

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)
COMPANY'S APPLICATION FOR) CASE NO. IPC-E-21-17
AUTHORITY TO INCREASE ITS RATES)
FOR ELECTRIC SERVICE TO RECOVER)
COSTS ASSOCIATED WITH THE JIM)
BRIDGER POWER PLANT.)
)
)

IDAHO POWER COMPANY

DIRECT TESTIMONY

OF

RYAN N. ADELMAN

1 Q. Please state your name and business address.

2 A. My name is Ryan Adelman. My business address
3 is 1221 West Idaho Street, Boise, Idaho 83702.

4 Q. By whom are you employed and in what capacity?

5 A. I am employed by Idaho Power Company ("Idaho
6 Power" or "Company") as the Vice President of Power Supply.

7 Q. Please describe your educational background.

8 A. I graduated in 1996 from the University of
9 Idaho, Moscow, Idaho, receiving a Bachelor of Science
10 Degree in Civil Engineering. I am a registered
11 professional engineer in the state of Idaho. In 2018, I
12 earned a Master of Business Administration through Boise
13 State University's Executive MBA program. In 2019, I
14 completed the Energy Executive Course through the
15 University of Idaho.

16 Q. Please describe your work experience with
17 Idaho Power.

18 A. From 2004 to 2008, I was employed by Idaho
19 Power as an engineer in Power Production's Civil
20 Engineering Group. In 2008, I became an Engineering
21 Leader, initially responsible for the Langley Gulch power
22 plant project and later the Power Production Civil
23 Engineering Department. In 2015 I was promoted to Senior
24 Manager of the Projects Department where I managed the
25 Project Management and Cost and Controls group. In 2018, I

1 led the Company's Southeast Idaho area as a Regional
2 Manager. In 2019, I was promoted to Vice President of
3 Transmission and Distribution Engineering and Construction,
4 later renamed to Planning, Engineering and Construction. In
5 2020, I transitioned to my current position, Vice President
6 of Power Supply, where my responsibilities include
7 supervision over Idaho Power's jointly-owned coal assets,
8 load serving operations and merchant activities.

9 Q. What is the purpose of your testimony in this
10 proceeding?

11 A. The purpose of my testimony is to discuss the
12 changes in the position of the Jim Bridger power plant
13 ("Bridger") in Idaho Power's generation portfolio. In
14 addition, I will discuss the prudence of investments made
15 at Bridger that have been added to the associated plant
16 balances since the Company's last general rate case, Case
17 No. IPC-E-11-08, and to inform the Idaho Public Utilities
18 Commission ("Commission") of necessary future investments
19 at the plant to ensure Bridger continues to be available
20 for reliable load service through the end of 2030.

21 Q. Have you prepared any exhibits detailing the
22 investments made at Bridger since January 1, 2012?

23 A. Yes. Exhibit No. 3 details Idaho Power's
24 share of the investments made at Bridger between January 1,
25 2012, and December 31, 2020. Projects for which the

1 Company's ownership share is over \$1,000,000 include a
2 project description and investment purpose classification
3 for environmental compliance or for reliability.

4 **I. THE BRIDGER PLANT**

5 Q. Please describe the Bridger plant.

6 A. The Bridger plant located near Rock Springs,
7 Wyoming consists of four generating units. PacifiCorp has
8 two-thirds ownership and is the operator of the facility.
9 Idaho Power owns one-third, or 771 megawatts ("MW")¹ of
10 Bridger. Unit 1 began commercial operation in 1974, Unit 2
11 in 1975, Unit 3 in 1976 and Unit 4 in 1979. Idaho Power's
12 one-third share of the units' nominal net (or "net
13 reliable") generation capacities are 177 MW, 180 MW, 174 MW
14 and 175 MW, respectively. The Company and PacifiCorp
15 (collectively, the "Co-Owners") work jointly to make
16 decisions regarding the plant, including required
17 investments and the retirement of the plant.

18 The plant is connected to the Borah West
19 transmission path, 345 kilovolt ("kV"), 230 kV, and 138 kV
20 transmission lines west of the Borah Substation near
21 American Falls, Idaho. Idaho Power's one-third share of
22 energy from Bridger flows west over this path. The Idaho-
23 Wyoming path, or Bridger West, consists of three 345 kV
24 transmission lines between Bridger and southeastern Idaho.

¹ Generator nameplate rating.

1 The Company owns 800 MW of the 2,400 MW east-to-west
2 capacity which effectively feeds into the Borah West path
3 when power is moving east to west from Bridger.

4 The Bridger plant is adjacent to Idaho Power and
5 PacifiCorp's co-owned Bridger Coal Company mine.
6 Additionally, coal is delivered to Bridger from the Black
7 Butte mine via rail. Coal combustion residuals are
8 disposed of on plant property in a solid waste landfill and
9 a flue gas desulfurization waste surface impoundment. The
10 plant also utilizes evaporation ponds, which makes it
11 effectively a "zero-discharge" facility.

12 Q. Please describe the current agreements under
13 which the Co-Owners own and operate Bridger.

14 A. Currently, the ownership and operation of
15 Bridger is dictated by three agreements: the Agreement for
16 the Ownership of the Jim Bridger Project between Idaho
17 Power Company and Pacific Power & Light Company, the
18 Agreement for the Construction of the Jim Bridger Project
19 between Idaho Power Company and Pacific Power & Light
20 Company, and the Agreement for the Operation of the Jim
21 Bridger Project between Idaho Power Company and Pacific
22 Power & Light Company ("Operation Agreement"), all of which
23 are dated September 22, 1969, as amended by Amendments 1
24 through 9 (collectively, "Bridger Agreements"). The Bridger
25 Agreements set forth the respective obligations of the Co-

1 Owners with respect to the ownership, construction and
2 operation of Bridger.

3 Q. How have the Co-Owners been operating Bridger?

4 A. The coal units deliver generating capacity and
5 energy during high-demand periods as well as during periods
6 having high wholesale-electric market prices. Bridger
7 provides highly valuable capacity during periods of peak
8 demand, but also low cost and dispatchable baseload energy.
9 In addition, Bridger specifically provides recognized
10 flexible ramping capability to demonstrate ramping
11 preparedness to maintain system reliability as well as to
12 comply with Federal Energy Regulatory Commission regulation
13 and Energy Imbalance Market participant rules.

14 **II. BRIDGER IN IDAHO POWER'S GENERATION PORTFOLIO**

15 Q. In his direct testimony, Company witness
16 Matthew Larkin states that the current depreciable life at
17 the Bridger plant reflects a 2034 end-of-life for all four
18 units. Has the Company performed any analysis since the
19 2034 end-of-life date was determined to identify economic
20 impacts of an earlier exit from coal-fired operations at
21 Bridger?

22 A. Yes. Idaho Power's Second Amended 2019
23 Integrated Resource Plan ("IRP"), which was acknowledged by
24 the Commission with Order No. 34959, identified a preferred

1 portfolio that included early Bridger unit exits in 2022,
2 2026, 2028, and 2030, concluding the earlier exit from
3 Bridger would provide a more favorable economic outcome as
4 compared to an end-of-life assumption of 2034.

5 Q. Are there any future environmental
6 regulations that could affect the operation of Bridger
7 prior to 2034?

8 A. Yes. Units 1 and 2 currently require
9 Selective Catalytic Reduction ("SCR") controls to be
10 installed and operational by year-end 2021 and 2022 for
11 continued unrestricted operations through 2034. As I will
12 discuss later in my testimony, SCR controls investments
13 were made on Units 3 and 4 in 2015 and 2016, respectively.
14 For Units 1 and 2, PacifiCorp, as operator of the plant,
15 has submitted an application to the State of Wyoming for a
16 Regional Haze Reassessment, which could provide an
17 alternative to SCR controls installation. The state of
18 Wyoming approved a revision to the Wyoming Regional Haze
19 State Implementation Plan ("Wyoming Regional Haze SIP")
20 that established emission limitations on Bridger as a whole
21 (single stack) in lieu of installing SCR controls on
22 Bridger Units 1 and 2. The revision has been proposed for
23 approval by the U.S. Environmental Protection Agency
24 ("EPA"), Region 8 and was submitted to the Office of the

1 Federal Register. The co-owners are currently awaiting
2 action from the incoming Administration.

3 Q. In light of these regulations, were the
4 potential significant investments in Units 1 and 2 included
5 in the Second Amended 2019 IRP?

6 A. No. Because there is still uncertainty
7 around the effect of final regulation, the SCR controls
8 investment on Units 1 and 2 were not planned or included in
9 the cost estimates in Idaho Power's Second Amended 2019 IRP
10 analysis.

11 Q. Do the existing Bridger Agreements contain
12 specified terms and provisions that would inform the
13 process by which PacifiCorp or Idaho Power could end
14 participation in a Bridger unit during the time the other
15 co-owner wishes to continue operations?

16 A. No. The Bridger Agreements do not
17 contemplate a scenario in which one co-owner chooses to
18 exit a single or all units during the time the other co-
19 owner wishes to continue operations. In its 2019 IRP,
20 acknowledged in Case No. PAC-E-19-16, PacifiCorp identified
21 different exit dates for each Bridger unit, with the first
22 unit being exited in 2023. The Co-Owners have not
23 developed contractual terms that would be necessary to
24 allow for the potential earlier exit of a Bridger unit by

1 one co-owner, and not both Co-Owners. As committed to in
2 the Action Plan of the Second Amended 2019 IRP, Idaho Power
3 has begun discussions with PacifiCorp about early exits
4 from the Bridger units.

5 Q. Will Idaho Power continue to evaluate
6 alternative exit dates for the Bridger units as an
7 agreement with PacifiCorp is developed and executed?

8 A. Yes. In addition to working with PacifiCorp
9 to reach agreement on the exit of a Bridger unit or for the
10 potential synchronization of exit dates, the Company will
11 continue to evaluate the appropriate exit dates for the
12 units within development of the 2021 IRP, in pursuit of the
13 least cost, least risk alternative for customers.

14 **III. BRIDGER CAPITAL BUDGET PARTICIPATION**

15 Q. As a one-third owner in the plant, is Idaho
16 Power involved in the decision-making process related to
17 capital investments at Bridger?

18 A. Yes. As the plant operator, PacifiCorp
19 manages the capital budget for Bridger. However, the
20 Company is and always has been actively involved in the
21 decision-making process in all matters associated with
22 Bridger capital investments as a co-owner. While
23 PacifiCorp, as the operator, vets and analyzes the need for
24 specific capital replacements as they arise to continue

1 reliable and safe operation of the plant, Idaho Power
2 regularly participates in discussions of the capital
3 investment forecast prepared by PacifiCorp, influencing the
4 investments ultimately made.

5 Q. What documentation does the Company have
6 available as the one-third owner and non-operating partner?

7 A. Idaho Power receives from PacifiCorp a
8 monthly billing invoice, invoice support documentation, and
9 monthly invoice reconciliation. Appropriation Requests are
10 available for every project, which include a project
11 description, investment reason, project number, and
12 projected expenditures for the project, by year. During
13 the quarterly Ownership Meetings, Idaho Power reviews the
14 current year O&M and capital budgets and forecasts.

15 Q. Does Idaho Power have any contractual rights
16 to approve items such as capital spend?

17 A. Yes. Under Section 5.4 of the Operation
18 Agreement, each October PacifiCorp will submit a forecast
19 of its estimate of operating expenses for the following
20 calendar year, including capital projects, to Idaho Power.
21 The budget will include items of expenditures for
22 replacement and repair of facilities and will include a
23 contingency for emergency repairs and replacements. The
24 forecast is subject to approval by the Company. Under the

1 agreement, if the forecast for projects changes by 10
2 percent or more during the calendar year, PacifiCorp will
3 notify Idaho Power. In addition, under compliance with the
4 Sarbanes-Oxley Act, forecasts for projects over \$1 million
5 that change by 10 percent or more during the calendar year
6 must be approved by both Co-Owners.

7 Q. Please describe the Company's participation
8 in the Bridger capital investment discussions that meet the
9 contractual rights described above.

10 A. Mid-year, the Co-Owners hold a capital
11 budget review where the forecasted capital projects
12 expected to occur over the next three calendar years over
13 \$50,000 are discussed in detail. In addition, large
14 capital projects expected over the next decade are
15 reviewed. Unit overhauls, which I will explain later in my
16 testimony, and the scope and need of projects are
17 discussed. Following the meeting, plant personnel
18 consolidates and finalizes the list of all projects,
19 including the scope, need and consequence for each.

20 Following the quarterly Ownership Meeting that
21 occurs in September, the plant personnel present a formal
22 capital and operations and maintenance ("O&M") expense
23 budget for the following year as well as a high level 10-
24 year forecast. The intent of the meeting is for the Co-

1 Owners to ask questions of the plant personnel, most often
2 the subject matter experts, about any details surrounding
3 the forecasted capital investments and O&M expense.

4 Q. How does the Company monitor the budget?

5 A. During each quarterly Ownership Meeting, a
6 standing agenda item is to review the current year capital
7 and O&M expense budget, routinely providing Idaho Power the
8 opportunity to raise any questions necessary about upcoming
9 projects. Additionally, on a monthly basis, forecasts for
10 capital and O&M expense are provided for review by the
11 Company.

12 **IV. BRIDGER INVESTMENTS SINCE 2011**

13 Q. What is the time period for which Idaho Power
14 is requesting a prudence review of Bridger investments for
15 purposes of recovery in customer rates?

16 A. Idaho Power's last general rate case, Case No.
17 IPC-E-11-08, used a 2011 test year as a basis for plant
18 values. Therefore, the Company is requesting a prudence
19 determination on incremental Bridger investments since the
20 last rate case, or those investments made at the plant
21 during the January 1, 2012, through December 31, 2020, time
22 period. There have been a number of investments required
23 to operate the plant in a safe, efficient, and reliable
24 manner, including investments required to ensure

1 environmental compliance as well as a number of investments
2 for routine maintenance and repair.

3 Q. Have you identified the investments made at
4 Bridger during the January 1, 2012, through December 31,
5 2020, time period?

6 A. Yes. Exhibit No. 3 presents Idaho Power's
7 share of the investments made at Bridger between January 1,
8 2012, and December 31, 2020, detailing 841 different
9 projects totaling \$266.3 million. In addition, for those
10 projects for which Idaho Power's ownership share is over \$1
11 million, the Company has included a project description and
12 investment purpose classification as to whether the
13 investment was for environmental compliance or for
14 reliability. Of the 24 projects over \$1 million, nine were
15 required for environmental compliance and 15 for the
16 continued reliable operation of Bridger.

17 Q. Were all the projects comprising the \$266.3
18 million in investment that occurred between the 2011 test
19 year and December 31, 2020, necessary for either
20 environmental compliance, the safe and economic operation
21 of the plant, or for reliability purposes?

22 A. Yes.

23 **Environmental Compliance Investments**

24 Q. What investments over \$1 million have been
25 made for environmental compliance since January 1, 2012?

1 A. The investments made at Bridger for
2 environmental compliance make up nearly 50 percent of the
3 total Bridger investments since January 1, 2012, with the
4 two largest being the SCR controls installation on Units 3
5 and 4. In total, of the projects over \$1 million, nine
6 were required for environmental compliance. Aside from the
7 SCR controls, other projects include: (1) mercury controls
8 additions on all four units, (2) replacement of the
9 catalyst of the SCR control on Unit 3, (3) modifications to
10 the coal combustion residuals effluent system, and (4) the
11 relining of the scrubber absorber lining on Unit 4.

12 Q. Please explain the installation of the SCR
13 controls on Units 3 and 4.

14 A. The investments in SCR controls on Units 3
15 and 4 are the two largest investments made at Bridger since
16 2011, totaling \$58.29 million and \$51.65 million,
17 respectively. These emission control investments were made
18 to reduce nitrogen oxide emissions from Bridger Units 3 and
19 4 in compliance with state and federal emission
20 requirements. Each SCR control system is comprised of two
21 separate universal reactors, with multiple catalyst levels,
22 inlet and outlet ductwork, a shared ammonia reagent system,
23 an economizer upgrade, structural reinforcement of the
24 boiler and flue gas path ductwork and equipment, and

1 included the extension of the existing plant distributed
2 control system. An induced draft fan upgrade and an
3 associated auxiliary power system variable frequency drive
4 insertion was required on Unit 4 as well.

5 Q. Why did Units 3 and 4 have SCR controls
6 installed first?

7 A. The SCR controls were installed on Units 3 and
8 4 first because it coordinated with Bridger planned unit
9 overhaul schedules and the requirement for SCR controls
10 installation on PacifiCorp's other plants. Lead time and
11 construction schedules for SCR controls necessitated a
12 coordinated installation in the PacifiCorp fleet.

13 Q. Which state and federal emission requirements
14 did the Bridger SCR controls satisfy?

15 A. The Bridger SCR controls were required to
16 comply with the Clean Air Act Regional Haze Rules and
17 the resulting Wyoming Regional Haze State Implementation
18 Plan ("Wyoming Regional Haze SIP"). The Clean Air Act
19 required each state to develop plans to meet various air
20 quality requirements, Wyoming's plan is referred to as the
21 Wyoming Regional Haze SIP. The state of Wyoming was
22 required to submit its Wyoming Regional Haze SIP to the
23 EPA for approval.

24 Q. What is the intent of the Wyoming Regional
25 Haze SIP?

1 A. The Wyoming Regional Haze SIP must assure
2 reasonable progress towards the national goal of achieving
3 natural visibility conditions in national parks and
4 wilderness areas by the year 2064, including a requirement
5 that certain categories of existing major stationary
6 sources permitted or built between 1962 and 1977, including
7 the Bridger plant, procure, install, and operate within the
8 emission limitation established by the Best Available
9 Retrofit Technology ("BART") pollution control standard, as
10 determined by Wyoming. This was defined as the first phase
11 while the second phase of the Wyoming Regional Haze SIP was
12 to determine the Long-Term Strategy to continue to reduce
13 regional haze in the Wyoming national park and wilderness
14 areas.

15 Q. What efforts were undergone to evaluate
16 available emissions control technologies for BART-eligible
17 sources?

18 A. As part of the BART review, the Co-Owners
19 engaged CH2MHILL to prepare an evaluation of several
20 technologies on their ability to economically achieve
21 compliance and support an integrated approach to control
22 criteria pollutants (e.g., sulfur dioxide, nitrogen oxide,
23 and particulate matter for the facility), if it were to
24 continue to operate and to burn coal. The BART analyses
25 reviewed available retrofit emission control technologies

1 and their associated performance and cost metrics. Each
2 technology was reviewed against its ability to meet a
3 presumptive BART emission limits based on technology and
4 fuel characteristics, the cost for each, and the projected
5 improvement in visibility which can be expected by the
6 installation of the respective technology.

7 Next, for each unit subject to BART, the state
8 environmental regulatory agencies identified the
9 appropriate control technology to achieve what the air
10 quality regulators determined were cost-effective emission
11 reductions. Wyoming's BART determination included the
12 installation of low nitrogen oxide burners and overfire air
13 ports, which were incorporated into both the BART permits
14 issued for Bridger as well as the Wyoming Regional Haze SIP
15 and were subsequently installed on all four units. In
16 addition, the SCR controls were included in the Wyoming
17 Regional Haze SIP as part of the Long-Term Strategy to meet
18 the goals required as part of the second phase.

19 Q. Did the EPA take action on the Wyoming
20 Regional Haze SIP?

21 A. Yes. The EPA chose to approve and disapprove
22 portions of the Wyoming Regional Haze SIP in its "re-
23 proposal" on May 23, 2013, with final approval on January
24 30, 2014. As part of its re-proposal, the EPA approved

1 Wyoming's determination of the Long-Term Strategy of
2 installing SCRs on Units 3 and 4 in 2015 and 2016,
3 respectively and Units 1 and 2 in 2021 and 2022.
4 Enforceable by the EPA, nitrogen oxide limits for Bridger
5 Units 3 and 4 were established at an SCR-based emissions
6 limit of 0.07 lb/MMBtu, well below the 0.26 lb/MMBtu of
7 emissions produced at the time.

8 Q. Did the Co-Owners have any alternatives to
9 installation of the SCR controls on Bridger Units 3 and 4?

10 A. No. In order to comply with the requirements
11 of the Wyoming Regional Haze SIP, it was necessary to
12 install and operate the SCR controls. Idaho Power has an
13 obligation to operate its facilities in compliance with its
14 permit requirements and the applicable laws and
15 regulations, as well as satisfy the Company's other
16 statutory requirements.

17 Q. Did Idaho Power receive any additional
18 regulatory approval of the emissions control investments at
19 Bridger?

20 A. Yes. On June 28, 2013, the Company filed an
21 application with the Commission for a Certificate of Public
22 Convenience and Necessity ("CPCN"), seeking authorization
23 of its investment in SCR controls and associated ancillary
24 equipment in Bridger Units 3 and 4. As part of the case,
25 Idaho Power prepared a Coal Unit Environmental Investment

1 Analysis supporting the upgrade of Bridger Units 3 and 4 to
2 allow for the ongoing coal-fueled energy production as the
3 least-cost, least risk outcome for customers.

4 Q. Did the Commission issue an order in Case No.
5 IPC-E-13-16 approving the Company's application for a CPCN
6 for the Bridger Unit 3 and 4 SCR controls?

7 A. Yes. With Order No. 32929 the Commission
8 confirmed that circumstances at the time required the
9 upgrades to Bridger Units 3 and 4 for Idaho Power to meet
10 environmental regulations and to continue providing
11 reliable energy to customers. In their order, the
12 Commission directed Idaho Power to file quarterly reports
13 updating the Commission on any changes to environmental
14 policy or regulations as the Bridger upgrades were
15 installed and placed in service. Subsequently, the
16 Commission issued Certificate No. 516, certifying that the
17 future public and convenience and necessity requires the
18 Bridger SCR control investments for Units 3 and 4.

19 Q. Did the Company comply with the Commission's
20 directive to file quarterly progress reports describing
21 changes to environmental policy or regulations that
22 potentially impacted the Bridger SCR controls investments
23 on Units 3 and 4?

24 A. Yes. Idaho Power filed 13 quarterly reports,
25 spanning the three years between March 2014 and March 2017

1 in accordance with Order No. 32929. In addition to
2 providing environmental regulations updates, the reports
3 informed the Commission on the status of construction
4 progress, with detail by unit when applicable, and the
5 scheduled completion dates of major milestones. Finally,
6 each report included a summary of actual project costs and
7 a forecast of total project costs.

8 In the September 2015 report, the Company provided
9 the results of the updated analysis for Bridger Units 3 and
10 4 that were included in Appendix C to Idaho Power's 2015
11 Integrated Resource Plan. Based on the Bridger analysis,
12 installation of the SCR controls on Unit 3 and 4 continued
13 to be the least-cost option compared to shuttering Units 3
14 and 4 and replacing that generation with a combined-cycle
15 combustion turbine resource. The Company believes it
16 adhered to the requirements in Order No. 32929 and that, at
17 the time, the SCR investments represented a low-cost and-
18 low risk option for serving customer demands.

19 Q. What comprises the total \$58.29 million and
20 \$51.65 million in SCR controls investments for Bridger
21 Units 3 and 4, respectively?

22 A. The majority of the costs, approximately \$82
23 million excluding Allowance for Funds Used During
24 Construction ("AFUDC"), were associated with the
25 engineer, procure, and construct contract ("EPC

1 Contract") for the contractor that performed work on the
2 Bridger units.

3 Q. How was the contractor selected that
4 performed the installation of the SCR controls on Bridger
5 Units 3 and 4?

6 A. A competitive Request for Proposal ("RFP")
7 process was undertaken by PacifiCorp, as operator of the
8 Jim Bridger Plant. With input from Idaho Power,
9 PacifiCorp developed an RFP package that included a
10 detailed scope of work, performance based technical
11 specifications, concept drawings, expected performance
12 guarantees and commercial requirements. PacifiCorp
13 developed a bid evaluation matrix establishing selection
14 criteria, allowing for a balanced outcome for tradeoffs
15 between cost, technical advantages, and commercial
16 terms.

17 Responses to the RFP were evaluated with a number
18 of rounds of additional information requests and
19 clarifications. The results of this extensive evaluation
20 resulted in a short list of the two lowest-cost evaluated
21 respondents that presented the best value. PacifiCorp
22 held further technical and commercial negotiations with
23 the short-listed respondents. Based on these
24 negotiations, the EPC contract was awarded to the
25 respondent that the Company and PacifiCorp felt provided

1 the best overall value.

2 Q. Aside from the EPC Contract, what made up
3 the remaining costs of the SCR controls investments?

4 A. The remaining costs were the result of work
5 and materials required for the installation of the SCR
6 controls including flue gas reinforcement for \$5 million,
7 economizer upgrades of \$4 million, boiler and air
8 preheater reinforcement work for approximately \$3
9 million, spare parts totaling about \$450,000, and other
10 miscellaneous costs totaling approximately \$4 million.
11 In addition, the SCR controls investment costs include
12 nearly \$10 million in AFUDC expenses.

13 Q. How did the total project costs compare to
14 estimated cost of the SCR controls investments at
15 Bridger?

16 A. Idaho Power's share of the SCR controls
17 investment on Bridger Units 3 and 4 were estimated to be
18 \$62.92 million and \$66.91 million, respectively.
19 Combined, actual costs were \$19.5 million less than the
20 original cost estimate. The exceptional management
21 oversight of the installation of the SCR controls on
22 Bridger Units 3 and 4 resulted in an under-budget project
23 that met the deadlines under the Wyoming Regional Haze
24 SIP.

25 Q. You indicated mercury controls additions were

1 made to all four units. Were these the next largest
2 investments for environmental compliance?

3 A. Yes. The next four investments at Bridger for
4 environmental compliance totaled approximately \$2.2 million
5 each and were for the development and implementation of
6 mercury controls necessary for pollutant mitigation on all
7 Bridger units. In 2015, each unit received an Activated
8 Carbon Injection ("ACI") system that removes mercury as
9 required by the EPA Mercury and Air Toxics Standard
10 ("MATS"). The ACI system injects an activated carbon into
11 the flue gas which is then collected in the precipitator.

12 Q. What was the next project required for
13 environmental compliance?

14 A. The seventh investment for environmental
15 compliance was for catalyst work within the SCR control
16 on Bridger Unit 3. Approximately every four years, the
17 catalyst in the SCR control must be replaced to ensure
18 the nitrogen oxide removal meets the emission limits as
19 required by the Wyoming Regional Haze SIP. This project,
20 totaling approximately \$1.6 million, required the
21 replacement of two layers of the Unit 3 SCR control
22 catalyst.

23 Q. Please describe the final two investments over
24 \$1 million that were required for environmental compliance.

25 A. The next investment required for environmental

1 compliance totaled approximately \$1.4 million and was for
2 work on the coal combustion residuals ("CCR") effluent
3 system. Modifications were made to prevent CCRs from
4 contacting the ground or going into the evaporation pond.
5 New retention ponds were installed, one existing pond was
6 removed because it was not lined and would not meet future
7 environmental regulations, and new concrete lined
8 collection structures were constructed around the plant.

9 Finally, at approximately \$1.1 million, the ninth
10 project totaling more than \$1 million and required for
11 environmental compliance was for the relining of the
12 scrubber absorber lining on Bridger Unit 4. The original
13 lining was rubber and had reached the end of its life. The
14 work entailed the replacement of the middle one-third of
15 the rubber lining and the dual flow trays.

16 Q. How much have these nine environmental
17 compliance investments contributed to the additions at
18 Boardman since January 1, 2012?

19 A. At \$122.9 million, the investments for
20 environmental compliance are the largest expenditures made
21 at Bridger since 2011, making up 73 percent of the total
22 projects over \$1 million.

23 **Plant Reliability Investments**

24 Q. You indicated there were 15 investments
25 greater than \$1 million required for the reliable operation

1 of the plant. What was the largest investment made to
2 maintain reliability?

3 A. In 2013, an upgrade to the Bridger Unit 2
4 turbines was completed for a total of \$13.5 million. The
5 work was split between two work orders, one for the high-
6 pressure turbine and one for the low-pressure turbines.
7 This project was specific to the two low-pressure turbines
8 on Unit 2. The total investment in the high-pressure
9 turbine work did not exceed the \$1 million project
10 threshold. While overhauls that replace and repair the
11 blades and diaphragms on turbines aid in extending the life
12 of the turbine and partially restore efficiency, occurring
13 approximately every eight years for the high pressure
14 turbines and 12 years for the low-pressure turbines, a
15 complete replacement of the turbine is often required every
16 15 to 20 years. The replacement lowered the heat rate and
17 increased the efficiency of Unit 2.

18 Q. Did the replacement of the low-pressure
19 turbines on Unit 2 require any additional work to be
20 performed associated with the unit?

21 A. Yes. The replacement of the low-pressure
22 turbines in Unit 2 increased the generation capacity of the
23 unit. However, the existing generator step-up ("GSU")
24 transformer would not accommodate the increase in
25 generation, so the GSU at Unit 2 was upgraded. The upgrade

1 of the GSU resulted in project costs of \$1.8 million.

2 Q. What additional investments were made at
3 Bridger to maintain reliability?

4 A. The next set of investments made to maintain
5 reliable operations of Bridger was the replacement of the
6 finishing superheater within the boiler of all four units.
7 Tube failures were occurring within the superheaters due to
8 dissimilar metal welds and long-term overheating, an
9 indication in the past that the superheaters were nearing
10 the end of their useful life. As can be seen in Exhibit
11 No. 3, the superheater replacement for each unit was
12 assigned a separate work order, with the total project
13 costs ranging from \$2.8 million to \$4.2 million per unit.
14 One unit replacement occurred each year from 2015 through
15 2018.

16 Q. How does the dissimilar metal welds cause tube
17 failures?

18 A. Tubes that carry steam extend vertically from
19 the bottom of the superheater and then turn horizontally.
20 Over time, routine maintenance required the replacement of
21 the tubes to prevent failures. The replacement tubes were
22 different materials and were welded together, an acceptable
23 and, in most cases, unavoidable repair to the superheaters
24 made in the 1970s. The dissimilar welds began corroding
25 and plant personnel believed it to be the source of the

1 tube failures.

2 Q. Is long-term overheating avoidable?

3 A. No. Long-term overheating is unavoidable in a
4 unit because pressure parts exposed to elevated
5 temperatures are only designed for a usable lifetime of a
6 superheater, the end of which was approaching for each
7 unit.

8 Q. How did the plant operator determine the
9 replacement of the superheaters was required?

10 A. Because the superheaters were nearing the end
11 of their expected 30 to 35 year life span, samples were
12 taken from each boiler and sent to a third party for
13 analysis and an assessment of the remaining life of the
14 superheater. The results indicated, without replacement,
15 dissimilar metal weld failures would continue to occur. In
16 addition, the evidence of the long-term overheating
17 suggested the remaining life of the superheaters was
18 dwindling. The replacement of the superheater was
19 performed on the boiler of each unit, with a new tubing
20 design that consisted of a single, continuous piece to
21 avoid future dissimilar welds. The replacement of the
22 superheaters on Units 3 and 4 included an increase to the
23 heating surface area, as committed to by the plant in the
24 various documents submitted for environmental compliance
25 that supported the SCR controls installation investments.

1 These four projects make up approximately \$14.1 million of
2 the total investments at Bridger since 2011.

3 Q. What were the additional reliability-related
4 investments?

5 A. The next set of projects over \$1 million that
6 were for the continued reliable operations of Bridger were
7 the replacement of the cooling towers on Units 1, 2 and 3.
8 A structural analysis was performed on the existing wood
9 structure in the cooling towers of all four units and
10 determined that the cooling towers would fail if they were
11 not replaced.

12 Q. What happens when a cooling tower fails?

13 A. Cooling towers are heat exchangers that
14 provide cooling water to the steam cycle of the units.
15 Cooling water flows from the towers to the condensers,
16 condensing the steam leaving the low-pressure turbines.
17 This cooling water will then return back to the cooling
18 tower, repeating the cycle. Failure in the cooling tower
19 would cause an extended operational outage at Bridger.

20 Q. Were the wood structures replaced in the
21 cooling towers for Units 1, 2 and 3?

22 A. Yes. The wood structures were replaced in the
23 three cooling towers between 2013 and 2015. The structures
24 were replaced with a fiberglass reinforced plastic that is
25 designed to last the remaining life of the plant.

1 Q. Was the wood structure within the cooling
2 tower of Unit 4 replaced?

3 A. Yes, however the cooling tower for Unit 4
4 showed signs of failure much earlier and was rebuilt in
5 2004. Therefore, the costs associated with the repairs to
6 the Unit 4 cooling tower are not included in the Company's
7 request for prudence in this proceeding.

8 Q. Were there any other investments for
9 reliability that were made on all four Bridger units?

10 A. Yes. An inspection of the air preheaters on
11 all four units found the air preheater baskets to be
12 deteriorating. The air preheater recovers heat from the
13 boiler flue gas, increasing the efficiency of the unit by
14 reducing the heat lost in the flue gas. The replacement of
15 the basket ensured continued efficient heat transfer and
16 reduced back pressure as the flue gas exited the boiler.
17 The air preheater baskets on Units 3 and 4 required an
18 enamel coated basket for an extended life as the ammonia
19 injected in the SCR controls can shorten the useful life of
20 the baskets absent the extra protection. Each project
21 totaled \$1.1 million to \$1.4 million.

22 Q. What was the remaining project associated with
23 the reliability of Bridger totaling more than \$1 million?

24 A. The final investment required to maintain
25 reliable operations at Bridger totaled \$1.2 million and was

1 for the replacement of the pendant platens within the
2 superheater on Unit 1. Fly ash, soot blower erosion and
3 long-term overheating were damaging the pendant platens
4 which pick up the heat within the superheater. This
5 project replaced the entire lower section of the pendant
6 platens on Unit 1 in an effort to prevent extended tube
7 leak outages.

8 Q. Please summarize the investments over \$1
9 million made at Bridger since 2011.

10 A. There were 24 projects over \$1 million at the
11 Bridger plant between January 1, 2012, through December 31,
12 2020, totaling \$168.5 million. Of those, nine projects
13 were to maintain environmental compliance and 15 were to
14 maintain the reliable operation of Bridger. The majority
15 of the costs were associated with investments required for
16 environmental compliance, a total of \$122.9 million, while
17 the remaining \$45.6 million were investments required for
18 continued reliability.

19 **V. FORECASTED BRIDGER INVESTMENTS**

20 Q. Company witness Matthew Larkin indicated the
21 proposed levelized revenue requirement mechanism includes
22 investments forecasted at Bridger for all four units
23 through 2030, Idaho Power's expected exit from operations
24 of the plant. Please explain the investments expected to
25 be made over the remaining life of the plant.

1 A. While the Company is cognizant of the
2 approaching end-of-life of Bridger, there are investments
3 necessary to ensure the plant remains operational in a
4 safe, efficient, and reliable matter. Because the Co-Owners
5 do not have a definitive agreement detailing expected cost
6 responsibilities upon exit, Idaho Power has assumed that
7 once a co-owner has exited a unit, that co-owner is no
8 longer responsible for capital costs associated with that
9 unit. Common facility investments are forecasted to remain
10 the responsibility of a co-owner until the last unit is
11 exited by that co-owner. Finally, the capital addition
12 forecast assumes PacifiCorp's current exit dates of the
13 four Bridger units reflected in PacifiCorp's 2019 IRP: 2023
14 for Unit 1, 2028 for Unit 2, 2037 for Unit 3 and 2037 for
15 Unit 4.

16 The largest expenditures are associated with the
17 major overhaul of each unit that is required every four
18 years. The plant performs the overhaul on one unit per
19 year, planning the outage years in advance as the unit may
20 be down for 35 to 50 days depending on the work required.
21 The intent of the overhaul is to perform the repairs and
22 upgrades on major components that cannot be performed while
23 the unit is online or during short outages.

24 Q. What type of work is performed during the
25 overhaul of a unit?

1 A. An overhaul will include a boiler inspection
2 including the repairs or replacement of boiler tubes,
3 boiler sections, burners and burner nozzles. The turbine
4 will be refurbished, if needed, and the generator will be
5 opened and cleaned on the inside, and repairs will be made
6 to other major components including the boiler feed pumps,
7 feedwater heaters, and other major pumps, fans, and motors.

8 Q. What additional investments does the Company
9 anticipate will be required prior to Idaho Power's exit
10 from operations at Bridger?

11 A. Aside from the annual blanket projects for
12 pumps, valves and motors, and routine infrastructure to
13 maintain the reliable safe operations of the plant, the
14 single largest expected expenditure is required for
15 environmental compliance: replacement of an unlined flue
16 gas desulfurization ponds which must otherwise stop
17 receiving scrubber waste in 2023. Also in 2023, the plant
18 has forecasted the installation of a hydrator to allow
19 refined soda ash to be used as scrubber reagent.

20 Q. What are blanket projects?

21 A. Blanket projects are intended to capture
22 capital issues that arise, typically equipment failures
23 that were unplanned and therefore not budgeted.

24 Q. You discussed a project associated with an
25 unlined pond earlier in your testimony. Is this flue gas

1 desulfurization pond a similar project?

2 A. Yes. The CCR rules established by the EPA
3 apply to all unlined ponds. This project will dewater the
4 existing evaporation pond, install a liner, and reroute the
5 piping of the waste liquor to the new pond. It is expected
6 the existing pond will be dewatered by mid-2021, and
7 construction of the new flue gas desulfurization pond will
8 start immediately, with completion expected in 2023. The
9 plant anticipates other specific projects to comply with
10 CCR disposal requirements in 2028. The forecasted
11 investments, while minimal, are required for environmental
12 compliance or for the continued safe and reliable operation
13 of the plant.

14 **VI. CONCLUSION**

15 Q. Please summarize your testimony.

16 A. Idaho Power's Second Amended 2019 IRP
17 identified a preferred portfolio that included Bridger unit
18 exits in 2022, 2026, 2028, and 2030, concluding the earlier
19 exit from Bridger would provide a more favorable economic
20 outcome as compared to the current end-of-life assumption
21 of 2034. Idaho Power has been required to make
22 investments at Bridger since 2011 and has been actively
23 involved in the capital spend decision making process at
24 the plant. Of the 24 projects identified in which Idaho
25 Power's share of the investments was more than \$1 million,

1 nine projects totaling \$122.9 million were for
2 environmental compliance and 15 totaling \$45.6 million were
3 for reliability purposes. While the Company has been
4 cognizant of the approaching end-of-life of Bridger, the
5 investments made were prudent and required to ensure the
6 plant remains operational in a safe, efficient, and
7 reliable matter.

8 Q. Does this conclude your testimony?

9 A. Yes.

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DECLARATION OF RYAN N. ADELMAN

I, Ryan N. Adelman, declare under penalty of perjury under the laws of the state of Idaho:

1. My name is Ryan N. Adelman. I am employed by Idaho Power Company as the Vice President of Power Supply.

2. On behalf of Idaho Power, I present this pre-filed direct testimony and Exhibit No. 3 in this matter.

3. To the best of my knowledge, my pre-filed direct testimony and exhibit are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence before the Idaho Public Utilities Commission and is subject to penalty for perjury.

SIGNED this 2nd day of June 2021, at Boise, Idaho.



Ryan N. Adelman

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. IPC-E-21-17

IDAHO POWER COMPANY

**ADELMAN
TESTIMONY**

EXHIBIT NO. 3

BRIDGER PLANT ADDITIONS: Jan 1, 2012 - Dec 31, 2020

Project	Descr	U1	U2	U3	U4	BC	Total	Purpose	Project Description/Justification
27350185	BRIDGER 2011C039 J84 SCR				58,290,056		58,290,056	Environmental	The installation of Selective Catalytic Reduction ("SCR") system and associated ancillary equipment on Unit 3. The SCR system is comprised of two separate universal reactors, with multiple catalyst levels, inlet and outlet ductwork, a shared ammonia reagent system, an economizer upgrade, structural reinforcement of the boiler and flue gas path ductwork and equipment, and included the extension of the existing plant distributed control system. The investments and ancillary equipment provided for a reduction in the nitrogen oxide emissions in compliance with existing state and federal emission requirements. The BART Appeal Settlement Agreement with the state of Wyoming and the Wyoming Regional Haze State Implementation Plan ("Wyoming Regional Haze SIP") required the installation of an SCR on Unit 3 by the end of 2015. The EPA signed a notice of final rulemaking on January 30, 2014, making this emission reduction requirement federally enforceable as well.
27350182	BRIDGER 2011C038 J83 SCR SYS D			51,651,350			51,651,350	Environmental	The installation of SCR system and associated ancillary equipment on Unit 4. The SCR system is comprised of two separate universal reactors, with multiple catalyst levels, inlet and outlet ductwork, a shared ammonia reagent system, an economizer upgrade, structural reinforcement of the boiler and flue gas path ductwork and equipment, and included the extension of the existing plant distributed control system. In addition, an induced draft fan upgrade and an associated auxiliary power system variable frequency drive insertion were made on Unit 4. The investments and ancillary equipment provided for a reduction in the nitrogen oxide emissions in compliance with existing state and federal emission requirements. The BART Appeal Settlement Agreement with the state of Wyoming and the Wyoming Regional Haze SIP required the installation of an SCR on Unit 4 by the end of 2016. The EPA signed a notice of final rulemaking on January 30, 2014, making this emission reduction requirement federally enforceable as well.
27344048	BRIDGER 2008C131LP U2 TURBINE		13,520,389				13,520,389	Reliability	The Unit 2 turbine was in need of an upgrade to maintain efficiency. The work was split between two work orders, one for the high pressure turbine and one for the low pressure turbines. This project upgraded the two low pressure turbines on Unit 2 (each unit has two low pressure turbines). This upgrade lowered the heat rate and increased the efficiency of Unit 2.
27457815	BRIDGER 2016C052 U2 REPLACE FI		4,145,312				4,145,312	Reliability	The finishing superheater within the boiler of all four units were replaced. These costs are specific to Unit 2. Replacement was required due to tube failures from both dissimilar metal welds and long-term overheating. Samples were taken and sent to a third party for analysis and an assessment of the remaining life. The results indicated an increase in dissimilar metal welds in the future. The long-term overheating is unavoidable in a unit as pressure parts at elevated temperatures are designed for a usable lifetime, which was nearing. These were also sampled and sent to a third party for analysis. The evidence suggested remaining life was dwindling. These tube failures have been an indication of finishing superheater failures in the past and the need for a replacement.
27411888	BRIDGER 2014C037 U3 REPLACE FI			3,878,440			3,878,440	Reliability	The finishing superheater within the boiler of all four units were replaced. These costs are specific to Unit 3. Replacement was required due to tube failures from both dissimilar metal welds and long-term overheating. Samples were taken and sent to a third party for analysis and an assessment of the remaining life. The results indicated an increase in dissimilar metal welds in the future. The long-term overheating is unavoidable in a unit as pressure parts at elevated temperatures are designed for a usable lifetime, which was nearing. These were also sampled and sent to a third party for analysis. The evidence suggested remaining life was dwindling. These tube failures have been an indication of finishing superheater failures in the past and the need for a replacement. The finishing superheater replacement on Unit 3 also included an increase to the heating surface area as indicated in the environmental submittals that accompanied the SCR controls projects.
27437083	BRIDGER 2015C070 U4 REPLACE FI				3,277,736		3,277,736	Reliability	The finishing superheater within the boiler of all four units were replaced. These costs are specific to Unit 4. Replacement was required due to tube failures from both dissimilar metal welds and long-term overheating. Samples were taken and sent to a third party for analysis and an assessment of the remaining life. The results indicated an increase in dissimilar metal welds in the future. The long-term overheating is unavoidable in a unit as pressure parts at elevated temperatures are designed for a usable lifetime, which was nearing. These were also sampled and sent to a third party for analysis. The evidence suggested remaining life was dwindling. These tube failures have been an indication of finishing superheater failures in the past and the need for a replacement. The finishing superheater replacement on Unit 4 also included an increase to the heating surface area as indicated in the environmental submittals that accompanied the SCR controls projects.
27403809	BRIDGER 2014C029 U3 REPLACE CO			2,845,601			2,845,601	Reliability	A structural analysis was performed on the existing wood structure in the cooling towers of all four units, showing the towers in Unit 3 would fail if not replaced. The failing of a cooling tower would cause an extended operational outage. This project replaced the wood structure with a fiberglass reinforced plastic that is designed to last the remaining life of the plant.
27481633	BRIDGER 2017C067 U1 REPLACE FI	2,822,899					2,822,899	Reliability	The finishing superheater within the boiler of all four units were replaced. These costs are specific to Unit 2. Replacement was required due to tube failures from both dissimilar metal welds and long-term overheating. Samples were taken and sent to a third party for analysis and an assessment of the remaining life. The results indicated an increase in dissimilar metal welds in the future. The long-term overheating is unavoidable in a unit as pressure parts at elevated temperatures are designed for a usable lifetime, which was nearing. These were also sampled and sent to a third party for analysis. The evidence suggested remaining life was dwindling. These tube failures have been an indication of finishing superheater failures in the past and the need for a replacement.
27402637	BRIDGER 2014C023 U1 REPLACE CO	2,788,360					2,788,360	Reliability	A structural analysis was performed on the existing wood structure in the cooling towers of all four units, showing the towers in Unit 1 would fail if not replaced. The failing of a cooling tower would cause an extended operational outage. This project replaced the wood structure with a fiberglass reinforced plastic that is designed to last the remaining life of the plant.
27371146	BRIDGER 2012C069 U2 REPLACE CO		2,748,628				2,748,628	Reliability	A structural analysis was performed on the existing wood structure in the cooling towers of all four units, showing the towers in Unit 2 would fail if not replaced. The failing of a cooling tower would cause an extended operational outage. This project replaced the wood structure with a fiberglass reinforced plastic that is designed to last the remaining life of the plant.
27374745	BRIDGER 2012C076 U2 MERCURY CO		2,221,588				2,221,588	Environmental	Unit 1 mercury controls development and implementation. This project installed an Activated Carbon Injection ("ACI") system on Unit 2 for the removal of mercury as required by the Environmental Protection Agency's ("EPA") Mercury and Air Toxics Standard ("MATS"). The ACI system injects an activated carbon into the flue gas which is then collected in the precipitator.
27374749	BRIDGER 2012C078 U4 MERCURY CO				2,219,064		2,219,064	Environmental	Unit 4 mercury controls development and implementation. This project installed an ACI system on Unit 4 for the removal of mercury as required by the EPA's MATS. The ACI system injects an activated carbon into the flue gas which is then collected in the precipitator.
27374748	BRIDGER 2012C077 U3 MERCURY CO			2,203,082			2,203,082	Environmental	Unit 3 mercury controls development and implementation. This project installed an ACI system on Unit 3 for the removal of mercury as required by the EPA's MATS. The ACI system injects an activated carbon into the flue gas which is then collected in the precipitator.
27374736	BRIDGER 2012C075 U1 MERCURY CO	2,187,374					2,187,374	Environmental	Unit 1 mercury controls development and implementation. This project installed an ACI system on Unit 1 for the removal of mercury as required by the EPA's MATS. The ACI system injects an activated carbon into the flue gas which is then collected in the precipitator.
27373188	BRIDGER 2012C71 U2 GSU TRANSFO		1,814,904				1,814,904	Reliability	When the Unit 2 turbine was upgraded, the maximum capacity of the unit increased and the existing Generator Step-Up ("GSU") transformer would not accommodate this increase in generation. These costs are associated with the rewind of the GSU on Unit 2 to increase capacity.
27519307	BRIDGER 2018C113 U3 SCR CATALY			1,629,526			1,629,526	Environmental	Approximately every four years, the catalyst in the SCR control must be replaced to ensure the nitrogen oxide removal meets the emission limits as required by the Wyoming Regional Haze rules. Two layers of the catalyst in the Unit 3 SCR were replaced.
27352672	BRIDGER 2011C051 U1 REPLACE/RE	393,297	393,297	393,297	393,297		1,573,189	Reliability	The GSU transformer for Unit 1 failed and required a replacement. The GSU on Unit 1 was scrapped and a spare GSU was installed on Unit 1. These project costs are associated with the purchase of a new spare GSU for use on any of the four units.
27473622	BRIDGER 2016C099 U2 APH BASKET		1,390,721				1,390,721	Reliability	The air preheater baskets on Unit 2 were inspected and found to be deteriorating. This replacement of both the top and bottom layers ensures efficient heat transfer and reduced back pressure as the flue gas exits the boiler.
27439233	BRIDGER 2015C077 CCR EFFLUENT					1,350,658	1,350,658	Environmental	Modifications were made to the coal combustion residuals ("CCR") effluent system to prevent CCRs from contacting the ground or going into the evaporation pond. New retention ponds were installed, the existing pond was removed because it was not lined, and new concrete lined collection structures were constructed around the plant.
27433317	BRIDGER 2015C050 U3 APH BASKET			1,266,858			1,266,858	Reliability	The air preheater baskets on Unit 3 were inspected and found to be deteriorating and falling apart. This replacement of both the top and bottom layers ensures efficient heat transfer and reduced back pressure as the flue gas exits the boiler. The air preheater baskets on Unit 3 needed enamel coated baskets to extend the life because of the ammonia injected in the SCR control.
27360950	BRIDGER 2011C058 U4 APH BASKET				1,230,925		1,230,925	Reliability	The air preheater baskets on Unit 4 were inspected and found to be deteriorating and falling apart. This replacement of both the top and bottom layers ensures efficient heat transfer and reduced back pressure as the flue gas exits the boiler. The air preheater baskets on Unit 4 needed enamel coated baskets to extend the life because of the ammonia injected in the SCR control.
27398634	BRIDGER 2014C001 U1 PENDANT PL	1,174,469					1,174,469	Reliability	The entire lower section of the pendant platens on Unit 1 required replacement because of fly ash, soot blower erosion, and long time overheating. The replacement prevents extending tube leak outages.

BRIDGER PLANT ADDITIONS: Jan 1, 2012 - Dec 31, 2020

Project	Descr	U1	U2	U3	U4	BC	Total	Purpose	Project Description/Justification
27463768	BRIDGER 2016C035 U4 ABSORBER R				1,112,706		1,112,706	Environmental	The scrubber absorber lining of Unit 4 was relined. The original lining was rubber and had reached the end of its life. This project replaced the middle one-third of rubber lining and dual flow trays.
27499207	BRIDGER 2017C120 U1 APH BASKET	1,109,490					1,109,490	Reliability	The air preheater baskets on Unit 1 were inspected and found to be deteriorating and falling apart. This replacement of both the top and bottom layers ensures efficient heat transfer and reduced back pressure as the flue gas exits the boiler.
27441698	BRIDGER 2015C079 U4 REPLACE HO				932,637		932,637		
27363132	BRIDGER 2012C050 U4 WET STACK				921,632		921,632		
27445785	BRIDGER 2015C094 U3 HIP & LP B			893,540			893,540		
27383742	BRIDGER 2013C020 U2 SCRUBBER D		829,599				829,599		
27459805	BRIDGER 2016C050 CCR BOTTOM AS					817,269	817,269		
27355531	BRIDGER 2011C057 U4 REPLACE UP				792,329		792,329		
27439123	BRIDGER 2015C049 REPLACE 01/02					790,180	790,180		
27355587	BRIDGER 2011C059 U4 REHEATER O				770,573		770,573		
27423731	JIM BRIDGER 345KV REACTOR BREA					697,549	697,549		
27319641	BRIDGER 2010C024 NEW SEWAGE TR					678,413	678,413		
27405728	BRIDGER 2014C015 U1 BURNERS -	663,594					663,594		
27529748	BRIDGER 2019C015 U4 #41 ABS CO				658,943		658,943		
27501249	BRIDGER 2018C025 U1 BURNERS -	648,931					648,931		
27553355	BRIDGER 2020C049 U4 #43 ABS CO				613,138		613,138		
27485917	BRIDGER CITC2016C901 CRITICAL					607,833	607,833		
27465208	BRIDGER 2016C034 U4 BURNERS -				607,510		607,510		
27521483	BRIDGER 2019C010 U4 #42 ABS CO				595,808		595,808		
27435425	BRIDGER 2015C045 U3 BURNERS -			594,428			594,428		
27479355	BRIDGER 2017C042 U2 BURNERS MA		591,716				591,716		
27334426	BRIDGER 2010C047 MERCURY CONTR					583,220	583,220		
27457818	BRIDGER 2016C057 DCS SIMULATOR					564,506	564,506		
27521482	BRIDGER 2018C128 U3 REHEATER B			559,428			559,428		
27477414	BRIDGER 2017C036 BLANKET PUMPS					556,314	556,314		
27388379	BRIDGER 2013C010 U2 BURNERS MA		553,674				553,674		
27503132	BRIDGER 2018C052 BLANKET - PUM					546,601	546,601		
27499330	BRIDGER 2018C010 U3 PRECIPITAT			542,943			542,943		
27495323	BRIDGER 2018C002 U1 PRECIPITAT	539,771					539,771		
27519306	BRIDGER 2018C112 U3 BURNERS MA			536,621			536,621		
27366431	BRIDGER 2012C058 U4 BURNERS -				534,491		534,491		
27422145	BRIDGER 2015C001 PURCHASE SPAR					528,465	528,465		
27371135	BRIDGER 2012C001 REPLACE COAL					514,221	514,221		
27525030	BRIDGER 2019C032 BLANKET - PUM					508,531	508,531		
27531189	BRIDGER 2019C012 U3 SCRUBBER D			507,461			507,461		
27483924	BRIDGER 2017C068 SCRAPER REBUI					505,273	505,273		
27401266	BRIDGER 2014C006 U1 STEAM COOL	496,559					496,559		
27523303	BRIDGER 2019C001 U3 STACK LINI			495,665			495,665		
27463766	BRIDGER 2016C014 U4 REPLACE CH				474,295		474,295		
27350332	BRIDGER 2011C200 CCB JB FGD PO					474,055	474,055		
27389258	BRIDGER 2013C022 777 FRAME UP					469,605	469,605		
27473624	BRIDGER 2017C001 U2 PRECIPITAT		463,050				463,050		
27437116	BRIDGER 2015C071 CCR FA HANDLI					460,509	460,509		
27467817	BRIDGER 2016C093 SPARE START U					460,501	460,501		
27263222	BRIDGER 2007C209 U4 SO2 EMIS C				455,923		455,923		
27376631	BRIDGER 2012C008 WATER WAGON R					450,770	450,770		
27525026	BRIDGER 2019C026 U3 DCS HARDWA			449,130			449,130		
27455282	BRIDGER 2016C003 COMPRESSED AI					445,031	445,031		
27423701	BRIDGER 2014C061 U3 STEAM COOL			441,219			441,219		
27364631	BRIDGER 2012C018 U4 WATERWALL				436,128		436,128		
27380761	BRIDGER 2012C059 777 FRAME-UP					426,649	426,649		
27499332	BRIDGER 2017C123 TREATED WATER					426,010	426,010		
27539563	BRIDGER 2019C092 REBUILD 01 CE					421,355	421,355		
27371139	BRIDGER 2012C032 777, FRAME-UP					408,425	408,425		
27445604	JOOA BRIDGER 345KV SUBSTATION					407,918	407,918		
27437115	BRIDGER 2015C072 CCR BA HANDLI					398,717	398,717		
27360949	BRIDGER 2011C056 RAD STACKER C					395,068	395,068		
27445705	BRIDGER 2015C016 REBUILD 777 A					392,898	392,898		
27463776	BRIDGER 2016C078 CCR FLYASH CO					390,696	390,696		
27463774	BRIDGER 2016C047 REBUILD 777 A					388,886	388,886		
27378446	BRIDGER 2012C082 U2 STEAM COOL		383,686				383,686		
27453586	BRIDGER 2016C011U4DAMPER U4 MA				382,940		382,940		
27453580	BRIDGER 2016C020LCCTR REFURBI					372,194	372,194		
27501242	BRIDGER 2018C003 U1 DCS HARDWA	369,504					369,504		
27475625	BRIDGER 2017C003 U2 DCS HMI &		356,900				356,900		
27385483	BRIDGER 2013C026 COALYARD PLC/					356,102	356,102		
27521754	BRIDGER 2019/C/014 U3 STACK BR			353,988			353,988		
27493742	BRIDGER 2017C050 REBUILD 777 A					351,141	351,141		
27453572	BRIDGER 2016/C/002 U4 PRECIP E				348,882		348,882		
27525027	BRIDGER 2019C027 UO DCS HARDWA					346,372	346,372		
27459801	BRIDGER 2016C027 REBUILD FRAME					344,075	344,075		
27513381	BRIDGER 2018C084 REBUILD D-10					342,794	342,794		
27521484	BRIDGER 2019C013 U3 PRECIPITAT			342,583			342,583		
27525024	BRIDGER 2019C019 U3 SDCC REPLA			339,388			339,388		
27477405	BRIDGER 2017C002 U2 PRECIP EPI		337,226				337,226		
27405731	BRIDGER 2014C034 REBUILD 777 A					333,467	333,467		
27451387	BRIDGER 2016C004 U4 STEAM-COOL				332,879		332,879		
27388383	BRIDGER 2013C019 US STACK BREE		329,316				329,316		

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Project	Descr	U1	U2	U3	U4	BC	Total	Purpose	Project Description/Justification
27376630	BRIDGER 2011C201 NERC CIP COMP					328,760	328,760		
27401267	BRIDGER 2014C014 U1 DCS HARWAR	323,787					323,787		
27429046	BRIDGER 2015C002 U3 PRECIP EPI			322,875			322,875		
27371138	BRIDGER 2012C009 REPLACE 16G B					321,407	321,407		
27525034	BRIDGER 2019C049 BLANKET - MIL					321,299	321,299		
27439234	BRIDGER 2015C078 CCR MATERIAL					318,530	318,530		
27407590	BRIDGER 2014C035 COALYARD PLC/					315,898	315,898		
27489695	BRIDGER 2017C078 RLD DITCH #6					315,301	315,301		
27553266	BRIDGER 2020C016 BLANKET - PUM					311,351	311,351		
27405730	BRIDGER 2014C024 U1 PRECIP EP	304,985					304,985		
27356018	BRIDGER TWYO2011C004 RAS DIGIT					303,823	303,823		
27559513	BRIDGER 2020C066 REBUILD FRAME					297,590	297,590		
27380759	BRIDGER 2013C005 U2 DCS HARWAR		296,458				296,458		
27367613	BRIDGER2012C022 U4 SCRUBBER DU				295,226		295,226		
27463770	BRIDGER 2016C044 U4 TURBINE 7T				291,820		291,820		
27449255	BRIDGER 2015C098 U4 REPLACE 42				290,048		290,048		
27497082	BRIDGER 2017C084 COMPRESSED AI					288,056	288,056		
27435423	BRIDGER 2015C044 REBUILD FRAME					287,921	287,921		
27517643	BRIDGER 2018C119 U3 REPLACE 32			287,809			287,809		
27415955	BRIDGER 2014C057 U1 LPG BUCKET	286,651					286,651		
27519310	BRIDGER 2018C124 U3 REPLACE 33			286,110			286,110		
27470124	BRIDGER 2016C108 U4 STACK BREE				285,341		285,341		
27525028	BRIDGER 2019C028 COALYARD DCS					283,228	283,228		
27401268	BRIDGER 2014C022 BLANKET - PUM					280,263	280,263		
27525029	BRIDGER 2019C038 U3 PRECIPITAT			278,492			278,492		
27470085	BRIDGER 2016C063 U2 REPLACE 23		278,123				278,123		
27455301	BRIDGER 2016C019 U4 DCS HMI &				275,843		275,843		
27362902	BRIDGER 2012C039 BLANKET - MIL					272,290	272,290		
27493752	BRIDGER 2017C106 U1 REPLACE 13	271,485					271,485		
27493751	BRIDGER 2017C105 U1 REPLACE 12	271,382					271,382		
27451386	BRIDGER 2016C001 TURBINE BUILD					268,320	268,320		
27445784	BRIDGER 2015C093 U3 HIGH VOLTA			267,926			267,926		
27430999	BRIDGER 2015C048 U3 DCS HMI &			265,167			265,167		
27463787	BRIDGER 2016C080 U2 CABR INJEC		264,955				264,955		
27497086	BRIDGER 2018C013 U1 BFFT TRIP	264,523					264,523		
27430996	BRIDGER 2015C026 BLANKET - PUM					262,136	262,136		
27501245	BRIDGER 2018C014 U1 REPLACE FL	261,897					261,897		
27463767	BRIDGER 2016C023 U4 SCRUBBER D				261,661		261,661		
27461897	BRIDGER 2016C79 U1 CABR INJECT	259,012					259,012		
27383739	BRIDGER 2013C004 BLANKET PUMPS					256,413	256,413		
27363963	BRIDGER TZR52011C001 RAS PHASE					254,805	254,805		
27470086	BRIDGER 2016C064 U2 REPLACE #2		254,147				254,147		
27519311	BRIDGER 2019C024 U3 BFFT TRIP			253,050			253,050		
27356951	BRIDGER 2012C005 U4 DEC HARDWA				248,679		248,679		
27529750	BRIDGER 2019C051 BLANKET - MOT					243,515	243,515		
27459800	BRIDGER 2016C15 U4 REPLACE REC				239,074		239,074		
27529756	BRIDGER 2019C075 U3 LPA SCREEN			238,851			238,851		
27481632	BRIDGER 2017C010 U2 REPLACE FL		233,738				233,738		
27411884	BRIDGER 2014C030 UNDERGROUND E					233,714	233,714		
27479353	BRIDGER 2017C004 REBUILD FRAME					232,339	232,339		
27479282	BRIDGER 2017C029 U2 BFFT TRIP		231,990				231,990		
27463775	BRIDGER 2016C068 SDCC LOADOUT					231,259	231,259		
27367615	BRIDGER 2012C038 U4 INSTALL EP				231,222		231,222		
27511206	BRIDGER 2018C042 REPLACE PULVE					229,954	229,954		
27503063	BRIDGER 2018C008 U1 PRECIPITAT	228,469					228,469		
27470858	JOINT ASSET-PAC SPONSORED: JBG					228,406	228,406		
27481644	BRIDGER 2017C026 U2 REPLACE TU		223,822				223,822		
27435420	BRIDGER 2015C025 BLANKET - MIL					221,473	221,473		
27352680	BRIDGER 2011C052 U4 TRANSFORME				219,802		219,802		
27503068	BRIDGER 2018C012 U1 SCRUBBER D	217,310					217,310		
27501244	BRIDGER 2018C009 U1 PRECIPITAT	215,897					215,897		
27470122	BRIDGER 2016C106 U4 TURBINE ST				215,011		215,011		
27441693	BRIDGER 2015C041 U3 REPLACE FL			214,360			214,360		
27429049	BRIDGER 2015C004 COALYARD PLC/					213,679	213,679		
27463778	BRIDGER 2016C084 U4 REPLACE FL				212,543		212,543		
27477363	BRIDGER 2017C014 U2 NUVA FEED		210,918				210,918		
27423703	BRIDGER 2014C062 U3 REPLACE 35			201,388			201,388		
27555273	BRIDGER 2020C072 REBUILD 777 A					201,372	201,372		
27407587	BRIDGER 2014C016 U1 REPLACE DR	201,331					201,331		
27501246	BRIDGER 2018C015 U1 STACK LNI	200,489					200,489		
27435416	BRIDGER 2015C011 U3 PRECIPITA			199,610			199,610		
27483917	BRIDGER 2017C064 BLANKET - REP					199,581	199,581		
27531192	BRIDGER 2019C044 U3 APH SEAL R			199,193			199,193		
27439124	BRIDGER 2015C058 U3 TURBINE 7T			198,067			198,067		
27362901	BRIDGER 2012C030 BLANKET - PUM					198,000	198,000		
27465356	BRIDGER 2016C082 SPARE L-1 BUC					197,610	197,610		
27521500	BRIDGER 2018C073 U4 SCR PLATFO				197,549		197,549		
27470121	BRIDGER 2016C105 U4 TURBINE 8T				196,201		196,201		
27481646	BRIDGER 2017C038 BLANKET - MOT					195,691	195,691		
27495320	BRIDGER 2017C107 REPLACE 05 CH					194,962	194,962		

BRIDGER PLANT ADDITIONS: Jan 1, 2012 - Dec 31, 2020

Project	Descr	U1	U2	U3	U4	BC	Total	Purpose	Project Description/Justification
27542998	BRIDGER 2020C003 BLANKET - MOT					194,594	194,594		
27356950	BRIDGER 2012C004 U0 DEC HARDWA					192,326	192,326		
27479354	BRIDGER 2017C015 U2 STACK LINI		192,092				192,092		
27401262	BRIDGER 2013C014 BLANKET-MOTOR					190,827	190,827		
27388381	BRIDGER 2013C015 U2 REPLACE TU		190,300				190,300		
27551352	BRIDGER 2020C064 BLANKET - MIL					189,416	189,416		
27435418	BRIDGER 2015C024 U3 REPLACE CW			188,219			188,219		
27409851	BRIDGER 2014C005 U1 STACK BREE	187,323					187,323		
27487465	BRIDGER 2017C023 WASTE LIQUOR					186,927	186,927		
27403807	BRIDGER 2014C025 U1 REPLACE NU	185,218					185,218		
27366417	BRIDGER 2012C012 U4 REPLACE CW				183,706		183,706		
27493690	BRIDGER 2017C109 U1 BOILER OPT	183,391					183,391		
27383745	BRIDGER 2013C025 AGC					182,298	182,298		
27495130	BRIDGER 2018C016 U3 BOILER OPT			181,950			181,950		
27505300	BRIDGER 2018C077 11 BOILER FEE					181,482	181,482		
27471817	BRIDGER 2016C112 U0 WASTE LIQU					180,234	180,234		
27441704	BRIDGER 2015C009 U3 SDCC LOWER			180,165			180,165		
27479357	BRIDGER 2017C048 WATER BALANCE					179,803	179,803		
27366421	BRIDGER 2012C035 U2 ADDITIONAL		179,779				179,779		
27459802	BRIDGER 2016C038 U4 SDCC LOWER				178,475		178,475		
27530128	BRIDGER 2019C064 U3 WATERWALL			178,228			178,228		
27401259	BRIDGER 2013C008 REPLACE PULVE					177,245	177,245		
27501252	BRIDGER 2018C032 U1 NUVA FEED	176,191					176,191		
27457814	BRIDGER 2016C051 REPLACE PULVE					174,661	174,661		
27569752	BRIDGER 2020C095 REPLACE 35 TO					173,425	173,425		
27461812	BRIDGER 2016C030 U4 STACK LINE				172,268		172,268		
27445777	BRIDGER 2015C043 BLANKET - MOT					168,657	168,657		
27411880	BRIDGER 2014C004 U1 PREDIPITAT	167,260					167,260		
27405732	BRIDGER 2014C038 REPLACE 01 EF					167,176	167,176		
27527234	BRIDGER 2019C021 U3 LPA SCR CO			166,757			166,757		
27364628	BRIDGER 2012C006 UPS UPGRADES					165,305	165,305		
27364625	BRIDGER 2012C002 U4 HEAVY WALL				164,785		164,785		
27523295	BRIDGER 2018C049 BLANKET - MIL					164,447	164,447		
27470123	BRIDGER 2016C107 U4 TURBINE ST				162,118		162,118		
27531265	BRIDGER 2019C074 U3 CATALYST A			161,036			161,036		
27495321	BRIDGER 2017C112 01 SECONDARY					158,843	158,843		
27513385	BRIDGER 2018C095 U3 REPLACE 72			158,802			158,802		
27409849	BRIDGER 2014C002 U1 SCRUBBER D	158,480					158,480		
27437077	BRIDGER 2015C017 U3 MERCURY DE			157,369			157,369		
27356155	JIM BRIDGER UNIT#2 - REDUNDANT		155,377				155,377		
27509226	BRIDGER 2018C090 U1 ID FAN DIS	154,929					154,929		
27503130	BRIDGER 2018C043 U1 SH DIVISIO	151,907					151,907		
27481645	BRIDGER 2017C027 U2 HEAVY WALL		151,733				151,733		
27477409	BRIDGER 2017C012 U2 NUVA FEED		151,575				151,575		
27529757	BRIDGER 2019C067 U3 PA DUCT IN			151,016			151,016		
27521499	BRIDGER 2018C072 U3 SCR PLATFO			150,040			150,040		
27445706	BRIDGER 2015C033 U3 STACK LIN			149,464			149,464		
27366430	BRIDGER 2012C052 U4 REPLACE TU				149,215		149,215		
27366435	BRIDGER 2012C064 U4 ABSORBBER L				148,764		148,764		
27541810	BRIDGER 2019C085 BLANKET - COA					148,127	148,127		
27435421	BRIDGER 2015C032 REBUILD WATER					147,408	147,408		
27461890	BRIDGER 2016C070 U4 GSU HEAT E				146,433		146,433		
27405727	BRIDGER 2014C012 U1 REPLACE CW	143,750					143,750		
27503072	BRIDGER 2018C022 U1 REPLACE EC	143,114					143,114		
27537480	BRIDGER 2019C/055 REPLACE 03					141,656	141,656		
27383738	BRIDGER 2013C003 US SDCC INSTA					139,658	139,658		
27366425	BRIDGER 2012C047 U4 ADDITIONAL				139,440		139,440		
27385448	BRIDGER 2013C013 U1 BRIDGE CRA	139,130					139,130		
27505216	BRIDGER 2018C026 BLANKET - MOT					138,839	138,839		
27385442	BRIDGER 2013C007 BLANKET - MIL					137,513	137,513		
27491662	BRIDGER 2017C097 U1 PRECIP ROO	137,228					137,228		
27523296	BRIDGER 2018C070 BLANKET - UND					136,862	136,862		
27499200	BRIDGER 2017C108 U1 EHC PUMPS	135,614					135,614		
27523304	BRIDGER 2019C003 U3 NUVA FEED			134,455			134,455		
27531221	BRIDGER 2019C047 U3 ID FAN DIS			133,951			133,951		
27457813	BRIDGER 2016C043 U4 REPLACE NU				133,772		133,772		
27435430	BRIDGER 2015C061 U3 REPLACE GS			133,685			133,685		
27385447	BRIDGER 2013C002 U2 REPLACE CW		132,150				132,150		
27499198	BRIDGER 2017C101 A & B RO PUMP					130,897	130,897		
27501257	BRIDGER 2018C061 U1 MERCURY DE	130,853					130,853		
27501255	BRIDGER 2018C059 U1 PA DUCT IN	130,577					130,577		
27509227	BRIDGER 2018C092 BCP MOTOR REW					130,239	130,239		
27433315	BRIDGER 2015C039 U3 BFP TURBIN			129,480			129,480		
27501247	BRIDGER 2018C021 U1 ACOUSTIC L	129,279					129,279		
27461895	BRIDGER 2016C077 U4 SDCC WEAR				128,564		128,564		
27443622	BRIDGER 2015C065 U3 HP & LP SH			128,476			128,476		
27366423	BRIDGER 2012C045 U1 ADDITIONAL	128,129					128,129		
27527159	BRIDGER 2019C025 U3 REPLACE NU			128,010			128,010		
27455355	BRIDGER 2016C026 BLANKET REPLA					127,932	127,932		
27477364	BRIDGER 2017C032 U2 MERCURY DE		127,283				127,283		

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Project	Descr	U1	U2	U3	U4	BC	Total	Purpose	Project Description/Justification
27483923	BRIDGER 2017C063 U1 TURBINE 9T	126,986					126,986		
27529747	BRIDGER 2019C002 U3 REPLACE PR			126,398			126,398		
27371148	BRIDGER 2012C066 REBUILD 02 C					126,217	126,217		
27491665	BRIDGER 2017C098 U2 PRECIP ROO		123,819				123,819		
27465359	BRIDGER 2016C049 U3-4 SCR/PREC			61,419	61,419		122,839		
27455308	BRIDGER 2016C013 BCP MOTOR REW					121,147	121,147		
27439121	BRIDGER 2015C047 U3 REPLACE CO			120,153			120,153		
27366422	BRIDGER 2012C044 U2 ADDITIONAL		119,892				119,892		
27559519	BRIDGER 2020C077 REPLACE ROOFI					119,633	119,633		
27491666	BRIDGER 2017C099 01 ACID CONTA					119,570	119,570		
27457804	BRIDGER 2016C029 U4 NUVA FEED				119,551		119,551		
27477374	BRIDGER 2017C030 CCR FLY ASH E					119,088	119,088		
27477410	BRIDGER 2017C013 U2 STACK BREE		118,052				118,052		
27401260	BRIDGER 2013C011 BOILER FEED P					117,853	117,853		
27489693	BRIDGER 2017C039 REPLACE 300 T					117,432	117,432		
27383539	BRIDGER TZRS/2011/C/TU4 362KVC					117,199	117,199		
27547307	BRIDGER 2019C108 PURCHASE VACU					117,090	117,090		
27513380	BRIDGER 2018C076 BLANKET - REP					116,986	116,986		
27376632	BRIDGER 2012C028 U4 BRIDGER CR				114,209		114,209		
27455313	BRIDGER 2016C045 U4 SCWS ION E				113,919		113,919		
27541812	BRIDGER 2019C089 HG DUAL UMBIL					113,088	113,088		
27527163	BRIDGER 2019C042 U3 APH SECTOR			113,020			113,020		
27467816	BRIDGER 2016C067 U4 HEAVY WALL				112,277		112,277		
27459810	BRIDGER 2016C058 91 EFFLUENT P					111,960	111,960		
27514205	BRIDGER 2018C100 CCR-BOTTOM AS					111,901	111,901		
27441691	BRIDGER 2015C038 PHYSICAL SECU					110,880	110,880		
27354723	JIM BRIDGER SY: 345KV REACTORS					109,842	109,842		
27523300	BRIDGER 2018C122 U3 EHC PUMPS			109,797			109,797		
27457810	BRIDGER 2016C048 FIRE SYSTEM A					109,374	109,374		
27411881	BRIDGER 2014C017 U1 REPLACE TU	107,889					107,889		
27481629	BRIDGER 2017C037 BLANKET - ELE					106,723	106,723		
27527259	PAC-SPONS JOOA: JIM BRIDGER RP					106,654	106,654		
27519566	BRIDGER 2018C118 UO-GLYCOL HEA					106,613	106,613		
27411889	BRIDGER 2014C040 U1 APH SECTOR	106,523					106,523		
27415956	BRIDGER 2014C058 U1 TURBINE CR	106,447					106,447		
27555269	BRIDGER 2020C039 BCP MOTOR REW					106,278	106,278		
27465188	BRIDGER 2016C024 U4 PRECIPITA				105,861		105,861		
27467825	BRIDGER 2016C081 GUNN MINE SUB					104,841	104,841		
27523305	BRIDGER 2019C029 U3 TURBINE BE			104,493			104,493		
27527166	BRIDGER 2019C065 U3 ACOUSTIC L			104,055			104,055		
27524351	BRIDGER 2018C135 U2 ELEVATOR U		103,512				103,512		
27371137	BRIDGER 2012C007 TRACK HOE REP					103,161	103,161		
27477407	BRIDGER 2017C011 U2 SCRUBBER D		102,060				102,060		
27524354	BRIDGER 2018C136 U4 ELEVATOR U				101,481		101,481		
27527164	BRIDGER 2019C057 BLANKET - REP					101,407	101,407		
27505230	BRIDGER 2018C044 U1 APH SECTOR	101,123					101,123		
27561651	BRIDGER 2020C090 UO WASTE LIQU					100,973	100,973		
27471808	BRIDGER 2016C062 U4 REPLACE EP				100,814		100,814		
27541805	BRIDGER 2019C040 BLANKET UPGRA					100,152	100,152		
27503089	BRIDGER 2018C063 U1 HYDROGEN S	99,977					99,977		
27566765	BRIDGER 2020C097 REPLACE LOADE					99,955	99,955		
27490516	BRIDGER 2017C085 U2 SOOTBLOWER		99,751				99,751		
27479290	BRIDGER 2016C066 U2 PA DUCT IN		99,250				99,250		
27531218	BRIDGER 2019C009 U3 PRECIP OUT			98,595			98,595		
27369052	BRIDGER 2012C025 U4 TURB PROTE				98,412		98,412		
27433300	BRIDGER 2012C011 PURCHASE PLAN					97,672	97,672		
27366424	BRIDGER 2012C046 U3 ADDITIONAL			96,921			96,921		
27367618	BRIDGER 2012C049 U4 ECONOMIZER				96,375		96,375		
27507250	BRIDGER 2018C033 BLANKET - ELE					96,029	96,029		
27480498	JOINT ASSET-PAC SPONSORED: JBR					95,571	95,571		
27525031	BRIDGER 2019C045 U3 ECONOMIZER			94,925			94,925		
27527167	BRIDGER 2019C066 UO MERCURY DE					94,666	94,666		
27501256	BRIDGER 2018C064 U1 FLAME SCAN	94,658					94,658		
27483702	BRIDGER 2017C020 U2 PRECIPITAT		94,654				94,654		
27445783	BRIDGER 2015C096 U3 PENDANT PL			94,078			94,078		
27489499	JOINT ASSET-PAC SPONSORED: JIM					93,546	93,546		
27559765	BRIDGER TSYS/2017/C/864 NERC P					93,482	93,482		
27471811	BRIDGER 2016C109 U4 TURBINE PA				93,143		93,143		
27501253	BRIDGER 2018C035 U1 SDCC REPLA	92,912					92,912		
27443615	BRIDGER 2015C012 U3 STACK BREE			92,497			92,497		
27471815	BRIDGER 2016C111 U4 MAIN TURBI				92,490		92,490		
27503069	BRIDGER 2018C017 U1 STACK BREE	92,337					92,337		
27465192	BRIDGER 2016C036 U4 LP HOOD SP				92,219		92,219		
27497154	BRIDGER 2017C118 UO COAL SILO'					90,617	90,617		
27353727	JIM BRIDGER 2011C053 REPLACE F					90,613	90,613		
27559546	BRIDGER 2020C085 UO 01-ACID TA					90,239	90,239		
27479362	BRIDGER 2017C059 BLANKET - SHO					90,107	90,107		
27515347	BRIDGER 2018C085 DUST COLLECTO					90,070	90,070		
27489699	BRIDGER 2017C088 UO-NEW TRUCK					90,037	90,037		
27531241	BRIDGER 2019C079 U4 ABS 42 OUT				89,891		89,891		

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Project	Descr	U1	U2	U3	U4	BC	Total	Purpose	Project Description/Justification
27517680	BRIDGER 2018C117 INSTALL EFFLU					89,332	89,332		
27388384	BRIDGER 2013C023 U2 PRECIPITAT		88,837				88,837		
27523307	BRIDGER 2019C035 U3 FLAME SCAN			87,305			87,305		
27475628	BRIDGER 2017C017 U2 REPLACE SC		87,134				87,134		
27519563	BRIDGER 2018C106 U2 BURNER ACC		86,916				86,916		
27443613	BRIDGER 2015C010 U3 SCRUBBER D			86,373			86,373		
27525033	BRIDGER 2019C048 REPLACE PULVE					86,254	86,254		
27430998	BRIDGER 2015C046 U3 SOOTBLOWER			85,563			85,563		
27519565	BRIDGER 2018C108 U4 BURNER ACC				85,126		85,126		
27367621	BRIDGER 2012C055 U4 BOILER DOO				85,107		85,107		
27467789	BRIDGER 2016C046 U4 SDCC REPL				84,703		84,703		
27477558	BRIDGER 2017C051 U2 SDCC REPLA		84,600				84,600		
27362904	BRIDGER 2012C040 BLANKET - MOT					84,126	84,126		
27355533	BRIDGER 2011C061 03 CENTRAL AI					84,048	84,048		
27439117	BRIDGER 2015C003 U3 SLMS HP UP			83,798			83,798		
27487477	BRIDGER 2017C072 BCP RECONDITI		83,285				83,285		
27353726	JIM BRIDGER 2011C048 JB BOILER					82,920	82,920		
27519564	BRIDGER 2018C107 U3 BURNER ACC			81,964			81,964		
27497088	BRIDGER 2017C093 REPLACE ROOFI					80,667	80,667		
27463783	BRIDGER 2016C087 U2 REPLACE 72		80,641				80,641		
27451486	BRIDGER 2015C103 O18 CONVEYOR					80,603	80,603		
27441701	BRIDGER 2015C083 REPLACE LARGE					80,587	80,587		
27461817	BRIDGER 2016C073 U4 VERTICAL C				80,134		80,134		
27475620	BRIDGER 2016C060 U1 SDCC REPLA	79,758					79,758		
27505231	BRIDGER 2018C047 U1 REPLACE 11	79,475					79,475		
27479361	BRIDGER 2017C019 U2 REPLACE PR		79,123				79,123		
27533259	BRIDGER 2019C034 REPLACE ROOFI					78,774	78,774		
27471810	BRIDGER 2016C086 ADMIN OFFICE					78,637	78,637		
27521501	BRIDGER 2018C123 ASPHALT WORK					78,548	78,548		
27531197	BRIDGER 2019C037 U3 INSTALL OR			78,423			78,423		
27430997	BRIDGER 2015C029 U3 APH SECTOR			78,340			78,340		
27537482	BRIDGER 2019/C/080 BCP MOTOR R			78,263			78,263		
27491655	BRIDGER 2017C087 WATER TREATME					78,090	78,090		
27374765	BRIDGER 2012C072 PURCHASE SURP					77,571	77,571		
27511213	BRIDGER 2018C102 U2 SDCC REPLA		77,394				77,394		
27531219	BRIDGER 2019C020 U3 CIRC WATER			75,196			75,196		
27529755	BRIDGER 2019C059 U3 COAL PIPE			74,965			74,965		
27483892	BRIDGER 2017C018 U2 PRECIP DAM		73,894				73,894		
27367624	BRIDGER 2012C060 U1 REPLACE TU	73,439					73,439		
27501239	BRIDGER 2017C057 REPLACE PULVE					73,281	73,281		
27519556	BRIDGER 2017C122 PURCHASE PORT					73,148	73,148		
27467831	BRIDGER 2016C102 REDUNDANT CSF					72,957	72,957		
27527161	BRIDGER 2019C039 BLANKET - ELE					72,885	72,885		
27501251	BRIDGER 2018C027 U1 PRECIP TR	72,720					72,720		
27501243	BRIDGER 2018C006 U1 REPLACE PR	72,264					72,264		
27388378	BRIDGER 2013C001 U2 REPLACE MA		72,218				72,218		
27433303	BRIDGER 2015C035 U3 REPLACE SC			71,641			71,641		
27470110	BRIDGER 2016C103 U4 TURBINE ST				71,442		71,442		
27398632	BRIDGER 2013C035 AT TEMPERATUR					71,149	71,149		
27503070	BRIDGER 2018C018 U1 PRECIP DAM	71,144					71,144		
27539561	BRIDGER 2019C090 REPLACE DAMAG					70,726	70,726		
27511211	BRIDGER 2018C098 U4 SDCC REPLA				70,493		70,493		
27451383	BRIDGER 2015C028 BCP MOTOR REV			70,371			70,371		
27525007	BRIDGER 2019C008 U3 PRECIP DAM			70,342			70,342		
27443621	BRIDGER 2015C013 U3 SDCC EXTER			69,971			69,971		
27479363	BRIDGER 2017C060 U2 SDCC REPLA		69,822				69,822		
27463781	BRIDGER 2016C071 REPLACE GREEN					69,524	69,524		
27403805	BRIDGER 2014C013 U1 SOOTBLOWER	69,049					69,049		
27465198	BRIDGER 2016C075 U4 PA DUCT IN				68,823		68,823		
27553268	BRIDGER 2020C063 U0 CSF ACID T					68,673	68,673		
27475468	BRIDGER 2016C115 CAPITAL SPARE					68,430	68,430		
27459807	BRIDGER 2016C054 U2 SDCC REPLA		67,992				67,992		
27491661	BRIDGER 2017C095 U4 PRECIP ROO				67,842		67,842		
27398635	BRIDGER 2014C010 U1 SDCC INSTA	67,807					67,807		
27398631	BRIDGER 2013C032 WASTE LIQUOR					67,651	67,651		
27403810	BRIDGER 2014C031/22CWP REWIND					67,646	67,646		
27403808	BRIDGER 2014C027 U2 SDCC CHAIN		67,533				67,533		
27551445	BRIDGER 2020C047 U1 SDCC REPLA	67,013					67,013		
27523319	BRIDGER 2019C043 U3 REPLACE 31			66,912			66,912		
27541811	BRIDGER 2019C088 FLOW MONITOR					66,432	66,432		
27555270	BRIDGER 2020C048 U4 SDCC REPL				66,171		66,171		
27463780	BRIDGER 2016C041 U4 TURBINE GE				66,020		66,020		
27415957	BRIDGER TROC2013C002 MICROWAVE					65,840	65,840		
27551350	BRIDGER 2020C061 U2 SDCC REPLA		65,119				65,119		
27545656	BRIDGER 2019C100 BLANKET - MIL					65,077	65,077		
27507399	BRIDGER 2017C117 WAREHOUSE LOA					64,718	64,718		
27533257	BRIDGER 2019C031 U3 UPGRADE CO			64,640			64,640		
27547302	BRIDGER 2019C102 PLANT SCAFFOL					64,535	64,535		
27483896	BRIDGER 2017C044 U2 UPGRADE CO		64,017				64,017		
27485777	BRIDGER 2012C015 DUMP TRUCK FO					63,807	63,807		

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Project	Descr	U1	U2	U3	U4	BC	Total	Purpose	Project Description/Justification
27549346	BRIDGER 2019C107 U0 UPGRADE PD					63,401	63,401		
27422144	BRIDGER 2014C056 CAPITAL SPARE					63,268	63,268		
27373109	BRIDGER 2012C054 U4 RELINE ECO				62,242		62,242		
27355528	BRIDGER 2011C055 REPLACE CONDE					62,166	62,166		
27495319	BRIDGER 2017C091 PLANT CONCRET					61,840	61,840		
27413987	BRIDGER 2014C026 REPLACE 260V					61,636	61,636		
27471818	BRIDGER 2016C113 U4 REAR WATER				61,499		61,499		
27491660	BRIDGER 2017C094 U3 PRECIP ROO			61,468			61,468		
27477411	BRIDGER 2017C041 U2 SOOTBLOWER		61,316				61,316		
27503087	BRIDGER 2018C060 BLANKET UPGRA					61,087	61,087		
27459803	BRIDGER 2016C018 U4 SOOTBLOWER				60,864		60,864		
27511212	BRIDGER 2018C099 U3 MILL DISCH			60,836			60,836		
27527165	BRIDGER 2019C063 BLANKET - SMA					60,699	60,699		
27455309	BRIDGER 2016C028 U4 NETWORK HA				60,695		60,695		
27433301	BRIDGER 2015C005 REPLACE IT-38					60,590	60,590		
27557171	BRIDGER 2020C079 TREATED WATER					60,242	60,242		
27453577	BRIDGER 2016C017 WATERGIRL OVA					60,066	60,066		
27509242	BRIDGER 2018C097 32 APH TRUNNI					59,901	59,901		
27465362	BRIDGER 2016C096 SURGE POND RE					59,257	59,257		
27457803	BRIDGER 2016C021 U4 BFF SYSTEM				58,532		58,532		
27360953	BRIDGER 2011C062 777 ENGINE RE					58,478	58,478		
27389257	BRIDGER 2013C021 RELINE SOUTH					58,353	58,353		
27435422	BRIDGER 2015C037 U3 BFF SYSTEM			58,342			58,342		
27421236	BRIDGER 2014C039 U1 RECOAT CIR	58,000					58,000		
27507243	BRIDGER 2018C023 U1 UPGRADE CO	57,370					57,370		
27398633	BRIDGER 2013C038 U1 SDCC CHAIN	57,366					57,366		
27366429	BRIDGER 2012C051 U4 APH SECTOR				56,753		56,753		
27541809	BRIDGER 2019C069 REPLACE LARGE					56,510	56,510		
27481631	BRIDGER 2017C043 U2 FLAME SCAN		55,981				55,981		
27366420	BRIDGER 2012C031U2 SDCC CHAIN		55,617				55,617		
27551351	BRIDGER 2020C062 U3 SDCC REPLA			55,484			55,484		
27525081	BRIDGER 2019C054 BLANKET UNDER					55,253	55,253		
27467829	BRIDGER 2016C101 U4 ABSORBER P				55,024		55,024		
27483701	BRIDGER 2017C007 U2 CIRC WATER		54,450				54,450		
27491659	BRIDGER 2017C089 U2 SCRUBBER F		54,248				54,248		
27405729	BRIDGER 2014C021 U1 BFFT AC/DC	53,932					53,932		
27519304	BRIDGER 2018C103 REPLACE PLANT					53,807	53,807		
27521502	BRIDGER 2018C126 U1 COOLING TO	53,756					53,756		
27473621	BRIDGER 2016C097 REPLACE ROOFI					53,710	53,710		
27459799	BRIDGER 2016C12 BLANKET-MILLS,					53,642	53,642		
27485916	BRIDGER 2017C080 U2 ID FAN OUT		53,521				53,521		
27483893	BRIDGER 2017C028 REPLACE PLANT					53,295	53,295		
27483920	BRIDGER 2017C071 U2 ECONOMIZER		52,750				52,750		
27499211	BRIDGER 2018C034 U1 BFFT EXHAU	52,387					52,387		
27507245	BRIDGER 2018C039 U1 REPLACE EP	51,983					51,983		
27525025	BRIDGER 2019C023 REPLACE EX-21					51,959	51,959		
27362898	BRIDGER 2012C026 U1 SDCC REPLA	51,926					51,926		
27505235	BRIDGER 2018C086 U3 SDCC REPLA			51,483			51,483		
27529752	BRIDGER 2019C052 BLANKET - PLA					51,382	51,382		
27410700	BRIDGER 2014C047 U1 BFF SYSTEM	51,199					51,199		
27367625	BRIDGER 2012C061 BREZEWAY & M					51,141	51,141		
27481643	BRIDGER 2017C008 U2 SDCC LINER		50,935				50,935		
27533266	BRIDGER 2019C061 U3 REPLACE 26			50,796			50,796		
27505228	BRIDGER 2018C041 U1 CIRC WATER	50,789					50,789		
27453579	BRIDGER 2016C022 U4 REPLACE PR				50,577		50,577		
27477361	BRIDGER 2017C009 U2 SDCC REPLA		50,423				50,423		
27473620	BRIDGER 2016C114 U3 SDCC REPLA			50,349			50,349		
27493753	BRIDGER 2017C092 BLANKET - SID					50,041	50,041		
27481642	BRIDGER 2017C061 U2 REPLACE 21		49,992				49,992		
27453575	BRIDGER 2016C006 WASTE LIQUOR					49,944	49,944		
27449550	BRIDGER 2015C101 REBUILD BUS 3					49,549	49,549		
27401264	BRIDGER 2013C036 BCP MOTOR REV		49,530				49,530		
27398715	JIM BRIDGER UNIT#1REDUNDANT LI	49,195					49,195		
27499335	BRIDGER 2017C062 UPGRADE 7.2 K					48,770	48,770		
27445782	BRIDGER 2015C086 REBUILD SDCC					48,164	48,164		
27470108	BRIDGER 2015C082 REPLACE TAXED					47,484	47,484		
27514206	BRIDGER 2018C109 INSTALL PICK					47,476	47,476		
27371165	BRIDGER 2012C068 RELINE NORTH					47,408	47,408		
27407589	BRIDGER 2014C033 U1 MILL RISER	47,140					47,140		
27525070	BRIDGER 2019C050 U3 FEEDWATER			47,027			47,027		
27467792	BRIDGER 2016C074 91 SURGE BIN					46,829	46,829		
27443612	BRIDGER 2015C008 U3 REPLACE EC			46,827			46,827		
27505204	BRIDGER 2017C052 BLANKET - MIL					46,675	46,675		
27521503	BRIDGER 2018C127 U3 COOLING TO			46,643			46,643		
27503134	BRIDGER 2018C068 BLANKET - SMA					46,183	46,183		
27507247	BRIDGER 2018C051 HEAT TRACE SY					45,847	45,847		
27407586	BRIDGER 2014C003 U1 REPLACE PR	45,837					45,837		
27367609	BRIDGER 2012C020 U4 PRECIPITAT				45,830		45,830		
27355521	BRIDGER 2011C054 THERMAL GNERA					45,752	45,752		
27437081	BRIDGER 2015C056 U3 BOILER FEE			45,703			45,703		

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Project	Descr	U1	U2	U3	U4	BC	Total	Purpose	Project Description/Justification
27405726	BRIDGER 2014C009 U1 BFPT ANNUN	45,346					45,346		
27362897	BRIDGER 2011C202 OSISOFT PI SY					45,144	45,144		
27493748	BRIDGER 2017C103 CONVEYOR BELT					45,034	45,034		
27479289	BRIDGER 2017C054 U2 21 BFPT AC		45,001				45,001		
27455304	BRIDGER 2016C009 COAT 01 CLARI					44,885	44,885		
27463782	BRIDGER 2016C076 REPLACE EX-21					44,548	44,548		
27378442	BRIDGER 2012C083 NORTH PLANT R					44,446	44,446		
27405733	BRIDGER 2014C043 CONVEYOR BELT					44,291	44,291		
27539560	BRIDGER 2019C056 RPLC SMALL SE					44,213	44,213		
27479358	BRIDGER 2017C005 U2 SDCC & TRA		43,943				43,943		
27485779	BRIDGER 2017C081 U2 FEEDWTER S		43,888				43,888		
27401265	BRIDGER 2013C037 U4 SDCC CHAIN				43,849		43,849		
27475470	BRIDGER 2017C025 U2 BFPT EXHAU		43,753				43,753		
27457808	BRIDGER 2016C032 DCS NETWORK R					43,700	43,700		
27417907	BRIDGER 2014C059 RELINE 02 PRI					43,502	43,502		
27479286	BRIDGER 2017C049 U2 22 BFPT AC		43,489				43,489		
27487476	BRIDGER 2017C031 COMMON ANNUNC					42,964	42,964		
27523297	BRIDGER 2018C110 SUPPLY FUEL S					42,931	42,931		
27495322	BRIDGER 2018C001 REPLACE EX-21					42,895	42,895		
27445897	BRIDGER 2012C046 U3 ADD BOILER			42,746			42,746		
27414062	BRIDGER 2014C055 U3 REPLACE CH			42,598			42,598		
27505233	BRIDGER 2018C065 U1 NETWORK HA	42,523					42,523		
27537481	BRIDGER 2019/C/072 CONVEYOR BE					41,940	41,940		
27441696	BRIDGER 2015C063 REPLACE FORKL					41,777	41,777		
27505211	BRIDGER 2018C031 U1 RELINE ECO	41,691					41,691		
27441692	BRIDGER 2015C040 U3 TURBINE GE			41,474			41,474		
27412071	BRIDGER 2014C052 U1 MAIN TURBI	41,389					41,389		
27527160	BRIDGER 2019C030 U3 BFPT AC/DC			41,370			41,370		
27435429	BRIDGER 2015C052 RECOAT 01 WAS					41,357	41,357		
27443611	BRIDGER 2015C007 U3 SDCC REPLA			41,220			41,220		
27545654	BRIDGER 2019C073 DUST COLLECTO					41,158	41,158		
27543729	BRIDGER 2019C093 U4 ASH PIPELI				41,072		41,072		
27435432	BRIDGER 2015C062 U3 SCRUBBER P			40,807			40,807		
27465197	BRIDGER 2016C056 U4 REPLACE 13				40,728		40,728		
27376633	BRIDGER 2012C070 PURCHASE BOIL					40,515	40,515		
27385446	BRIDGER 2013C018 U2 REPLACE PR		40,405				40,405		
27465195	BRIDGER 2016C055 U4 REPLACE 26				40,162		40,162		
27517678	BRIDGER 2018C091 UO OVERLAND C					39,745	39,745		
27493689	BRIDGER 2017C077 U2 SERVICE WA		39,668				39,668		
27385445	BRIDGER 2013C029 U3 SDCC REPLA			39,268			39,268		
27445714	BRIDGER 2015C089 RELINE 02 SUR					39,148	39,148		
27360951	BRIDGER 2012C016 UPGRADE FUEL					39,144	39,144		
27535431	BRIDGER 2019C077 3D TRASAR NAL					39,088	39,088		
27383552	BRIDGER 2012C089 U2 PURCHASE F		38,969				38,969		
27451473	BRIDGER 2015C100 777 BED ASH D					38,905	38,905		
27505234	BRIDGER 2018C079 U1 SWCS SKID	38,328					38,328		
27439125	BRIDGER 2015C066 CONVEYOR BELT					38,021	38,021		
27543725	BRIDGER 2019C084 HEAT TRACE SY					37,883	37,883		
27503085	BRIDGER 2018C045 U1 BFPT AC/DC	37,870					37,870		
27479284	BRIDGER 2017C040 REPLACE EX-21					37,586	37,586		
27531196	BRIDGER 2019C033 LOADOUT CONVE					37,551	37,551		
27509243	BRIDGER 2018C101 U4 STACK BREE				37,467		37,467		
27405725	BRIDGER 2014C008 U1 30 VOLTAGE	37,118					37,118		
27366434	BRIDGER 2012C063 02 WATER LIQU					37,062	37,062		
27396734	BRIDGER 2013C033 REPLACE CAC C					36,992	36,992		
27479360	BRIDGER 2017C016 COAT 02 CLARI					36,954	36,954		
27551431	BRIDGER 2020C031 BLANKET - ELE					36,947	36,947		
27367623	BRIDGER 2012C057 REPLACE EX-21					36,941	36,941		
27471805	BRIDGER 2016C059 PHYSICAL SECU					36,662	36,662		
27441775	BRIDGER 2015C081 CCR JB LANDFI					36,651	36,651		
27453576	BRIDGER 2016C007 U1 SCRUBBER P	36,629					36,629		
27437074	BRIDGER 2015C006 U3 REPLACE PR			36,355			36,355		
27461816	BRIDGER 2016C053 U4 RPLC SILO				36,297		36,297		
27547290	BRIDGER DZRS2017C001 JB SUB RE					35,832	35,832		
27470109	BRIDGER 2016C094 SIDEWALK REPL					35,705	35,705		
27455312	BRIDGER 2016C033 U4 SDCC & TRA				35,577		35,577		
27561650	BRIDGER 2020C091 UO CONTRACTOR					35,523	35,523		
27519308	BRIDGER 2018C114 LUBRICATION S					35,488	35,488		
27470119	BRIDGER 2016C104 U4 SDCC REPLA				35,379		35,379		
27503086	BRIDGER 2018C048 U1 TURBINE GE	35,282					35,282		
27441694	BRIDGER 2015C053 U3 INSTALL DU			35,254			35,254		
27503090	BRIDGER 2018C075 U1 FEEDWATER	35,244					35,244		
27525020	BRIDGER 2019C011 U3 SO3 NOZZLE			35,178			35,178		
27457797	BRIDGER 2016/C/008 U2 SCRUBBER		34,961				34,961		
27447646	BRIDGER 2015C091 REPLACE 01 TR					34,532	34,532		
27517679	BRIDGER 2018C115 ADDITIONAL HE					34,531	34,531		
27529754	BRIDGER 2019C058 REPLACE RO ME					34,516	34,516		
27509240	BRIDGER 2018C087 92 SECONDARY					34,257	34,257		
27531072	BRIDGER 2019C070 U3 ERY MODIFI			34,210			34,210		
27439119	BRIDGER 2015C023 U3 NETWORK HA			34,025			34,025		

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27410698	BRIDGER 2014C044 REWIND/CONVER					33,996	33,996		
27503061	BRIDGER 2018C004 U1 SDCC TU/SU	33,878					33,878		
27517149	BRIDGER 2017C075 REDUNDANT BCP					33,843	33,843		
27524331	BRIDGER 2018C111 POWERFILM FEE					33,754	33,754		
27437113	BRIDGER 2015C059 M&C MERCURY P					33,694	33,694		
27477406	BRIDGER 2017C006 U2 RPLC SILO		33,479				33,479		
27547305	BRIDGER 2019C106 ELECTRONIC OP					33,184	33,184		
27439120	BRIDGER 2015C034 U3 REPLACE DO			33,132			33,132		
27439118	BRIDGER 2015C022 NETWORK FIREW					33,072	33,072		
27429050	BRIDGER 2015C014 LOADOUT CONVE					33,036	33,036		
27371142	BRIDGER 2012C036 BLANKET - CON					32,978	32,978		
27441697	BRIDGER 2015C064 U4 SCRUBBER P				32,722		32,722		
27411891	BRIDGER 2014C041 U0 PURCHASE T					32,686	32,686		
27543727	BRIDGER 2019C086 REPLACE 91 LI					32,605	32,605		
27557169	BRIDGER 2020C078 U1 REPLACE PY	32,484					32,484		
27362900	BRIDGER 2012C029 U4 BF PMP TUR				32,456		32,456		
27471813	BRIDGER 2016C110 U4 42 BFPT-HP				32,251		32,251		
27383746	BRIDGER CITS2012C107 SIEM CONV					31,881	31,881		
27381703	BRIDGER 2012C081 CAC COOLER RE					31,826	31,826		
27437078	BRIDGER 2015C042 NVR CAMERA SE					31,714	31,714		
27409854	BRIDGER 2014C020 U1 LP HOOD SP	31,540					31,540		
27449549	BRIDGER 2015C099 LANDFILL STOR					31,441	31,441		
27435426	BRIDGER 2015C051 REPLACE EX-21					31,396	31,396		
27435417	BRIDGER 2015C018 U3 3 OT VOLTA			31,222			31,222		
27409852	BRIDGER 2014C011 U1 CIRC WATER	31,199					31,199		
27503076	BRIDGER 2018C038 U1 SDCC LINER	30,899					30,899		
27481640	BRIDGER 2017C024 U2 REPLACE 13		30,642				30,642		
27433302	BRIDGER 2015C027 U2 SDCC REPLA		30,070				30,070		
27470088	BRIDGER 2016C085 U4 RECOAT & R				30,022		30,022		
27366418	BRIDGER 2012C014 FORKLIFT, DRE					29,967	29,967		
27457798	BRIDGER 2016C016 U4 BFPT ANNUN				29,864		29,864		
27365624	BRIDGER 2012C042 UPGRADE U4 MA				29,740		29,740		
27429051	BRIDGER 2015C020 BLANKET - ELE					29,643	29,643		
27507254	BRIDGER 2018C080 U1 EDS UPGRAD	29,091					29,091		
27499210	BRIDGER 2018C019 U1 SO3 NOZZLE	28,945					28,945		
27421238	BRIDGER 2014C051 U3 SDCC REPLA			28,911			28,911		
27529749	BRIDGER 2019C041 U3 PRECIPITAT			28,868			28,868		
27383741	BRIDGER 2013C017 U2 30 VOLTAGE		28,839				28,839		
27525021	BRIDGER 2019C016 U3 SDCC REPLA			28,725			28,725		
27364632	BRIDGER 2012C019 JLG MECHANICA					28,643	28,643		
27445712	BRIDGER 2015C069 U3 RELINE ECO			28,621			28,621		
27470089	BRIDGER 2016C089 RELINE 95 HEA					28,587	28,587		
27439231	BRIDGER 2015C073 U3 M&C MERCUR			28,551			28,551		
27439230	BRIDGER 2015C073 U2 M&C MERCUR		28,551				28,551		
27439232	BRIDGER 2015C075 U4 M&C MERCUR				28,551		28,551		
27501254	BRIDGER 2018C036 U1 SDCC REPLA	28,526					28,526		
27465191	BRIDGER 2016C025 U4 STACK HOOD				28,520		28,520		
27441687	BRIDGER 2015C015 U3 REPLACE BA			28,245			28,245		
27559539	BRIDGER 2020C084 U4 SCR LPA SC				28,078		28,078		
27396192	BRIDGER 2013C034 SAFETY SIGNS/					28,031	28,031		
27505221	BRIDGER 2018C037 U1 SDCC & TRA	27,958					27,958		
27519555	BRIDGER 2018C054 REPLACE 02 LI					27,843	27,843		
27560909	PAC-SPONS JOOA: JIM BRIDGER RE					27,582	27,582		
27441688	BRIDGER 2015C021 U3 SDCC & TRA			27,501			27,501		
27461814	BRIDGER 2016C040 U4 46 A&B FWH				26,999		26,999		
27436331	BRIDGER 2015C054 8832 CONTROLL					26,684	26,684		
27559496	BRIDGER 2020C038 REPLACE FORKL					26,384	26,384		
27409853	BRIDGER 2014C019 REPLACE EX-21					26,016	26,016		
27511336	BRIDGER 2018C104 12 APH TRUNNI					25,798	25,798		
27449551	BRIDGER 2015C102 U0 - ACID BUI					25,764	25,764		
27551347	BRIDGER 2020C017 BLANKET - SMA					25,763	25,763		
27543733	BRIDGER 2019C099 SAND AND SALT					25,636	25,636		
27467827	BRIDGER 2016C092 U4 MIST ELIMI				25,607		25,607		
27364633	BRIDGER 2012C024 U4 3A VOLTAGE				25,589		25,589		
27483703	BRIDGER 2017C022 U2 SO3 NOZZLE		25,442				25,442		
27366419	BRIDGER 2012C027 U4 REPLACE DO				25,410		25,410		
27364635	BRIDGER 2012C034 NITROGEN GENE					25,029	25,029		
27470090	BRIDGER 2016C088 RPLC SMALL SE					24,968	24,968		
27523298	BRIDGER 2018C120 LIGHT EQUIPME					24,843	24,843		
27455303	BRIDGER 2016C005 MAIN TURBINE					24,825	24,825		
27412070	BRIDGER 2014C046 U1 #11 FEEDWA	24,779					24,779		
27524334	BRIDGER 2018C129 MAIN TURBINE					24,617	24,617		
27388380	BRIDGER 2013C012 REPLACE EX-21					24,296	24,296		
27367612	BRIDGER 2012C021 U4 REPLACE PR				24,117		24,117		
27507397	BRIDGER 2018C062 U2 SDCC REPLA		23,920				23,920		
27479285	BRIDGER 2017C045 U2 TURBINE GE		23,879				23,879		
27505207	BRIDGER 2018C020 U1 REPLACE DO	23,750					23,750		
27553270	BRIDGER 2020C067 U4 ULTRASONIC				23,701		23,701		
27363131	BRIDGER 2012C023 BLANKET SMALL					23,691	23,691		
27402636	BRIDGER 2014C007 U1 SDCC TRANS	22,926					22,926		

BRIDGER PLANT ADDITIONS: Jan 1, 2012 - Dec 31, 2020

Project	Descr	U1	U2	U3	U4	BC	Total	Purpose	Project Description/Justification
27481639	BRIDGER 2017C021 U2 PRECIPITAT		22,603				22,603		
27447648	BRIDGER 2015C092 MILLION GALLO					22,460	22,460		
27553352	BRIDGER 2020C042 U4 PRECIPITAT				22,207		22,207		
27430995	BRIDGER 2015C019 U3 BFFT ANNUN			22,178			22,178		
27383740	BRIDGER 2013C006 U2 BFFT ANNUN		22,089				22,089		
27367620	BRIDGER 2012C053 U4 INSTALL NE				21,950		21,950		
27549364	BRIDGER 2020C028 U4 SDCC REPLA				21,949		21,949		
27364634	BRIDGER 2012C033 U4 SDCC/TRANS				21,862		21,862		
27499203	BRIDGER 2017C111 EXPLOSION PRO					21,839	21,839		
27417906	BRIDGER 2014C049 MAIN FIRE PUM					21,802	21,802		
27421237	BRIDGER 2014C050 U4 SDCC REPLA			21,760			21,760		
27525022	BRIDGER 2019C017 U3 SDCC TU/SU			21,538			21,538		
27483894	BRIDGER 2017C034 U2 NETWORK HA		21,325				21,325		
27519575	BRIDGER 2018C105 BLANKET - PLA					21,325	21,325		
27443620	BRIDGER 2015C087 REPLACE BOWL					21,173	21,173		
27376634	BRIDGER 2012C079 U3 36 A&B FWH			21,052			21,052		
27568617	BRIDGER 2020C101 U0 O1B CHUTEW					21,044	21,044		
27364629	BRIDGER 2012C013 REPLACE PORTA					20,957	20,957		
27499208	BRIDGER 2017C121 REPLACE O1 LI					20,660	20,660		
27379816	BRIDGER 2012C085 REPLACE GSU S			10,322	10,322		20,644		
27447525	BRIDGER 2015C090 U3 RELAY ROOM			20,639			20,639		
27521498	BRIDGER 2018C024 BLANKET MCC U					20,410	20,410		
27413991	BRIDGER 2014C045 U1 REPLACE 13	20,105					20,105		
27489579	BRIDGER 2017C082 LUBE TRUCK RE					19,992	19,992		
27497084	BRIDGER 2017C114 REPLACE CATHO					19,959	19,959		
27407588	BRIDGER 2014C028 BLANKET - SMA					19,900	19,900		
27509241	BRIDGER 2018C093 U1 STACK EXPA	19,871					19,871		
27414053	BRIDGER 2014C053 U1 REPLACE CW	19,391					19,391		
27445711	BRIDGER 2015C055 U3 REPLACE EP			19,376			19,376		
27436333	BRIDGER 2014C862 TAIT SOFTWARE					19,124	19,124		
27470117	BRIDGER 2016C100 U0 SO2 AMBIEN					19,001	19,001		
27371149	BRIDGER DWYO2011C700 WYOMING S					18,816	18,816		
27497083	BRIDGER 2017C113 U2 APH SECTOR		18,814				18,814		
27483921	BRIDGER 2017C073 GR PUMP STATI					18,751	18,751		
27519303	BRIDGER 2018C082 BLANKET - SHO					18,659	18,659		
27383551	BRIDGER 2012C091 LAB INSTRUMEN					18,195	18,195		
27547298	BRIDGER 2019C087 GUNN MINE SUB					17,992	17,992		
27379814	BRIDGER 2012C073 RAINBOW ROOM					17,964	17,964		
27388382	BRIDGER 2013C016 U2 INSTALL NE		17,697				17,697		
27443619	BRIDGER 2015C084 O3 CAC INSTA					17,650	17,650		
27353728	JIM BRIDGER DVS2008C8007 FIXE					17,309	17,309		
27547304	BRIDGER 2019C105 REPLACE MERCU					17,306	17,306		
27560910	PAC-SPONS JOOA: JIM BRIDGER SU					17,228	17,228		
27507256	BRIDGER 2018C094 11 BFFT HP ST					16,916	16,916		
27543732	BRIDGER 2019C098 U3 APH GUIDE			16,780			16,780		
27499206	BRIDGER 2017C119 RESIDE MCC 04					16,710	16,710		
27531198	BRIDGER 2019C053 REPLACE FIRE					16,561	16,561		
27371147	BRIDGER 2012C056 REPLACE PROT					16,518	16,518		
27489577	BRIDGER 2017C058 U1 REPLACE GR	16,263					16,263		
27437082	BRIDGER 2015C060 U3 SODIUM ANA			16,244			16,244		
27383744	BRIDGER 2013C028 U2 SDCC & TRA		16,242				16,242		
27367617	BRIDGER 2012C043 O1 & O2 DIESE					16,206	16,206		
27524345	BRIDGER 2018C133 U1 MAIN TURBI	16,180					16,180		
27445713	BRIDGER 2015C088 RELINE 06 SEC					15,745	15,745		
27463933	BRIDGER CITC2015C658 2015 ROUT					15,701	15,701		
27479288	BRIDGER 2017C053 U2 SODIUM ANA		15,659				15,659		
27411882	BRIDGER 2014C018 U1 INSTALL NE	15,585					15,585		
27380758	BRIDGER 2013C009 U2 RPLC PA FA		15,542				15,542		
27465194	BRIDGER 2016C042 U4 WEST WALL				15,470		15,470		
27485778	BRIDGER 2017C056 REPLACE FIRE					15,465	15,465		
27491695	BRIDGER 2017C090 U2 WEST WALL		15,347				15,347		
27467791	BRIDGER 2016C072 U4 SODIUM ANA				15,331		15,331		
27524340	BRIDGER 2018C131 U3 MAIN TURB			15,317			15,317		
27407601	BRIDGER 2012C010 LANDFILL LAND					15,313	15,313		
27386232	BRIDGER TZR52011CTR210044127 1					15,001	15,001		
27385443	BRIDGER 2012C090 REPLACE ANODE					14,603	14,603		
27443618	BRIDGER 2015C067 U3 MILL RISER			14,543			14,543		
27493750	BRIDGER 2017C104 42 ABSORBER I					14,445	14,445		
27441776	BRIDGER 2015C080 FLYASH UNLOAD					14,435	14,435		
27505201	BRIDGER CITC2018C250 BOUNDARY					14,359	14,359		
27371144	BRIDGER 2012C037 REPLACE CATHO					14,292	14,292		
27566705	BRIDGER 2020C094 U0 STAIR CASE					14,253	14,253		
27385484	BRIDGER 2012C092 REPLACE ANODE					14,160	14,160		
27386230	BRIDGER TZR52011CTR210044129 1					14,014	14,014		
27507249	BRIDGER 2018C069 BLANKET - OFF					13,905	13,905		
27386223	BRIDGER TZR52011CTR210044578 1					13,893	13,893		
27564797	BRIDGER UO 2020/C/081 DUST COL					13,867	13,867		
27439228	BRIDGER 2015C068 MERCURY ANALY					13,569	13,569		
27445779	BRIDGER 2015C076 LANDFILL MONI					13,262	13,262		
27386231	BRIDGER TZR52011CTR210044128 1					12,956	12,956		

BRIDGER PLANT ADDITIONS: Jan 1, 2012 - Dec 31, 2020

Project	Descr	U1	U2	U3	U4	BC	Total	Purpose	Project Description/Justification
27525023	BRIDGER 2019C018 U3 SDCC RETUR			12,956			12,956		
27371245	BRIDGER TZR52011CTR6 BUILD STE					12,900	12,900		
27523230	BRIDGER 2019C046 U3 REPLACE 32			12,601			12,601		
27401263	BRIDGER 2013C024 REPLACE SML S					12,331	12,331		
27507236	BRIDGER 2018C005 U1 SDCC RETUR	12,230					12,230		
27383743	BRIDGER 2013C027 U2 PA APH EXP		12,213				12,213		
27383737	BRIDGER 2012C093 REPLACE 21 FW					12,121	12,121		
27491654	BRIDGER 2017C076 U2 REPLACE AP		11,883				11,883		
27507240	BRIDGER 2018C007 U1 PRECIP OUT	11,681					11,681		
27531195	BRIDGER 2019C022 U3 SDCC & TRA			11,641			11,641		
27411887	BRIDGER 2014C036 U1 WEST WALL	11,641					11,641		
27386236	BRIDGER TZR52011CTR210044573 1					11,604	11,604		
27373110	BRIDGER 2012C067 91 LIME FEEDE					11,597	11,597		
27376635	BRIDGER 2012C080 U3 WEST WALL			11,474			11,474		
27479364	BRIDGER 2017C069 U4 REPLACE GU				11,402		11,402		
27451384	BRIDGER 2015C104 COAL LAB ANAL					11,385	11,385		
27447649	BRIDGER 2015C095 LOW PRESSURE					11,169	11,169		
27443616	BRIDGER 2015C036 U3 LP HOOD SP			11,040			11,040		
27547301	BRIDGER 2019C096 CHUTWORK REP					11,002	11,002		
27524349	BRIDGER 2018C134 U1 FIFTH ELEV	10,880					10,880		
27539559	BRIDGER 2018C096 BLANKET LCC S					10,878	10,878		
27386222	BRIDGER TZR52011CTR210044579 1					10,875	10,875		
27465361	BRIDGER 2016C095 01A CONVEYOR					10,738	10,738		
27507398	BRIDGER 2018C089 UORECOAT IRRI					10,493	10,493		
27560853	PAC-SPONS JOOA: JIM BRIDGER SU					10,460	10,460		
27566690	BRIDGER 2020C089 UO COAL LAB E					10,248	10,248		
27383548	BRIDGER 2012C088 JOCKEY FIRE P					10,086	10,086		
27555271	BRIDGER 2020C059 BLANKET BUILD					10,064	10,064		
27441690	BRIDGER 2015C031 U1 APH GUIDE	9,993					9,993		
27517640	BRIDGER 2018C116 REPLACE CATH					9,537	9,537		
27493743	BRIDGER 2017C086 PURCHASE STOR					9,503	9,503		
27559560	BRIDGER 2020C069 UO 01-CHEM TR					9,377	9,377		
27545742	BRIDGER 2019C097 RECOAT DIESEL					9,270	9,270		
27483918	BRIDGER 2017C065 BLANKET - OFF					9,135	9,135		
27473619	BRIDGER 2016C116 HG84I CALIBRA					9,106	9,106		
27396732	BRIDGER 2013C031 UPGRADE GE/BE					9,103	9,103		
27501281	BRIDGER 2017C116 FROZEN FOOD M					9,097	9,097		
27564795	BRIDGER UO 2020C080 REPLACE CA					9,074	9,074		
27493745	BRIDGER 2017C096 JIM BRIDGER S					8,960	8,960		
27423700	BRIDGER 2014C048 SPARE BFPT HP					8,936	8,936		
27551348	BRIDGER 2020C019 BLANKET - OFF					8,851	8,851		
27364636	BRIDGER 2012C041 PLATFORM AROU					8,768	8,768		
27507248	BRIDGER 2018C066 UO NETWORK HA					8,710	8,710		
27485746	BRIDGER 2017C033 COALYARD NETW					8,569	8,569		
27467826	BRIDGER 2016C091 FIRE EXTINGUI					8,168	8,168		
27386226	BRIDGER TZR52011CTR210044577 1					7,687	7,687		
27386221	BRIDGER TZR52011CTR210044580 1					7,328	7,328		
27542998	BRIDGER 2020C003 BLANKET - MOT					7,033	7,033		
27455306	BRIDGER 2016C010 DAHS SERVER C					6,857	6,857		
27507257	BRIDGER 2018C74 U1 UPGRADE APH	6,855					6,855		
27547496	BRIDGER CITC2018C675 DIGITAL V					6,675	6,675		
27386219	BRIDGER TZR52011CTR210044622 1					6,626	6,626		
27412073	BRIDGER CITS2013C775 TAGOUT R1					6,579	6,579		
27386218	BRIDGER TZR52011CTR210044623 9					6,575	6,575		
27499334	BRIDGER CITC/2017/C/223 WIRELE					6,499	6,499		
27386229	BRIDGER TZR52011CTR210044574 1					6,479	6,479		
27429735	BRIDGER DSYS2007C807 MOBILE RA					6,468	6,468		
27383538	BRIDGER CITS/2012/C/102 MATRIK					6,399	6,399		
27547303	BRIDGER 2019C104 WAREHOUSE CAR					6,252	6,252		
27386220	BRIDGER TZR52011CTR210044621 1					6,228	6,228		
27465199	BRIDGER 2016C90 BLANKET - OFFI					6,170	6,170		
27449547	BRIDGER 2015C097 PURCHASE LIGH					5,937	5,937		
27405893	BRIDGER CITC2013C358 CY13 WAN					5,833	5,833		
27493747	BRIDGER 2017C102 COAL RECEIVIN					5,704	5,704		
27378443	BRIDGER 2012C084 2012 PAVING -					5,359	5,359		
27429734	BRIDGER DSYS2007C807 MOBILE RA					5,114	5,114		
27547494	BRIDGER CITS2018C426 BARCODE S					4,998	4,998		
27378444	BRIDGER 2012C086 2012 PAVING -					4,817	4,817		
27396193	BRIDGER 2010CITC C503 WINDOWS					4,697	4,697		
27447523	BRIDGER 2015C030 U3 UPGRADE AP			4,631			4,631		
27549343	BRIDGER CITS2018C305 TAGOUT PR					4,616	4,616		
27378440	BRIDGER 2012C087 2012 PAVING -					4,298	4,298		
27376692	BRIDGER 2012C74 GENERATION PRO					4,263	4,263		
27386227	BRIDGER TZR52011CTR210044575 1					4,090	4,090		
27517677	BRIDGER 2018C055 REPLACE FIRE					4,085	4,085		
27411886	BRIDGER 2014C032 U1 REPLACE PA	4,011					4,011		
27549342	BRIDGER CITC2018C666 WINDOWS F					3,753	3,753		
27386224	BRIDGER TZR52011CTR210044576 1					3,727	3,727		
27366427	BRIDGER 2012C048 U4 BFPT T/C A				3,595		3,595		
27560920	PAC-SPONS JOOA: JIM BRIDGER RE					3,435	3,435		

BRIDGER PLANT ADDITIONS: Jan 1, 2012 - Dec 31, 2020

Project	Descr	U1	U2	U3	U4	BC	Total	Purpose	Project Description/Justification
27505227	BRIDGER 2018C040 U1 COAL PIPE	3,394					3,394		
27567773	PAC-SPONSORED JOOA: JIM BRIDGE					3,350	3,350		
27475573	BRIDGER 2016C117 PLASMA/CUTTER					2,975	2,975		
27504951	BRIDGER CITS2017C478 BARCODE P					2,812	2,812		
27460872	BRIDGER TZRS2014CTR6 WY-RPLC-T					2,268	2,268		
27529758	BRIDGER 2019C076 BLANKET - OFF					2,033	2,033		
27365774	BRIDGER CITS2011C409 BARCODE P					1,980	1,980		
27475621	BRIDGER 2016C066 U4 UPGRADE AP				1,979		1,979		
27350329	BRIDGER 2011C047 BCP MOTOR REV					1,964	1,964		
27499204	BRIDGER 2017C115 U2 UPGRADE AP		1,918				1,918		
27542311	PAC-SPONS JOOA: JIM BRIDGER CA					1,508	1,508		
27517675	BRIDGER CITS2018C122 SYSLOG FO					1,472	1,472		
27371234	BRIDGER TZRS2010CTR6 REPLACE 2					1,401	1,401		
27367719	BRIDGER CITC 2011C 237 CY11 UP					1,208	1,208		
27457215	JOINT ASSET - JIM BRIDGER SC57					590	590		
27489697	BRIDGER 2017C079 BLANKET ASBES					547	547		
27560918	PAC-SPONS JOOA: JIM BRIDGER; R					504	504		
27385486	BRIDGER CITC2012C237 CY 12 N-D					378	378		
27367718	BRIDGER CITC 2011C 236 CY11 TE					190	190		
27560917	PAC-SPONS JOOA: JIM BRIDGER 10					127	127		
27521485	BRIDGER 2019C036 U3 HYDROGEN S			60			60		
	TOTAL	22,261,717	36,742,959	79,734,598	84,101,381	43,429,474	266,270,128		

Note: Idaho Power does not record investments by unit. The allocation between units presented above is the Company's estimate based on project descriptions.