

Sophie Hayes (12546)
Utah Clean Energy
1014 2nd Ave.
Salt Lake City, UT 84103
801-363-4046
Attorney for Utah Clean Energy

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Review of Electric Service Schedule No. 38, Qualifying Facilities Procedures, and Other Related Procedural Issues	DOCKET NO. 14-035-140 Utah Clean Energy – List of Issues
--	---

Utah Clean Energy hereby submits the following list of issues in response to the Commission’s Notice of Status and Scheduling Conference, issued October 27, 2014.

DATED: October 31, 2014

RESPECTFULLY SUBMITTED,

Sophie Hayes
Attorney for Utah Clean Energy

DOCKET NO. 14-035-140 – UTAH CLEAN ENERGY’S LIST OF ISSUES

Substantive Issues Regarding Avoided Cost Pricing and Qualifying Facility (QF) Power Purchase Agreement (PPA) Provisions

- Specific adjustments to Rocky Mountain Power’s (Company) Official Forward Price Curve (OFPC) and other GRID model inputs solely for avoided cost pricing purposes
- Transmission constraints—potential impacts on pricing and PPA provisions
- Addressing solar integration charges without a solar integration study
- The Company’s renewable resource capacity valuation study
- Giving appropriate credit for capacity value
- Treatment of regulatory and environmental compliance costs in avoided cost pricing
- How to reality check avoided cost prices and modeling assumptions

QF Process Issues

- QF queue management practices
- Appropriate timing and intersection between the large generator interconnection process and the QF PPA process

Regulatory issues

- Whether the Company’s tariffs and procedures for QFs comply with the Federal Energy Regulatory Commission’s (FERC) regulations implementing the Public Utility Regulatory Policy Act of 1978 (PURPA). *See* 18 C.F.R. Section 292.301, et seq.
- Should there be tariff protections for large generators going through the Large Generator Interconnection Agreement (LGIA) process?
- Should there be a different process (other than working through PacifiCorp Transmission) for QFs interconnecting to the Company’s distribution system pursuant to Utah Public Service Commission Rule R746-312 – Electrical Interconnection?
- What are the impacts of PacifiCorp’s new Energy Imbalance Market on transmission system transparency?
- Under what circumstances should the Company file a compliance filing regarding changes to avoided cost pricing, and under what circumstances should the Company request approval from the Commission?

DOCKET NO. 14-035-140

CERTIFICATE OF SERVICE

I CERTIFY that on 31st day of October, 2014, a true and correct copy of the foregoing was delivered upon the following as indicated below:

By Electronic-Mail:

David L. Taylor (dave.taylor@pacificorp.com)
Yvonne R. Hogle (yvonne.hogle@pacificorp.com)
Daniel Solander (daniel.solander@pacificorp.com)
Rocky Mountain Power

Chris Parker (chrisparker@utah.gov)
William Powell (wpowell@utah.gov)
Abdinasir Abdulle (aabdulle@utah.gov)
Dennis Miller (dennismiller@utah.gov)
Division of Public Utilities

Michele Beck (mbeck@utah.gov)
Cheryl Murray (cmurray@utah.gov)
Bela Vastag (bvastag@utah.gov)
Utah Office of Consumer Services

Patricia Schmid (pschmid@utah.gov)
Justin Jetter (jjetter@utah.gov)
Rex Olsen (rolsen@utah.gov)
Assistant Attorneys General

Gary A. Dodge (gdodge@hjdllaw.com)
Hatch, James & Dodge

Ros Rocco Vrba, MBA (rosvrba@energyofutah.com)
Energy of Utah LLC

Lisa Tormoen Hickey (lisahickey@coloradolawyers.net)
Alpern Myers Stuart LLC

Robert Millsap (bobmillsap@renewable-energy-advisors.com)
Renewable Energy Advisors

Christine Mikell (christine@wasatchwind.com)
Wasatch Wind

Brian W. Burnett (brianburnett@cnmlaw.com)
Callister Nebeker & McCullough

Michael D. Cutbirth (mcutbirth@champlinwind.com)
Blue Mountain Power Partners, LLC

Ellis-Hall Consultants, LLC (mail@ehc-usa.com)

Jerold G. Oldroyd (oldroydj@ballardspahr.com)
Tesia N. Stanley (stanleyt@ballardspahr.com)
Daniel R. Simon (simond@ballardspahr.com)
Ballard Spahr LLP

William J. Evans (bevans@parsonsbehle.com)
Vicki M. Baldwin (vbaldwin@parsonsbehle.com)
Parsons Behle & Latimer

Utah Clean Energy

 /s/
Sophie Hayes