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## **BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

| Long Ridge Wind objection in the Matter of<br>the Application of Rocky Mountain Power  |   |
|--|---|
| for Approval of Changes to Renewable<br>Avoided Cost Methodology for Qualifying<br>Facilities Projects Larger than Three<br>Megawatts- Docket 12-035-100 | <ul> <li>OBJECTION TO REQUEST FOR</li> <li>APPROVAL OF CHANGES TO</li> <li>RENEWABLE AVOIDED COST</li> <li>METHODOLOGY AND MOTION</li> <li>TO STAY AGENCY ACTION</li> </ul> |

Pursuant to the Rocky Mountain Power ("Company") submitted request that the Public Service Commission of Utah ("Commission") approve certain changes to the currently effective avoided cost pricing for large renewable qualifying facilities ("QF"), approved by the Commission October 31, 2005 in Docket No. 03-035-14 ("2005 Order"), and reaffirmed by the Commission September 20, 2012 in Docket No. 12-2557-01 ("2012 Order").

Long Ridge Wind LLP has actively pursued development of its 160 MW wind asset since December, 2010. We have dedicated significant resources and funds for the continuing development of our asset in good faith and within the guidelines of current Utah QF requirements and procedure.

We believe that the approval of Rocky Mountain Power's request to stay action will cause significant harm to our company and to our ability to continue with the project's development. Further more, we would like to reference Docket 12-2557-01 regarding Blue Mountain Wind, dated September 20, 2012. We believe that this ruling bears directly on our project.

## Long Ridge Wind LLP provides the following sequence of events:

January, 2011- Energy of Utah initiated land control discussion with BLM- Millard County February-May 2012- Long Ridge Wind LLP continues working with BLM- Millard County

April 2011- Long Ridge Wind LLP initiates discussions with Utah Hill Airforce Base regarding Long Ridge Wind project.

June, 2011- Long Ridge Wind LLP files complete BLM – SF- 299 application (land control)

June, 2011- Long Ridge Wind LLP initiates un-official transmission discussions with the Company on our interest in Millard County (via Dennis Desmarais-Portland office)

July, 2011- Long Ridge Wind LLP requests information on Renewable RFP from the Company February, 2012: Long Ridge Wind LLP initiated open discussion regarding its 160 MW Wind asset in Millard County with the Company.

April 20, 2012: Long Ridge Wind LLP submitted all Wind QF requested documentation and submitted hard copy to the Company.

July 26, 2012: The Company provided a letter of concurrence pending calculation of the QF price.

August 31, 2012: The Company provided two QF cost proposals to Long Ridge Wind LLP. The offers were significantly lower than our expectations, based on our understanding of Schedule 38 pricing methodology.

September 13, 2012: We met with the Division of Public Utilities to discuss apparent inconsistencies in the Company's pricing proposal.

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September 21, 2012: We met the Division of Public Utilities to discuss further apparent inconsistencies in the Company's pricing proposal, along with Schedule 38 functionality concerns.

September 24, 2012: We met with representatives of the Company to discuss the proposal's pricing. The Company indicated that the Public Service Commission's Blue Mountain ruling would cause the Company to issue a new pricing proposal, using the same monthly pricing schedule used in the approved Blue Mountain schedule. The Company also indicated that the situation made our concerns about the original proposal irrelevant, and that the new pricing proposal would probably be ready within about a week.

September 8, 2012: The Company indicated its intent to submit a filing on Docket 12-035-100

We are small Utah developer with limited resource but a genuine interest in providing costeffective, renewable energy to Utah consumers.

We ask The Public Service Commission of Utah for expedited processing of this matter.

## Respectfully

Ros Rocco Vrba MBA for Energy of Utah