

Docket No. 17-035-40

Division of Public Utilities Questions for the October 11, 2017 Technical Conference

October 4, 2017

The Division requests that the time allotted for the Technical Conference be spent effectively. At the Technical Conference in Docket No. 17-035-39, the Company spent the majority of the time summarizing its case, witness by witness. Many questions went unanswered due to time and room constraints. The Division expressly requests that the Company does not summarize its case at the Technical Conference, witness by witness, as it did before. Like most parties following this docket, the Division has read the testimony of the Company's witnesses as well as its Application. Therefore, the Division requests that the Company address specific questions that are either not clear, are not contained in the filing, or that have not been adequately addressed through discovery. Please plan with the assumption that the parties have already read the Company's Application and testimonies.

The Division requests that the Company email one day in advance of the Technical Conference any *specific files or supporting documentation* that the Company will refer to or use in its response to questions from all participating parties. It is not enough to say that the answer is contained in the work papers of this witness or in the 12th Supplemental attachment here or there, etc. Please email any specific files the Company will refer to or use as supporting documentation to its responses so that parties on the phone can have the materials available prior to the Technical Conference. If necessary, email redacted and confidential versions of the files.

Finally, it is not the Division's intent to monopolize the time during the Technical Conference. Therefore, the Division submits primary questions, followed by secondary questions so that other parties have adequate time to have their questions before the Company proceeds to the Division's secondary questions.

Primary Questions

1. The Company's Application was filed on June 30, 2017. Since the filing, there have been developments in Utah proceedings as well as proceedings in other jurisdictions related to

the wind RFP and the IRP proceeding, both of which impact certain elements of the Application. Please describe all the relevant events in these proceedings and how they impact the Application and potential benefits of the projects.

2. The decision to pursue the wind and transmission project was supported by analysis conducted in the IRP. This analysis tested the addition of these components to the resource mix and found that they yielded customer benefits in certain price-policy scenarios. Please describe any analysis conducted by the Company supporting the optimality of this combination of transmission and renewable generation. Include in this discussion details on any analysis of other configurations of PTC-eligible generation, including solar as an alternative to wind.
3. Please provide a detailed discussion of the reliability need for the project, as opposed to the economic benefits of the project. Include in this discussion a description of all studies performed supporting the reliability need, and any study updates or additional studies that have been completed since the filing of the application.

Secondary Questions

1. Rick Vail pg. 4:70-76. With respect to the transmission projects that will allow the Company to add 1,270 MW of wind resources, if the Company is authorized to add 594 MW of repowered wind from the 17-035-39 Docket plus 860 MW of new wind (1,454 MW total), under the scenario of maximum capacity in any one hour, please explain any effect this will have on Dave Johnston and Wyodak generating resources, respectively. Please provide maps if necessary and supporting documentation.
2. Rick Vail pg. 14:322-341. The transmission system in south east Wyoming is already operating at capacity. Because of the limited fault current, the existing variable generation makes for a weak grid. The Company claims that the proposed transmission will alleviate this problem and provide a stiff grid. However, at the same time, the Company requests

approval to add even more variable wind generation to the area. This seems that it could create the same issue only more significantly. Mr. Vail makes the following statement:

Installing more variable resources in an area relative to total transmission capacity allows for more efficient use of the transmission system and the ability to use the most cost-effective resources to meet customer demand.

Please explain this concept better with supporting documentation, examples, or maps.

3. Rick Vail pg. 15: 336-339. The Company states that when the proposed and existing wind generation in the area is producing at capacity, the other resources in the area (i.e., Dave Johnston and Wyodak) can be curtailed to allow transmission capacity for wind generation. Please explain how this is an efficient use of resources, given that Dave Johnston and Wyodak costs are already on the books and are being recovered (all things considered).
4. Rick Vail pg. 17:395-398. With respect to system reliability, many of the transmission line projects being proposed involve building new lines in parallel to existing lines or reconstructing portions of existing lines. How does this help mitigate outages caused by storms, fire or other interferences?
5. Rick Vail pg. 21:484-824. The Company discusses the permits, studies, etc., needed to construct the transmission projects, and it appears the Company is still waiting for many of the permits and studies to be completed. The Company is projecting to start construction on the transmission/substation by April of 2019 and have it completed by October 2020 (roughly 19 months). Note: the 135 mile, 345 kV Populus to Terminal project began construction in October 2007 and was completed in 2010 – three years. Please explain how the Company can realistically accomplish the construction of the transmission projects by October 2020 given the time previous projects have required.
6. Please provide to date all known permits, conditional use permits, applications, and county or local approvals of any kind that the Company must obtain before beginning construction

of the Segment D line and the transmission upgrades. Please provide in the right hand side of this list the dates that the respective permits, approvals, etc. were obtained.

Please provide below this list a separate matrix of all of the remaining permits, approvals, conditional use permits, Idaho or Wyoming permits, state or local approvals, etc. that have yet to be obtained. List the identity or regulatory body that must issue the required approval, the current status and expected dates of each approval or permit, and provide a link to the identity requiring approval or where possible a document link. Please provide supporting documentation for each of the permits identified above.

7. Please provide a project-by-project timeline for each of the respective transmission projects that can be viewed without the use of a magnifying glass or high-power zoom lens.