

Docket 17-035-40

OCS Questions to RMP for the October 11, 2017 Technical Conference

The Office of Consumer Services requests the Company provide a Transmission Expert who can discuss transmission issues in depth.

- 1) In response to OCS 1.19, which concerned transmission studies, the Company supplied the WECC November 24, 2010 Phase 2 – Bridger Area Study Group Path Rating Report. Are the important conclusions from that report that the Aeolus West path will not significantly impact paths external to PacifiCorp, and that the study determined that the Aeolus West path rating is 2,672 MW (Page 7 of that report)? If there are any other important conclusions relevant to this proceeding, please discuss them.
- 2) Refer to the Company's response to OCS 1.23, please explain the difference in the transfer limit assumptions discussed in the Company's response including the Aeolus West transmission path rating of 2,650 MW, the Aeolus West path flow of 1,640 MW, and the incremental increase of east to west transfers of 750 MW.
- 3) Also related to the Company's response to OCS 1.23, please explain in greater detail how the Stiffness factor being so low prevents any additional wind generation from being added without additional transmission in the Eastern Wyoming Region. Please discuss all other alternatives to increase the stiffness factor other than the Aeolus – Bridger/Anticline line. For example, could the 230 kV upgrades be implemented alone?
- 4) Given that the November 24, 2010 Path Study considered two Gateway paths, one from Central Wyoming to Eastern Idaho, and the other from Central Wyoming to Central Utah, how did the Company decide to prioritize constructing the path to Eastern Idaho over the path to Central Utah?
- 5) Why wouldn't the retirement of Dave Johnston in 2027, or earlier, provide the additional 750 MW of transfer capability needed to allow the additional 1,270 MW of wind to be added in Eastern Wyoming, even if other less costly transmission upgrades were to be implemented?
- 6) During the RFP proceeding (17-035-23), the Company's witnesses emphasized the importance of meeting the "safe harbor" provisions of the PTC requirements, which the Company referred to as "bright line" tests, and it emphasized the riskiness of possibly having to prove to the IRS that it had met the continuous construction requirements of the PTC requirements, in the event that transmission is not completed by the end of 2020.

To meet this bright line test, it appears that the Company is only allowing 45 days slippage on the transmission project as the completion date is expected to be in October 2020 (Teply Testimony, line 333). Please discuss other specific transmission projects of a similar size and scope have been constructed within such a tight construction window. In addition, please discuss the actual versus planned construction timelines of other transmission projects that the Company has constructed (such as Red Butte – Sigurd, Mona – Oquirrh and Populus - Terminal).

- 7) The Office would like to understand how the Company's current wind generation is affecting transmission congestion in Wyoming and how this congestion is affecting the current operation of the Company's wind resources (and thermal resources) located in Wyoming. In response to OCS 1.2 in Docket No. 17-035-23, the Company stated:

The Company's transmission system in southeastern Wyoming is operating at capacity, which limits transfer of existing resources from this area. The transmission system that connects the prime wind region in eastern Wyoming to the more westerly areas of Wyoming consists largely of three 230 kV lines. These lines comprise the Western Electricity Coordinating Council rated Path 37, referred to as TOT 4A. For reference the path definition is the sum of line flows as follows:

Riverton – Wyopo 230 kV

Platte – Standpipe 230 kV

Spence – Mustang 230 kV

The limitation for this Path varies by outage condition, but in general, is limited by the amount of transmission capacity or "congestion" across this cut plane; the non-simultaneous rating of this path is 1025 MW.

The Office would like the Company to explain the current capacities of the components of the southeastern Wyoming transmission system and how they relate to simultaneous peak output of wind resources, dispatch of thermal resources and any curtailments of wind. Please explain if wind resources are the cause of the transmission-limiting congestion across the "cut plane" referenced above. If not, what is the cause?