

–BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH–

IN THE MATTER OF PACIFICORP’S)	
APPLICATION FOR APPROVAL OF)	
ALTERNATIVE COST RECOVERY FOR MAJOR)	DOCKET No. 21-035-42
PLANT ADDITIONS OF THE PRYOR MOUNTAIN)	Exhibit No. DPU 3.0 SR
AND TB FLATS WIND PROJECTS)	Surrebuttal Testimony of Trevor R. Jones

REDACTED

FOR THE DIVISION OF PUBLIC UTILITIES
DEPARTMENT OF COMMERCE
STATE OF UTAH

Surrebuttal Testimony of

Trevor R. Jones

November 18, 2021

TABLE OF CONTENTS

I. INTRODUCTION..... 1

II. PURPOSE AND SUMMARY..... 1

III. TB FLATS 2

IV. CONCLUSION 3

1 **INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME, OCCUPATION, AND BUSINESS ADDRESS.**

3 A. My name is Trevor R. Jones. I am a Utilities Analyst for the Utah Division of Public
4 Utilities (Division). My business address is 160 East 300 South, Salt Lake City, Utah
5 84111.

6 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING?**

7 A. The Division.

8 **Q. ARE YOU THE SAME TREVOR R. JONES WHO FILED DIRECT TESTIMONY**
9 **IN THIS PROCEEDING?**

10 A. Yes, I am.

11

12 **PURPOSE AND SUMMARY**

13 **Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY IN THIS**
14 **CASE?**

15 A. The purpose of my testimony is to provide analysis related to PacifiCorp's (Company)
16 TB Flats wind project and respond to Company witness Timothy J. Hemstreet.

17 **Q. CAN YOU SUMMARIZE YOUR TESTIMONY AND RECOMMENDATIONS?**

18 A. In the application, the Company is asking for an increase in the total project estimated
19 costs for the TB Flats project. Based on my analysis, which includes information
20 obtained after I filed my direct testimony, I find the costs to be prudent and recommend
21 their allowance if the Commission grants the application.

22

23 **TB FLATS**

24 **Q. CAN YOU RESTATE WHAT THE COMPANY IS ASKING FOR?**

25 A. As more fully stated in my direct testimony, the latest cost estimate before the application
26 was filed in this case was [REDACTED] million as found in the Company’s last general rate
27 case, Docket No. 20-035-04. In this Docket, the application states that the total project
28 cost estimate has increased to [REDACTED] million. The difference of [REDACTED] million is the
29 increase the Company is asking for in regard to TB Flats and is what I reviewed and
30 analyzed.

31 **Q. IN YOUR DIRECT TESTIMONY YOU STATED CONCERNS REGARDING A**
32 **[REDACTED] MARKUP, DO YOU STILL HAVE CONCERNS WITH THIS?**

33 A. No. The markup is used as a contingency with the contractor to complete the work. A
34 more full explanation is found in the rebuttal testimony of Company witness Mr.
35 Hemstreet, at lines 44-58. In answering the data request DPU 11.1, the Company
36 mentions that it is now [REDACTED] markup. The Company’s response is attached as Exhibit 3.1
37 a SR CONF.

38 **Q. HOW DOES THAT AFFECT WHAT THE COMPANY IS ASKING FOR?**

39 A. Decreasing the [REDACTED] markup down to [REDACTED], the total Covid-19 costs decrease from roughly
40 [REDACTED] million to about [REDACTED] million as seen in Table 1 which incorporates information the
41 Company provided in Exhibit 3.1 SR.

Table 1

\$	[REDACTED]	[REDACTED]
\$	[REDACTED]	[REDACTED]
\$	[REDACTED]	[REDACTED]

45

46

47 **Q. WHAT IS THE TOTAL FINAL COST ESTIMATE FOR TB FLATS?**

48 A. Approximately [REDACTED]. As stated in my direct testimony, the final cost for the
49 project will not be determined for 9-12 months after completion.

50 **Q. DO YOU FIND THIS COST ESTIMATE TO BE REASONABLE?**

51 A. Yes.

52

53 **CONCLUSION**

54

55 **Q. WHAT IS YOUR CONCLUSION?**

56 A. The Division is recommending the Commission deny the Company's request because it
57 does not satisfy the 1% capital addition threshold required by Utah Code § 54-7-13.4.
58 Should the Commission find that the Application does satisfy the statute, I am
59 recommending that the costs of approximately [REDACTED] million for TB Flats be approved.

60 **Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?**

61 A. Yes.