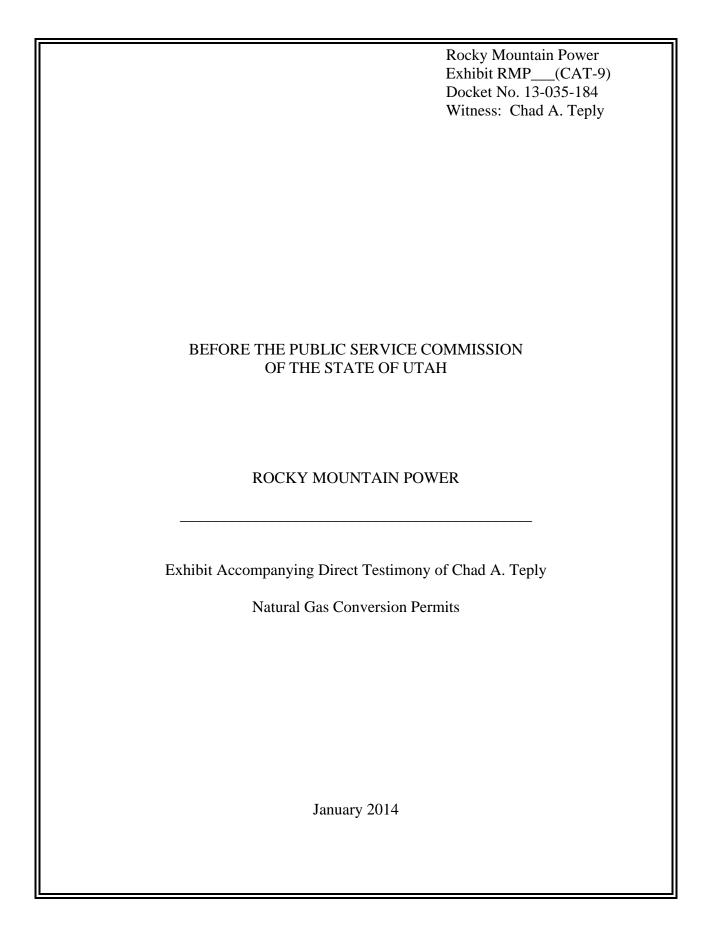
PUBLIC SERVICE COMMISSION OF UTAH

Docket No. 14-035-147

Exhibit SC___JIF-7

Utah Docket 13-035-184 Exhibit RMP___(CAT-9)



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Natural Gas Conversion Permits

The Company intends to convert Naughton Unit 3 to 100% natural gas fueling in lieu of installing a SCR and baghouse. Before doing so, however, the state of Wyoming must change its Regional Haze SIP and the associated documents to allow for the natural gas conversion. Also, once EPA issues its final action on the Naughton Unit 3 portion of the Regional Haze SIP, EPA may need to reopen that approval and instead agree that the Naughton Unit 3 natural gas conversion meets regional haze requirements.

In the abstract, changing the Wyoming Regional Haze SIP, the supporting state permitting documents, and EPA's approval to allow for a gas conversion should not pose major permitting problems. This is because, as compared to burning coal with the SCR and baghouse alternative, the natural gas conversion will result in both lower total emissions (for sulfur dioxide ("SO₂"), NOx, particulate matter ("PM")) and reduced visibility impact.

The Company's preferred timing for the conversion is to proceed with the tie-in work after December 31, 2017 - three years after the December 31, 2014 deadline for installing a SCR and baghouse. The exact conversion commissioning date, however, has not yet been finalized.

On January 28, 2013, the Company submitted a Prevention of Significant Deterioration ("PSD") applicability determination to the WDEQ AQD. The Company sought approval to convert Naughton Unit 3 from a coal fueled unit to a natural gas fueled unit. The natural gas conversion is proposed as a better-than-BART alternative to the permit conditions that require the installation of a SCR

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24 and baghouse on Naughton Unit 3 by December 31, 2014. The Company also 25 requested that the natural gas conversion be delayed until after December 31, 2017. 26 27 On July 5, 2013, the WDEQ AQD completed its final review of the 28 Company's application to modify the Naughton plant by reducing permitted 29 emissions from Unit 3 and ultimately converting the unit from a coal fueled unit 30 to a 100% natural gas fueled unit in 2018. Consequently, the WDEQ AQD issued 31 Permit MD-14506 to the Company for the natural gas conversion in 2018. 32 Exhibit CAT - 6 illustrates the permitting and regulatory timeline.