 18, 2017, the following parties filed rebuttal testimony with exhibits: RMP, TOTCO, and Anadarko.

31. On January 8, 2018, RMP filed a Motion to Strike or Limit Testimony requesting that certain portions of each of the direct testimony of RMS, Southland, Anadarko, TOTCO and BP be stricken or limited. RMP also filed supplemental rebuttal testimony of Roderick D. Fisher.

32. On January 12, 2018, Anadarko, Southland, and BP filed objections to the proposed briefing schedule to respond to RMP's Motion to Strike or Limit Testimony.

33. On January 16, 2018, RMP filed direct supplemental testimony and exhibits.

34. On January 18, 2018, RMP filed a replacement Confidential Exhibit RMP\_\_ (RTL-2SD) to the supplemental direct testimony of Rick T. Link.

35. On January 19, 2018, the Commission filed a Notice of Supplemented Application and a letter to landowners notifying them that the Company supplemented its application and exhibits after having identified the specific wind projects through the request for proposal process, which supplement increased the proposed total capacity from 860 MW to approximately 1,171 MW.

36. On January 26, 2018, RMP filed an Unopposed Motion to Vacate and Amend Procedural Schedule.

37. On January 29, 2018, the Commission issued a Suspension Order, ordering the June 30, 2017 Application be suspended for investigation and the Commission's final order, for the final three (3) month term prescribed by subsection (c) of Wyoming Statutes § 37-3-106, starting after the 30 days' notice term provided for in subsection (b).

38. On January 29, 2018, TOTCO filed a Response to RMP Motion to Strike, and testimony of Garry L. Miller.

39. On January 30, 2018, Rock Creek Wind, LLC ("Rock Creek") filed a Petition to Intervene.

40. On January 31, 2018, RMP filed Replacement Confidential Exhibits RMP \_\_ (CAT-1SD-4) and (CAT-2SD-1) to the supplemental direct testimony of Chad A. Teply.

41. On January 31, 2018, BP, Anadarko and Southland filed a Joint Memorandum in Opposition to RMP Motion to Strike.

42. On February 5, 2018, RMS filed a Response in Opposition to RMP Motion to Strike or Otherwise Limit Scope.

43. On February 6, 2018, the Commission issued a Suspension Order, ordering the January 16, 2018 "Amended Application" be suspended, for investigation and the Commission's final order, for the six-month term prescribed by subsection (c) of Wyoming Statutes § 37-3-106, starting after the 30 days' notice term provided for in subsection (b).

44. On February 6, 2018, RMP filed a Reply in Support of Motion to Strike.

45. On February 6, 2018, BP filed its Motion to Withdraw as Intervenor.

46. On February 8, 2018, the Commission denied the Motion to Strike or Limit Testimony with leave to refile the motion.

47. On February 14, 2018, the Commission issued a Notice and Order Vacating Public Hearing, pursuant to open meeting action taken on February 6, 2018, wherein the remaining procedural schedule and public hearing set to commence on February 22, 2018, were vacated with a new schedule to be set at a later date.

48. On February 15, 2018, RMP filed its Opposition to Rock Creek Intervention.

49. On February 16, 2018, RMP filed second supplemental direct testimony and exhibits.

50. On February 21, 2018, Rock Creek filed its Reply in Support of Petition to Intervene.

51. On February 23, 2018 RMP filed replacement pages of supplemental direct testimony and second supplemental direct testimony (redline and clean versions of both) for witnesses Rick T. Link and Cindy A. Crane, as well as corrected exhibits and workpapers for Rick T. Link.

52. On February 26, 2018, the Commission issued its Order Granting Motion to Withdraw Intervention of BP.

53. On February 26, 2018, the Commission issued a Scheduling Order.

54. On February 27, 2018, TOTCO filed supplemental testimony of Garry L. Miller.

55. On March 1, 2018, the Commission issued its Notice of Second Supplemented Application.

56. On March 1, 2018, NLRA filed supplemental direct testimony of Kenneth G. Lay.

57. On March 2, 2018, the following parties filed supplemental direct (or response) testimony: OCA, RMS, Rock Creek, Southland, WIEC, Anadarko, and Interwest.

58. On March 5, 2018, WIEC filed corrected non-confidential supplemental response testimony of Nicholas L. Phillips.

59. On March 9, 2018, the Commission issued its Order Granting Rock Creek Petition to Intervene.

60. On March 14, 2018, RMP filed supplemental rebuttal testimony and exhibits and WIEC filed cross answer testimony.

61. On March 14, 2018, Anadarko filed a Notice reserving its right to address the rebuttal testimony of RMP filed March 14, 2018 at the evidentiary hearing April 9, 2018.



62. On March 15, 2018, WIEC filed second corrected supplemental response testimony of Nicholas L. Phillips.

63. On March 16, 2018, RMP filed its Objection to Notice Filed By Anadarko Land Corp.

64. On March 19, 2018, the Commission issued its Notice and Order Setting Public Hearing.

65. On March 22, 2018, TOTCO filed a petition for leave to withdraw.

66. On March 23, 2018, Rock Creek filed a petition for leave to withdraw.

67. On March 23, 2018, the following parties filed Summary of Remaining Issues, Updated Summary of Contentions: RMP, WIEC, OCA, NLRA, Anadarko, Southland, RMS, and Interwest. The parties also filed a Stipulated Summary of Uncontroverted Facts.

68. On March 29, 2018, the Commission issued two orders granting the TOTCO and Rock Creek petitions to withdraw.

69. On April 2, 2018, RMP filed a Motion to Submit Additional Exhibits and the Commission held a prehearing conference.

70. On April 5, 2018, the Commission issued its exhibit list.

71. On April 5, 2018, NLRA filed a petition for leave to withdraw.

72. On April 6, 2018, the Commission issued its order denying RMP's motion to strike.

73. On April 6, 2018, RMP and WIEC jointly informed the hearings officer that they had reached a settlement in principle.

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74. On June 30, 2017, RMP filed an application together with testimony, and exhibits requesting that, pursuant to Wyoming Statute § 37-2-121, the Commission (a) determine that the

Company's decision to upgrade or "repower" existing wind resources is prudent ("Repowering Project"), (b) approve the Company's continued recovery of the replaced wind plant equipment, and (c) approve the Company's proposed ratemaking treatment. On February 5, 2018, RMP filed supplemental direct testimony.

#### **The Tax Cuts and Jobs Act of 2017**

75. On December 22, 2017, "An Act to Provide for Reconciliation pursuant to Titles II and V of the Concurrent Resolution on the Budget for Fiscal Year 2018" (Pub. L. 115-97, commonly known as the "Tax Cuts and Jobs Act of 2017") was enacted into law.

76. On December 29, 2017, the Commission issued An Order Requiring Wyoming Public Utilities and Telecommunications Companies to Account for Financial Benefits Associated with Passage of the Tax Cuts and Jobs Act of 2017 as Deferred Regulatory Liabilities in Docket No. 90000-134-XO-17, which required public utilities (1) directly or indirectly subject to payment of federal income taxes to calculate, on an ongoing basis, the difference between its federal income tax liability under the law in effect on December 31, 2017, and the law in effect on and after January 1, 2018, and (2) to account for and record the difference as a deferred regulatory liability. The Commission also stated that the currently approved rates of each public utility charged for services rendered on and after January 1, 2018, would be subject to refund and adjustment commensurate with the difference between its federal income tax liability under the law in effect on December 31, 2017, and the law in effect on and after January 1, 2018.

77. On March 23, 2018, the Commission issued an order in Docket No. 90000-134-XO-17 requiring all affected public utilities organized as corporations to file an initial assessment of the overall effects of the Tax Cuts and Jobs Act of 2017 on their rates and a statement of their intentions with respect to any anticipated rate adjustment related to the corporate tax rate change.

78. RMP filed its tax assessment plan on March 29, 2018.

## **AGREEMENTS REGARDING RESOLUTION OF SPECIFIC ISSUES**

### **General Terms**

79. The 520 Settling Parties agree that RMP should be granted conditional CPCNs, subject to the acquisition of all necessary rights-of-way, to proceed forward with the proposed Aeolus-to-Bridger/Anticline line; the Ekola Flats, TB Flats I and II, and Cedar Springs wind projects; and the related network upgrades as described in the Second Supplemental Direct Testimony of RMP in Docket 20000-520-EA-17 (collectively, the “Stipulated Projects”).

80. The 520 Settling Parties agree that the regulatory approvals as described in Paragraph 79 above are subject to the following:

- a. All costs and benefits associated with the Stipulated Projects will flow through to customers through normal ratemaking mechanisms such as general rate cases and the Energy Cost Adjustment Mechanism. The RTM proposed by the Company in Docket No. 20000-520-EA-17 shall not be adopted.
- b. The 520 Settling Parties agree to support a test period in the next general rate case that reflects the annualized costs and benefits for the portion of the Stipulated Projects in service by the rate effective date.
- c. The 520 Settling Parties agree that the Company will bear the risks related to any portion of the new wind facilities that do not qualify for Production Tax Credits (“PTCs”). To the extent any new wind project fails to qualify for PTCs, in whole or in part, PTCs will be imputed to each such project based on that project’s actual wind output for equipment placed in service and included in rate base at full revenue value (*i.e.*, including full gross up for federal and other applicable taxes),



unless the failure to qualify for PTCs is a result of either: 1) a change in law; or 2) an event that is beyond the reasonable control of the Company and the entities with whom the Company has contracted for services including contractors, vendors, and suppliers. An event that is beyond the reasonable control of the Company is defined for purposes of this Stipulation as a force majeure event as set forth in the applicable agreement(s) that is/are associated with the particular facility at issue, as entered into between the Company and entities with which the Company has contracted for services for the development of the particular new wind or transmission project ("Force Majeure Event"). A Force Majeure Event does not include any instance where the Company has failed to make all commercially reasonable efforts to obtain approval of PTCs, including the pursuit of an excusable disruption under federal tax rules. In the event of a change in law, the Company will make all commercially reasonable efforts to mitigate the loss of value to customers including, but not limited to, cancelling the acquisition or construction of facilities to the extent practical and cost effective from the customers' perspective. In the event of a change in law or a Force Majeure Event, the Company will promptly file a notice with the Commission describing the event, the impact of the event, and the Company's assessment of the ability to complete the facility, in whole or in part, and other relevant information regarding the event and remediation. If there is any dispute regarding the applicability of this provision or the extent of its applicability to a particular facility, or any dispute about the Company's actions in the face of a change of law or Force Majeure Event, such dispute will be resolved by the

Commission in the first general rate proceeding where the Company seeks to include the capital costs of the facility into rates.

- d. The 520 Settling Parties agree that the Company will bear the risks related to construction cost overruns associated with the Stipulated Projects. As such, the Company will not be allowed to recover any imprudent costs, costs due to Company mismanagement, or any costs in excess of the Cost Cap set forth below. Further, the Company has the burden of going forward and the burden of proof regarding the recovery of any of the costs associated with the Stipulated Projects. However, the 520 Settling Parties agree not to challenge RMP's prudence or recovery of the actual capital costs associated the Stipulated Projects except to the extent (1) the actual costs of constructing either the Aeolus-to-Bridger/Anticline Line or, collectively, the remainder of the Stipulated Projects, exceeds the applicable estimated costs as presented in the Second Supplemental Direct Testimony of RMP in Docket 20000-520-EA-17, or (2) there is evidence of mismanagement. If such circumstances ever exist, any challenge to cost recovery will be limited to the prudence of the actual costs in excess of the estimated costs or the impact of the mismanagement. In demonstrating prudence of the Stipulated Projects, in whole or in part, the Company may argue that the prudence of Stipulated Projects should be reviewed on an overall basis.
- e. The Company shall not seek nor be permitted recovery in Wyoming of Wyoming's share of capital costs in excess of \$ [REDACTED] (total company) for the Stipulated Projects all taken together ("Cost Cap"). The Cost Cap is set approximately [REDACTED] [REDACTED] than the Company's most recent cost estimates presented in these

proceedings for the Stipulated Projects. Nothing in the Cost Cap is intended to preclude recovery of capital costs in excess of budgeted amounts for any particular project. The Cost Cap is intended to apply to all of the Stipulated Projects, taken as a whole. In the course of other state regulatory pre-approval proceedings in Utah (Docket No. 17-035-40) or Idaho (Docket PAC-E-17-07), to the extent one or more elements of the Stipulated Projects are not approved or the Company reduces its cost estimates for one or more elements of the Stipulated Projects, the Cost Cap on a total Company basis shall be reset for Wyoming to be [REDACTED] the new or revised cost estimates.

- f. RMP and WIEC agree that to the extent the Commission approves the stipulations in both Docket Nos. 20000-EA-519-17 and 20000-EA-520-17, the individual cost caps shall be combined into a single cost cap of [REDACTED] or [REDACTED]. [REDACTED] If there is a single cost cap and if in the course of other state regulatory pre-approval proceedings in Utah (Docket Nos. 17-035-39 and 17-035-40) or Idaho (Docket PAC-E-17-07), to the extent one or more elements of the Stipulated Projects are not approved or the Company reduces its cost estimates for one or more elements of the Stipulated Projects, the Cost Cap on a total Company basis shall be reset for Wyoming to be [REDACTED] the new or revised cost estimates.
- g. The 520 Settling Parties agree that all liquidated damages received by the Company under contractual agreements with vendors will first be retained by the Company to recover any construction costs in excess of the Cost Cap as discussed in Paragraph 80.e. above. Any remaining amounts will be passed onto customers as



an offset to capital costs, including, but not limited to, liquidated damages received due to the equipment not meeting specified availability and performance.

81. The 520 Settling Parties agree to reconvene and to reconsider and amend the terms and conditions of this Stipulation if the Company executes and obtains approval of a settlement agreement with parties in either Utah Docket No. 17-035-40 or Idaho Docket PAC-E-17-07 and those settlement agreements include more favorable terms and conditions for customers, recognizing that differences exist in current regulatory treatment or mechanisms between the states that will impact any settlement structure achieved in other states, than those set forth in this Stipulation. If after reconvening, the overall terms of a settlement agreement reached and approved in either Utah or Idaho is more favorable than the agreement reached herein, the Company will file with the Commission to align the overall outcome of this Stipulation with the other states.

#### **Public Interest**

82. The 520 Settling Parties represent a large cross section of public participants and together with the Company stipulate and agree that this Stipulation is in the public interest and that in its entirety it is reasonable. The 520 Settling Parties acknowledge that this Stipulation represents a compromise in the positions of the 520 Settling Parties in these Dockets and has been negotiated in good faith. The 520 Settling Parties have agreed to present hearing testimony and evidence in support of this Stipulation to the extent discussed in the Stipulation and to acknowledge that their support and advocacy of the Stipulation is based upon a finding by the Commission that the Stipulation is in the public interest. The 520 Settling Parties stipulate to support all elements of this Stipulation as being in the public interest in proceedings before the Commission, and to advocate in good faith that the Commission approve this Stipulation in its entirety.

## **GENERAL TERMS AND CONDITIONS**

83. The 520 Settling Parties stipulate and agree that all negotiations relating to this Stipulation are privileged and confidential, and no 520 Settling Party shall be bound by any position asserted in the negotiations, except to the extent expressly stated in this Stipulation.

84. The 520 Settling Parties stipulate and agree that this Stipulation represents a compromise in the positions of all 520 Settling Parties. As such, evidence of conduct or statements made in the negotiation and discussion phases of this Stipulation shall not be admissible as evidence in any proceeding before the Commission or any court.

85. The 520 Settling Parties stipulate and agree that except as expressly noted herein, the execution of this Stipulation shall not be deemed to constitute an acknowledgement of any Stipulating Party hereto of the validity or invalidity of any particular method, theory or principle of ratemaking or regulation, and no 520 Settling Party shall be deemed to have agreed that any principle, method or theory of regulation employed in arriving at this Stipulation is appropriate for resolving any issue in any other proceeding. The execution of the Stipulation shall not constitute the basis of estoppel or waiver in future proceedings by any 520 Settling Party. Furthermore, no 520 Settling Party hereafter shall be deemed to be bound by any position asserted by any 520 Settling Party, and no finding of fact or conclusion of law other than those expressly stated herein shall be deemed to be implicit in this Stipulation.

86. The 520 Settling Parties agree to the admission of all pre-filed testimony and exhibits filed in Docket No. 20000-520-EA-17. The 520 Settling Parties waive cross examination of witnesses regarding pre-filed testimony and exhibits.

87. The 520 Settling Parties will support the Stipulation with testimony at the hearing. Appropriate witnesses in this Docket will be made available in person or telephonically to the

Commission for the purpose of responding to any questions and examination by the Commission in support of the Stipulation.

88. The 520 Settling Parties acknowledge that this Stipulation represents a compromise in the positions of the 520 Settling Parties in this Docket and has been negotiated as a packaged settlement. The 520 Settling Parties acknowledge that their support and advocacy of the Stipulation is based upon the Stipulation as a whole, in its entirety, and not based upon its individual components viewed in isolation. The 520 Settling Parties acknowledge that their support and advocacy of the Stipulation may be compromised by material alterations thereto by the Commission.

89. In the event the Commission rejects or materially alters the Stipulation, the 520 Settling Parties agree they are no longer bound by its terms and are not deemed to have waived any of their respective procedural or due process rights under Wyoming law.

90. If the Commission chooses to adopt and approve the Stipulation, this Stipulation resolves all disputed matters relative to Docket No. 20000-520-EA-17. Any disputed matters shall be deemed resolved to the extent that the Stipulation is not compromised by alterations.

91. The issuance of an Order approving this Stipulation shall not be deemed to work as an estoppel upon the 520 Settling Parties or the Commission, or otherwise establish or create any limitation on or precedent of the Commission in future proceedings.

92. This Stipulation shall not become effective and shall be given no force and effect until the issuance of a final Commission decision that accepts and approves this Stipulation.

93. This Stipulation is in the public interest and is the result of a negotiated settlement. The compromises and settlements set forth in this Stipulation are consistent with the public interest and are supported by the 520 Settling Parties' testimony in this proceeding.

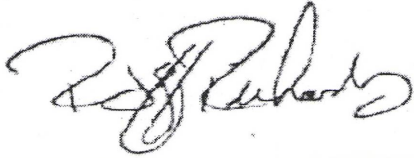


94. This Stipulation may be executed in one or more counterparts and each counterpart shall have the same force and effect as an original document and as if all the 520 Settling Parties had signed the same document. Any signature page of this Stipulation may be detached from any counterpart of this Stipulation without impairing the legal effect of any signatures thereon, and may be attached to another counterpart of the Stipulation identical in form hereto but having attached to it one or more signature page(s).

[Signature Page Follows]

Respectfully submitted this 10<sup>th</sup> day of April, 2018.

**ROCKY MOUNTAIN POWER**



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Respectfully submitted this 10<sup>th</sup> day of April, 2018.

**ROCKY MOUNTAIN POWER**

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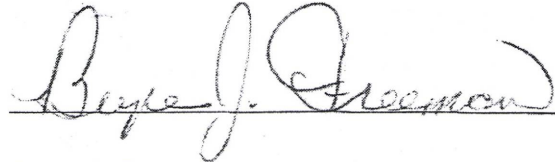
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