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Attorney for Rocky Mountain Power

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

)	
In the Matter of the Request of Rocky)	DOCKET NO. 14-035
Mountain Power for a Limited Stay of)	
Schedule 38 Qualifying Facility Procedures)	REQUEST FOR LIMITED STAY
)	-

Pursuant to Utah Code Ann. § 63G-4-201, 204 and Utah Admin. Code R746-100-3, Rocky Mountain Power ("Rocky Mountain Power" or "Company") respectfully requests that the Public Service Commission of Utah ("Commission") grant the Company a 90 day limited stay of certain provisions of Schedule 38, Qualifying Facility Procedures.

In support of its request, Rocky Mountain Power states as follows:

- 1. Rocky Mountain Power is a division of PacifiCorp. PacifiCorp is an Oregon corporation that provides electric service to retail customers through its Rocky Mountain Power division in the states of Utah, Wyoming, and Idaho, and through its Pacific Power division in the states of Oregon, California, and Washington.
- 2. Rocky Mountain Power is a public utility in the state of Utah and is subject to the Commission's jurisdiction with respect to its prices and terms of electric service to retail customers in Utah. The Company serves approximately 830,000 customers and has approximately 2,400 employees in Utah. Rocky Mountain Power's principal place of business in Utah is 201 South Main Street, Suite 2300, Salt Lake City, Utah 84111.

3. Communications regarding this filing should be addressed to:

David L. Taylor
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Rocky Mountain Power
201 South Main Street, Suite 2300
Salt Lake City, Utah 84111

E-mail: dave.taylor@pacificorp.com

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In addition, Rocky Mountain Power requests that all data requests regarding this filing be sent in Microsoft Word or plain text format to the following:

By email (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center

PacifiCorp

825 NE Multnomah, Suite 2000

Portland, Oregon 97232

Informal questions may be directed to Dave Taylor, Utah Regulatory Affairs Manager at (801) 220-2923.

4. Since the Commission's August 16, 2013, Order in Docket No. 12-035-100, the Company has received requests for indicative prices for over 25 different Utah QF projects totaling over 1,700 megawatts of nameplate capacity, predominantly made up of solar projects located in southern Utah. In that same timeframe the Company has also received indicative pricing requests from several qualifying facilities ("QFs") located in states other than Utah, but which also require prices to be prepared utilizing the Company's GRID model. At the current time, the Company has eleven outstanding requests for indicative pricing in Utah for which

2

prices are yet to be completed. In addition, the Company has been contacted by developers requesting additional projects totaling about 350 megawatts of nameplate capacity.

5. Due to the volume of requests past and currently-outstanding requests, the Company will not be able to complete the requested pricing studies within the timeframe contemplated in Schedule 38, which calls for prices to be returned to a QF developer within 30 days of submission of all required project-related information. Despite the Company's best efforts, the 30-day clock has already elapsed for three of these requests and will expire shortly for the remaining projects. The Company continues to process the requests and will provide indicative prices as soon as possible; it is anticipated that all outstanding requests can be completed no later than August 20, 2014.

MOTION TO STAY

- 6. Based on the foregoing, the Company requests that the Commission grant the Company a 90 day, limited stay of the requirements of paragraph I.B.3 of Schedule 38, which, as noted above, requires the Company to provide indicative pricing within 30 days of the completion of all requirements of paragraph I.B.2.
- 7. A stay of the application of Schedule 38, specifically paragraph I.B.3, is in the best interests of the Company and its ratepayers. The Company is committed to following the requirements of its tariffs; it has just become impossible to keep up with the current volume of requests for pricing the Company has received over the past several months. A brief, limited stay of the requirements of Schedule 38 will allow the Company to clear the backlog and will not cause harm to the Company's customers.

RELIEF REQUESTED

8. Based on the foregoing, the Company requests that the Commission immediately stay the 30 day requirement contained in paragraph I.B.3 of Schedule 38, and allow the Company until August 20, 2014, to provide indicative pricing to all currently outstanding requests.

Dated this 22nd day of May 2014.

Respectfully submitted,

ROCKY MOUNTAIN POWER

Daniel E. Solander

Attorney for Rocky Mountain Power

CERTIFICATE OF SERVICE

I hereby certify that on this 22th day of May, 2014, a true copy of the foregoing document was sent via email to the following:

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5