



201 South Main, Suite 2300
Salt Lake City, Utah 84111

September 5, 2013

***VIA ELECTRONIC FILING
AND HAND DELIVERY***

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Secretary

RE: In the Matter of the Application of Rocky Mountain Power for Approval of Power Purchase Agreement Between PacifiCorp and Long Ridge Wind I, LLC – Docket No. 13-035-117

In accordance with the Scheduling Order issued by the Public Service Commission of Utah (the “Commission”) on July 25, 2013, Rocky Mountain Power submits the following reply comments in response to the comments filed by the Utah Office of Consumer Services and Utah Clean Energy and the Settlement Stipulation between Long Ridge Wind I, LLC and the Utah Division of Public Utilities.

The Commission’s review and approval of Qualifying Facility (“QF”) power purchase agreements is governed by Utah Code Ann § 54-12-2. In accordance with that section, the Commission established the methodology for calculating avoided cost rates for large wind qualifying facilities in 2005, in Docket No. 03-035-14¹ in its Report and Order dated October 31, 2005, which was then confirmed by the Commission in a December 20, 2012 Order on Motion to Stay Agency Action in Docket No. 12-035-100.²

The pricing and terms and conditions included in the power purchase agreement (“PPA”) between Long Ridge Wind I, LLC and PacifiCorp are consistent with the Commission orders in Docket No. 03-035-14 and Docket No. 12-035-100.

The Commission issued an Order on Phase II Issues in Docket No. 12-035-100 on August 16, 2013. The PPA between Long Ridge Wind I, LLC and PacifiCorp was executed on July 3, 2013, prior to issuance of the order in Phase II of Docket No. 12-035-100. Therefore, the rates and other terms and conditions contained in the PPA between PacifiCorp and Long Ridge Wind

¹ *In the Matter of the Application of PacifiCorp for Approval of an IRP-based Avoided Cost Methodology for QF Projects Larger than One Megawatt.*

² *In the Matter of the Application of Rocky Mountain Power for Approval of Changes to Renewable Avoided Cost Methodology for Qualifying Facilities Projects Larger than Three Megawatts.*

Utah Public Service Commission

September 5, 2013

Page 2

I, LLC are consistent with those established by the Commission, applicable at the time of execution.

Utah Schedule No. 38 governs the procedures the Company uses when processing requests for indicative QF pricing and when negotiating and executing QF PPAs. The Company followed all of the applicable procedures contained in the tariff when negotiating the PPA between PacifiCorp and Long Ridge Wind I, LLC, that is before the Commission for approval.

Very Truly Yours,

Jeffrey K. Larsen
Vice President, Regulation & Government Affairs
Rocky Mountain Power

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of September 2013, a true and correct copy of the forgoing was served on the following by electronic mail:

Chris Parker
William Powell
Dennis Miller
Division of Public Utilities
160 East 300 South, 4th Floor
Salt Lake City, UT 84111
ChrisParker@utah.gov
wpowell@utah.gov
dennismiller@utah.gov

Michele Beck
Danny Martinez
Cheryl Murray
Dan Gimble
Utah Office of Consumer Services
160 East 300 South, 2nd Floor
Salt Lake City, UT 84111
mbeck@utah.gov
dannymartinez@utah.gov
cmurray@utah.gov
dgimble@utah.gov

Patricia Schmid
Justin Jetter
Assistant Attorney General
500 Heber M. Wells Building
160 East 300 South
Salt Lake City, Utah 84111
pschmid@utah.gov
jjetter@utah.gov

Sophie Hayes
Sarah Wright
Utah Clean Energy
1014 2nd Avenue
Salt Lake City, UT 84111
sophie@utahcleanenergy.org
sarah@utahcleanenergy.org

Brent Coleman
Assistant Attorney General
500 Heber M. Wells Building
160 East 300 South
Salt Lake City, Utah 84111
bcoleman@utah.gov

Cliff Moorman
Internal Counsel, Apex CleanEnergy, Inc.
310 4th St. N.E., Suite 200
Charlottesville, VA 22902
cliff.moorman@apexcleanenergy.com

Eamon Perrel
Apex Clean Energy, Inc
310 4th St. N.E., Suite 200
Charlottesville, VA 22902
eamon.perrel@apexcleanenergy.com

Paul Zarnowiecki
Orrick, Herrington & Sutcliffe
1152 15th Street, N.W.
Washington DC 20005-1706
pzarnowiecki@orrick.com

Ros Verba
Energy of Utah LLC
P.O. Box 900083,
Sandy, UT 84090-0083
rosvrba@energyofutah.onmicrosoft.com

Gary A. Dodge
Hatch James & Dodge
10 West Broadway, Suite 400
Salt Lake City, UT 84101
gdodge@hjdllaw.com
