



1407 West North Temple  
Salt Lake City, Utah 84116

August 3, 2021

***VIA ELECTRONIC FILING***

Public Service Commission of Utah  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84114

Attention: Gary Widerburg  
Commission Administrator

**Re: Docket No. 21-035-42  
In the Matter of Rocky Mountain Power's Application for Alternative Cost  
Recovery for Major Plant Additions of the Pryor Mountain and TB Flats Wind  
Projects**

Rocky Mountain Power hereby submits for filing the Application of Rocky Mountain Power for Authority to Decrease its Retail Electric Utility Service Rates in Utah and for Approval of Its Proposed Electric Service Schedules related to recovery for Pryor Mountain and TB Flats wind projects. Enclosed are the confidential and non-confidential electronic copies of the testimony, exhibits, and workpapers in the file formats in which they were created. Exhibits provided in pdf format were provided from a published report, document or authored outside the company. Also enclosed are the confidential and non-confidential electronic copies of the complete filing requirements under Utah Public Service Commission Rule R746-700-30.

Rocky Mountain Power respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

By E-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)  
[jana.saba@pacificorp.com](mailto:jana.saba@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232

Informal inquiries may be directed to Jana Saba at (801) 220-2823.

Sincerely,

Joelle Steward  
Vice President, Regulation

cc: Service List Docket Nos. 21-035-42

**CERTIFICATE OF SERVICE**

Docket No. 21-035-42

I hereby certify that on August 3, 2021, a true and correct copy of the foregoing was served by electronic mail to the following:

**Utah Office of Consumer Services**

Michele Beck [mbeck@utah.gov](mailto:mbeck@utah.gov)  
[ocs@utah.gov](mailto:ocs@utah.gov)

**Division of Public Utilities**

[dpudatarequest@utah.gov](mailto:dpudatarequest@utah.gov)

**Assistant Attorney General**

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**Rocky Mountain Power**

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Emily Wegener



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*Attorneys for Rocky Mountain Power*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Application of	)	
Rocky Mountain Power for Approval of	)	Docket No. 21-035-42
Alternative Cost Recovery for Major Plant	)	
Additions of the Pryor Mountain and	)	<b>APPLICATION</b>
TB Flats Wind Projects	)	
	)	
	)	

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**APPLICATION FOR ALTERNATIVE COST RECOVERY**

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Pursuant to section 54-7-13.4 of the Utah Code and R746-700-1 of the Utah Administrative Code, PacifiCorp, dba Rocky Mountain Power (“Rocky Mountain Power” or the “Company”), hereby respectfully submits its Application (“Application”) to the Public Service Commission of Utah (“Commission”), requesting approval for a decrease in the Company’s retail electric utility service rates in Utah in the amount of \$4.2 million for the alternative cost recovery of the major plant addition investments in the Pryor Mountain and TB Flats wind projects that are not recovered through current rates set in the 2020 General Rate Case, Docket No. 20-035-04 (“2020 GRC”).

In the 2020 GRC, the Commission determined that the portion of these projects that was unavoidably delayed due to the COVID-19 pandemic could not be recovered through an extended test year. This Application seeks recovery of costs not recovered by the Company in the 2020 GRC because Pryor Mountain and TB Flats constitute major plant additions under section 54-7-13.4 of the Utah Code, and the Company will not fully recover its investment in these wind projects while customers will be receiving the full benefits of the investments through the Energy Balancing Account (“EBA”). The Company requests to incorporate in its base rates for all classes of customers the decrease of \$4.2 million or 0.2 percent, through the proposed tariffs presented in Exhibit RMP\_\_ (RMM-3), to be made effective on January 1, 2022, subject to section 54-7-13.4(6)(a)(i) of the Utah Code.

In support of this Application, Rocky Mountain Power states as follows:

1. Rocky Mountain Power is a division of PacifiCorp, an Oregon corporation, that provides electric service to retail customers in the states of Utah, Wyoming, and Idaho. Rocky Mountain Power is a public utility in the state of Utah and is subject to the Commission’s jurisdiction with respect to its prices and terms of electric service to retail customers in Utah. The Company serves approximately 948,000 customers in Utah. Rocky Mountain Power’s principal place of business in Utah is 1407 West North Temple, Suite 320, Salt Lake City, Utah 84116.

2. Communications regarding this Application should be sent to:

Jana Saba  
Utah Regulatory Affairs Manager  
Rocky Mountain Power  
1407 West North Temple, Suite 330  
Salt Lake City, UT 84116  
Email: [jana.saba@pacificorp.com](mailto:jana.saba@pacificorp.com)

Emily L. Wegener  
Stephanie Barber-Renteria  
Rocky Mountain Power  
1407 West North Temple, Suite 320  
Salt Lake City, Utah 84116  
E-mail: [emily.wegener@pacificorp.com](mailto:emily.wegener@pacificorp.com)  
[stephanie.barber-renteria@pacificorp.com](mailto:stephanie.barber-renteria@pacificorp.com)

In addition, the Company respectfully requests that all data requests regarding this matter be addressed to:

By e-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah St, Suite 2000  
Portland, Oregon 97232

Informal inquiries related to this Application may be directed to Jana Saba, Utah Regulatory Affairs Manager, at (801) 220-2823.

## **BACKGROUND**

1. Pryor Mountain is a 240 megawatt (“MW”) wind project, located in Carbon County, Montana, approximately 60 miles south of Billings, Montana. The project consists of 114 wind turbine generators (“WTGs”), an electrical collector system, a collector substation with two 34.5 kilovolt (“kV”) to 230 kV step-up transformers, an operations and maintenance (“O&M”) building, and site access roads.

2. TB Flats is a 500 MW wind generation facility and associated infrastructure, located on approximately 41,000 acres of leased private and state land in Carbon and Albany Counties, Wyoming. The facilities consist of 132 WTGs, an electrical collector system, collector substations, access roads, meteorological towers, an O&M building,

communication equipment, and supervisory control and data acquisition control equipment.

3. At the time Rocky Mountain Power filed its application in the 2020 GRC, on May 8, 2020, the Company expected Pryor Mountain and TB Flats to achieve commercial operation in December 2020 and be in service for the entire calendar year 2021 test period in the case. However, the completion of construction for both wind projects was unavoidably delayed due to the COVID-19 pandemic.

4. For Pryor Mountain, approximately 160 MW of nameplate capacity was in-service at the start of 2021. The remaining 80 MW of capacity was placed into service as of April 1, 2021.

5. For TB Flats, approximately 309 MW of nameplate capacity was in-service at the start of 2021. The remaining approximately 191 MW of capacity was placed into service on July 26, 2021.

6. In the 2020 GRC, Rocky Mountain Power proposed implementing a two-step rate increase, the second step of which would have included annualized recovery of the delayed plant investments rather than an average-of-period for plant in service during the test period.

7. This approach was not adopted by the Commission. Instead, the Commission adjusted the Company's "revenue requirement to reflect the inclusion of the delayed portions of [Pryor Mountain and TB Flats] in rate base at their average-of-period values in the Test Year."<sup>1</sup>

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<sup>1</sup> *Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations*, Docket No. 20-035-04, Confidential Order at 46 (Dec. 30, 2020).

8. Following implementation of the rates authorized in the Commission's order in the 2020 GRC, Rocky Mountain Power has made investments in Pryor Mountain and TB Flats that are not being recovered in current rates. This Application seeks approval for alternative cost recovery for the major plant addition investments in Pryor Mountain and TB Flats that were not recovered in the 2020 GRC.

### **REQUEST FOR AUTHORITY TO DECREASE RATES**

#### **Pryor Mountain and TB Flats Satisfy the Statutory Requirements for Alternative Cost Recovery for Major Plant Additions**

9. Rocky Mountain Power's total investment in Pryor Mountain is estimated to be \$ [REDACTED] million. The Commission affirmed the prudence of the Company's acquisition and development of Pryor Mountain in the 2020 GRC at a cost of \$ [REDACTED] million. The wind project at Pryor Mountain is used to serve Utah customers.

10. Rocky Mountain Power's total investment in TB Flats is estimated to be \$ [REDACTED] million. The Commission approved Rocky Mountain Power's resource application for TB Flats in Docket No. 17-035-40 as part of the Company's Energy Vision 2020 Projects. The total project cost for TB Flats was also included in the Company's revenue requirement in the 2020 GRC at a level of \$ [REDACTED] million on a 13-month average. The wind project at TB Flats is used to serve Utah customers.

11. Alternative cost recovery for a major plant addition is authorized when a single capital investment project in total exceeds one percent of the Company's rate base, based on the most recent general rate case determination. One percent of the Company's Utah rate base approved by the Commission in the 2020 GRC is \$75.6 million.

12. Rocky Mountain Power's system-wide costs are allocated to Utah based on the recently approved 2020 PacifiCorp Inter-Jurisdictional Cost Allocation Protocol ("2020 Protocol").<sup>2</sup>

13. Under the 2020 Protocol, of the \$ [REDACTED] million invested in Pryor Mountain, \$ [REDACTED] million will be allocated to Utah. This capital investment exceeds one percent of the Company's rate base determination in the 2020 GRC.

14. Under the 2020 Protocol, of the \$ [REDACTED] million invested in TB Flats, \$ [REDACTED] million will be allocated to Utah. This capital investment exceeds one percent of the Company's rate base determination in the 2020 GRC.

15. This Application is timely as the final in-service dates for Pryor Mountain and TB Flats, are April 1, 2021, and July 26, 2021, respectively, which are within 18 months of the Commission's final order in the 2020 GRC.

### **Filing Requirements**

16. This Application complies with the minimum filing requirements established by the Commission in R746-700-30 of the Utah Administrative Code for cost recovery of a major plant addition. Attachment 1 to this Application lists each filing requirement identified in the regulations and the location of the responsive information.

17. The Company provided notice of its intent to file this Application on June 28, 2021, more than 30 days in advance of the filing as required by R746-700-1.B of the Utah Administrative Code.

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<sup>2</sup> *Application of Rocky Mountain Power for Approval of the 2020 Inter-Jurisdictional Cost Allocation Agreement*, Docket No. 19-035-42, Order Approving 2020 Protocol (Apr. 15, 2020).



REDACTED

18. Rocky Mountain Power requests a rate decrease in the amount of \$4.2 million for the alternative cost recovery of the major plant addition investments in Pryor Mountain and TB Flats that were not recovered in the 2020 GRC. The Company's investment in Pryor Mountain that has not yet been recovered is \$ [REDACTED] million, and the Company's investment in TB Flats that has not yet been recovered is \$ [REDACTED] million, for a total of \$ [REDACTED] million. On a Utah-allocated basis, the portion of unrecovered investments is \$ [REDACTED] million.

19. As discussed by Company witness Mr. Steven R. McDougal, the requested incremental revenue requirement results in a net decrease in rates because the incremental plant costs are offset by incremental production tax credit and net power cost savings.

20. In accordance with the 150-day period provided under section 54-7-13.4(4)(b) of the Utah Code, Rocky Mountain Power requests that the Commission issue an order to implement the proposed tariffs on January 1, 2022.

**General Information**

21. The general information required by R746-700-30.A of the Utah Administrative Code is provided in the Direct Testimony of Messrs. Timothy J. Hemstreet, Robert Van Engelenhoven, and Steven R. McDougal, and is described in detail in Attachment 1 to this Application.

**Financial Information**

22. The financial information required by R746-700-30.B of the Utah Administration Code is provided in the Direct Testimony of Messrs. Hemstreet, Van Engelenhoven, and McDougal to this Application and described in detail in Attachment 1 to this Application.

### **Capital Cost, Rate Base and Jurisdictional Allocation**

23. The capital cost, rate base and jurisdictional allocation information required by R746-700-30.C of the Utah Administrative Code is included in the Direct Testimony of Ms. Nikki L. Kobliha and Messrs. Hemstreet, Van Engelenhoven, and McDougal to this Application and is described in detail in Attachment 1 to this Application.

### **Cost and Operating Expense Information**

24. The cost and operating expenses information required by R746-700-30.D of the Utah Administrative Code is included in the Direct Testimony of Mr. McDougal to this Application and is described in detail in Attachment 1 to this Application.

### **Net Power Cost**

25. The net power costs information required by R746-700-30.E of the Utah Administrative Code is included in the Direct Testimony of Mr. McDougal to this Application and is described in detail in Attachment 1 to this Application.

### **RATE SPREAD**

26. The Company is proposing to allocate the revenue decrease to customer classes based upon the final rate spread decision adopted by the Commission in the 2020 GRC and the revenue requirement presented in this proceeding by Company witness Mr. Meredith.

27. The table below summarizes the proposed decrease by rate schedule for each listed customer class for the \$4.2 million decrease to base.

**TABLE 1**

<b>Customer Class</b>	<b>Proposed Percentage Change from Rates In Effect on the date of Application</b>
Residential	-0.2%
Schedule 6	-0.2%
Schedule 8	-0.2%
Schedule 9	-0.3%
Irrigation	-0.2%
Lighting	-0.2%
<b>Total</b>	<b>-0.2%</b>

**RATE DESIGN**

28. Rocky Mountain Power proposes to collect the change in revenue requirement from customers through changes to demand charges (where applicable) and energy charges for each customer class. Rates are designed to collect the total revenue requirement proposed by the Company for each rate schedule.

**WITNESSES – PREFILED TESTIMONY**

29. This Application and the requests made herein are supported by the prefiled written direct testimony and exhibits of the following witnesses, all of which are exhibits to this Application:

- **Joelle R. Steward**, Vice President, Regulation, Rocky Mountain Power, provides an overview of the Company’s request in this proceeding, particularly in the context of Commission’s decision in the 2020 GRC.
- **Steven R. McDougal**, Director of Revenue Requirements, provides the capital costs of Pryor Mountain and TB Flats, describes the Company’s revenue

requirement associated with the major plant additions that was not recovered in the 2020 GRC, and discusses the jurisdictional allocation of the investments. Mr. McDougal also provides the net power cost impact of the major plant additions including the impact to base net power costs associated with the Energy Balancing Account.

- **Robert Van Engelenhoven**, Director of Resource Development, provides information regarding the investment, development, and completion of the Pryor Mountain Wind Project.

- **Timothy J. Hemstreet**, Managing Director of Renewable Energy Development, provides information regarding the investment, development, and completion of the TB Flats wind project.

- **Nikki L. Kobliha**, Vice President, Chief Financial Officer and Treasurer, provides information on the financing of the capital investments in the major plant additions.

- **Robert M. Meredith**, Director of Pricing and Cost of Service, provides the Company's class cost of service impacts of the major plant additions and describes the Company's rate spread and rate design proposals, as well as the proposed tariff changes to be implemented on January 1, 2022.

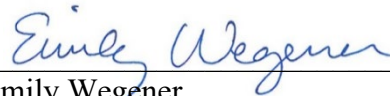
**WHEREFORE**, by this Application, Rocky Mountain Power respectfully requests that the Commission:

30. Authorize cost recovery through customer rates, which results in a net decrease of \$4.2 million, and which the Company requests to incorporate in its rates and charges for all customer classes on January 1, 2022, through its proposed tariffs.

DATED this 3<sup>rd</sup> day of August 2021.

Respectfully submitted,

ROCKY MOUNTAIN POWER



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*Attorneys for Rocky Mountain Power*

# Attachment 1

**R746 Public Service Commission  
Sub-Section R746-700-30 Information for Alternative Cost Recovery Filing  
Rocky Mountain Power Docket 21-035-42**

<b>Rule</b>	<b>Description</b>	<b>Pryor Mountain Location in Filing</b>	<b>TB Flats Location in Filing</b>
<b>A.</b>	<b>General Information Requirements</b>		
1	All documents and presentations that were provided to management, senior management and the Board of Directors of the utility and its affiliates related to the plant addition.	This information is provided in R746-700-30-A-1	This information is provided in R746-700-30-A-1
2	Copies of all Board of Directors' minutes of the utility and its affiliates where the plant was discussed, approved, reviewed, evaluated, or presented.	The Minutes of Board of Directors Meetings are highly confidential and commercially sensitive. The Company requests special handling. Please contact Jana Saba at (801) 220-2823 to discuss arrangements for review.	The Minutes of Board of Directors Meetings are highly confidential and commercially sensitive. The Company requests special handling. Please contact Jana Saba at (801) 220-2823 to discuss arrangements for review.
3	Details of the plant being acquired including its location, capacity, technologies used, project milestones or progress dates, projected in-service date and demonstrating that the plant addition is a major plant addition under 54-17-13.4.	Please refer to MPA FR R746-700-30.A.3	Please refer to MPA FR R746-700-30.A.3
4	Description of any changes, modifications, etc. to the existing utility plant/system that may be necessary to integrate the plant addition with the utility's system.	Network upgrades to the local transmission system were necessary to interconnect the Pryor Mountain wind project consistent with the large generator interconnection agreement (LGIA) for Q0542. Please refer to the Company's response to MPA Filing Requirement R746-700-30.A.11, specifically Confidential Attachment MPA Filing Requirement R746-700-30.A.11 for a copy of the LGIA.	Network upgrades to the local transmission system were necessary to interconnect the TB Flats wind project, consistent with the LGIA for Q0707. Generation Interconnection Q0708 interconnects through the collector substation for Q0707, therefore no additional network upgrades were identified to interconnect the Q0708 project. Please refer to the Company's response to MPA Filing Requirement R746-700-30.A.11, specifically Confidential Attachment MPA Filing Requirement R746-700-30.A.11 for copies of the LGIA's.
5	Information establishing the prudence of the plant addition, information addressing the provisions of 54-17-13.4, and the provisions of 54-17-302 and 54-17-303.	This information is provided in R746-700-30-A.5	This information is provided in R746-700-30-A.5
6	Information establishing the consistency of the plant addition to projected plant acquisitions in the utility's latest Integrated Resource Plan and its Action Plan. Show that the plant addition resource is as favorable or more favorable than the compared Integrated Resource Plan resource items in terms of least cost and least risk or explain why it need not.	This information is provided in R746-700-30-A.6	This information is provided in R746-700-30-A.6
7	Any and all documents and analyses that address the plant addition's projected costs, savings and benefits and demonstrate how and when the utility's ratepayers will see a net benefit from the plant addition and quantify the net benefit.	Please refer to MPA FR R746-700-30.A.6	Please refer to MPA FR R746-700-30.A.6
8	Where applicable, information on whether and how the plant addition has been or will be inspected as part of due diligence, including identification of who conducted or will conduct the inspection and copies of all reports or other documents prepared by the inspectors.	The Pryor Mountain wind project and the TB Flats wind projects were developed by PacifiCorp and inspection of construction activities occurred throughout the construction period. No due diligence inspection report is available given PacifiCorp developed the facility and it was not acquired as an operating project.	The Pryor Mountain wind project and the TB Flats wind projects were developed by PacifiCorp and inspection of construction activities occurred throughout the construction period. No due diligence inspection report is available given PacifiCorp developed the facility and it was not acquired as an operating project.
9	A list of all outside consultants or advisors used, or expected to be used by the utility in connection with the plant addition and all reports, including interim reports, prepared by outside consultants or advisors.	Black and Veatch, Inc. (B&V) served as a consultant to conduct a wind resource assessment for the project. Please refer to Confidential Attachment MPA FR R746-700-30-A.9 which provides a copy of the wind resource assessment prepared by B&V for the Pryor Mountain wind project.	B&V also served as a consultant to conduct a wind resource assessment for the project. Please refer to Confidential Attachment MPA FR R746-700-30-A.9 which provides a copy of the wind resource assessment prepared by B&V for the TB Flats wind projects.

<b>R746 Public Service Commission</b>		
<b>Sub-Section R746-700-30 Information for Alternative Cost Recovery Filing</b>		
<b>Rocky Mountain Power Docket 21-035-42</b>		
10	All internal reports that were prepared when analyzing the purchase or construction of the plant addition.	Please refer to the Company's response to MPA Filing Requirements R746-700-30.A.1, R746-700-30.A.6 and R746-700-30.A.9.
11	Where applicable, copies of contracts that are expected to be assumed following close of acquisition.	This information is provided in R746-700-30.A.11
12	Where applicable, copies of all contracts between the utility and the seller or operator of the plant addition.	Not applicable; the Pryor Mountain wind project and the TB Flats wind projects are newly constructed wind projects, constructed under contract for PacifiCorp. These wind projects were not operational wind projects that PacifiCorp acquired from any third party(ies).
13	Where applicable, a history of the plant addition to be acquired including financial and performance characteristics for the past five years, or from the start of commercial operation, whichever is less.	Not applicable; the Pryor Mountain wind project and the TB Flats wind projects are newly constructed wind projects, constructed under contract for PacifiCorp. These wind projects were not operational wind projects that PacifiCorp acquired from any third party(ies).
14	Where applicable, information on the utility's understanding of the reasons why the seller is selling the facility.	Not applicable; the Pryor Mountain wind project and the TB Flats wind projects are newly constructed wind projects, constructed under contract for PacifiCorp. These wind projects were not operational wind projects that PacifiCorp acquired from any third party(ies).
15	Where applicable, information on the seller's book value of the plant.	Not applicable; the Pryor Mountain wind project and the TB Flats wind projects are newly constructed wind projects, constructed under contract for PacifiCorp. These wind projects were not operational wind projects that PacifiCorp acquired from any third party(ies).
16	An indication whether the seller will allow interested persons who have signed a confidentiality agreement with the utility access to the seller's books and records for audit, and what restrictions may apply to such access.	Not applicable; the Pryor Mountain wind project and the TB Flats wind projects are newly constructed wind projects, constructed under contract for PacifiCorp. These wind projects were not operational wind projects that PacifiCorp acquired from any third party(ies).



<b>R746 Public Service Commission</b>		
<b>Sub-Section R746-700-30 Information for Alternative Cost Recovery Filing</b>		
<b>Rocky Mountain Power Docket 21-035-42</b>		
<b>Financial and Revenue information</b>		
<b>B.</b>		
1	Provide information of the revenues, costs and benefits arising from the plant addition, identifying any limits and conditions on forecast information/calculations.	Please refer to the direct testimonies and exhibits of Company witnesses, Timothy J. Hemstreet, Robert Van Engelenhoven, and Steven R. McDougal, as well as the Company's response to MPA Filing Requirement R746-700-30.A.1.
2	Information on the net revenue impact of bringing the plant online and operating the plant within the utility's system compared to operations without the plant.	Please refer to direct testimony and exhibits of Company witness, Steven R. McDougal. For a copy of the model used to perform the calculation, please refer to the Company's response to MPA Filing Requirement R746-700-30.D.1.
3	Justification for any acquisition premium the utility plans to include in rates and recover from ratepayers..	Not applicable; the Pryor Mountain wind project and the TB Flats wind projects are newly constructed wind projects, constructed under contract for PacifiCorp. These wind projects were not operational wind projects that PacifiCorp acquired from any third party(ies).
<b>C.</b>		
1	<b>Capital cost, rate base and jurisdictional allocation information.</b> Information on how the utility plans to finance the construction or acquisition of the plant addition. This is to include the timing and amount of any equity, debt, or other security issuances and any documents to, or received from, any investment bankers or other entities regarding the issuance of any securities connected with the plant addition.	Please refer to the direct testimony and exhibits of Company witness, Nikki L. Koblaha.
2	Information indicating whether the utility has discussed the plant addition with any rating agencies and provide any reports or rating agencies provided with respect to the plant addition. If not, indicate when it plans to discuss the plant addition with any rating agency.	Please refer to the direct testimony and exhibits of Company witness, Nikki L. Koblaha.
3	Information on how much of the purchase price or construction costs the utility intends to place into rate base.	Please refer to the direct testimony and exhibits of Company witness, Nikki L. Koblaha.
4	Information showing the amount and relating to any analysis of AFUDC associated with the plant addition.	Please refer to the direct testimonies and exhibits of Company witnesses, Robert Van Engelenhoven, Timothy J. Hemstreet and Steven R. McDougal.
5	Information on the utility's anticipated jurisdictional allocation for the plant addition and any change in allocation factors and other plant, revenue and expense/cost allocations arising from the plant addition.	This information is provided in R746-700-30-C.4 Please refer to the direct testimony and exhibits of Company witness, Steven R. McDougal and Confidential Exhibit RMP (SRM-1).

<b>R746 Public Service Commission</b>		
<b>Sub-Section R746-700-30 Information for Alternative Cost Recovery Filing</b>		
<b>Rocky Mountain Power Docket 21-035-42</b>		
<b>Cost and Operating Expenses Information</b>		
<b>D.</b>		
1	A complete analysis of all costs associated with constructing, acquiring and operating the plant for which the utility will seek recovery from Utah ratepayers and identify any costs for which no recovery will be sought from Utah ratepayers	Please refer to the direct testimony and exhibits of Company witness, Steven R. McDougal. Please refer to the Confidential Attachment in FR R746-700-30-D.1 which provides a copy of the models used to perform the calculation.
2	Information on all clearances, permits or other government regulatory authorizations necessary, to be modified and completed for the plant and their associated costs.	This information is provided in R746-700-30-D.2
3	Information on any liquidated damages clause and early termination fees, penalties, or other expenses which may be incurred if the plant is not completed or acquired.	Not applicable; the Pryor Mountain wind project and the TB Flats wind projects are completed and are commercially operational.
4	Information on whether there are any integration costs or fees (transmission, pipeline, etc.).	Please refer to MPA FR R746-700-30.A.4
5	Information on any costs analysis analyzing bringing the plant online.	Please refer to MPA FR R746-700-30.C.4
6	Information on how the plant addition will change and the amount of change on the utility's Operation and Maintenance costs.	The addition of the Pryor Mountain wind project and the TB Flats Wind Projects in the Company's application will not have a material impact on the operations and maintenance (O&M) level set in the rate case. Therefore, no change in O&M related to the capital addition is requested in this proceeding.
7	All operating cost analyses that have been completed related to the plant addition.	Please refer to the APRs provided in R746-700-30.A.1 for operating costs analyses completed for this plant addition
8	The planned accounting treatment for the plant, including the proposed journal entries or other accounting entries for such planned accounting treatment.	This information is provided in R746-700-30-D.8
9	A description of and the amounts for overhead, closing, contingent or any other costs for which the utility expects it will ask recovery as a result of the acquisition.	Please refer to Confidential Attachment R746-700-30-D.9 which provides the TB Flats and Pryor Mountain contingency.
<b>E.</b>		
<b>1</b>	<b>Net Power Costs Information</b> The impacts of the plant addition on any utility power cost and production cost dispatch models. If any models are revised to accommodate the plant addition, the revised models will be available to the parties participating in the application proceeding.	Please refer to the direct testimony and exhibits of Company witness, Steven R. McDougal and Exhibit RMP__ (SRM-1).
2	A net power cost study (NPC) in the utility's production cost dispatch model that documents changes from previous net power cost estimates. All relevant workpapers and documentation to allow any other person to perform an independent analysis and verification of the NPC will be provided.	Please refer to the Confidential Attachment R746-700-30-E.2 which provides the net power costs (NPC) work papers supporting the direct testimony and exhibits of Company witness, Steven R. McDougal. Please also refer to the Confidential Attachment R746-700-30-E.2, specifically folder "UT MPA - Pryor and TB Flats GRID PROJECT CONF" which provides a copy of the Generation and Regulation Initiative Decision Tool (GRID) projects used to produce the above referenced NPC work papers.
3	Show how the plant addition impacts planned outages, unplanned outages, and maintenance at the utility's generation resources.	This information is provided in R746-700-30-E.3