

1  
Richard S. Collins  
Gore School of Business  
Westminster College  
1840 South 1300 East  
Salt Lake City, UT 84105  
Telephone: 801-832-2665  
Facsimile: 801-832-3106  
Email: rcollins@Westminstercollege.edu  
Representing Wasatch Wind

2

3

4

5

---

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

---

IN THE MATTER OF THE PETITION OF  
WASATCH WIND, LLC FOR APPROVAL  
OF A CONTRACT FOR THE SALE OF  
CAPACITY AND ENERGY FROM THEIR  
PROPOSED QF FACILITIES

IN THE MATTER OF THE APPLICATION  
OF PACIFICORP FOR APPROVAL OF  
POWER PURCHASE AGREEMENT  
BETWEEN PACIFICORP AND SPANISH  
FORK WIND PARK 2, LLC

DOCKET NO. 06-035-42  
DOCKET NO. 06-035-76

PETITION FOR DELAY AND REQUEST  
FOR A TECHNICAL CONFERENCE  
AND  
RE-SCHEDULING OF PROCEEDINGS  
JULY 14, 2006

6

---

7

8

9       Wasatch Wind hereby submits the following petition for Commission consideration,  
10      we request a prompt reply.

11

DATED this 16<sup>th</sup> day of August, 2006.

12

Richard S. Collins

13

14

/s/\_\_\_\_\_

15

Richard S. Collins

16

Representing Wasatch Wind

17

18

CERTIFICATE OF SERVICE

19

1 I hereby certify that a true and correct copy of the foregoing was sent by  
2 United States mail, postage prepaid, or by email this 11 day of, July 2005, to the following:  
3

4 Michael Ginsberg  
5 Patricia Schmid  
6 Utah Division of Public Utilities  
7 Heber M. Wells Bldg, 5th Floor  
8 160 East 300 South  
9 Salt Lake City UT 84111  
10 [mginberg@utah.gov](mailto:mginberg@utah.gov)  
11 pschmid@utah.gov  
12

13 Reed Warnick  
14 Paul Proctor  
15 Committee of Consumer Services  
16 Heber M. Wells BLDG, 5<sup>th</sup> Floor  
17 160 East 300 South  
18 Salt Lake City, UT 84111  
19 [rwarnick@utah.gov](mailto:rwarnick@utah.gov)  
20 pproctor@utah.gov  
21

22 Paul Clements  
23 PacifiCorp C&T  
24 201 S Main St. Suite 2300  
25 SLC, UT 84111  
26 Paul.clements@pacificorp.com  
27

28 Christine Watson Mikell  
29 3658 E Golden Oaks Dr  
30 Salt Lake City, UT 84121  
31 [christine@isotruss.com](mailto:christine@isotruss.com)  
32

33 Todd Velnosky  
34 Business Development Manager - Wind Energy  
35 John Deere Credit  
36 6400 NW 86th Street, P.O. Box 6600  
37 Johnston, IA 50131-6600 USA  
38 VelnoskyToddL@JohnDeere.com  
39  
40  
41  
42  
43

Dean Brockbank  
PacifiCorp  
201 S Main St. Suite 2300  
Salt Lake City, UT 84111  
[dean.brockbank@pacficorp.com](mailto:dean.brockbank@pacficorp.com)

Sarah Wright  
1014 2nd Avenue  
Salt Lake City, UT 84103  
[sarah@utahcleanenergy.org](mailto:sarah@utahcleanenergy.org)

Tracy Livingston  
357 W 910 S  
Heber City, UT 84032  
[tracy@wasatchwind.com](mailto:tracy@wasatchwind.com)

44 Wasatch Wind petitions the Commission for a delay in the proceedings to

1 determine avoided line losses associated with the provision of energy and capacity from  
2 the Spanish Fork Wind Park 2 facilities to Rocky Mountain Power. In addition, we  
3 request a technical conference be scheduled as soon as possible to discuss a proper  
4 procedure for determining line losses and to obtain information in a more efficient  
5 manner than the current data request process. Wasatch Wind requests that Commission  
6 staff be included in the technical conference to insure that the information that the  
7 Commission needs to make a determination of possible line losses is included in the  
8 analysis and becomes part of the record through testimony.

9           There are a number of reasons that Wasatch Wind is making this request. First, it  
10 is our contention that a delay in the proceedings will not cause material harm to any party  
11 and the additional information gathered will provide a better record on which the  
12 Commission can make a decision. Wasatch Wind has conferred with the Division and  
13 the Committee and they do not oppose a delay in the schedule. Rocky Mountain Power  
14 has agreed to a technical conference, but as of this filing opposes a delay in the  
15 proceeding even though there will be no material or financial harm to the Company from  
16 the delay. The wind facility is slated to be operational in late 2007 or early 2008.

17           One of the main reasons for the request to delay is the difficulty Wasatch Wind  
18 has experienced getting technical support for the analysis necessary for testimony. The  
19 Commission has already heard evidence on avoided line losses and the testimony  
20 provided did not meet the Commission requirements to make a decision that would keep  
21 ratepayers neutral. Wasatch Wind determined that in order to meet the Commission  
22 requirements, additional expertise would be need for this proceeding. We contacted local  
23 consulting and engineering firms about representing us in this proceeding. Our contacts

1       within these organizations were initially very interested in doing the analysis. They  
2       appeared to be perfect candidates as they had substantial experience working with  
3       PacificCorp's transmission system, their initial analysis indicated the possibility of  
4       substantial line loss savings to the Company from the purchase of energy from our  
5       facility. After some delay and further consultation with their superiors, they declined to  
6       offer their services. One engineering consulting firm had recently signed a no compete  
7       agreement with Rocky Mountain Power which would not allow them to represent a party  
8       in opposition to Rocky Mountain Power. Another entity does substantial business with  
9       Rocky Mountain Power and it was fearful of jeopardizing that financial relationship.  
10      Wasatch Wind was forced to look outside the local consulting industry to find help. After  
11     considerable efforts, we have finally secured the services of Michael Unger of Elcon and  
12     Associates and have been trying to amass the necessary information to do our analysis.  
13      Although acquainted with the Pacific Power and Light system, the Portland Oregon based  
14     Elcon and Associates does not have any experience with the transmission system in the  
15     eastern part of the PacificCorp system. This puts us at a severe disadvantage and we have  
16     made numerous data requests to obtain the necessary information. Unfortunately, the  
17     data request process has bogged down and we feel we do not currently have the requisite  
18     data to perform our analysis.

19           The analysis will require data concerning the exact configuration of the  
20     transmission system between the QF facilities and local Rocky Mountain Power loads  
21     and the same for the proxy plant. It will also require information about what other plants  
22     or purchases might be backed down during the production of the QF facility. The  
23     answers to the data requests have not allowed our consultant enough information or time

1 to successfully model that analysis and there are still questions about how to interpret the  
2 answers. Our data request (1.7 PC) requested the name of a contact person within  
3 PacifiCorp with technical skills and information needed to appropriately answer follow  
4 up questions. PacifiCorp responded that all requests for information should be sent to  
5 [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com). In follow up telephone conversation with Rocky Mountain  
6 Power counsel, we were informed that the Company would support a technical  
7 conference but counsel maintained that all data requests must go through the formal data  
8 request procedure which has a 14 day response date. Our delay in obtaining competent  
9 expert witnesses and the use of the formal data request process has hampered our ability  
10 to obtain data and perform an analysis. As a result we are not prepared to present our full  
11 analysis by the filing date for Direct Testimony currently scheduled for August 18, 2006

12 We request that the Commission set aside the filing dates for testimony and for  
13 hearing and instead set up a technical conference to discuss the issues. After the technical  
14 conference, a new schedule for testimony and hearing dates can be determined. This  
15 delay although opposed by the Company will allow parties more time to obtain the  
16 requisite data and perform the necessary analysis. This will provide a more informed  
17 record on which the Commission can make a decision.

18

19 DATED this 16<sup>th</sup> day of August, 2006.

20 Richard S. Collins

21

22

/s/ \_\_\_\_\_  
Richard S. Collins  
Representing Wasatch Wind