

an identified reliability need. For the reasons discussed above, Staff does not believe such projects are appropriate for acknowledgement in the IRP framework. Regardless of whether the Commission acknowledges the Company's Energy Vision 2020 projects, Staff reiterates that the Commission should provide guidance on the anticipated sharing of risks and benefits between the Company and its customers that may be considered in a future ratemaking proceeding.

In these Final Comments, Staff recommends the following actions and additional requirements:

- **Actions: Recommend for Non-Acknowledgment**

- a. Wind Repowering:

- Staff recommends that the Commission not acknowledge PacifiCorp Action Item 1a in its 2017 Action Plan.

- b. Wind RFP/Aeolus to Bridger/Anticline:

- Staff recommends that the Commission not acknowledge PacifiCorp Action Items 1b and 2a in its 2017 Action Plan.

- **Actions: Recommend for Potential Acknowledgement of PacifiCorp's Resource Acquisitions**

Should the Commission choose to consider conditional acknowledgement based on a finding that PacifiCorp's major resource acquisition represents a low-cost opportunity, Staff proposes that the Commission adopt a framework to protect customers. These protections are not intended to prevent resource development; instead, they are intended to limit guaranteed rates of return to resources and strategies that are needed to provide safe, reliable and affordable service to customers and ensure that the risks associated with resources that are not needed, but may nonetheless represent an economic opportunity, are appropriately borne by project developers.

The protections we contemplate can be thought of as falling into two time periods: pre-COD and post-COD. In the pre-COD phase, the construction phase-the ratepayer protection is simply to set a construction-cost cap. Given that the Company will be provided or will be able to produce detailed construction cost or purchase cost figures associated with some level of all-in economic benefit to its customers, the Commission could convey to the Company that any costs in excess of those the Company indicates customers could economically incur will not be recoverable.

The second protection, for the post-COD period, ensures that from customers' perspective, project revenue is at least as favorable as modeled. For the