

## **DPU Exhibit 1.1 DIR**

**RMP's Redacted Responses to  
Data Requests Referenced in the  
Direct Testimony of  
Dr. Joni S. Zenger**

**DPU Exhibit 1.1 DIR**  
**Place Holder for Confidential**  
**Exhibit**  
**OCS DR 1.5**

## **DPU Data Request 1.2**

**Force Majeure Claims – Pryor Mountain.** In reference to the prior question, for each force majeure claim, please explain how each of the claim was resolved. Please state if another vendor was brought in, please provide any agreed to schedule changes, delivery changes, changes to dates of services, etc.

## **Response to DPU Data Request 1.2**

The Company assumes that the reference to the “prior question” is intended to be a reference to DPU Data Request 1.1. Based on the foregoing assumption, the Company responds as follows:

Please refer to the Company’s response to DPU Data Request 1.1, specifically Confidential Attachment DPU 1.1. The Company continues to negotiate with the Balance of Plant (BOP) and Turbine Supply contractors to settle contractual delay claims due to the COVID-19 pandemic. Negotiations are advancing in a productive manner are expected to be settled before the end of 2021.

21-035-42 / Rocky Mountain Power  
September 17, 2021  
DPU Data Request 1.10

**DPU Data Request 1.10**

**In-Service Delays.** For each item documented in the previous question, please provide a narrative description of how and if the PCN or other documentation impacted the in-service date of the TB Flats project.

**Response to DPU Data Request 1.10**

The Company assumes that the reference to the “previous question” is intended to be a reference to DPU Data Request 1.9. Based on the foregoing assumption, the Company responds as follows:

Please refer to the Company’s response to OCS Data Request 1.10 which is indicative of the movement of the TB Flats wind project deemed in-service date delay from November 2020 through July 2021.

**DPU Data Request 1.8**

**In-Service Delays.** For each item documented in the previous question, please provide a narrative description of how and if the PCN or other documentation impacted the in-service date of the Pryor Mountain project.

**Response to DPU Data Request 1.8**

The Company assumes that the reference to the “previous question” is intended to be a reference to DPU Data Request 1.7. Based on the foregoing assumption, the Company responds as follows:

The cause for the in-service delays was due to the COVID-19 pandemic. Following the outbreak of COVID-19, the wind turbine supplier could not deliver the equipment according to the contract due to the disruption the global supply chain. The delayed delivery of major equipment, primarily the wind turbine components was the primary cause of the in-service delays.

Please also refer to the Company’s response to DPU Data Request 1.1.

### **DPU Data Request 3.1**

**Pryor Mountain WTGs.** On page 2 of Mr. Robert Van Engelenhoven's Direct Testimony, Mr. Van Engelenhoven provides a description of the equipment for the Pryor Mountain wind project. Mr. Van Engelenhoven provided testimony in the RMP General Rate Case (GRC) in Docket No. 20-035-04 that had a slightly different description of the equipment for that project. Please explain the reason for the change in the number of Vestas Model V110-2.2 generators and the Vestas model V110-2.2 MW follow on generators from what was identified in the GRC.

### **Response to DPU Data Request 3.1**

**From the direct testimony of Company witness, Robert Van Engelenhoven Docket 20-035-04 (general rate case (GRC)), page 3, lines 49 through 54**

**Summary:**

57 Vestas V110-2.0 megawatt (MW) safe harbor

21 Vestas V110-2.2 MW safe harbor

32 Vestas V110-2.2 MW follow-on

**From the direct testimony of Mr. Engelenhoven in this proceeding:**

**Docket 21-035-42, page 2, lines 24 and 25**

**Summary:**

57 Vestas V110-2.0 MW safe harbor

16 Vestas V110-2.2 MW safe harbor

37 Vestas V110-2.2 MW follow-on

On June 17, 2020, the Company executed a no-cost contract amendment with Vestas to substitute five of the planned 21 – V110 nacelles furnished to the Company through an affiliate transaction with Berkshire Hathaway Energy Renewables with five – V110 nacelles that the Company owned and were also in storage at the Vestas Colorado facility. The change was made because the Company had available equipment that could be applied to the Pryor Mountain wind project and thus did not require as many wind turbine generators (WTG) from Berkshire Hathaway Energy Renewables to complete the project.

21-035-42 / Rocky Mountain Power

September 17, 2021

DPU Data Request 1.4

#### **DPU Data Request 1.4**

**Force Majeure Claims – TB Flats.** In reference to the prior question, for each force majeure claim, please explain how each of the claim was resolved. Please state if another vendor was brought in, please provide any agreed to schedule changes, delivery changes, changes to dates of services, etc.

#### **Response to DPU Data Request 1.4**

The Company assumes that the reference to the “prior question” is intended to be a reference to DPU Data Request 1.3. Based on the foregoing assumption, the Company responds as follows:

The Company continues to negotiate with the Balance of Plant (BOP) and Turbine Supply contractors to settle contractual delay claims due to the COVID-19 pandemic. Negotiations are advancing in a productive manner are expected to be settled before the end of 2021.

### **DPU Data Request 1.1**

**Force Majeure Claims – Pryor Mountain.** Please provide copies all of force majeure claims by vendors, consultants, contractors, etc. who were involved in any part of the construction of the Pryor Mountain Wind Project or network upgrades required to bring the project into service. This includes all deliveries and installation of WTGs, commissioning of WTGs, collector substations, etc. Please include the dates of the force majeure claims, the Company's responses to the claims, and please state if any of the claims were non-COVID related. Please identify if any of these have already been accounted for in Docket No. 20-035-04.

### **Response to DPU Data Request 1.1**

Please refer to Confidential Attachment DPU 1.1 which provides copies of force majeure claims associated with the Pryor Mountain wind project. The Pryor Mountain wind project received notifications of the COVID-19 pandemic force majeure event from nearly every supplier and contractor that the Company had a contract with for this project. However, the only material claims that required extensive negotiation and settlement were from the turbine supply contractor and balance of plant (BOP) contractor. The Company notes that the total project costs for the Pryor Mountain wind project presented in this proceeding are less than the project costs included in the Company's rebuttal testimony in the general rate case (GRC), Docket No. 20-035-04. Please refer to the Company's response to OCS Data Request 1.5 for more details.

Confidential information is provided subject to R746-1-601–606 of the Utah Public Service Commission Rules.



**DPU Exhibit 1.1 DIR**  
**Place Holder for Confidential**  
**Exhibit**  
**DPU DR 1.1 - Attachment**

21-035-42 / Rocky Mountain Power  
September 10, 2021  
OCS Data Request 1.4

#### **OCS Data Request 1.4**

Refer to the testimony of Mr. Van Englenhoven. Page 2, line 26. Please explain the difference between the V-110 2.2 and V-110 2.2 “follow-on” WTG’s.

#### **Response to OCS Data Request 1.4**

The V110-2.2 equipment is identical, but equipment denoted as “follow-on” equipment is equipment supplied to a wind project that was not used to establish the start of construction for the project under Internal Revenue Service (IRS) rules. This “follow-on” equipment “follows” safe harbor equipment that is deployed to the site to establish the start of construction for the wind project, and thus the level of production tax credits (PTC) for which it will be eligible.