

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION	)	CASE NO. PAC-E-24-04
OF ROCKY MOUNTAIN POWER FOR	)	
AUTHORITY TO INCREASE ITS RATES	)	DIRECT TESTIMONY OF
AND CHARGES IN IDAHO AND	)	TIMOTHY J. HEMSTREET
APPROVAL OF PROPOSED	)	REDACTED
ELECTRIC SERVICE SCHEDULES AND	)	
REGULATIONS	)	

ROCKY MOUNTAIN POWER

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CASE NO. PAC-E-24-04

May 2024

1 I. INTRODUCTION AND QUALIFICATIONS

2 Q. Please state your name, business address, and present  
3 position with PacifiCorp d/b/a Rocky Mountain Power (the  
4 "Company").

5 A. My name is Timothy J. Hemstreet. My business address is  
6 825 NE Multnomah Street, Suite 1800, Portland, Oregon  
7 97232. My present position is Vice President of  
8 Renewable Energy Development for PacifiCorp.

9 Q. Briefly describe your education and business experience.

10 A. I hold a Bachelor of Science degree in Civil Engineering  
11 from the University of Notre Dame in Indiana and a Master  
12 of Science degree in Civil Engineering from the  
13 University of Texas at Austin. I am also a Registered  
14 Professional Engineer in the State of Oregon. Prior to  
15 joining the Company in 2004, I held positions in  
16 engineering consulting and environmental compliance.  
17 Since joining the Company, I have held positions in  
18 environmental policy, engineering, project management,  
19 and hydroelectric project licensing and program  
20 management. In 2016, I assumed a role in renewable energy  
21 development, and in June 2019 I assumed a role focusing  
22 on PacifiCorp's wind repowering effort, and assumed my  
23 current role in September 2022, in which I oversee the  
24 development of renewable energy resources that enhance  
25 and complement PacifiCorp's existing renewable energy

1 resource portfolio.

2 **Q. Have you testified in previous regulatory proceedings?**

3 A. Yes. I have previously sponsored testimony in Idaho,  
4 California, Oregon, Utah, Washington, and Wyoming.

5 **II. PURPOSE OF TESTIMONY**

6 **Q. What is the purpose of your direct testimony?**

7 A. The purpose of my testimony is to demonstrate the  
8 prudence of the Company's efforts to acquire and repower  
9 the Foote Creek II, III and IV ("Foote Creek II-IV") and  
10 Rock River I wind energy facilities (collectively, the  
11 "Projects"), similar to the effort undertaken previously  
12 at the Company's Foote Creek I wind facility, for which  
13 cost recovery was approved in the Company's last general  
14 rate case.<sup>1</sup> My testimony provides detail on the Company's  
15 commercial and other arrangements related to the  
16 Projects, and explains their customer benefits.  
17 Specifically, my testimony addresses:

- 18 • the background of the Projects;
- 19 • the scope of the repowering effort and the  
20 Project's relationship to the Company's earlier  
21 repowering efforts;
- 22 • the contracting arrangements, implementation  
23 status, permitting status, and schedule for the  
24 Projects;
- 25 • the energy benefits of the Projects;
- 26 • the financial benefits for customers of repowering  
27 resulting from production tax credit ("PTC")

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<sup>1</sup> *In the Matter of Rocky Mountain Power's Application for Authority to Increase its Rates and Charges in Idaho and Approval of Proposed Electric Service Schedules and Regulations, Case No. PAC-E-21-07, Order No. 35277 (Dec. 30, 2021).*



1 preferred portfolio.<sup>2</sup> The Company obtained the required  
2 certificates of public convenience and necessity  
3 (“CPCNs”) for both Projects from the Wyoming Public  
4 Service Commission (“Wyoming Commission”).<sup>3</sup> Construction  
5 at Foote Creek II-IV began in the summer of 2022, and  
6 the project reached commercial operation in November  
7 2023. Construction of Rock River I began in the spring  
8 of 2023 with commercial operation on track for late 2024.

9 **IV. WIND REPOWERING PROJECT BACKGROUND, SCOPE, AND**  
10 **RELATION TO PRIOR REPOWERING PROJECTS**

11 **Q. Please explain the background of the Foote Creek II-IV**  
12 **and Rock River I wind energy projects.**

13 A. The Foote Creek Rim wind energy projects, consisting of  
14 Foote Creek I, II, III and IV, were the first utility-  
15 scale, commercial wind energy projects in the state of  
16 Wyoming. The projects are located at Foote Creek Rim due  
17 to the extraordinary combination of geography and wind  
18 energy resource at the site that causes already robust  
19 winds to accelerate as they move over the elevated

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<sup>2</sup> *In re PacifiCorp 2021 Integrated Resource Plan*, at 295, 323 (<https://www.pacificorp.com/energy/integrated-resource-plan.html>); *In re PacifiCorp 2023 Integrated Resource Plan*, at 307 (<https://www.pacificorp.com/energy/integrated-resource-plan.html>).

<sup>3</sup> *In re Application of RMP for a Certificate of Public Convenience and Necessity to Construct New Wind Turbines and Update Collector Lines at the Existing Foote Creek II-IV Wind Energy Facility*, Docket No. 20000-606-EN-21 (Record No. 16955); *In re Application of RMP for a Certificate of Public Convenience and Necessity to Construct New Wind Turbines and Update Collector Lines at the Existing Rock River I Wind Energy Facility*, Docket No. 20000-613-EN-22 (Record No. 17017).

1 plateau of the Foote Creek Rim. Development of wind  
2 energy facilities to take advantage of these favorable  
3 wind energy characteristics began in the early 1990s,  
4 and construction of the Foote Creek Rim projects was  
5 completed between 1999 and 2000. The Rock River I wind  
6 project is located approximately five miles northeast of  
7 the Foote Creek Rim projects and four miles northwest of  
8 the High Plains and McFadden Ridge projects. Rock River  
9 I was developed shortly after the Foote Creek Rim  
10 projects and reached commercial operation in October  
11 2001. Rock River I was similarly developed adjacent to  
12 the Foote Creek Rim due to these similar favorable wind  
13 energy resource characteristics.

14 PacifiCorp participated in wind energy development  
15 at the Foote Creek Rim site in partnership with the  
16 Eugene Water & Electric Board ("EWEB") and the  
17 Bonneville Power Administration ("BPA"). PacifiCorp and  
18 EWEB were co-owners of the Foote Creek I wind energy  
19 facility that reached commercial operation in 1999, and  
20 BPA purchased a portion of the project's output.  
21 PacifiCorp acquired full ownership of the Foote Creek I  
22 project in 2019 and completed repowering of the project  
23 in March 2021. The Foote Creek II-IV wind energy  
24 facilities, which were previously owned by Terra-Gen,  
25 LLC ("Terra-Gen"), were independently developed and

1 their generation output was sold to other utilities  
2 under power purchase agreements. The Foote Creek II-IV  
3 projects were constructed with 64 wind turbines (of  
4 which 33 turbines had a nameplate capacity of 0.6  
5 megawatt ("MW") each and 31 turbines had a nameplate  
6 capacity of 0.75 MW) with a total nameplate capacity of  
7 43.35 MW.

8 Rock River I was constructed with 50 wind turbines  
9 (each turbine with a nameplate capacity of one megawatt)  
10 with a total nameplate capacity of 50 MW. Rock River I  
11 was previously co-owned by Terra-Gen and Shell Wind  
12 Energy Inc. ("Shell") and its output was sold to the  
13 Company under a 20-year power purchase agreement that  
14 expired in December 2021. The Rock River I project  
15 interconnects to the Company's transmission system at  
16 the Foote Creek Substation.

17 **Q. What does it mean to repower a wind energy facility?**

18 A. Repowering a wind energy facility means upgrading the  
19 wind turbine generator ("WTG") equipment at an existing  
20 wind energy project with more efficient equipment to  
21 increase the power generation from the facility and  
22 extend the life of the facility. Specifically,  
23 repowering Foote Creek II-IV and Rock River I involves  
24 installing new turbines while reusing other pre-existing  
25 facility infrastructure.

1 **Q. Please briefly describe PacifiCorp's effort to repower**  
2 **the Foote Creek II-IV and Rock River I facilities.**

3 A. Similar to the Company's effort to repower its  
4 neighboring Foote Creek I facility, repowering of the  
5 Projects involves installing modern WTGs.

6 At Foote Creek II-IV, the repowering effort  
7 involved installing 11 new WTGs of the same type recently  
8 installed at Foote Creek I to replace the older wind  
9 turbines of much smaller capacity that were previously  
10 at the site. Similarly, the Rock River I repowering  
11 effort will install 19 new WTGs to replace the smaller  
12 capacity turbines originally at the project.

13 The new WTGs at the Projects will be supported on  
14 new foundations and connected to the Foote Creek  
15 Substation with new energy collector circuits. The  
16 turbines will have updated switchgear and controls, and  
17 the new WTG locations will be linked by new turbine  
18 access roads. The proposed site layout for the Foote  
19 Creek II-IV repowering effort is shown in Exhibit No. 36  
20 and the Rock River I site layout is shown in Exhibit No.  
21 37.

22 **Q. Will the Projects benefit from PacifiCorp's prior**  
23 **efforts to repower the adjacent facilities?**

24 A. Yes. As part of the Foote Creek I repowering effort, the  
25 Company obtained the master wind energy lease rights for



1 the entire Foote Creek Rim site, encompassing the  
2 original Foote Creek I, Foote Creek II, Foote Creek III,  
3 and Foote Creek IV wind energy project boundaries. These  
4 rights were acquired in August 2019 and their  
5 acquisition enhanced the customer benefits of the Foote  
6 Creek I repowering project by reducing the ongoing land  
7 rights cost of the project. Similarly, repowering the  
8 Foote Creek II-IV facilities will allow customers to  
9 fully benefit from these wind energy lease rights, which  
10 provide the ability to cost-effectively generate power  
11 at one of the most favorable wind energy locations in  
12 Wyoming. Acquiring the Foote Creek II-IV facilities  
13 allowed the Company to nearly double the number of modern  
14 turbines it operates at the Foote Creek Rim, increasing  
15 operations and maintenance efficiencies associated with  
16 current operations at the repowered Foote Creek I  
17 facility.

18 The Rock River I facility will benefit from the  
19 Company's recent repowering effort at the nearby High  
20 Plans and McFadden Ridge projects, utilizing operations  
21 and maintenance staff contracted for that project to  
22 also operate the Rock River I facility. Thus, no  
23 additional operations facilities are needed to support  
24 project operations. Some project controls will also be  
25 housed at the Company's Foote Creek operations and

1 maintenance building, which is nearby the Foote Creek  
2 Substation, where Rock River I will interconnect to the  
3 transmission system. This local infrastructure results  
4 in efficiencies and cost savings for the project since  
5 it can draw on existing infrastructure as well as Company  
6 staff and contractor resources.

7 **Q. Are there other ways in which Foote Creek II-IV will**  
8 **benefit from PacifiCorp's prior repowering effort at**  
9 **Foote Creek I?**

10 A. Yes. The Foote Creek I repowering project required  
11 access road upgrades to the Foote Creek Rim plateau to  
12 allow larger, modern wind turbine equipment to be  
13 delivered to the site. These improvements were also used  
14 for the Foote Creek II-IV facilities, and the enclosed  
15 switchgear building constructed adjacent to the Foote  
16 Creek Substation as part of the Foote Creek I repowering  
17 project is being used for equipment that will support  
18 the repowered project, reducing costs. Finally, the  
19 Foote Creek II-IV facilities will be operated from the  
20 Company's existing operations and maintenance building  
21 for the Foote Creek I project, so no additional  
22 facilities are needed for project operations.

1 **Q. Will the larger blades from the new turbines increase**  
2 **the potential for avian impacts at the repowered**  
3 **facilities?**

4 A. Monthly monitoring conducted at the Projects over the  
5 last several years shows no significant avian impacts.  
6 Although the larger blades and greater rotor-swept area  
7 will increase the overall risk zone of the repowered  
8 wind turbines, this does not necessarily correlate with  
9 an increased risk of avian impacts. The significant  
10 reduction in the number of turbines that will be deployed  
11 at the site also means that less of the overall project  
12 site area will be covered by wind turbines. To further  
13 mitigate any potential impacts, at both the Foote Creek  
14 II-IV and Rock River I projects, new turbine locations  
15 have been sited to avoid areas of higher avian use such  
16 as the edges of the plateaus.

17 The Company also performs monthly monitoring at all  
18 Company-owned Wyoming wind facilities and reports to  
19 both the Wyoming Game and Fish Department and the U.S.  
20 Fish and Wildlife Service. Once repowering concludes,  
21 the Company will begin this monthly monitoring at the  
22 Projects to determine if the new turbines cause  
23 additional impacts to avian species and will engage with  
24 the appropriate agency to discuss and, if prudent and  
25 practicable, implement additional avoidance,

1 minimization, or mitigation measures. In addition, the  
2 Company continues to coordinate with both the Wyoming  
3 Game and Fish Department and the U.S. Fish and Wildlife  
4 Service on the Project, including the development of an  
5 Eagle Conservation Plan and Bird and Bat Conservation  
6 Strategy for the new turbines.

7 **V. WIND REPOWERING PROJECT CONTRACTING, PERMITTING**  
8 **STATUS, SCHEDULE, AND COST**

9 **Q. What commercial arrangements has PacifiCorp made to**  
10 **acquire and repower the Projects?**

11 A. For Foote Creek II-IV, in addition to the earlier  
12 acquisition of the master wind energy lease rights for  
13 the project site, PacifiCorp executed a Purchase and  
14 Sale Option Agreement ("PSOA") with Terra-Gen to acquire  
15 100 percent of its interests in the Foote Creek II, III  
16 and IV facilities. Pursuant to the PSOA, Terra-Gen  
17 removed the original 64 turbines from the site and  
18 completed site restoration activities in preparation for  
19 repowering of the facility by the Company. The Company  
20 closed on the acquisition of the facilities pursuant to  
21 the PSOA in June 2022, following the approval of the  
22 Company's CPCN application by the Wyoming Commission.

23 For Rock River I, the Company negotiated a PSOA  
24 with Terra-Gen and Shell to acquire 100 percent of their  
25 interests in the Rock River I facility including the

1 project's wind energy lease rights, transmission and  
2 access easements, and interconnection agreement.  
3 Pursuant to the PSOA, Terra-Gen and Shell removed the  
4 original 50 turbines from the site and completed site  
5 restoration activities in preparation for repowering of  
6 the site by the Company. The Company closed on the  
7 acquisition of the facilities pursuant to the PSOA in  
8 February 2023, and shortly thereafter issued a Full  
9 Notice to Proceed to the construction contractor. The  
10 Company began repowering construction activities in the  
11 spring of 2023, in support of a late 2024 in-service  
12 date for the project.

13 **Q. What other commercial arrangements has PacifiCorp made**  
14 **with respect to the Projects?**

15 A. For Foote Creek II-IV, the Company executed a master  
16 supply agreement and a turbine supply agreement for the  
17 repowering turbines with Vestas-American Wind Energy,  
18 Inc. ("Vestas") in which Vestas will supply and  
19 commission WTGs suitable for the site of the same type  
20 used at the Foote Creek I facility. The Company has also  
21 executed a contract for balance of plant ("BOP") wind  
22 energy construction services following a competitive  
23 procurement process in which proposals from qualified  
24 wind energy construction companies were solicited. The  
25 Company has also executed a turbine service and

1 maintenance agreement with Vestas, which will provide  
2 service for the repowered turbines consistent with  
3 negotiated pricing and terms.

4 For Rock River I, the Company executed a safe harbor  
5 purchase agreement and a turbine supply agreement with  
6 General Electric International, Inc. ("GE") in which GE  
7 will supply and commission WTGs suitable for the site.  
8 The Company has also executed a BOP wind energy  
9 construction services contract. The Company has also  
10 executed a full-service agreement with GE under which GE  
11 will maintain the repowered turbines consistent with  
12 negotiated pricing and terms.

13 **Q. What is the status of necessary permitting to begin**  
14 **construction of the repowering projects?**

15 A. For both Projects, the Company has received the  
16 necessary Federal Aviation Administration no-hazard  
17 determinations to install the larger new turbines at the  
18 site. The Company has also received Conditional Use  
19 Permits for the repowering efforts from Carbon County,  
20 Wyoming. The Company has received building permits from  
21 Carbon County for both the Foote Creek II-IV and Rock  
22 River I.

23 **Q. What is the anticipated construction schedule for the**  
24 **Projects?**

25 A. For Foote Creek II-IV, the Company began construction in

1 the summer of 2022, and turbine delivery and  
2 commissioning activities occurred in summer and fall of  
3 2023. Foote Creek II-IV achieved commercial operation in  
4 November 2023. Major Project milestones for Foote Creek  
5 II-IV are shown below:

6	<u>Milestone</u>	<u>Completion Date</u>
7	Wyoming CPCN Approval	April 2022
8	Project Acquisition	June 2022
9	Construction Mobilization	June 2022
10	Turbine Foundation Completion	September 2022
11	Access Road Completion	April 2023
12	Complete Turbine Deliveries	June 2023
13	Mechanical and Electrical Completion	October 2023
14	Commercial Operation	November 2023
15	Final Completion/Site Restoration	July 2024
16		(Anticipated)

17 For Rock River I, the Company began construction in  
18 the spring of 2023, with foundations and access roads  
19 the focus of efforts in 2023 and turbine delivery,  
20 installation and commissioning activities occurring in  
21 2024. The Rock River I project is anticipated to be fully  
22 online and serving customers in December 2024. Major  
23 Project milestones are indicated below:

24	<u>Milestone</u>	<u>Completion</u>
25	<u>Date</u>	
26	Wyoming CPCN Approval	September 2022
27	Project Acquisition	February 2023
28	Construction Mobilization	May 2023
29	Turbine Foundation Completion	September 2023
30	Access Road Completion	April 2024
31	Complete Turbine Deliveries	June 2024
32		(anticipated)
33	Mechanical and Electrical Completion	September 2024
34		(anticipated)
35	Commercial Operation	November 2024

1 (anticipated)  
2 Final Completion/Site Restoration July 2025  
3 (anticipated)

4 **Q. What is the construction status of Foote Creek II-IV?**

5 A. At Foote Creek II-IV, major construction activities are  
6 complete, and the project reached commercial operation  
7 on November 21, 2023, and the new turbines are operating  
8 and providing energy for customers. Remaining  
9 construction activities consist of interconnection  
10 improvements within the Foote Creek Substation and site  
11 restoration activities that will be completed in summer  
12 2024.

13 **Q. What is the construction status of Rock River I?**

14 A. Construction at Rock River I began in the spring of 2023  
15 and turbine foundations were completed in the fall of  
16 2023. Access roads are fully complete and prepared to  
17 receive turbine deliveries that will begin in May 2024.  
18 Turbine assembly by the balance of plant contractor will  
19 begin thereafter and the project is anticipated to be in  
20 commercial operation in November 2024. Similar to Foote  
21 Creek II-IV, site restoration activities will be  
22 completed in the following summer, when conditions are  
23 amenable for revegetation of construction laydown areas.

24 **Q. What is the cost of the Projects?**

25 A. The cost of acquiring and repowering the Foote Creek II-  
26 IV facilities was [REDACTED] on a total-Company



1 basis, which is [REDACTED] on a Idaho-allocated basis.  
2 The cost of acquiring and repowering the Rock River I  
3 facility is estimated at [REDACTED] on a total-  
4 Company basis, which is [REDACTED] on an Idaho-  
5 allocated basis.

6 **Q. Does the acquisition and repowering of the Projects**  
7 **benefit customers?**

8 A. Yes. Acquisition and repowering of the Foote Creek II-  
9 IV and Rock River I projects will result in significant  
10 benefits for customers as a result of the energy and PTC  
11 benefits of the project, as more fully detailed in the  
12 direct testimony of Company witness Mr. Thomas R. Burns.

13 **VI. WIND REPOWERING BENEFITS INCLUDING REQUALIFICATION FOR**  
14 **PRODUCTION TAX CREDITS**

15 **Q. What benefits will customers realize from the Projects**  
16 **once repowered?**

17 A. Given the extraordinary wind resource in the area, the  
18 Projects will provide significant energy benefits to  
19 customers: the Foote Creek II-IV facilities are  
20 estimated to have a high net capacity factor of [REDACTED]  
21 percent, and the Rock River I facility is estimated to  
22 provide a similarly high net capacity factor of [REDACTED]  
23 percent. These high net capacity factors allow the  
24 facilities to contribute to system capacity needs.

1 **Q. Will the repowered Projects qualify for PTCs?**

2 A. Yes. Repowering will requalify both Projects for PTCs,  
3 which will be passed on to the Company's customers.

4 **Q. What is the value of the PTC for the Projects?**

5 A. For 2024, the value of the federal PTC is 2.9 cents per  
6 kilowatt-hour, or \$29 per megawatt-hour. This PTC value  
7 is adjusted annually based upon an inflation index, and  
8 the PTC is available for energy produced during the 10-  
9 year period after the wind facility begins commercial  
10 operation. Pursuant to the Inflation Reduction Act of  
11 2022, the Projects are expected to qualify for 110  
12 percent of the value of the federal PTC given the  
13 location of the projects in Carbon County, which is  
14 expected to meet the definition of an "energy community"  
15 under the law. Location in an "energy community"  
16 increases the PTC value from 100 percent to 110 percent  
17 under the Inflation Reduction Act.

18 **Q. Are there other requirements that the repowered Projects  
19 must satisfy to qualify for the PTC?**

20 A. Yes, the repowered Foote Creek II-IV and Rock River I  
21 projects must be in service before the end of 2025 and  
22 2026, respectively, to meet the IRS continuous efforts  
23 safe harbor and qualify for the PTC by completing  
24 construction within four calendar years. Because  
25 repowering at the Projects will not incorporate retained

1 components from the existing wind turbines at the site  
2 there are no requirements related to the Internal  
3 Revenue Service "80/20" test - a test that was applicable  
4 to the repowering of the majority of PacifiCorp's wind  
5 fleet in which the foundations and towers were retained.<sup>4</sup>

6 **Q. Will repowering increase the overall generating capacity  
7 of the Projects?**

8 A. No. The existing Foote Creek II - IV, and Rock River I  
9 interconnections will be fully used but the generating  
10 capacity of the Projects is not expected to be expanded  
11 as a result of repowering. The wind turbine equipment  
12 that will be used at the Projects has been optimized to  
13 make full use of the existing interconnection capacities  
14 and the Company has not factored into its analysis of  
15 the project an increase in interconnection capacity.

16 **Q. What is the anticipated generation that the Projects  
17 will produce?**

18 A. The Company retained the engineering consulting firm  
19 Black & Veatch, Inc. ("Black & Veatch") to evaluate the  
20 energy production expected from the Projects. To  
21 complete this assessment, Black & Veatch used site wind  
22 data, wind turbine location data, operational  
23 performance data, and other available site-specific

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<sup>4</sup> Internal Revenue Service Notice 2016-31, § 6 (May 5, 2016) (available here: <https://www.irs.gov/pub/irs-drop/n-16-31.pdf>).

1 information to model the expected generation from the  
2 Projects. The wind model also evaluated generation  
3 losses resulting from the wake losses at each turbine  
4 location. Wake losses are the reduction in generation at  
5 turbines downwind of other turbines due to reduced wind  
6 speed and increased turbulence in the airflow—or wake—  
7 behind a turbine. At Foote Creek II-IV, completion of  
8 the project is estimated to result in annual energy  
9 production of [REDACTED] gigawatt-hours ("GWh"), resulting in  
10 a high net capacity factor of [REDACTED] percent. At Rock River  
11 I, the estimated annual energy production of the  
12 facility is expected to be [REDACTED] GWh after repowering,  
13 resulting in a high net capacity factor of [REDACTED] percent.  
14 In total, the repowered Projects will produce an amount  
15 of energy used by the equivalent of nearly 42,000 homes.  
16 The technical analysis documenting the expected  
17 generation from the Projects is provided in Confidential  
18 Exhibit No. 38 and Confidential Exhibit No. 39.

19 **VII. REVIEW OF WIND REPOWERING PROJECTS IN THE IRP**

20 **Q. Were the Projects reviewed as part of the Company's 2021**  
21 **IRP?**

22 **A.** Yes. The Projects were made available as a potential  
23 resource that could meet customer energy needs in the

1 model used to develop the Company's 2021 IRP.<sup>5</sup> Because  
2 the resources were beneficial to customers, they were  
3 included in the Company's least-cost, least-risk  
4 preferred portfolio.

5 **Q. Was the acquisition and repowering of the Projects**  
6 **included in the 2021 IRP Action Plan?**

7 A. Yes. Action Item 2b of the 2021 IRP noted that the  
8 Company would pursue necessary regulatory approvals to  
9 authorize the acquisition and repowering of the Foote  
10 Creek II-IV and Rock River I facilities in order to  
11 support late 2023 and late 2024 in-service dates,  
12 respectively.<sup>6</sup> The Company's 2021 IRP Update continued  
13 to include acquisition and repowering of the Projects in  
14 the preferred portfolio, as did the Company's 2023 IRP.<sup>7</sup>

15 **Q. What is your recommendation?**

16 A. I recommend the Commission: (1) find that acquiring and  
17 repowering the Foote Creek II-IV and Rock River I wind  
18 projects are prudent, reasonable and in the public  
19 interest and will benefit customers; and (2) allow the

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<sup>5</sup> *In re PacifiCorp's 2021 Integrated Resource Plan*, at 295 (Sept. 1, 2021) (available here: <https://www.pacificorp.com/energy/integrated-resource-plan.html>).

<sup>6</sup> *Id.* at 323.

<sup>7</sup> *In re PacifiCorp's 2021 IRP Update*, at 5 (Mar. 31, 2022) (available here: [https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/en/energy/integrated-resource-plan/2021\\_IRP\\_Update.pdf](https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/en/energy/integrated-resource-plan/2021_IRP_Update.pdf)); *In re PacifiCorp's 2023 IRP*, at 10 (Mar. 31, 2023) (available here: [https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/en/energy/integrated-resource-plan/2023-irp/2023\\_IRP\\_Volume\\_I.pdf](https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/en/energy/integrated-resource-plan/2023-irp/2023_IRP_Volume_I.pdf)).

1 Company to recover the cost of these investments in  
2 retail rates.

3 **Q. Does this conclude your direct testimony?**

4 A. Yes.

Case No. PAC-E-24-04  
Exhibit No. 36  
Witness: Timothy J. Hemstreet

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

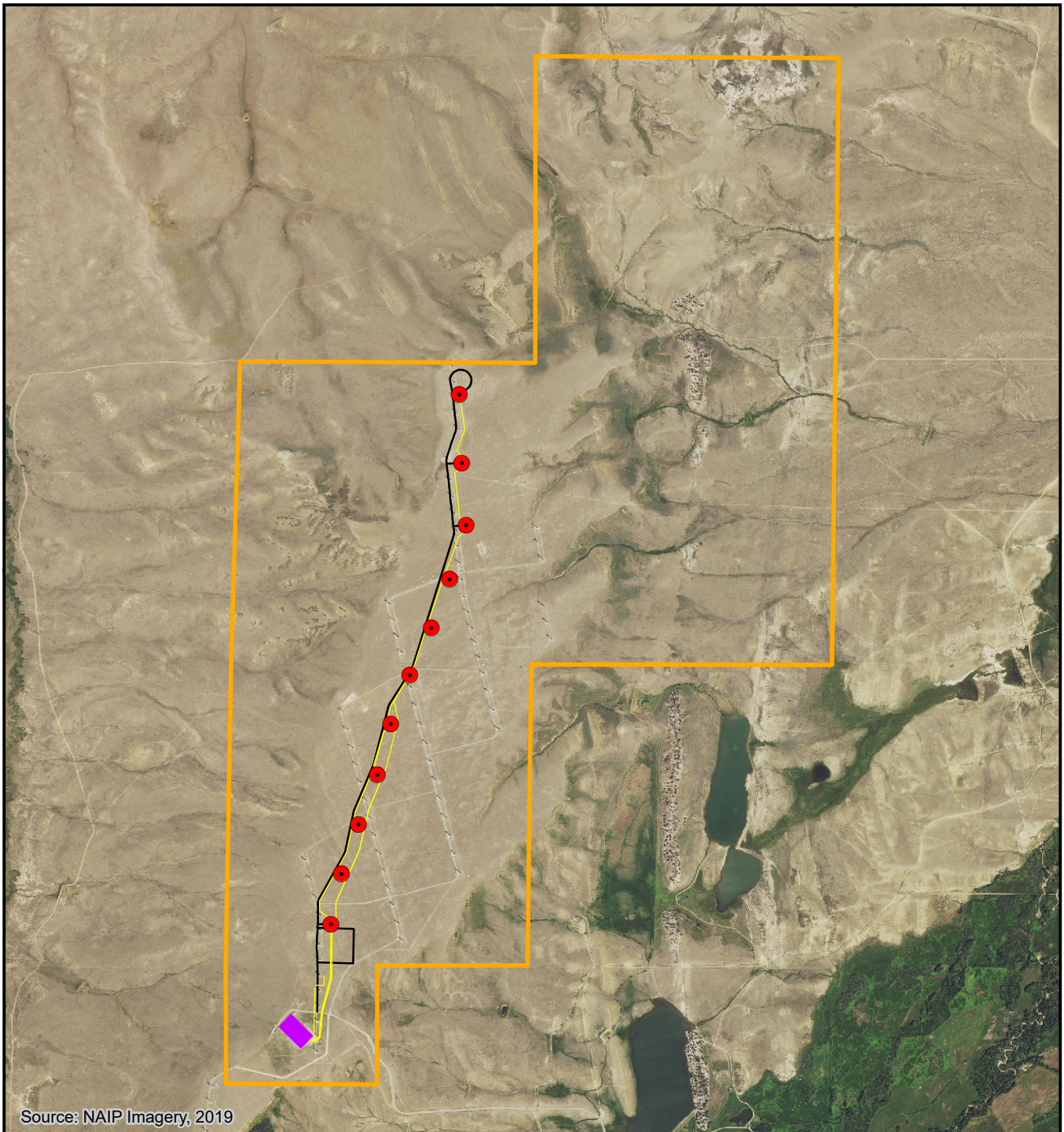
ROCKY MOUNTAIN POWER

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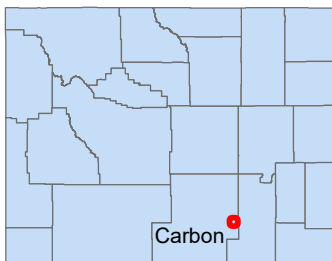
Exhibit Accompanying Direct Testimony  
of Timothy J. Hemstreet

Foote Creek Site Layout

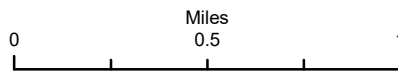
May 2024



Source: NAIP Imagery, 2019



-  Lease Boundary
-  Foote Creek II-IV Turbine
-  Electrical Collection Line
-  Access Road
-  Laydown Area
-  Substation



## Foote Creek II-IV

### Repowering

Project Location



MARTIN & NICHOLSON  
ENVIRONMENTAL CONSULTANTS



Case No. PAC-E-24-04  
Exhibit No. 37  
Witness: Timothy J. Hemstreet

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

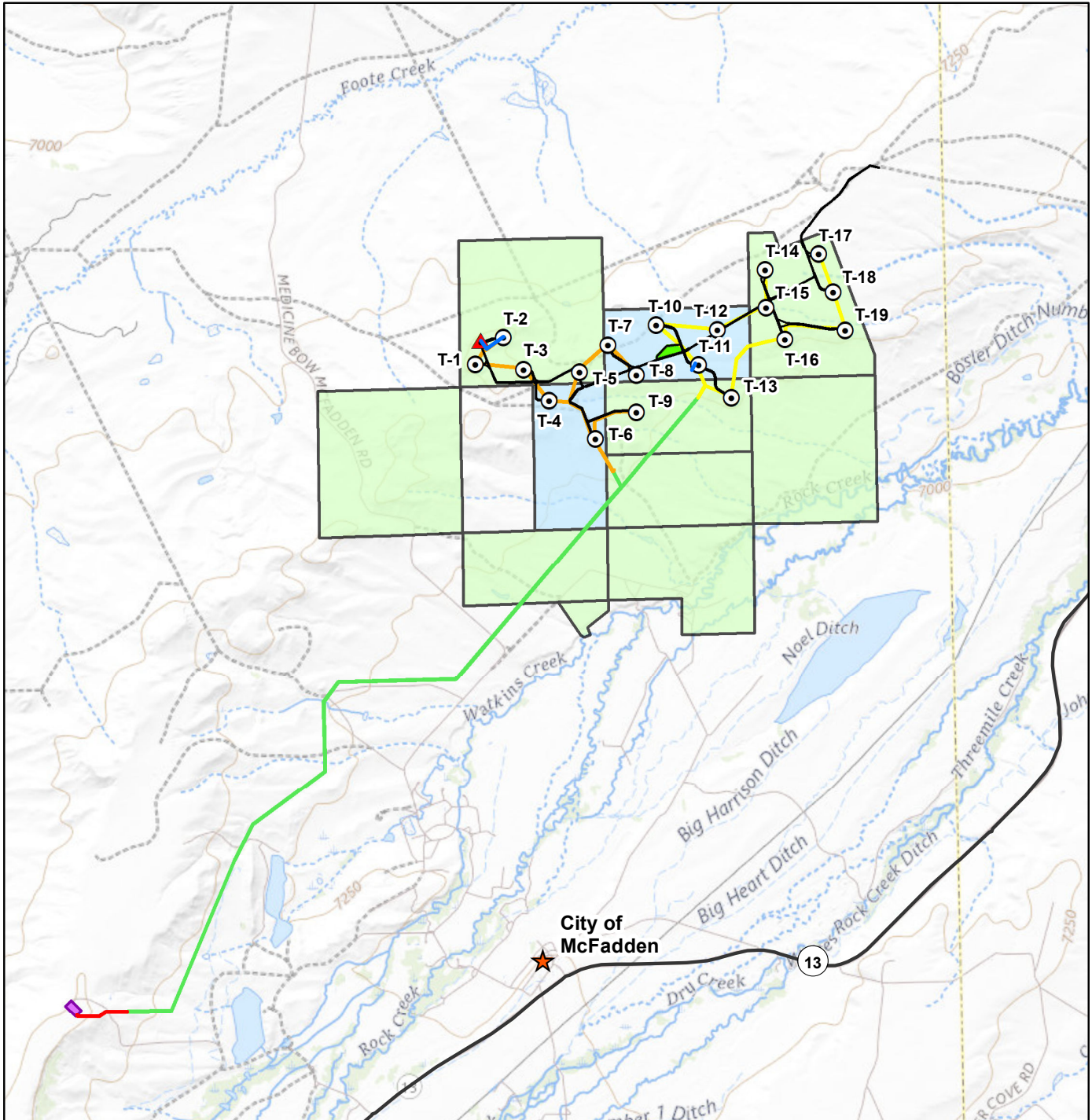
ROCKY MOUNTAIN POWER

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Exhibit Accompanying Direct Testimony  
of Timothy J. Hemstreet

Rock River I Site Layout

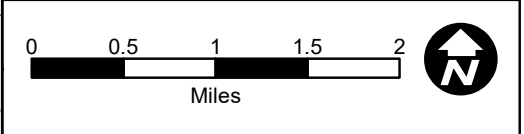
May 2024



	MET Tower		LV AC Cable
	Structure		UG Feeders
	Roadway		Laydown Area
	Existing Overhead Transmission Line		Substation
	Feeder 1		Rocky River Ranches
	Feeder 2		State of Wyoming



**FIGURE 1: VICINITY MAP**  
 ROCK RIVER REPOWER PROJECT  
 CARBON COUNTY, WYOMING  
 Project No. 193579D.000



Sources:  
 USGS (2019)  
 ESRI (2021)

**REDACTED**

Case No. PAC-E-24-04

Exhibit No. 38

Witness: Timothy J. Hemstreet

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

ROCKY MOUNTAIN POWER

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**REDACTED**

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Foote Creek II-IV Energy Production Analysis

May 2024

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ENTIRETY AND IS PROVIDED UNDER  
SEPARATE COVER**

**REDACTED**

Case No. PAC-E-24-04

Exhibit No. 39

Witness: Timothy J. Hemstreet

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

ROCKY MOUNTAIN POWER

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Rock River I Energy Production Analysis

May 2024

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