

1 **Q. What is infrastructure maintenance cost and why is it included in the**  
2 **Company's pro formed O&M budget for the ~~Hopkins Ridge Infill~~ Wild**  
3 **Horse expansion wind facility?**

4 A. In order to construct the Wild Horse expansion wind project, additional roads,  
5 crane pads, turbine foundations, fiber optic communication lines, and  
6 underground electrical collection cables were built. In addition, a new bay has  
7 been added in the existing substation complete with new switchgear, relaying, and  
8 main step-up transformer. Based on the experience gained from operating the  
9 Company's wind facilities and on prudent industry practice, routine infrastructure  
10 maintenance costs are certainly a foreseeable expense and are included in the  
11 Company's rate request for the expansion project. The cost of infrastructure  
12 maintenance is a known and foreseeable consequence of adding turbines to the  
13 Wild Horse expansion wind facility.

14 **Q. Why were development royalty payments recommended for disallowance,**  
15 **and why is it included in the Company's pro formed O&M budget for the**  
16 **Wild Horse expansion wind facility?**

17 A. Ms. Breda proposes that all pro forma adjustments to the Company's rate request  
18 that involve a forecast, budget, or projection be removed. While the Company  
19 owns the real estate beneath the Wild Horse expansion wind facility, it holds  
20 ongoing payment obligations with the original project developers. In the  
21 development rights transaction that brought Wild Horse to the Company, the